



EIOPA-BoS-13/415
27 September 2013

**EIOPA Final Report
on Public Consultation No. 13/010
On the Proposal for Guidelines on
Submission of Information to National
Competent Authorities**

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1. Scope

- 1.1. This Final Report sets out the feedback to the Consultation Paper (CP) No. 13/010, which provides an analysis of responses to the consultation including to the comments made by the Insurance and Reinsurance Stakeholders Group (IRSG), describes any material changes to the CP (or confirms that there have been no material changes), and explains the reasons for this in the light of feedback received.
- 1.2. It includes a feedback statement with EIOPA's opinion on the main comments received during the Public Consultation and the revised Guidelines and Annexes.

2. Purpose

- 2.1. EIOPA is issuing Guidelines addressed to National Competent Authorities (NCAs) on how they should prepare for the application of Solvency II. The Guidelines follow EIOPA's Opinion on interim measures regarding Solvency II published on the 20 December 2012¹ (hereafter 'the Opinion'), within which EIOPA:
 - a) Set out its expectations that NCAs, by way of preparing for the new system, put in place, starting on 1 January 2014, important aspects of the prospective and risk based supervisory approach to be introduced by Solvency II.
 - b) Stressed the importance of a consistent and convergent approach with respect to these preparations, notwithstanding the current status of the negotiations on the Omnibus II Directive (OMDII) and the further delay to the application of Solvency II.
 - c) Committed to publish Guidelines addressed to NCAs on how they should meet the expectations described in the Opinion.
- 2.2. The measures set out in the Guidelines are preparatory for Solvency II. In order to ensure effective and meaningful preparation, there needs to be a defined and demonstrable progression towards it. This means that during the preparatory phase, NCAs are expected to ensure that undertakings take steps towards implementing the relevant aspects of the regulatory framework addressed by these Guidelines. In addition this would also ensure that when Solvency II is applicable in their jurisdiction undertakings are better prepared to fully comply with Solvency II. In turn, NCAs will be expected to take the appropriate steps to promote industry's preparation towards Solvency II and to review and evaluate the quality of the information provided to them.
- 2.3. The package in this Final Report reflects EIOPA's position on the comments received and includes:
 - a) Feedback Statement;
 - b) Revised preparatory Guidelines on the information to be submitted to national competent authorities during the preparatory phase and Annexes:
 - Annex I: Content of quantitative information;
 - Annex II: "L-Annexes": list and description of the quantitative reporting items;
 - Annex III: Lines of Business;
 - Annex IV: Complementary Identification Code (CIC) categories;

¹ <https://eiopa.europa.eu/publications/eiopa-opinions/index.html>

- Annex V: Complementary Identification Code (CIC) table;
- Annex VI: Data Checks.

c) Appendixes:

- Appendix I: Quantitative Reporting Templates;
- Appendix II: LOGs;
- Appendix III: Changes LOG;
- Appendix IV: Mapping table for the re-naming of the templates;
- Appendix V: Impact Assessment;
- Appendix VI: Comments template.

2.4. It is important to explain the appendixes of this Final Report.

2.5. Appendix I includes the quantitative “templates” (i.e. the forms). These are no longer included as an Annex of the Guidelines since they are simply a visual representation of the information to be submitted. However, since EIOPA believes that although being only a visual representation they play an important role, they are instead included as an appendix to this Final Report.

2.6. Appendix II replicates Technical Annex II of the Guidelines (i.e. the “L” annexes), including all data items listed and described. In the Technical Annex II of the Guidelines, post consultation, only the data items to be submitted during the preparatory phase are included. As EIOPA believes it is important to keep the description of the full package in relation to the templates included in the preparatory phase, for information and comparison purposes, this full list is included as an appendix to this Final Report.

2.7. Appendix III includes a Changes LOG for the templates, which tracks, by template, the changes performed since (i) their publication in the “EIOPA Final Report on Public Consultations No. 11/009 and 11/011 On the Proposal for the Reporting and Disclosure Requirements” to the package publicly consulted in Public Consultation No. 13/010 in June 2013 and (ii) from the latter to the revised proposal of the Guidelines now published.

2.8. Appendix IV includes a mapping table for the new templates names. The working names of the templates used for the last years needed to be changed to reflect a final approach. It is EIOPA intention to use the names as currently proposed in the future technical standard. This is the first step. The second step will be to rename the templates not covered by the preparatory phase and as well as the cells. It was not considered appropriate to rename the cells at his point and therefore the second step will be done for the development of the technical standard.

2.9. Appendix V includes the revised Impact Assessment.

2.10. Appendix VI includes EIOPA answer to each comment received during the consultation phase.

3. Feedback Statement

I. Introduction

- 3.1. EIOPA would like to thank stakeholders and the IRSG for having provided comments on CP No. 13/010. These comments provided valuable suggestions for improving the requirements related to submission of information and helped to identify areas needing further clarification.
- 3.2. The amendments that have been made cover not only clarifications, including the acceptance of a number of rewording suggestions from respondents, but also some changes to the content of the Guidelines.
- 3.3. The feedback statement outlines the comments received from stakeholders to CP No. 13/010 and the EIOPA responses to those comments along with resulting changes made to the submission of information package.
- 3.4. For a complete overview of all comments, responses and resulting changes made please refer also to the comments template in Appendix VI of this Final Report.

II. Comments in general

- 3.5. Generally stakeholders supported a move towards a harmonised regime. Stakeholders also highlighted that a proliferation of national requirements should be avoided and a consistent approach adopted across all jurisdictions for the preparation of Solvency II was welcomed.
- 3.6. The following paragraphs address the main comments received and EIOPA's answer to those.

Principle based approach and proportionality principle

- 3.7. Stakeholders want to see a 'principles based' approach for the preparatory Guidelines. They believe that the Guidelines ought to be proportionate, focus on overall issues and should avoid granularity and not be lengthy.
- 3.8. The approach taken by EIOPA is that the Guidelines do not describe how the requirements are to be applied on a case by case basis, but that they try to be applicable to all possible examples.
- 3.9. EIOPA aims to ensure that the Guidelines are applied in a manner that is proportionate in the context of the preparatory phase, and allows for some flexibility in application of these Guidelines through provisions for 'phasing-in' (i.e. different expectations for 2014 and 2015) and for the use of thresholds. Since proportionality applies whenever there are different ways to achieve expected outcomes, the Guidelines per nature do not explicitly refer to the principle of proportionality at every opportunity but specific proportionality provisions are included such as materiality thresholds and new recitals in submission of information Guidelines. As they are generally not setting out how undertakings are supposed to comply with

requirements, the Guidelines also do not and cannot give specific examples of what would be considered proportionate under certain circumstances.

- 3.10. EIOPA expects that NCAs ensure that the provisions described in the Opinion are applied 'in a manner which is proportionate to the nature, scale and complexity inherent in the business of the insurance and reinsurance undertaking'. The approach taken aims to ensure that this expectation can be met, and this is reflected in the drafting of the Guidelines in two principal ways:
 - a) In most cases, the Guidelines are principle based or drafted with a view to the outcome and supervisory objective that should be met, taking into account the preparatory nature of the Guidelines.
 - b) The scope and level of detail of the Guidelines reflects the fact that the Guidelines are issued in order to prepare for Solvency II and not for full Solvency II application from 1 January 2014. When implementing those Guidelines both NCAs and undertakings will be better prepared for Solvency II.

Purpose of the preparatory phase

- 3.11. Stakeholders questioned whether the purpose of the Guidelines was preparation or early implementation of Solvency II.
- 3.12. EIOPA would like to stress that the measures set out in the Guidelines are preparatory for Solvency II. However, to ensure effective and meaningful preparation, there needs to be a defined and demonstrable progression towards Solvency II by both supervisors and undertakings.
- 3.13. This means that during the preparatory phase, NCAs are expected to ensure that undertakings take active steps towards implementing the relevant aspects of the regulatory framework addressed in these Guidelines, so that when Solvency II is applicable, its requirements can be fully complied with. In turn, NCAs will be expected to take the necessary steps to enable them to review and evaluate the quality of the information provided to them, and to discuss with undertakings the progress being made.
- 3.14. The Guidelines are drafted using the formula "national competent authorities should ensure that" which supports this approach. In fact the Opinion stated that NCAs 'should put in place, starting on 1 January 2014, certain important aspects of the prospective and risk based supervisory approach to be introduced'. It is for NCAs to decide how to integrate the preparatory Guidelines into their regulatory or supervisory frameworks. It is important to emphasise the starting and the expected phasing-in approach here: NCAs and undertakings are expected to progress in their preparedness for Solvency II during the course of the preparatory phase.
- 3.15. Undertakings are expected to achieve the outcomes expected, taking into account the preparatory nature of the Guidelines. EIOPA expects that Guidelines are implemented by NCAs in a way that undertakings' Systems of Governance and processes for Forward Looking Assessment of Own

Risks (FLAOR) as well as for Submission of Information are in place and aligned with the requirements in the preparatory Guidelines. This should allow undertakings to perform the FLAOR during 2014 and 2015 and to submit the information in 2015, as defined in the respective Guidelines.

Enforcement measures and supervisory actions

- 3.16. Stakeholders supported that the preparatory phase should enable NCA's to assess preparedness but that it should not lead to any enforcement measures, asking for this clarification to be explicitly dealt with in a Guideline rather than in the introductory text.
- 3.17. EIOPA clarifies that NCAs are expected to comply with the Guidelines by ensuring that undertakings meet the specified outcomes taking into consideration its preparatory nature.
- 3.18. EIOPA Guidelines do not give indications on enforcement measures in relation to the implementation by undertakings of the preparatory Guidelines or in the specific way of implementation itself.
- 3.19. The means by which each NCA incorporates EIOPA Guidelines into their supervisory or regulatory frameworks is left at their discretion and it is not an EIOPA competence. When considering the best appropriate way to incorporate EIOPA Guidelines NCAs may be affected by their competences and powers and specific tools used at national level to incorporate the Guidelines.
- 3.20. Regardless of how NCAs incorporate the Guidelines at national level, EIOPA expects as an active step a dialogue to take place between NCAs and undertakings during the preparatory phase in order to prepare for Solvency II.
- 3.21. The preparatory Guidelines by themselves do not require supervisory actions, in particular regarding failures by undertakings to comply with Solvency II Pillar I requirements as a result of the information provided during the preparatory phase.
- 3.22. Nevertheless, the following two examples on supervisory action would be expected:
 - a) It is expected that undertakings take into consideration any information arising from the implementation of the system of governance or from the performance of the FLAOR in the performance of their business or future business planning. It is also expected that a dialogue between NCAs and undertakings would take place, when appropriate. Although the dialogue could take this arising information into consideration, the preparatory Guidelines do not require NCAs to require an increase of capital, if the received information suggests a failure with Solvency II Directive requirements.
 - b) When NCAs receive information on the calculation of the Solvency Capital Requirements and the determination of Own Funds it is expected that NCAs review the quality of the information received

and that they may take supervisory actions if the quality of the information raises concerns. But it is not expected from the preparatory Guidelines that NCAs would take any supervisory action if the Own Funds are lower than the Solvency Capital Requirement.

Status of the Solvency II Directive and the Delegated Acts (Implementing measures and Technical Standards)

- 3.23. Stakeholders asked for clarifications about the interaction between the preparatory Guidelines and the overall Solvency II negotiation process. They also asked that the associated timing of submission of information and the link to Pillar I ought to be spelled out in different scenarios if the Omnibus II Directive has not been agreed or has not progressed sufficiently by the end of 2013.
- 3.24. The Guidelines provide direct references to the corresponding provisions set out in the Solvency II Directive. EIOPA acknowledges that certain parts of the Solvency II Directive are to be revised by the OMDII and that delegated acts proposal have not yet been finalised by the European Commission.
- 3.25. These direct references to Solvency II are made using the expression "In accordance with..." indicating the legal basis of the topic, without prejudice to the current revision of the Solvency II Directive by OMDII.
- 3.26. Although the comply-or-explain replies are provided to the preparatory Guidelines only, it is anticipated that during the preparatory phase NCAs and undertakings are preparing for the implementation of all areas covered by Solvency II Directive and not only those covered by the preparatory Guidelines.
- 3.27. EIOPA highlights that the current working assumption for the preparatory Guidelines is that Solvency II will be applicable from 1 January 2016. Under this assumption, starting the preparatory phase from 2015, as requested by some stakeholders, would be too late, especially for the System of Governance including the Forward Looking Assessment of Own Risks and submission of information processes.
- 3.28. The final Solvency II Directive requirements will be determined by the OMDII, and the delegated acts. EIOPA is working under the assumption that these measures will be available in time for NCAs and undertakings to prepare for the submission of the forward looking assessment during 2014 and 2015 and the quantitative and qualitative information in 2015. In which case, at that stage, EIOPA would prepare technical specifications on Pillar I quantitative issues, including on the valuation of technical provisions, valuation of assets and liabilities other than technical provisions, the calculation of the Solvency Capital Requirement and provide guidance on the assumptions underlying the calculation of the standard formula calculation, which reflect the decision on OMDII.
- 3.29. However, as this assumption is based on the current agenda of OMDII negotiations, for the submission of information and the report on the Forward Looking Assessment the submission dates will be reviewed at the

end of 2013 based on the latest developments with regard to OMD II. A revision clause was introduced in the Guidelines accordingly.

Minimum or maximum harmonisation

- 3.30. Stakeholders questioned the extent to which any Guidelines would be 'mandatory' or whether NCAs could go beyond them, i.e. whether 'minimum' or 'maximum' harmonisation is being sought. It is understood that NCAs could choose to go further than any Guidelines issued by EIOPA which, in the view of stakeholders, may not be desirable or practical.
- 3.31. In fact NCAs may have current legislation or regulation that already go beyond the provisions set by the Guidelines and may also do it in future, to the extent that it is consistent with Union law as Solvency II Directive entered into force on the 6 January 2010 (Article 311).

Status of the Explanatory text

- 3.32. Stakeholders commented on the status of the Explanatory text. Stakeholders pointed out that the Explanatory text should not provide a further layer of requirements, as it was not subject to public consultation.
- 3.33. EIOPA would like to clarify that the Explanatory text is not subject to the comply-or-explain. The aim of the Explanatory text is to provide illustrations on how Guidelines or certain parts of them can work in practice, adding cross references, concrete applications or examples without creating new obligations that should be complied with. Its content is intended to offer support to the users of the Guidelines and therefore it does not need to be publicly consulted.
- 3.34. In the Explanatory Text, examples of good practices are given, i.e. it shows in more detail on case by case basis examples on how proportionality can be applied, and it presents as well tables in order to help visualise certain structures on an exemplary basis.

Application by third countries

- 3.35. Stakeholders argued that it would be inappropriate any extra-territoriality to be applied on an interim basis. They believe that only EEA undertakings should be subjected, directly or indirectly, to requirements at this stage which require any degree of adaptation to the Solvency II regime.
- 3.36. EIOPA does not expect that supervisory authorities in third countries apply the preparatory Guidelines. The Guidelines are not subject to equivalence analysis nor do they pre-empt any decision taken in past or future by the European Commission regarding equivalence.
- 3.37. In the CP No. 13/010 and in the revised preparatory Guidelines it was clarified that "When the deduction and aggregation method is applied, insurance and reinsurance groups are allowed to use solvency capital requirements and eligible own funds of related third country undertakings

calculated according to their local rules for the purposes of these Guidelines only, and without prejudice to any future European Commission equivalence determinations and any future decisions of group supervisors”, meaning that all third countries would be considered equivalent during the preparatory phase regardless of any equivalence analysis conducted or applied for.

- 3.38. Notwithstanding this, with regard to Pillar II requirements as the preparatory System of Governance and the Forward Looking Assessment of Own Risks EIOPA assumes that third country supervisors have similar parts of risk management in their national requirements where the preparatory Guidelines follow international standards.
- 3.39. When referring to group structures or group level the preparatory Guidelines apply to EEA groups only. They do not apply to branches of third country (re)insurance companies set up in the EEA.

Comply-or-explain mechanism

- 3.40. Article 16 of the EIOPA Regulation sets out that NCAs have to report to EIOPA within 2 months from the publication of the Preparatory Guidelines whether they comply or intend to comply with each Guideline. In case NCAs do not comply with a guideline they need to provide an explanation about the reasons for non-compliance.
- 3.41. The responses on comply-or-explain provided by NCAs will be made publicly available by EIOPA. In the cases of not compliance, the reasons will be kept confidential unless agreed otherwise by the Board of Supervisors.
- 3.42. The NCAs replies provided during the comply-or-explain will be updated later following the submission of the progress report by NCAs to EIOPA.
- 3.43. EIOPA recognises that in a significant number of member states, the NCA does not have the legal competence to enact the relevant financial legislation and is dependent on the powers bestowed upon it.
- 3.44. If NCAs don't comply with the Guidelines then, by nature EIOPA expectations on NCAs actions need to be considered accordingly.

Progress report

- 3.45. The progress report is a tool to facilitate communication between EIOPA and the NCAs but it is not part of the requirements for preparation towards Solvency II.
- 3.46. NCAs are required to submit a progress report to EIOPA by the end of February during two years after the application of the Guidelines. The first NCA's progress report should be submitted by 28 February 2015, based on the period from 1 January 2014 to 31 December 2014.
- 3.47. It is up to the NCAs to decide on the level of detail of the information given to EIOPA in the progress report and how this information has to be gathered at national level.

III. Specific issues raised by respondents

Legal basis

- 3.48. The stakeholders expressed strong reservations with regard to the introduction of quantitative aspects of Solvency II, particularly formal Pillar 3 regulatory reporting (as well as within ORSA), raising significant concerns in this area.
- 3.49. Stakeholders questioned the legal basis for preparatory phase on submission of information and have doubts on whether EIOPA might require reporting templates from the industry when there is not an approved regime to report on.
- 3.50. In particular, they claim that EIOPA interim reporting might deviate significantly from the final basis as the outcome and consequences of the LTGA is not yet determined and negotiations concluded.
- 3.51. EIOPA acknowledges these concerns. However it believes that the preparation for the submission of information under Solvency II is crucial. In fact undertakings claimed during previous consultations that they would need at least 18 months for the preparation. Assuming that Solvency II will be applicable as from 1 January 2016 that would mean that they would need to start implementation as from 1 June 2014. This timing is consistent with the approach taken in the preparatory guidelines publicly consulted. EIOPA has minimised the possibilities of changes, in particular with the use of only a sub-set of the information to be submitted in future.

Proportionality principle

- 3.52. During the last few years and throughout the different consultations that EIOPA performed, a number of stakeholders consistently reported serious concerns regarding the application of the proportionality principle in the reporting package. As a result of these consultations, EIOPA has introduced several proportionality aspects in the reporting package, namely introduction of materiality thresholds, exemptions in certain cases, etc.
- 3.53. EIOPA sees the proportionality principle as crucial for the implementation of the Solvency II Framework and therefore EIOPA has continued working on this area in last few months.
- 3.54. Taking this into consideration EIOPA highlights the following principles that are now reflected in the Introduction of the Guidelines:
- a) For the purposes of the quarterly reporting of the balance sheet, except for technical provisions, in preparatory phase only quarter 3 of 2015, proportionality and materiality in relation to the quarterly report data need to be assessed. In making assessments of materiality, it has to be recognised that quarterly measurements may rely on estimates and estimation methods to a greater extent

than measurements of annual financial data. The measurement procedures for the quarterly reporting have to be designed to ensure that the resulting information is reliable and comply with the Solvency II standards and that all material information that is relevant for the understanding of the data is reported.

b) The calculation of technical provisions during the year, in particular the ones for the purpose of quarterly reporting, in preparatory phase only quarter 3 of 2015, may rely on simplified methods in the calculation of the risk margin and best estimate (to be further elaborated by EIOPA).

3.55. EIOPA has also considered the specific case of insurance and reinsurance captives, in particular in relation to the quarterly submission of information. EIOPA believes that the preparatory phase should be in line with the final Solvency II framework but also have a phasing in nature. Taking this into consideration EIOPA decided to allow NCAs to exempt, in case any captive is covered by the market share applied, insurance and reinsurance captives from the submission of information in relation to the Q3 of 2015. Insurance and reinsurance captives do need to submit the annual information and should be considered in the calculation of the market share.

3.56. EIOPA highlights that this solution for the quarterly reporting does not preempt any future solution to be applied under Solvency II for the quarterly submission of information by insurance and reinsurance captives under the Solvency II regime.

Parallel running

3.57. Stakeholders are concerned with the fact that they will continue to be regulated and supervised under the existing SI based regime and the SI based reporting requirements will remain in force. As such, the preparatory reporting requirements will lead to parallel running of the submission of information. As a result, there will be an additional cost incurred by the industry and a significant impact on their resources.

3.58. This is in fact a reality that would have to occur during the preparation for Solvency II. Both undertakings and supervisory authorities would need to switch from SI to SII reporting from one day to the other. A preparation phase would always be needed in order to guarantee that a disruption in the daily management of the undertaking, in the activities of the supervisory authority and as a consequence in the protection of the policyholders would not occur.

Changes to the templates

3.59. Stakeholders have asked for any changes from the previously consulted Quarterly Reporting Templates (QRTs) to be clearly identified. They highlighted that publishing a revised set of templates without indicating any changes creates the task of having to compare the templates with

previous versions for each entity within the scope of Solvency II and urged EIOPA to issue a proper change log (comparing with the version issued in July 2012 with the final preparatory QRTs). .

- 3.60. In fact, after publication of the Final Report in July 2012 some errors/mistakes were identified and reported to EIOPA by both supervisory authorities and stakeholders. Also some queries raised led to the conclusion that amendments and further clarifications were needed. Some of them have already been reflected in an ERRATUM.
- 3.61. Also, the development of the Data Point Modelling (DPM) led to up-grades in the templates. When analysing the templates for DPM purposes some errors/mistakes or improvements were identified that required to be reflected in the templates.
- 3.62. However, EIOPA has taken on board the concerns raised and developed such a change LOG. Appendix III of this Final Report provides, for the templates applicable in the preparatory phase, explanations of the changes performed to the templates and LOG files from July 2012 to the ones published in CP-13/010 and separately from the ones published in CP-13/010 to the ones now published in the final Guideline.
- 3.63. It was also noticed that in the consulted package (CP-13/010) some quarterly templates were used for the annual submission and a single template was used for both individual and group information. For clarity and as for the purposes of the future technical standard, this will have to be clearly identified, the final preparatory package now includes a split between individual and group templates and uses quarterly templates for quarterly submissions and annual templates to annual submissions, without changing the scope of the information to be submitted.

ECB

- 3.64. Stakeholders have required further alignment between EIOPA preparatory phase and ECB reporting requirements and more clarity on how the two sets of requirements will interact during the preparatory phase as well as after full implementation as soon as possible.
- 3.65. EIOPA's cooperation with the ECB has ensured that the reporting package proposed by the Guidelines is sufficient to meet ECB's expected initial requirements. EIOPA will continue to engage in a dialogue with the ECB aiming as much as possible to avoid undue costs to the undertakings arising from different requirements. However, this dialogue does not undermine the fact that any reporting requirements aim at the information needed for the supervisory review process and the preparatory phase requirements represents a sub-set of those requirements.

Third country branches

- 3.66. Specifically in relation to the submission of information stakeholders have required a clarification on whether the branches from third countries operating in the EU would be covered by these requirements.
- 3.67. Additionally there was a need to clarify if the business of these branches would be considered for the purposes of the market share calculation.
- 3.68. EIOPA clarifies that the third country branches operation in the EU are excluded from the submission of information requirements during the preparatory phase and should therefore be excluded from the market share calculations.
- 3.69. Guidance regarding clarification of an application of Solvency II Directive requirements, including reporting and disclosure requirements, to third country branches will be made available in future.

Thresholds on market share

- 3.70. Some stakeholders raised concerns about the appropriateness of the basis for market share calculation, in particular for life undertakings based on technical provisions.
- 3.71. Stakeholders raised concerns about different approaches to thresholds at individual and at group level, resulting in individual undertakings not captured by individual thresholds, however, having to report internally as its group falls within the threshold.
- 3.72. EIOPA confirms that in cases where undertakings fall below thresholds on individual level, they should be reported on group level when they are part of a group which is subject to reporting under the preparatory Guidelines. The purpose is to prepare groups for SII which should include all individual undertaking which are subject to SII.
- 3.73. Regarding the methodologies for the calculation of market share, EIOPA believes that the use of technical provisions for life undertakings and gross written premiums for non-life is the most adequate method. Also, although EIOPA acknowledges stakeholders' concerns regarding the degree of flexibility, it believes that it is important for NCAs to be able apply a risk-based approach, in line with Solvency II principles. As a result EIOPA has provided further clarification with respect to the market share calculation. The methodology for identification of undertakings covered by the market share has also been amended.
- 3.74. EIOPA would like to clarify that insurance and reinsurance undertakings not falling within the scope of Solvency II and for which NCA don't intend to apply Solvency II regime should also not be considered in the calculation of the market share.

Annually reporting (deadlines)

- 3.75. Stakeholders welcomed the fact that EIOPA's intention is to have only one annual submission of information during the preparatory phase. However, requested a delay in the submission dates. A re-scheduling of the deadlines for submission of information would allow undertakings to use resources more efficiently, i.e. submitting preparatory reporting during off – cycle period.
- 3.76. EIOPA has carefully considered all arguments put forward and decided to incorporate a delay of 2 weeks in the annual submission deadline for both, individual and groups, in the preparatory phase, i.e. a deadline for submission to NCAs of 22 weeks for individual and 28 weeks for groups, after reporting year end.

Quarterly reporting (frequency and deadlines)

- 3.77. The stakeholders are broadly in agreement with the proposal of the content of individual reporting for annual and quarterly submission, except for detailed list of assets and detailed list of derivatives and best estimate by country.
- 3.78. With regard to assets reporting, stakeholders are proposing either deferral of the requirement until full adoption of Solvency II, or a phasing-in approach.
- 3.79. Stakeholders generally do not support quarterly reporting at individual level or at group level, but if the requirement is to remain, they propose a maximum of one quarter to be reported during preparatory phase, i.e. the quarter ending 30 September. Also, they requested that the use of "best effort basis"/simplifications to be explicitly mentioned in the Guidelines, in particular in relation to quarterly reporting.
- 3.80. Stakeholders state that undertakings will be working on current reporting requirements (Solvency I), listing reporting requirements and SII preparatory Guidelines reporting requirements within overlapping timeframes. In addition to the quarter 4 of 2015 reporting, undertakings would also need to report information as at the initial date of application of Solvency II.
- 3.81. EIOPA has carefully considered all arguments put forward by stakeholders and agree that the submission of one quarter (Q3) should be sufficient for the preparation for Solvency II, especially taking into consideration the day-1 reporting. As for the deadlines EIOPA believes it is crucial that undertakings and groups prepare for the quarterly submission of information considering the deadlines that they will have to comply with.

XBRL

- 3.82. During preparatory phase, stakeholders recommend that the basis of submission of data to the NCAs be kept as simple as possible and as such they believe that the implementation of XBRL taxonomy should be

deferred until full implementation of Solvency II. They propose to provide data using a straightforward file upload with standardised protocol and/or standardised Excel spread sheet.

- 3.83. EIOPA clarifies that in accordance with the EIOPA's preparatory Guidelines, undertakings are required to submit information requested in electronic format both for quantitative and narrative information. However, it is up to each NCA to make a decision as to the use of XBRL.
- 3.84. To facilitate this EIOPA will make available a tool for undertakings to enable them to submit information using XBRL in time for preparatory phase.

Deduction and Aggregation method

- 3.85. Stakeholders have commented that the combined effect of the Guidelines is that, if the Group Supervisor and the concerned supervisors agree to the use of the Deduction and Aggregation (D&A) method, then third countries can be consolidated into the Group balance sheet on the assumption that the third country is equivalent. Although this assumption of equivalence is helpful, it is dependent upon the D&A method decision which lies with the Group supervisor and is therefore uncertain.
- 3.86. They claim that the European Commission and supervisors have already set the expectation that major third countries will be equivalent. It would create a simpler and more streamlined approach if all third countries were automatically consolidated on an equivalent basis using the D&A method for the purpose of these guidelines.
- 3.87. EIOPA would like to clarify the following in order to avoid any misunderstandings:
 - a) For the purpose of the preparatory phase all third countries are considered to be equivalent, without pre-empting any future decision;
 - b) The default method for calculation of group solvency capital requirement is the consolidation method;
 - c) The use of D&A does not depend on the equivalence classification. There might be cases where the third country regime is considered to be equivalent but it is not considered adequate to use the D&A method.
- 3.88. Having considered all comments received, and willing to avoid pre-empting future decisions from the European Commission on equivalence or from NCAs on consolidation methods once SII becomes applicable, EIOPA incorporated in the Guidelines the possibility for a group to decide which method it would apply during the preparatory phase for the calculation of its group solvency with regard to third country undertakings. The group, should make its decision after having considered the outcome of a dialogue to be engaged with the group supervisor on the method of calculation for the group solvency calculation during the preparatory phase

with regard to the third country undertakings. As part of the dialogue the group should explain to the group supervisor why the exclusive application of the accounting consolidation-based method would not be considered appropriate.

- 3.89. When the group intends to apply during the preparatory phase the D&A method or the combination of Accounting consolidation-based method and D&A method, the insurance group will be required to explain to the group supervisor the rationale for deviating from the outcome of the dialogue when commencing its solvency calculations for the preparatory phase.
- 3.90. Whatever decision is made by the group, it is made without prejudice to the decision of the group supervisor on the calculation method once SII becomes applicable.
- 3.91. In the case the group intends to apply during the preparatory phase the method 2 as defined in Article 233 of Solvency II or the combination of method 1 as defined in Article 230 of Solvency II and method 2 as defined in Article 233 of Solvency II, and this is not in line with the outcome of the dialogue, the insurance or reinsurance group will have to communicate the rationale for deviating from the outcome of the dialogue before commencing their solvency calculations for the preparatory phase.

Standard formula SCR templates for Internal model companies

- 3.92. Stakeholders have commented that insurers should not need to submit both internal model and standard formula forms. If standard formula forms are required as part of the pre-application process for Internal model approval, it should be part of these Guidelines, noting that the timelines may be different and not all the information gathered the full suite of Standard Formula SCR templates is relevant.
- 3.93. Stakeholders claim that the submission of the SCR calculation using the standard formula under the regular reporting would require such undertakings to build systems to report these data, which would be obsolescent under Solvency II.
- 3.94. Having considering this, EIOPA highlights that insurance and reinsurance undertakings engaged in a pre-application process for Internal models should submit information on the Solvency Capital Requirement calculated both with the standard formula and with the full/partial internal model. However, the submission related to the standard formula is defined under the "Guidelines on Pre-Application of Internal Models" while the submission related to the full/partial internal model, for the purpose of submission of information, is defined under the "Guidelines on submission of information to national competent authorities" as proposed by the stakeholders.

Ring-fenced funds ('RFF')

- 3.95. Stakeholders have commented on the fact that the preparatory reporting measures require reporting of ring-fenced funds at group level, which was not required by the EIOPA July 2012 QRTs. These were only required for individual reporting. According to stakeholders, to implement this in companies' systems it would require the creation of a separate consolidation hierarchy from the group legal entity consolidation hierarchy as a one-off.
- 3.96. Stakeholders also commented that for individual reporting, firms are required to report the largest material RFF plus all other RFFs as an aggregate. According to stakeholders, this requires the creation of a consolidation hierarchy to consolidate all the "other" non-material RFFs as a one-off in their IT systems.
- 3.97. Therefore stakeholders do not support the reporting for RFF reporting during the preparatory phase.
- 3.98. EIOPA believes that it is very important that undertakings prepare for the calculation and submission of information by Ring Fenced Funds, both at individual and group level, as this will be an important part of the Solvency II. Therefore the requirement of the submission of information for the major material RFF and the remaining part was kept both at individual and group level and further clarifications have been provided. Regarding the calculation of the SCR at an entity or group level when undertakings have RFFs, EIOPA will engage in a dialogue with stakeholders to ensure that an appropriate solution is incorporated in the technical specifications. EIOPA considers important to clarify that in future the information to be submitted by RFF may include also the Balance sheet, information on own funds, SCR calculation and technical provisions, as identified in the July 2012 Final Report.
- 3.99. EIOPA would like to clarify that the requirements do not cover the aggregation of the "other" material RFFs. The requirement is to report in relation to the major material RFFs and the remaining part, being the remaining part the "non-RFFs" business and the non-material RFFs of the undertaking.

Narrative reporting

- 3.100. Stakeholders have raised concerns about the purpose of narrative reporting during the preparatory phase. The majority of stakeholders do not support it. They argue that if the purpose of the Guidelines is to assess progress towards achieving compliance with SII requirements, spending time and resources producing narrative information that describes a temporary situation (temporary, because undertakings will be in the course of making progress towards achieving compliance) seems unduly burdensome.
- 3.101. For System of Governance narrative reporting requirements, the stakeholders believe that NCAs will be able to assess progress towards Pillar II compliance via the means proposed for the System of Governance Guidelines.

- 3.102. EIOPA clarifies that the objective of introducing narrative reporting during preparatory phase is for undertakings to prepare for the narrative reporting in Solvency II (i.e. to set up systems and procedures in order to gather necessary information and to prepare reports) and for supervisors to assess undertakings preparedness (for example, whether the narrative reporting is sufficient in terms of a scope and details). In addition, supervisors may use information contained in the narrative reporting, for example, with regard to System of Governance, to assist them in assessing progress made by undertakings in preparation for Solvency II System of Governance requirements.
- 3.103. EIOPA also amended the Guidelines in order for NCAs to receive the Narrative Report on electronically readable format.

On the specific templates

New template “Content of submission”

- 3.104. A new template named “Content of the submission” was added to the package. This template is to be used in preparatory phase and in Solvency II by supervisors to assess the completeness of the submission of information. The template now published contains only the templates required and the options applicable for the preparatory phase.

Balance sheet

- 3.105. Stakeholders have requested that during preparatory phase the reporting of the statutory account figures should be exempted.
- 3.106. EIOPA clarifies that one of the principles of this template is to compare Solvency II values and statutory values. For this purpose, it is important that statutory figures are reported in the same structure as Solvency II balance sheet.

Own funds

- 3.107. It was noticed in the consulted package that a quarterly version of the template was used for the annual submission and a single template was used for both individual and group information. For clarity and also in order to be aligned with the future technical standard,, the final preparatory package now includes a split between individual and group templates and uses quarterly templates for quarterly submissions and annual templates to annual submissions, without changing the scope of the information to be submitted.
- 3.108. In addition, due to data point modelling analysis, the own funds template will, for the future technical standard be split into 3 templates, without any change in the content. This split aims to have in a different template, information on the “general information”, “movements” and on the “open lists”. For that reason, the templates: S.23.01.b and S.23.01.g, which

represent the annual own funds template for individual and groups respectively, only reflect part of the annual version of own funds templates, as published in the Final Report in July 2012.

MCR / SCR

3.109.No major specific comments on the MCR and SCR templates besides the Ring Fenced Funds issue referred to in the comment above.

Assets

3.110.Stakeholders believe that unit-linked asset reporting should be excluded from the scope of detailed asset reporting. Collection of line by line asset data of unit linked business appears to be driven primarily by Pillar 3 interim reporting. Stakeholders believe this aspect should be deferred until full adoption of Solvency II as it will be particularly burdensome for limited benefit.

3.111.EIOPA believes that excluding unit-linked assets undermines a comprehensive view of the undertaking risk profile, in particular contagious risk. The security-by-security reporting will also concern unit-linked products, since EIOPA considers that these also present specific risks (for instance, undertakings selling bonds issued by entities of their own group, leading to conflicts of interests; or undertakings exposed to reputational risk if they have a major problem on one of their unit-linked; etc.).

3.112.Stakeholders commented that the GICS code indicated to identify the Economic sector does not provide adequate coverage. One key example is that it does not support the government or non-corporate sectors, so all the debt securities issued by sovereign, multi-nationals, local, municipal and governments do not have the appropriate GICS code.

3.113.They also highlighted that the GICS recommendation is biased towards a particular vendor and subjects the entire insurance industry and their asset managers/custodians to a single vendor's and licensing models what unfairly stifles competition.

3.114.EIOPA highlighted in the July 2012 Report that the code to be used to identify the "Economic sector of issuer" was not decided yet, making however a reference to NACE. In CP-13/010 EIOPA proposed the use of the GICS code based on different feedbacks and analysis of the purpose.

3.115.Since then different views have been received from different types of stakeholders. Considering that NACE is the code defined by European Union for statistical purposes and is also adequate for prudential analysis of the investments and that NACE is free of charge, EIOPA, after having fully considered all arguments, decided to ask the identification of the "Economic sector of issuer" using the letter reference of the NACE code for identifying sectors (e.g. A: Agriculture, hunting and forestry; Section B: Fishing, etc.) except for the NACE relating to Financial intermediation, for which the 4 digits code should be used.

- 3.116. Stakeholders have suggested that insurance undertakings should also provide the Legal Entity Identifier (LEI) or, if not available, an Interim Entity Identifier (pre-LEI) as an ID Code in relation to the Issuer Code and Issuer Group Code.
- 3.117. EIOPA has introduced the possibility to report LEI to anticipate the use of the LEI codes. It is not something that EIOPA currently expects that could be widely used already during the preparatory phase, but EIOPA already included the possibility as it will be included in the final Solvency 2 package.
- 3.118. Finally, on assets, EIOPA is aware that it still needs to clarify in technical specifications how groups should report investment funds.

Technical provisions Non-Life

- 3.119. No major specific comments on technical provisions non-life templates.
- 3.120. See also paragraph 1.118.

Technical provisions Life

- 3.121. No major specific comments on technical provisions life templates.
- 3.122. See also paragraph 1.118.

Specific comments on groups templates

- 3.123. No major specific comments on group templates.

IV. Comments from Insurance and Reinsurance Stakeholders' Group (IRSG)

- 3.124. EIOPA received an IRSG Opinion on EIOPA Proposal for Guidelines on submission of information to national competent authorities, including Impact Assessment (CP-13/010). The Opinion included one letter where the main concerns were highlighted and 7 annexes with more detailed comments.
- 3.125. IRSG have strong reservations as regards the introduction of quantitative aspects particularly through formal Pillar 3 regulatory reporting (as well as within ORSA), raising significant concerns in this area.
- 3.126. A Minority Opinion supports EIOPA approach within interim measures of Solvency II.
- 3.127. On the letter the following main concerns were highlighted:
- a) Legal basis;
 - b) General observations regarding reporting during interim period;
 - c) Interim reporting guidelines and measures – Timelines;

- d) Requirements in addition to EIOPA's July 2012 stable platform;
- e) Need for stable Level 2 implementing measures.

3.128. The General comments and the specific comments on CP-13/010 addressed under Section 3, part II (Comments in general) of this Final report addresses all issues raised by IRSG. Therefore the responses are not repeated in this section.

4. Revised Guidelines

Introduction

- 4.1. According to Article 16 of Regulation (EU) 1094/2010 of 24 November 2010 (hereafter, EIOPA Regulation or the Regulation)¹ EIOPA is issuing Guidelines addressed to national competent authorities on how to proceed in the preparatory phase leading up to the applications of Directive 2009/138/EC of the European Parliament and of the Council of 25 November 2009 on the taking-up and pursuit of the business of Insurance and Reinsurance (Solvency II Directive)².
- 4.2. These Guidelines are based on Articles 35, 220 and 254 of the Solvency II Directive.
- 4.3. In the absence Preparatory Guidelines European national competent authorities may see the need to develop national solutions in order to ensure sound risk sensitive supervision. Instead of reaching consistent and convergent supervision in the European Union, different national solutions may emerge to the detriment of a good functioning internal market.
- 4.4. It is of key importance that there will be a consistent and convergent approach with respect to the preparation of Solvency II. These Guidelines should be seen as preparatory work for Solvency II by fostering preparation with respect to key areas of Solvency II in order to ensure proper management of undertakings and to ensure that supervisors have sufficient information at hand. These areas are the system of governance, including risk management system and a forward looking assessment of own risks (based on the Own Risk and Solvency Assessment principles), pre-application for internal models and submission of information to national competent authorities.
- 4.5. Early preparation is key in order to ensure that when Solvency II is fully applicable undertakings and national competent authorities will be well prepared and able to apply the new system. For this, national competent authorities are expected to engage with undertakings in a close dialogue.
- 4.6. As part of the preparation for the implementation of Solvency II, national competent authorities should put in place from 1 of January 2014 the Guidelines as set out in this document so that insurance and reinsurance undertakings take appropriate steps for the full implementation of Solvency II.

¹ OJ L 331, 15.12.2010, p. 48-83

² OJ L 335, 17.12.2009, p. 1-155

- 4.7. National competent authorities should send to EIOPA, a progress report on the application of these Guidelines by the end of February following each relevant year, the first being sent by 28 February 2015 based on the period 1 January 2014 to 31 December 2014.
- 4.8. National competent authorities are expected to ensure that insurance and reinsurance undertakings prepare for having appropriate systems and structures in place that would allow an adequate exchange of information with the national competent authorities.
- 4.9. As a preparation exercise for Solvency II implementation, the national competent authorities should ensure that, during the preparatory phase leading up to Solvency II the information outlined in these Guidelines is submitted by at least insurance and reinsurance undertakings and by insurance and reinsurance groups that represent a significant share of national markets. This information should be submitted in addition to any existing supervisory reporting requirements.
- 4.10. This preparation phase should be used as an opportunity for national competent authorities and undertakings to set up or foster a dialogue around implementation of reporting requirements. National competent authorities are expected to consider the information provided. National competent authorities will not be expected to take enforcement or regulatory action but it is likely to be appropriate to discuss and plan with insurance and reinsurance the progress being made. Data should be used only for the purpose of assessing and improving preparedness for Solvency II requirements.
- 4.11. EIOPA's intention is that for preparatory purposes the annual information is submitted once before Solvency II Directive is applicable and the quarterly information is submitted in relation to the third quarter prior to the application date of Solvency II Directive. The starting dates proposed for the submission of information are based on the assumption that the Solvency II Directive will be applicable on the 1 January 2016. These submission dates will, therefore, be reviewed at the end of 2013 based on the latest developments with regard to OMDII.
- 4.12. It should not be assumed that supervisory approval for specific items or methods required under Solvency II has been given.
- 4.13. Regarding information on internal models the aim of reporting during the preparatory phase takes into account the need of undertakings to prepare for the eventuality that its internal model may not be approved and the fact that the undertaking should prepare for the regular submission of information when Solvency II Directive is applicable.

- 4.14. Insurance and reinsurance undertakings engaged in a pre-application process for internal models should submit the information on the Solvency Capital Requirement (SCR) calculated both with the standard formula and with the full/partial internal model. The submission related to the standard formula is defined under the “Guidelines on Pre-Application of Internal Models” while the submission related to the full or partial internal model, for the purpose of submission of information, is defined under these Guidelines.
- 4.15. On the narrative report for the preparatory phase it is only required to submit a subset of the reporting requirements foreseen under Solvency II. It was considered that the submission of the full report would be burdensome and the content included in these Guidelines should already allow for a proper preparation to report the full narrative report when Solvency II Directive is applicable.
- 4.16. Also regarding quantitative information the set of information required is a subset of the full package. As a consequence, for the preparatory phase some reporting items will not be applicable.
- 4.17. As for reporting at a Ring Fenced Fund level EIOPA believes that it is very important that undertakings prepare for the calculation and submission of information by Ring Fenced Funds (RFF), both at individual and group level, as this will be an important part of Solvency II. Therefore the requirement of the submission of information for the major material RFF and the remaining part was kept both at individual and group level. Regarding the calculation of the SCR at entity or group level when undertakings have RFFs, EIOPA will engage in a dialogue with stakeholders to ensure that an appropriate solution is incorporated in the technical specifications.
- 4.18. As part of the preparation for the implementation of Solvency II, national competent authorities may already wish to use the taxonomy developed by EIOPA for the submission of information. For that the relevant support documentation was made available at <https://eiopa.europa.eu/publications/eu-wide-reporting-formats/index.html>. A new version of this information will be made available in the future.
- 4.19. Technical Annex VI describes the data checks to which the data submitted needs to comply with. This Annex should not be understood as representing the final position on data checks, namely due to the fact that the preparatory phase only includes a subset of the Solvency II reporting package.
- 4.20. When the method 2 as defined in Article 233 of the Solvency II Directive is applied, insurance and reinsurance groups are allowed to use solvency

capital requirements and eligible own funds of related third country undertakings calculated according to their local rules for the purposes of these Guidelines only, and without prejudice to any future European Commission equivalence determinations and any future decisions of group supervisors.

- 4.21. National competent authorities are expected to ensure that these Guidelines are applied in a manner which is proportionate to the nature, scale and complexity of the risks inherent in the business of the insurance and reinsurance undertaking. The Guidelines already reflect the application of the principle of proportionality by having the principle embedded and also by introducing thresholds in certain areas.
- 4.22. For the purpose of the quarterly reporting of the balance sheet, except for technical provisions, in preparatory phase only quarter 3 of 2015, proportionality and materiality in relation to the quarterly data need to be assessed. In making assessments of materiality, it has to be recognised that quarterly measurements may rely on estimates and estimation methods to a greater extent than measurements of annual financial data. The measurement procedures for the quarterly reporting have to be designed to ensure that the resulting information is reliable and complies with the Solvency II standards and that all material information that is relevant for the understanding of the data is reported.
- 4.23. The calculation of technical provisions during the year, in particular for the purpose of quarterly reporting, in preparatory phase only quarter 3 of 2015, may rely on simplified methods in the calculation of the risk margin and best estimate (to be further elaborated by EIOPA).
- 4.24. EIOPA has also considered the specific case of insurance and reinsurance captives, in particular in relation to the quarterly submission of information. EIOPA believes that the preparatory phase should be in line with the final Solvency II framework but also have a phasing in nature. Taking this into consideration EIOPA decided to allow national competent authorities to exempt, in case any captive is covered by the market share applied, insurance and reinsurance captives from the submission of information in relation to the Q3 of 2015. Insurance and reinsurance captives do need to submit the annual information and should be considered in the calculation of the market share
- 4.25. EIOPA highlights that this solution for the quarterly reporting does not preempt any future solution to be applied under Solvency II for the quarterly submission of information by insurance and reinsurance captives under the Solvency II regime.
- 4.26. The Guidelines apply to both individual insurance and reinsurance undertakings and at the level of the insurance and reinsurance group.

Additionally, insurance and reinsurance groups need to take into consideration the group specific Guidelines.

- 4.27. Therefore, the Guidelines set out in Sections I, II, III, and VIII clearly identify if they are applicable to individual insurance and reinsurance undertaking or at the level of the insurance and reinsurance group; Sections IV, V, VI, VII, and IX apply both to individual insurance and reinsurance undertakings and mutatis mutandis at the level of the insurance and reinsurance group, with Guidelines 26 and 33 being specific considerations on how such Guidelines apply at the level of the insurance and reinsurance group.
- 4.28. No notional Minimum Capital Requirement for composite insurance undertakings will be requested as that is out of scope for these Guidelines.
- 4.29. The Guidelines shall apply from 1st January 2014.

Section I: General provisions for Guidelines

Guideline 1- General provisions for Guidelines

- 4.30. National competent authorities should take the appropriate steps in order to put in place from 1 January 2014 the present Guidelines on submission of information to national competent authorities.
- 4.31. National competent authorities should ensure that insurance and reinsurance undertakings and groups take the appropriate steps to:
- a) build systems and structures to deliver high quality information for supervisory purposes, and;
 - b) submit to their national competent authorities the qualitative and quantitative information as set out in these Guidelines that will allow national competent authorities to review and evaluate the quality of the information and the progress made.

Guideline 2 - Progress report to EIOPA

- 4.32. National competent authorities should send to EIOPA, a progress report on the application of these Guidelines by the end of February following each relevant year, the first being sent by 28 February 2015 based on the period 1 January 2014 to 31 December 2014.

Section II: Scope of the submission of information – Thresholds to be applied

Guideline 3 – Individual annual quantitative information submission thresholds

- 4.33. In accordance with Article 35 of the Solvency II Directive, national competent authorities should ensure that insurance and reinsurance undertakings that represent at least 80% of the national market share, according to the criteria defined in Guideline 5 to 7, submit to the national competent authority the set of annual quantitative information identified in Guideline 13.

Guideline 4 – Individual quarterly quantitative information submission thresholds

- 4.34. In accordance with Article 35 of the Solvency II Directive, national competent authorities should ensure that insurance and reinsurance undertakings that represent at least 50% of the national market share, according to the criteria defined in Guideline 5 to 7, submit to the national competent authority the set of quarterly information identified in Guideline 16.

Guideline 5 – Market share for individual

- 4.35. National competent authorities should calculate the national market share referred to in Guidelines 3 and 4 based on the data submitted by insurance and reinsurance undertakings for the purposes of supervision on the annual reporting period ending during 2012.
- 4.36. To determine the national market share the following undertakings should be excluded:
- a) non-EEA insurance and reinsurance undertakings with a share in the national market through a branch office;
 - b) other EEA insurance and reinsurance undertakings with a share in the national market through a branch office or freedom of services.
- 4.37. Life and Non-life business should be considered separately.

Guideline 6 – Calculation of market share for life business

- 4.38. For Life business, national competent authorities should:
- a) Identify the insurance and reinsurance undertakings writing life insurance or reinsurance business that are expected to be within the scope of the Solvency II Directive at its initial date of application, based on information available at the time of notification;
 - b) Calculate the market share of each of them, dividing the amount of its gross life technical provisions by the total amount of gross life technical provisions of all insurance and reinsurance undertakings identified in the previous paragraph, and;
 - c) Identify the insurance and reinsurance undertakings for which the accumulated market share calculated in the previous paragraph reaches at least 80% for the purpose of Guideline 3 and 50% for the purpose of Guideline 4.

Guideline 7 – Calculation of market share for non-life business

- 4.39. For Non-life business, national competent authorities should:
- a) Identify the insurance and reinsurance undertakings writing non-life insurance or reinsurance business that are expected to be within the scope of the Solvency II Directive at its initial date of application, based on information available at the time of notification;
 - b) Calculate the market share of each of them, dividing the amount of its gross non-life written premiums, direct and reinsurance accepted, by the total amount of gross non-life written premiums, direct and reinsurance accepted, of all insurance and reinsurance undertakings identified in the previous paragraph, and;
 - c) Identify the insurance and reinsurance undertakings for which the accumulated market share calculated in the previous paragraph

reaches at least 80% for the purpose of Guideline 3 and 50% for the purpose of Guideline 4.

Guideline 8 - Notification by national competent authorities to insurance and reinsurance undertakings

4.40. National competent authorities should notify insurance and reinsurance undertakings falling into these thresholds, no later than 11 months before the initial submission reference dates indicated in Guideline 35.

Guideline 9 – Groups’ annual quantitative information submission thresholds

4.41. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that at least the participating insurance and reinsurance undertakings or insurance holding companies at the head of an insurance or reinsurance group with more than EUR 12 billion or the equivalent in the national currency of total assets in the consolidated accounting balance-sheet for the reporting period ending during 2012, submit to the group supervisor the set of annual quantitative information identified in Guideline 17.

4.42. The equivalent amount in national currency should be calculated by applying the exchange rate at the end of the reporting period for supervisory purposes referred in the previous paragraph.

4.43. If in a Member State no insurance or reinsurance group with headquarters in its territory falls under paragraph 1.41., the national competent authority should decide whether any insurance or reinsurance groups headquartered in its territory should submit to the group supervisor the set of annual quantitative information identified in Guideline 17, considering at least the nature, scale and complexity of the risks inherent to the business of the group and its significance in the local market.

4.44. Where the method 2 as defined in Article 233 of Solvency II Directive is applied, the national competent authority should ensure that total assets is calculated and communicated to the group supervisor by the group, based on the proportional sum of all total assets of insurance or reinsurance undertakings and insurance holding companies belonging to the group in the scope of the group solvency calculation.

Guideline 10 – Groups’ quarterly quantitative reporting thresholds

4.45. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that at least the participating insurance and reinsurance undertakings or insurance holding companies at the head of an insurance or reinsurance group with more than EUR 12

billion or the equivalent in the national currency of total assets in the consolidated accounting balance sheet, relating to the reporting period ending during 2012, submit to the group supervisor the set of quarterly quantitative information identified in Guideline 20.

- 4.46. The equivalent amount in national currency should be calculated by applying the exchange rate at the end of the reporting period for supervisory purposes referred in the previous paragraph.
- 4.47. If in a Member State no insurance or reinsurance group with headquarters in its territory falls under paragraph 1.45., the national competent authority should decide whether any insurance or reinsurance groups headquartered in its territory should submit to the group supervisor the set of quarterly quantitative information identified in Guideline 20, considering at least the nature, scale and complexity of the risks inherent to the business of group and its significance in the local market.
- 4.48. Where method 2 as defined in Article 233 of the Solvency II Directive is applied, the national competent authority should ensure that the total assets are calculated and communicated to the national competent authority by the group, based on the proportional sum of total assets of all insurance or reinsurance undertakings and insurance holding companies belonging to the group in the scope of the group solvency calculation.

Guideline 11 - Notification by national competent authorities to participating insurance and reinsurance undertaking or insurance holding company at the head of an insurance or reinsurance group

- 4.49. The national competent authorities should notify, the participating insurance and reinsurance undertaking or insurance holding company at the head of an insurance or reinsurance group falling into these thresholds no later than 11 months before the initial submission reference dates indicated in Guideline 35, that they are required to submit to the group supervisor the set of quarterly quantitative information identified in Guideline 20 and the set of annually quantitative information identified in Guideline 17.

Guideline 12 – Narrative reporting thresholds

- 4.50. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that insurance and reinsurance undertakings and the participating insurance and reinsurance undertaking or insurance holding company falling within the scope of Guidelines 3 and 9 submit to the corresponding national competent authority the set of narrative information identified in Section IV to Section VI of these Guidelines.

Section III: Quantitative information

Guideline 13 – Individual quantitative annual information

4.51. In accordance with Articles 35 of the Solvency II Directive, national competent authorities should ensure that individual insurance and reinsurance undertakings falling within the scope of Guideline 3 submit annually to the national competent authority the following items as defined in Technical Annex I, with the detail described in Technical Annex II, and under the references indicated below:

- a) S.01.01.b – Content of the submission;
 - b) S.01.02.b – Basic information;
 - c) S.02.01.b – Balance sheet;
 - d) S.02.02.b – Assets and liabilities by currency;
 - e) S.06.02.b – List of assets;
 - f) S.08.01.b – Open derivatives;
 - g) S.12.01.b – Life and Health Similar to Life Techniques Technical Provisions;
 - h) S.17.01.b – Non-life Technical Provisions;
 - i) S.23.01.b – Own funds;
 - j) S.25.01.b – Solvency Capital Requirement - Standard Formula or Partial Internal Models;
 - k) S.25.02.b – Solvency Capital Requirement - Partial Internal Models;
 - l) S.25.03.b – Solvency Capital Requirement - Full Internal Models;
 - m) S.26.01.b – Solvency Capital Requirement - Market risk;
 - n) S.26.02.b – Solvency Capital Requirement - Counterparty default risk;
 - o) S.26.03.b – Solvency Capital Requirement - Life underwriting risk;
 - p) S.26.04.b – Solvency Capital Requirement - Health underwriting risk;
 - q) S.26.05.b – Solvency Capital Requirement - Non-life underwriting risk;
 - r) S.26.06.b – Solvency Capital Requirement - Operational risk;
 - s) S.27.01.b – Solvency Capital Requirement - Non-life catastrophe risk;
 - t) S.28.01.b – Minimum Capital Requirement – Non-composite undertakings, and;
 - u) S.28.02.b – Minimum capital Requirement - Composite undertakings.
- 4.52. The information referred to in paragraph d) should be submitted for the number of currencies needed to report at least 90% of the total assets and liabilities, where the currencies to be reported are those underlying the asset or liability.
- 4.53. The information referred to in paragraphs g) and h) by country should be submitted for the home country and for the additional number of countries needed to report up to 90% of the Best Estimate for direct business on a

certain Line of business, with the rest being reported in items “For European Economic Area countries outside the materiality threshold” or “For non-European Economic Area countries outside the materiality threshold”.

Guideline 14 – Individual quantitative annual information – Internal Models

- 4.54. National competent authorities should ensure that insurance and reinsurance undertakings that are engaged with the relevant national competent authority in a pre-application process for an internal model that would be used for the calculation of the Solvency Capital Requirement, submit annually to the national competent authority, within the deadlines defined in Guideline 35 the relevant information identified in the Guideline 13.
- 4.55. For the information regarding the internal model calculation of Solvency Capital Requirement the relevant information identified in m) to s) of Guideline 13 according to the specific categorization of risks of the specific internal model and any additional information requested by the national competent authority about the internal model under pre-application should be submitted according to specific templates agreed with the respective national competent authority.

Guideline 15 – Individual quantitative annual information – Ring Fenced Funds

- 4.56. In addition to the information regarding the Solvency Capital Requirement at entity level, the information referred to in paragraph j) of Guideline 13 should be submitted, separately, regarding the Ring Fenced Fund with the most material notional Solvency Capital Requirement and regarding the remaining part of the business of the undertaking using the references S.25.01.I.
- 4.57. The information referred to in paragraphs m) to s) of Guideline 13 should be submitted, separately, regarding the Ring Fenced Fund with the most material notional Solvency Capital Requirement and regarding the remaining part of the business of the undertaking using the references S.26.01.I to S.26.06.I and S.27.01.I.
- 4.58. When undertaking is using an internal model for the calculation of Solvency Capital Requirement, the notional SCR for material Ring Fenced Fund and the remaining part, should be taken into account, when submitting the relevant information identified in k) and l) of Guideline 13, according to specific templates agreed with the respective national competent authority.

Guideline 16 – Individual quantitative quarterly information

4.59. In accordance with Articles 35 of the Solvency II Directive, national competent authorities should ensure that individual insurance and reinsurance undertakings falling within the scope of Guideline 4 submit quarterly to the national competent authority the following items as defined in Technical Annex I, with the detail described in Technical Annex II, and under the references indicated below:

- a) S.01.01.a – Content of the submission;
- b) S.01.02.a – Basic information;
- c) S.02.01.a – Balance sheet;
- d) S.06.02.a – List of assets;
- e) S.08.01.a – Open derivatives;
- f) S.12.01.a – Life and Health Similar to Life Techniques Technical Provisions;
- g) S.17.01.a – Non-life Technical Provisions;
- h) S.23.01.a – Own funds;
- i) S.28.01.a – Minimum Capital Requirement – Non-composite undertakings, and;
- j) S.28.02.a – Minimum capital Requirement - Composite undertakings.

4.60. Notwithstanding Guideline 4, national competent authorities may exempt captive insurance and reinsurance undertakings from the submission of the information referred to in the previous paragraph.

Guideline 17 – Groups’ quantitative annual information

4.61. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that participating insurance and reinsurance undertakings or insurance holding companies at the head of an insurance or reinsurance group falling within the scope of Guideline 9 submit annually to the national competent authority the following items as defined in Technical Annex I, with the detail described in Technical Annex II, and under the references indicated below:

- a) S.01.01.g – Content of the submission;
- b) S.01.02.g – Basic information;
- c) S.02.01.g – Balance sheet, when the method 1 as defined in Article 230 of Solvency II Directive is used, either exclusively or in combination with the 2 method or method 2 as defined in Article 233 of the Solvency II Directive;
- d) S.06.02.g – List of assets;
- e) S.08.01.g – Open derivatives;
- f) S.23.01.g – Own funds;
- g) S.25.01.g - Solvency Capital Requirement - Standard Formula or Partial Internal Models, when method 1 as defined in Article 230 of Solvency II Directive is used, either exclusively or in combination with method 2, as defined in Article 233 of the Solvency II Directive;

- h) S.25.02.g - Solvency Capital Requirement - Partial Internal Models, when method 1 as defined in Article 230 of the Solvency II Directive is used, either exclusively or in combination with method 2, as defined in Article 233 of the Solvency II Directive;
- i) S.25.03.g - Solvency Capital Requirement - Full Internal Models, when method 1 as defined in Article 230 of the Solvency II Directive is used, either exclusively or in combination with method 2, as defined in Article 233 of the Solvency II Directive;
- j) S.26.01.g - Solvency Capital Requirement - Market risk, when method 1 as defined in Article 230 of the Solvency II Directive is used, either exclusively or in combination with method 2, as defined in Article 233 of the Solvency II Directive;
- k) S.26.02.g - Solvency Capital Requirement - Counterparty default risk, when method 1 as defined in Article 230 of the Solvency II Directive is used, either exclusively or in combination with method 2, as defined in Article 233 of the Solvency II Directive;
- l) S.26.03.g - Solvency Capital Requirement - Life underwriting risk, when method 1 as defined in Article 230 of the Solvency II Directive is used, either exclusively or in combination with method 2, as defined in Article 233 of the Solvency II Directive;
- m) S.26.04.g - Solvency Capital Requirement - Health underwriting risk, when method 1 as defined in Article 230 of the Solvency II Directive is used, either exclusively or in combination with method 2, as defined in Article 233 of the Solvency II Directive;
- n) S.26.05.g - Solvency Capital Requirement - Non-life underwriting risk, when method 1 as defined in Article 230 of the Solvency II Directive is used, either exclusively or in combination with method 2, as defined in Article 233 of the Solvency II Directive;
- o) S.26.06.g - Solvency Capital Requirement - Operational risk, when method 1 as defined in Article 230 of the Solvency II Directive is used, either exclusively or in combination with method 2, as defined in Article 233 of the Solvency II Directive;
- p) S.27.01.g - Solvency Capital Requirement - Non-life catastrophe risk, when method 1 as defined in Article 230 of the Solvency II Directive is used, either exclusively or in combination with method 2, as defined in Article 233 of the Solvency II Directive;
- q) S.32.01.g - Undertakings in the scope of the group;
- r) S.33.01.g - Insurance and reinsurance individual requirements;
- s) S.34.01.g - Other regulated and non-regulated financial undertakings including insurance holding companies individual requirements and;
- t) S.35.01.g - Contribution to group technical provisions.

4.62. In accordance with Article 220 (2) of the Solvency II Directive, notwithstanding paragraph 1.63, national competent authorities in the role of group supervisor should form a view, after consulting the other

supervisory authorities concerned and the group itself, on whether an insurance or reinsurance group can apply the method 2 as defined in Article 233 of the Solvency II Directive or the combination of method 1 as defined in Article 230 of the Solvency II Directive and method 2 as defined in Article 233 of the Solvency II Directive, where the exclusive application of method 1 is not considered appropriate regarding the EEA operations.

- 4.63. With regard to third country undertakings, the insurance or reinsurance group and the group supervisor should engage in a dialogue on the method of calculation that the group will use to determine their group solvency for the preparatory phase. The insurance or reinsurance group should explain to the group supervisor why the exclusive application of method 1 is not considered appropriate.
- 4.64. During the preparatory phase the group should decide which method to apply after having considered the outcome of the dialogue with the group supervisor. In the case the group intends to apply during the preparatory phase the method 2 or the combination of method 1 as defined in Article 230 of Solvency II Directive and method 2 as defined in Article 233 of Solvency II Directive, and this is not in line with the outcome of the dialogue, the insurance or reinsurance groups should communicate the rationale for deviating from the outcome of the dialogue before commencing their solvency calculations for the preparatory phase.
- 4.65. The use of the method 2 or the combination of method 1 as defined in Article 230 of Solvency II Directive and method 2 as defined in Article 233 of Solvency II Directive should be applied without prejudice to any future decision of the group supervisor once Solvency II is applicable.

Guideline 18 – Groups’ quantitative annual information – Internal Models

- 4.66. National competent authorities should ensure that groups that are engaged with the relevant national competent authority in a pre-application process for an internal model that would be used for the calculation of the Solvency Capital Requirement, submit annually to the national competent authority, within the deadlines defined in Guideline 35, the relevant information identified in the Guideline 17.
- 4.67. In the case of group internal models under pre-application that would be used for the calculation of both the group Solvency Capital Requirement and some Solvency Capital Requirement of related undertakings, for the information regarding the internal model calculation of Solvency Capital Requirement the relevant information identified in j) to p) of the Guideline 17 according to the specific categorization of risks of the specific internal model and any additional information requested by the national competent

authority about the internal model under pre-application should be submitted according to specific templates agreed with the respective national competent authority.

Guideline 19 – Groups’ quantitative annual information – Ring Fenced Funds

- 4.68. When method 1 as defined in Article 230 of the Solvency II Directive is used, either exclusively or in combination with method 2, as defined in Article 233 of the Solvency II Directive, in addition to the information regarding the Solvency Capital Requirement calculation at group level, the information referred to in paragraphs g) of Guideline 17 should be submitted, separately, regarding the Ring Fenced Fund with the most material notional Solvency Capital Requirement and regarding the remaining part of the business of the group using the references S.25.01.n.
- 4.69. When method 1 as defined in Article 230 of the Solvency II Directive is used, either exclusively or in combination with method 2, as defined in Article 233 of the Solvency II Directive, the information referred to in paragraphs j) to p) of Guideline 17 should be submitted, separately, regarding the Ring Fenced Fund with the most material notional Solvency Capital Requirement and regarding the remaining part of the business of the group using the references S.26.01.n to S.26.06.n and S.27.01.n.
- 4.70. When method 2 as defined in Article 233 of the Solvency II Directive is used, the information referred to in paragraph r) of Guideline 17, in the cells B1 to B7 as defined in Annex II, should be submitted for insurance and reinsurance undertakings, separately, at entity level, regarding the Ring Fenced Fund with the most material notional Solvency Capital Requirement and regarding the remaining part of the business.
- 4.71. When undertaking is using an internal model for the calculation of Solvency Capital Requirement, the notional SCR for material Ring Fenced Fund and the remaining part, should be taken into account, when submitting the relevant information identified in h) and i) of Guideline 17, according to specific templates agreed with the respective national competent authority.

Guideline 20 – Groups’ quantitative quarterly information

- 4.72. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that participating insurance and reinsurance undertakings or insurance holding companies at the head of insurance or reinsurance group falling within the scope of Guideline 10 submit quarterly to the national competent authority the following items as defined in Technical Annex I, with the detail described in Technical Annex II, and under the references indicated below:

- a) S.01.01.f – Content of the submission;
- b) S.01.02.f – Basic information;
- c) S.02.01.f – Balance sheet, when method 1 as defined in Article 230 of the Solvency II Directive is used, either exclusively or in combination with method 2, as defined in Article 233 of the Solvency II Directive;
- d) S.06.02.f - List of assets;
- e) S.08.01.f – Open derivatives, and;
- f) S.23.01.f - Own funds.

Section IV: Narrative information on System of governance

Guideline 21 – Information on general governance requirements

4.73. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that the narrative report referred to in Guideline 12 includes the following information regarding insurance and reinsurance undertaking's general governance requirements:

- a) information allowing the national competent authority to gain a good understanding of the system of governance within the undertaking, and to assess its appropriateness to the undertaking's business strategy and operations;
- b) information relating to the undertaking's delegation of responsibilities, reporting lines and allocation of functions, and;
- c) the structure of the undertaking's administrative, management or supervisory body, providing a description of their main roles and responsibilities and a brief description of the segregation of responsibilities within these bodies, in particular whether relevant committees exist within them, as well as a description of the main roles and responsibilities of key functions held by such bodies.

Guideline 22 – Information on the fit and proper requirements

4.74. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that the narrative report referred to in Guideline 12 includes the following information regarding insurance and reinsurance undertaking's compliance with the fit and proper requirements:

- a) a list of the persons in the undertaking, or external to the undertaking in the case that the undertaking has outsourced key functions that are responsible for key functions, and;
- b) information on the policies and processes established by the undertaking to ensure that those persons are fit and proper.

Guideline 23 – Information on the risk management system

4.75. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that the narrative report referred to in Guideline 12 includes the following information regarding insurance and reinsurance undertaking's risk management system:

- a) a description of the undertaking's risk management system comprising strategies, processes and reporting procedures, and how it is able to effectively identify, measure, monitor, manage and report, on a continuous basis, the risks on an individual and aggregated level, to which the undertaking is or could be exposed;
- b) a description of how the risk management system including the risk management function are implemented and integrated into the organisational structure and decision-making processes of the undertaking;
- c) information on the undertaking's risk management strategies, objectives, processes and reporting procedures for each category of risk, with an explanation how these are documented, monitored and enforced;
- d) information on how the undertaking fulfils its obligation related to the 'prudent person principle' as set out in the Guidelines 22 to 30 on the System of Governance;
- e) information on how the undertaking verifies the appropriateness of credit assessments from external credit assessments institutions including how and the extent to which credit assessments from external credit assessments institutions are used.

Guideline 24 – Information on internal control system

4.76. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that the narrative report referred to in Guideline 12 includes the following information regarding insurance and reinsurance undertaking's internal control system:

- a) a description of the undertaking's internal control system;
- b) information on the key procedures that the internal control system includes, and;
- c) a description of how the compliance function is implemented.

Guideline 25 – Additional information

4.77. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that the narrative report referred to in Guideline 12 includes any other material information regarding insurance and reinsurance undertaking's system of governance.

Guideline 26 – Information on System of governance – Groups

- 4.78. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that Guidelines 21 to 25 apply to groups.
- 4.79. National competent authorities should ensure that groups provide additionally the following information:
- a) a description of how the risk management and internal control systems and reporting procedures are implemented consistently in all the undertakings included in the scope of group supervision, as referred to in the Guidelines on the System of Governance;
 - b) where applicable, a statement that the participating insurance or reinsurance undertaking or the insurance holding company has made use of the option to perform a single forward looking assessment of own risks document as set out in Guidelines 20 and 23 of forward looking assessment of own risks Guidelines. , and;
 - c) information on any material intra-group outsourcing arrangements;
 - d) qualitative and quantitative information on material specific risks at group level.

Guideline 27 – Information on Governance Structure

- 4.80. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure the narrative report referred to in Guideline 12 includes an organizational chart indicating the positions of key function holders within the information on the governance structure.

Section V: Narrative information on Capital management

Guideline 28 – Information on Own funds

- 4.81. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that the narrative report referred to in Guideline 12 includes the following information regarding insurance and reinsurance undertaking's and group's own funds:
- a) a quantitative and qualitative explanation of any material differences between equity as shown in the undertaking's financial statements and the excess of assets over liabilities as calculated for solvency purposes, and;
 - b) Information on the structure, amount and quality of basic own funds and ancillary own funds.
- 4.82. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that the narrative report referred to in Guideline 12 includes the following information regarding group's own funds:

- a) How the group's own funds have been calculated net of any intra-group transactions, including intra-group transactions with undertakings of other financial sectors, and;
- b) The nature of the restrictions to the transferability and fungibility of own funds in the related undertakings, if any.

Section VI: Narrative information on Valuation for solvency purposes

Guideline 29 – Information on valuation of assets

4.83. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that the narrative report referred to in Guideline 12 includes the following information regarding insurance and reinsurance undertaking's valuation of their assets for solvency purposes:

- a) separately for each material class of assets, the value of the assets as well as a description of the bases, methods and main assumptions used for valuation for solvency purposes, and;
- b) separately for each material class of assets, a quantitative and qualitative explanation of any material differences between the bases, methods and main assumptions used by the undertaking for the valuation for solvency purposes and those used for their valuation in financial statements.

Guideline 30 – Information on valuation of technical provisions

4.84. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that the narrative report referred to in Guideline 12 includes the following information regarding the insurance and reinsurance undertaking's valuation of their technical provisions for solvency purposes:

- a) separately for each material line of business the value of technical provisions, including the amount of the best estimate and the risk margin, as well as a description of the bases, methods and main assumptions used for their valuation for solvency purposes;
- b) a description of the level of uncertainty associated with the amount of technical provisions;
- c) separately for each material line of business, a quantitative and qualitative explanation of any material differences between the bases, methods and main assumptions used by the undertaking for the valuation for solvency purposes and those used for their valuation in financial statements, and;
- d) a description of the recoverables from reinsurance contracts and special purpose vehicles.

4.85. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that the narrative report referred to in Guideline 12 includes details of the relevant actuarial methodologies and assumptions used in the calculation of the technical provisions including details of any simplification used in the calculation of the technical provision, including deriving the risk margin and its allocation to the single lines of business and including a justification that the method chosen is proportionate to the nature, scale and complexity of risks.

Guideline 31 – Information on Valuation of other liabilities

4.86. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that the narrative report referred to in Guideline 12 includes the following information regarding the insurance and reinsurance undertaking's valuation of other liabilities for solvency purposes:

- a) separately for each material class of other liabilities the value of other liabilities as well as a description of the bases, methods and main assumptions used for their valuation for solvency purposes, and;
- b) separately for each material class of other liabilities, a quantitative and qualitative explanation of any material differences with the valuation bases, methods and main assumptions used by the undertaking for the valuation for solvency purposes and those used for their valuation in financial statements.

Guideline 32 – Any other material information

4.87. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that the narrative report referred to in Guideline 12 includes a separate section on any other material information regarding the insurance and reinsurance undertaking's valuation of assets and liabilities for solvency purposes.

4.88. In accordance with Articles 35 and 254 of the Solvency II Directive, information on the valuation of assets and liabilities for solvency purposes should include a description of:

- a) the relevant assumptions about future management actions, and;
- b) the relevant assumptions about policyholders' behaviour.

4.89. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that the narrative report referred to in Guideline 12 includes, when insurance and reinsurance undertakings use mark to model techniques information on:

- a) identification of the assets and liabilities to which that valuation approach applies;

- b) justification of the use of that valuation approach for the assets and liabilities referred to in point a);
- c) documentation of the assumptions underlying that valuation approach and;
- d) assessment of the valuation uncertainty of the assets and liabilities referred to in point a).

Guideline 33 – Information on Valuation for solvency purposes - Groups

4.90. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that Guidelines 29 to 32 applies to groups and includes additionally the information regarding the group's valuation for solvency purposes, where the bases, methods and main assumptions used at group level for the valuation for solvency purposes of the group's assets, technical provisions and other liabilities differ materially from those used by any of its subsidiaries for the valuation for solvency purposes of its assets, technical provisions and other liabilities, a quantitative and qualitative explanation of any material differences.

Section VII: Reporting process and undertakings' reporting policy

Guideline - 34 Undertakings' reporting policy

- 4.91. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that insurance and reinsurance undertakings establishes a reporting policy that complies with Guideline 9 of the Guidelines on System of Governance, and additionally:
- a) details which business unit is responsible for drafting any reporting to the supervisor along with those business units which are responsible for reviewing any reporting to the supervisor;
 - b) sets out processes and timeline for completion of the various reporting requirements and review and approval, and;
 - c) explains the processes and controls for guaranteeing the reliability, completeness and consistency of the data provided facilitating the analysis and comparison throughout the years.

Section VIII: Dates of initial application and deadlines

Guideline 35 – Initial submission reference dates and deadlines for submitting information to national competent authorities

4.92. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that insurance and reinsurance undertakings submit the annual quantitative information referred to in Section III, Guidelines 13, 14 and 15, regarding the annual

quantitative information related to financial year ending on 31 December 2014, no later than 22 weeks after the undertaking's financial year end.

- 4.93. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that insurance and reinsurance undertakings submit the quarterly quantitative information referred to in Section III, Guideline 16, regarding the quarterly quantitative templates related to the quarter ending on 30 September 2015, no later than 8 weeks after the quarter end.
- 4.94. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that the narrative reporting referred to in Sections IV to VI is submitted, in relation to financial year ending on 31 December 2014, no later than 22 weeks after the undertaking's financial year end.
- 4.95. For reporting by groups, the submission of the information referred to in Section III, Guidelines 17, 18, 19 and 20 and the narrative report referred to in Sections IV to VI, 6 weeks are added to the annual and quarterly submission deadlines referred in the previous paragraphs.
- 4.96. Where undertakings or groups are permitted by national laws to report their financial information based on their accounting year-end which deviates from the calendar year, reporting reference dates may be adjusted accordingly. The reference dates to be used should be approved by the supervisory authority.

Section IX: Means for reporting, currency, units and data checks and others

Guideline 36 – Lines of Business and Complementary Identification Code

- 4.97. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that when the information submitted under these Guidelines is required by Line of Business, insurance and reinsurance undertakings use the Lines of Business as defined under Technical Annex III.
- 4.98. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that regarding information on assets and derivatives under these Guidelines, insurance and reinsurance undertakings use the Complementary Identification Code categories and table as defined under Technical Annexes IV and V.

Guideline 37 – Means for reporting

- 4.99. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that the quantitative

information referred in Section III is submitted electronically and the narrative report referred to in Sections IV to VI is submitted in an electronically readable format to the national competent authority.

Guideline 38 – Currency and units

4.100. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that all monetary data is submitted in the undertaking's and group currency of reporting, which requires converting of other currencies into the currency of reporting, with the exchange rate at the end of the reporting period.

4.101. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that all quantitative data is submitted in units.

Guideline 39 – Data Checks

4.102. In accordance with Articles 35 and 254 of the Solvency II Directive, national competent authorities should ensure that the data received comply with the data checks identified in Technical Annex VI.

Compliance and Reporting Rules

- 4.103. This document contains Guidelines issued under Article 16 of the EIOPA Regulation. In accordance with Article 16(3) of the EIOPA Regulation, Competent Authorities shall make every effort to comply with guidelines and recommendations.
- 4.104. Competent authorities that comply or intend to comply with these Guidelines should incorporate them into their regulatory or supervisory framework in an appropriate manner.
- 4.105. Competent authorities shall confirm to EIOPA whether they comply or intend to comply with these Guidelines, with reasons for non-compliance, within two months after the publication.
- 4.106. In the absence of a response by this deadline, competent authorities will be considered as non-compliant to the reporting.

Final Provision on Review

- 4.107. These Guidelines shall be subject to a review by EIOPA.
- 4.108. In particular, the dates referred to in Guideline 35 may be revised based on the latest developments on the Omnibus II negotiations.

5. Technical Annexes of the Guidelines

5.1 Technical Annex I: Content of quantitative information

This Annex includes an explanation of the type of information that national competent authorities should include in the submission of information regarding each reference.

S.01.01 – Content of the submission

1. The content of the submission comprises the information contained in Technical Annex II under the reference S.01.01 (different variants) detailing the content of the reporting instant being submitted.

S.01.02 – Basic information (old BI)

2. The basic information comprises the information contained in Technical Annex II under the reference S.01.02 (different variants), detailing basic information on the undertaking and the content of the quantitative reporting in general.

S.02.01 – Balance sheet (old BS-C1)

3. The balance sheet comprises the information contained in Technical Annex II under the reference S.02.01 (different variants) and differentiating between valuation in accordance with article 75 of Solvency II Directive and valuation according to undertaking's or group's statutory accounts. The balance sheet should cover the entire business of the insurance or reinsurance undertaking for individual reporting or of the business of the group.
4. For quarterly reporting, the balance sheet data indicated in the previous paragraph should only consider valuation in accordance with article 75 of Solvency II Directive.

S.02.02 – Assets and liabilities by currency (old BS-C1D)

5. Assets and liabilities by currency comprises the information contained in Technical Annex II under the reference S.02.02 (different variants), for the number of currencies needed to report at least 90% of the total assets and liabilities, where the currencies to be reported are those underlying the asset or liability.

S.06.02 – List of assets (old AS-D1)

6. The detailed list of assets comprises the information contained in Technical Annex II under the reference S.06.02 (different variants), and encompass the following specific requirements:

- a) A line-by-line list of investments classifiable as asset categories 1 to 9, as set out in Technical Annex IV - Complementary Identification Code Categories, distinguishing between ring fenced funds and whenever the undertaking or group makes the distinction between life insurance and non-life insurance for internal purposes distinguishing between these two businesses and shareholder's funds, and;
- b) Each asset is reported separately in relation to each portfolio and / or each ring-fenced or other internal fund;
- c) For investments classifiable under the following CIC code, as set out in Technical Annex V - Complementary Identification Code Table:
 - CIC 71 (Cash), only one line per currency is to be reported;
 - CIC 72 (Transferable deposits (cash equivalents)), only one line per pair(bank, currency) is to be reported;
 - CIC 73 (Other deposits short term (less than one year)), only one line per pair(bank, currency) is to be reported;
 - CIC 8X (Mortgages and loans): for mortgages and loans to individuals, including loans on policies, there must be only 2 lines, one line regarding loans to senior management board and another regarding loans to other individuals, without distinction between individuals;
 - CIC 95 (Plant and equipment (for own use)), only one line is reported, aggregating all plant and equipment.

7. For group reporting, and in addition to the requirements set in the previous paragraph, the following specific requirements should be met:

- a) Where method 1 as defined in Article 230 of Solvency II Directive is used exclusively, the reporting should reflect the consolidated position of the assets (i.e. net of intra group transactions) within the group. The report should be made as follows:
 - Item Legal name of the undertaking should not be reported;
 - For participating insurance and reinsurance undertakings or insurance holding companies: report made line-by-line of the assets held;
 - For insurance and reinsurance undertakings, insurance holding companies, ancillary services undertakings and special purpose vehicles which are subsidiaries: report made line-by-line of the assets held;
 - For other related undertakings which are subsidiaries: report one line for each undertaking held and identify it by using the available options in item Participation;

- For undertakings under which a significant influence as defined in Article 33 of Directive 1983/349/EC is exercised: report one line for each undertaking held and identify it by using the available options in item Participation, and;
 - Other Financial Sectors: report one line for each participation in other financial sectors held and identify it by using the available options in item Participation.
- b) Where method 2 as defined in Article 233 of Solvency II Directive is used exclusively, the report should include the detailed list of the assets net of intra group transactions held by the participating undertakings, the insurance holding companies and subsidiaries or one line for each undertaking held under which a significant influence as defined in Article 33 of Directive 1983/349/EC is exercised. The report should be made as follows:
- Item Legal name of the undertaking should be reported;
 - For participating insurance and reinsurance undertakings or insurance holding companies: report made line-by-line of the assets held;
 - For insurance and reinsurance undertakings, insurance holding companies, ancillary services undertakings and special purpose vehicle which are subsidiaries (European Economic Area, equivalent non- European Economic Area and non-equivalent non- European Economic Area): report made line-by-line of the assets held;
 - For other related undertakings which are subsidiaries (European Economic Area, equivalent non- European Economic Area and non-equivalent non- European Economic Area): report one line for each undertaking held;
 - For undertakings under which a significant influence as defined in Article 33 of Directive 1983/349/EC is exercised (European Economic Area, non-equivalent non- European Economic Area, equivalent non- European Economic Area countries): report one line for each undertaking held, and;
 - Other Financial Sectors: report one line for each participation in other financial sectors held.
- c) Where a combination of methods 1 as defined in Article 230 of Solvency II Directive and 2 as defined in Article 233 of Solvency II Directive is used:

- i. One part of the report reflects the consolidated position of the assets (i.e. net of Intra Group Transactions) within the group which must be reported. The report should be made as follows:
 - Item Legal name of the undertaking should not be reported;
 - For participating insurance and reinsurance undertakings or insurance holding companies for which method 1 as defined in Article 230 of Solvency II Directive is used: report made line-by-line of the assets held;
 - For insurance and reinsurance undertakings, insurance holding companies, ancillary services undertakings and special purpose vehicles which are subsidiaries for which method 1 as defined in Article 230 of Solvency II Directive is used: report made line-by-line of the assets held;
 - For other related undertakings which are subsidiaries and for which method 1 as defined in Article 230 of Solvency II Directive is used: report one line for each undertaking held and identify it by using the available options in item Participation;
 - For undertakings under which a significant influence as defined in Article 33 of Directive 1983/349/EC is exercised and for which method 1 as defined in Article 230 of Solvency II Directive is used: report one line for each undertaking held and identify it by using the available options in item Participation;
 - Other Financial Sectors: report one line for each participation in other financial sectors held and identify it by using the available options in item Participation;
 - Subsidiaries for which method 2 as defined in Article 233 of Solvency II Directive is used: report one line for each subsidiary held and identify it by using the available options in item Participation, and;
 - Undertakings under which a significant influence as defined in Article 33 of Directive 1983/349/EC is exercised and for which method 2 as defined in Article 233 of Solvency II Directive is used: report one line for each undertaking held and identify it by using the available options in item Participation.
- ii. The other part of the report should include the detailed list of the assets net of Intra Group Transactions held by the participating undertakings, the insurance holding companies and subsidiaries or one line for each undertaking held under which a significant influence as defined in Article 33 of Directive 1983/349/EC is exercised. The report should be made as follows:

- Item Legal name of the undertaking should be reported;
- For participating insurance and reinsurance undertakings or insurance holding companies and for which method 2 as defined in Article 233 of Solvency II Directive is used: report made line-by-line of the assets held;
- For insurance and reinsurance undertakings, insurance holding companies, ancillary services undertakings and special purpose vehicles which are subsidiaries (European Economic Area, equivalent non- European Economic Area and non-equivalent non-European Economic Area) and for which method 2 as defined in Article 233 of Solvency II Directive is used: report made line-by-line of the assets held;
- For other related undertakings which are subsidiaries and for which method 2 as defined in Article 233 of Solvency II Directive is used (European Economic Area, equivalent non- European Economic Area and non-equivalent non- European Economic Area): report one line for each other related undertaking;
- For undertakings under which a significant influence as defined in Article 33 of Directive 1983/349/EC is exercised and for which method 2 as defined in Article 233 of Solvency II Directive is used (European Economic Area, non-equivalent non- European Economic Area, equivalent non- European Economic Area countries): report one line for each undertaking held, and;
- Other Financial Sectors: report one line for each participation in other financial sectors held.

S.08.01 – Open derivatives (old AS-D20)

8. The list of derivatives – open positions comprises the information contained in Technical Annex II under the reference S.08.01 (different variants), and encompass with the following requirements:
 - a) A line-by-line list of derivatives classifiable as asset categories A to F, as set out in Technical Annex IV – Complementary Identification Code Categories, distinguishing between ring fenced funds. Whenever the undertaking or group makes the distinction between life insurance and non-life insurance for internal purposes, distinguishing between these two businesses and shareholder’s funds. When derivatives are issued by the undertaking as an internal (group) derivative and when derivatives relate to the undertakings’ liabilities, distinguishing between these two situations;

- b) All derivatives contracts that existed during the reporting period and were not closed prior to the reporting reference date;
 - c) Each derivative is reported separately in relation to each portfolio and / or each ring-fenced or other internal fund, and;
 - d) Derivatives to be reported are the ones directly held and not held indirectly through investment funds or structured products.
9. For group reporting, and in addition to the requirements set in the previous paragraph, the following specific requirements should be attended:
- a) Where method 1 as defined in Article 230 of Solvency II Directive is used exclusively, the reporting should reflect the consolidated position of the derivatives held (i.e. net of Intra Group Transactions) within the group. The report should be made as follows:
 - Item Legal name of the undertaking should not be reported;
 - For participating insurance and reinsurance undertakings or insurance holding companies: report made line-by-line of the derivatives held;
 - For insurance and reinsurance undertakings, insurance holding companies, ancillary services undertakings and special purpose vehicles which are subsidiaries: report made line-by-line of the derivatives held;
 - Derivatives held by other related undertakings which are subsidiaries should not be included;
 - Derivatives held by undertakings under which a significant influence as defined in Article 33 of Directive 1983/349/EC is exercised should not be included, and;
 - Derivatives held by participations in other financial sectors should not be included.
 - b) Where method 2 as defined in Article 233 of Solvency II Directive is used exclusively, the report should include the detailed list of the derivatives net of Intra Group Transactions held by the participating undertakings, the insurance holding companies and subsidiaries. The report should be made as follows:
 - Item Legal name of the undertaking should be reported;
 - For participating insurance and reinsurance undertakings or insurance holding companies: report made line-by-line of the derivatives held;

- For insurance and reinsurance undertakings, insurance holding companies, ancillary services undertakings and special purpose vehicles which are subsidiaries (European Economic Area, equivalent non- European Economic Area, non-equivalent non-European Economic Area) : report made line-by-line of the derivatives held;
 - Derivatives held by other related undertakings which are subsidiaries should not be included;
 - Derivatives held by undertakings under which a significant influence as defined in Article 33 of Directive 1983/349/EC is exercised (European Economic Area, non-equivalent non- European Economic Area, equivalent non- European Economic Area countries) should not be included, and;
 - Derivatives held by participations in other financial sectors (European Economic Area, non-equivalent non- European Economic Area, equivalent non- European Economic Area countries) should not be included.
- c) Where a combination of methods 1 as defined in Article 230 of Solvency II Directive and 2 as defined in Article 233 of Solvency II Directive is used:
- i. One part of the report reflects the consolidated position of the derivatives held (i.e. net of Intra Group Transaction) within the group which must be reported. The report should be made as follows:
 - Item Legal name of the undertaking should not be reported;
 - For participating insurance and reinsurance undertakings or insurance holding companies for which method 1 as defined in Article 230 of Solvency II Directive is used: report made line-by-line of the derivatives held;
 - For insurance and reinsurance undertakings, insurance holding companies, ancillary services undertakings and special purpose vehicles which are subsidiaries for which method 1 as defined in Article 230 of Solvency II Directive is used: report made line-by-line of the derivatives held;
 - Derivatives held by other related undertakings which are subsidiaries and for which method 1 as defined in Article 230 of Solvency II Directive is used should not be included;

- Derivatives held by undertakings under which a significant influence as defined in Article 33 of Directive 1983/349/EC is exercised and for which method 1 as defined in Article 230 of Solvency II Directive is used should not be included;
 - Derivatives held by participations in other financial sectors should not be included;
 - Derivatives held by subsidiaries for which method 2 as defined in Article 233 of Solvency II Directive is used should not be included, and;
 - Derivatives held by undertakings under which a significant influence as defined in Article 33 of Directive 1983/349/EC is exercised and for which method 2 as defined in Article 233 of Solvency II Directive is used should not be included.
- ii. The other part of the report should include the detailed list of the derivatives held net of Intra Group Transactions by the participating undertakings, the insurance holding companies and subsidiaries. The report should be made as follows:
- Item Legal name of the undertaking should be reported;
 - For insurance and reinsurance undertakings, insurance holding companies, ancillary services undertakings and special purpose vehicles which are subsidiaries (European Economic Area, equivalent non- European Economic Area , non-equivalent non-European Economic Area) for which method 2 as defined in Article 233 of Solvency II Directive is used: report made line-by-line of the derivatives held;
 - Derivatives held by other related undertakings which are subsidiaries and for which method 2 as defined in Article 233 of Solvency II Directive is used should not be included;
 - Derivatives held by undertakings under which a significant influence as defined in Article 33 of Directive 1983/349/EC is exercised (European Economic Area, non-equivalent non- European Economic Area, equivalent non- European Economic Area countries) and for which method 2 as defined in Article 233 of Solvency II Directive is used should not be included, and;
 - Derivatives held by participations in other financial sectors (European Economic Area, non-equivalent non- European Economic Area, equivalent non- European Economic Area countries) and for which method 2 as defined in Article 233 of Solvency II Directive is used should not be included.

S.14.01.a – Life and Health Similar to Life Techniques Technical Provisions (old TP-F1Q)

10. Life and Health Similar to Life Techniques Technical Provisions, regarding each Line of Business as defined in Technical Annex III – Lines of Business. Comprise the information contained in Technical Annex II under the reference S.14.01.a, and encompass with the following requirements:
- a) Technical provisions calculated as a whole (Replicable portfolio);
 - b) Gross Best Estimate of technical provisions calculated as a sum of Best Estimate and risk margin (Non-Replicable portfolio);
 - c) Total Recoverables from reinsurance and special purpose vehicles after the adjustment for expected losses due to counterparty default, and;
 - d) Risk Margin.

S.14.01.b – Life and Health Similar to Life Techniques Technical Provisions (old TP-F1)

11. Life and Health Similar to Life Techniques Technical Provisions, regarding each Line of Business as defined in Technical Annex III – Lines of Business. Comprises the information contained in Technical Annex II under the reference S.14.01.b, and encompass with the following requirements:
- a) Technical provisions calculated as a whole (Replicable portfolio);
 - b) Gross Best Estimate of technical provisions calculated as a sum of Best Estimate and risk margin (Non-Replicable portfolio);
 - c) Total Recoverables from reinsurance and special purpose vehicles after the adjustment for expected losses due to counterparty default, and;
 - d) Risk Margin;
 - e) Only the following items, relating to the amount of gross best estimate by country, are to be reported:
 - i. Gross Best Estimate for different countries - Home country;
 - ii. Gross Best Estimate for different countries - For countries in the materiality threshold;
 - iii. Gross Best Estimate for different countries - For European Economic Area countries outside the materiality threshold, and;
 - iv. Gross Best Estimate for different countries - For non-European Economic Area countries outside the materiality threshold.
 - f) The amount of gross Best Estimate by country regards to the location of risk underwritten.
12. Application of a materiality threshold:
- i. Reported the gross Best Estimate for the countries representing up to 90% of the Best Estimate for direct business on a certain Line of business, with the rest being reported in items "For European Economic Area countries outside the materiality threshold" or "For

- non-European Economic Area countries outside the materiality threshold”, and;
- ii. Regardless of the materiality threshold, the gross Best Estimate in the home country has to be reported.

S.17.01.a - Non-life Technical Provisions (old TP-E1Q)

13. Non-life Technical Provisions, regarding each Line of Business as defined in Technical Annex III – Line of Business, reporting direct insurance together with proportional accepted reinsurance. Comprise the information contained in Technical Annex II under the reference S.17.01.a, and encompass with the following requirements:
 - a) Technical provisions calculated as a whole (Replicable portfolio);
 - b) Gross Best Estimate of technical provisions calculated as a sum of Best Estimate and risk margin (Non-Replicable portfolio);
 - c) Total Recoverables from reinsurance and Special Purpose Vehicle after the adjustment for expected losses due to counterparty default, and;
 - d) Risk Margin.

S.17.01.b - Non-life Technical Provisions (old TP-E1)

14. Non-life Technical Provisions – Best Estimate by country, regarding each Line of Business as defined in Technical Annex III – Lines of Business, reporting direct insurance together with proportional accepted reinsurance. Comprises the information contained in Technical Annex II under the reference S.17.01.b, and encompass with the following requirements:
 - a) Technical provisions calculated as a whole (Replicable portfolio);
 - b) Gross Best Estimate of technical provisions calculated as a sum of Best Estimate and risk margin (Non-Replicable portfolio);
 - c) Total Recoverables from reinsurance and Special Purpose Vehicle after the adjustment for expected losses due to counterparty default, and;
 - d) Risk Margin;
 - e) only the following items, relating to the amount of gross Best Estimate by country, are to be reported:
 - i. Gross Best estimate for different countries - Home country;
 - ii. Gross Best estimate for different countries - For countries in the materiality threshold;
 - iii. Total gross Best estimate for European Economic Area countries outside the materiality threshold, and;
 - iv. Total gross Best estimate for non- European Economic Area countries outside the materiality threshold
 - f) The amount of gross Best Estimate by country regards to the localization of risk for “Medical expense”, “Income protection”, “Workers’ compensation”, “Fire and other damage to property” and “Credit and suretyship” Line of business;

g) The amount of gross Best Estimate by country regards to the country of underwriting for all the other non-life Lines of business.

15. Application of a materiality threshold:

- i. Reported the gross Best Estimate for the countries representing up to 90% of the Best Estimate for direct business on a certain Line of business, with the rest being reported in items "For European Economic Area countries outside the materiality threshold" or "For non- European Economic Area countries outside the materiality threshold", and;
- ii. Regardless of the materiality threshold, the gross Best Estimate in the home country has to be reported.

S.23.01 – Own funds (old OF-B1Q and OF-B1)

16. Own funds, comprises the information contained in Technical Annex II under the reference S.23.01 (different variants), and encompass with the following requirements:

- a) Information on Basic own funds items and tiers;
- b) Information on Ancillary own funds items and tiers;
- c) Information on available and eligible own funds to meet solvency requirements;
- d) Information on reconciliation reserve, and;
- e) Information on expected profits included in future premiums for Life business and Non-life business.

S.25.01 - Solvency Capital Requirement - for undertakings on Standard Formula or Partial Internal Models (old SCR-B2A)

17. The Solvency Capital Requirement - for undertakings on Standard Formula or Partial Internal Models comprises the information contained in Technical Annex II under the reference S.25.01 (different variants), and encompass information on Solvency capital requirement calculated using the standard formula, or, in case of undertakings using partial internal models, a split between the part of the Solvency Capital Requirement calculated with the standard formula and the part calculated with a partial internal model if any.

18. For group reporting and in addition to the requirements set in the previous paragraph, the following specific requirements should be met:

- a) This information is applicable when method 1 as defined in Article 230 of Solvency II Directive is used, either exclusively or in combination with method 2 as defined in Article 233 of Solvency II Directive;

- b) When combination method is being used, this information is to be submitted only for the part of the group calculated with method 1 as defined in Article 230 of Solvency II Directive, and;
- c) This information does not apply to groups when method 2 as defined in Article 233 of Solvency II Directive is being used exclusively.

S.25.02 - Solvency Capital Requirement - for undertakings on Partial Internal Models (old SCR-B2B)

- 19. The Solvency Capital Requirement - for undertakings on Partial Internal Models comprises the information contained in Technical Annex II under the reference S.25.02 (different variants), and encompasses information on Solvency capital requirement calculated using partial internal model.
- 20. For group reporting and in addition to the requirements set in the previous paragraph, the following specific requirements should be met:
 - a) This information is applicable when method 1 as defined in Article 230 of Solvency II Directive is used, either exclusively or in combination with method 2 as defined in Article 233 of Solvency II Directive;
 - b) When combination method is being used, this information is to be submitted only for the part of the group calculated with method 1 as defined in Article 230 of Solvency II Directive, and;
 - c) This information does not apply to groups when method 2 as defined in Article 233 of Solvency II Directive is being used exclusively

S.25.03 - Solvency Capital Requirement - for undertakings on Full Internal Models (old SCR-B2C)

- 21. The Solvency Capital Requirement - for undertakings on Full Internal Models comprises the information contained in Technical Annex II under the reference S.25.03 (different variants), and encompasses information on Solvency capital requirement calculated using full internal model.
- 22. For group reporting and in addition to the requirements set in the previous paragraph, the following specific requirements should be met:
 - a) This information is applicable when method 1 as defined in Article 230 of Solvency II Directive is used, either exclusively or in combination with method 2 as defined in Article 233 of Solvency II Directive;
 - b) When combination method is being used, this information is to be submitted only for the part of the group calculated with method 1 as defined in Article 230 of Solvency II Directive, and;
 - c) This information does not apply to groups when method 2 as defined in Article 233 of Solvency II Directive is being used exclusively.

S.26.01 - Solvency Capital Requirement - Market risk (old SCR-B3A)

- 23. The Solvency Capital Requirement - for Market Risk - comprises the information contained in Technical Annex II under the reference S.26.01

(different variants), and encompasses information on Solvency capital requirement for market risk, calculated using the standard formula.

24. For group reporting and in addition to the requirements set in the previous paragraph, the following specific requirements should be met:
- a) This information is applicable when method 1 as defined in Article 230 of Solvency II Directive is used, either exclusively or in combination with method 2 as defined in Article 233 of Solvency II Directive;
 - b) When combination method is being used, this information is to be submitted only for the part of the group calculated with method 1 as defined in Article 230 of Solvency II Directive, and;
 - c) This information does not apply to groups when method 2 as defined in Article 233 of Solvency II Directive is being used exclusively.

S.26.02 - Solvency Capital Requirement - Counterparty default risk (old SCR-B3B)

25. The Solvency Capital Requirement - for Counterparty Default Risk - comprises the information contained in Technical Annex II under the reference S.26.02 (different variants) and encompasses information on Solvency capital requirement for Counterparty Default Risk, calculated using the standard formula.
26. For group reporting and in addition to the requirements set in the previous paragraph, the following specific requirements should be met:
- a) This information is applicable when method 1 as defined in Article 230 of Solvency II Directive is used, either exclusively or in combination with method 2 as defined in Article 233 of Solvency II Directive;
 - b) When combination method is being used, this information is to be submitted only for the part of the group calculated with method 1 as defined in Article 230 of Solvency II Directive, and;
 - c) This information does not apply to groups when method 2 as defined in Article 233 of Solvency II Directive is being used exclusively.

S.26.03 - Solvency Capital Requirement - Life underwriting risk (old SCR-B3C)

27. The Solvency Capital Requirement - for Life Underwriting Risk - comprises the information contained in Technical Annex II under the reference S.26.03 (different variants), and encompasses information on Solvency capital requirement for Life Underwriting Risk, calculated using the standard formula.
28. For group reporting and in addition to the requirements set in the previous paragraph, the following specific requirements should be met:

- a) This information is applicable when method 1 as defined in Article 230 of Solvency II Directive is used, either exclusively or in combination with method 2 as defined in Article 233 of Solvency II Directive;
- b) When combination method is being used, this information is to be submitted only for the part of the group calculated with method 1 as defined in Article 230 of Solvency II Directive, and;
- c) This information does not apply to groups when method 2 as defined in Article 233 of Solvency II Directive is being used exclusively.

S.26.04 - Solvency Capital Requirement - Health underwriting risk (old SCR-B3D)

- 29. The Solvency Capital Requirement - for Health Underwriting Risk - comprises the information contained in Technical Annex II under the reference S.26.04 (different variants), and encompasses information on Solvency capital requirement for Health Underwriting Risk, calculated using the standard formula.
- 30. For group reporting and in addition to the requirements set in the previous paragraph, the following specific requirements should be met:
 - a) This information is applicable when method 1 as defined in Article 230 of Solvency II Directive is used, either exclusively or in combination with method 2 as defined in Article 233 of Solvency II Directive;
 - b) When combination method is being used, this information is to be submitted only for the part of the group calculated with method 1 as defined in Article 230 of Solvency II Directive, and;
 - c) This information does not apply to groups when method 2 as defined in Article 233 of Solvency II Directive is being used exclusively

S.26.05 - Solvency Capital Requirement - Non-life underwriting risk (old SCR-B3E)

- 31. The Solvency Capital Requirement - for Non-Life Underwriting Risk - comprises the information contained in Technical Annex II under the reference S.26.05 (different variants), and encompasses information on Solvency capital requirement for Non-Life Underwriting Risk, calculated using the standard formula.
- 32. For group reporting and in addition to the requirements set in the previous paragraph, the following specific requirements should be met:
 - a) This information is applicable when method 1 as defined in Article 230 of Solvency II Directive is used, either exclusively or in combination with method 2 as defined in Article 233 of Solvency II Directive;
 - b) When combination method is being used, this information is to be submitted only for the part of the group calculated with method 1 as defined in Article 230 of Solvency II Directive, and;

- c) This information does not apply to groups when method 2 as defined in Article 233 of Solvency II Directive is being used exclusively.

S.26.06 - Solvency Capital Requirement - Operational risk (old SCR-B3G)

- 33. The Solvency Capital Requirement - for Operational Risk - comprises the information contained in Technical Annex II under the reference S.26.06 (different variants), and encompasses information on Solvency capital requirement for Operational Risk calculated using the standard formula.
- 34. For group reporting and in addition to the requirements set in the previous paragraph, the following specific requirements should be met:
 - a) This information is applicable when method 1 as defined in Article 230 of Solvency II Directive is used, either exclusively or in combination with method 2 as defined in Article 233 of Solvency II Directive;
 - b) When combination method is being used, this information is to be submitted only for the part of the group calculated with method 1 as defined in Article 230 of Solvency II Directive, and;
 - c) This information does not apply to groups when method 2 as defined in Article 233 of Solvency II Directive is being used exclusively

S.27.01 - Solvency Capital Requirement - Non-life catastrophe risk (old SCR-B3F)

- 35. The Solvency Capital Requirement - for Non-Life Catastrophe Risk - comprises the information contained in Technical Annex II under the reference S.27.01 (different variants), and encompasses with the following requirements:
 - a) Information on Solvency capital requirement for Non-Life Catastrophe Risk, including Health Catastrophe risk, calculated using the standard formula, and;
 - b) For every type of catastrophe risk the risk mitigating effect of the undertaking's specific reinsurance contracts and special purpose vehicles must be determined. This calculation is prospective and must be based on the reinsurance program of the next reporting.
- 36. For group reporting and in addition to the requirements set in the previous paragraph, the following specific requirements should be met:
 - a) This information is applicable when method 1 as defined in Article 230 of Solvency II Directive is used, either exclusively or in combination with method 2 as defined in Article 233 of Solvency II Directive;
 - b) When combination method is being used, this information is to be submitted only for the part of the group calculated with method 1 as defined in Article 230 of Solvency II Directive, and;
 - c) This information does not apply to groups when method 2 as defined in Article 233 of Solvency II Directive is being used exclusively.

S.28.01- Minimum Capital Requirement except for composite undertakings (old MCR B4A)

37. The Minimum Capital Requirement - except for composite undertakings - comprises the information contained in Technical Annex II under the reference S.28.01 (different variants), and encompasses information on Minimum capital requirement for undertakings other than composites.

S.28.02 - Minimum Capital Requirement - Composite undertakings (old MCR B4B)

38. The Minimum Capital Requirement - for composite undertakings - comprises the information contained in Technical Annex II under the reference S.28.02 (different variants), and encompasses information on Minimum capital requirement for composite undertakings.

S.32.01.g – Undertakings in the scope of the group (old G01)

39. The undertakings in the scope of the group comprises the information contained in Technical Annex II under the reference S.32.01.g, and encompass with the following requirements:
- a) A line-by-line list of undertakings belonging to the group including their legal form, their relevant national competent authority and the type of undertaking;
 - b) Ranking criteria for each entity reported;
 - c) Criteria of influence, and;
 - d) Information about the inclusion in the scope of group supervision and the method chosen for calculating the Solvency Capital Requirement.

S.33.01.g – Insurance or reinsurance individual requirements (old G03)

40. Insurance or reinsurance individual requirements comprise the information contained in Technical Annex II under the reference S.32.02.g, and encompass with the following requirements.
41. For all European Economic Area insurance or reinsurance undertakings and non-European Economic Area insurance or reinsurance undertakings (when Solvency II Directive rules are used) when the method 2 as defined in Article 233 of Solvency II Directive is applied:
- a) A line-by-line list of individual requirements of undertakings belonging to the group including the individual Solvency Capital Requirement split by different risk categories, individual Minimum Capital Requirement and eligible individual own funds to cover the Solvency Capital Requirement;
 - b) In case of the use of the standard formula information about simplifications and where a partial internal model was used;
 - c) Information about a group or individual internal model.

42. Additionally, for non-European Economic Area insurance and reinsurance undertakings all local capital requirements, minimum capital requirements and eligible own funds in accordance with local rules, regardless of the method of calculation.

S.34.01.g – Other regulated and non-regulated financial undertakings including insurance holding companies individual requirements (old G04)

43. Other regulated and non-regulated financial undertakings including insurance and mixed holding companies individual requirements comprises the information contained in Technical Annex II under the reference S.34.01.g, and encompass a line-by-line list of Individual requirements of other regulated financial undertakings and other non-regulated financial undertakings, including insurance and mixed holding companies, whether controlled or not controlled, under all methods of calculation, including the notional Solvency Capital Requirement or sectorial capital requirement, notional Minimum Capital Requirement or sectorial minimum capital requirement and eligible own funds.

S.35.01.g –Contribution to group Technical Provisions (old G14)

44. The list of technical provisions that contribute to group technical provisions comprises the information contained in Technical Annex II under the reference S.35.01.g, and encompass with the following requirements:
- a) A list of technical provisions – Non-life excluding health;
 - b) A list of technical provisions – Health similar to non-life;
 - c) A list of technical provisions – Health similar to life;
 - d) A list of technical provisions – Life excluding health and index-linked and unit -linked;
 - e) A list of technical provisions – Index-linked and unit-linked insurance, and;
 - f) Total amount of TP (excluding IGT)
45. The template is applicable for method 1 as defined under Article 230 of the Solvency II Directive, method 2 as defined under Article 233 of the Solvency II Directive and a combination of methods 1 and 2.

Technical Annex II: List of quantitative reporting items

This Annex contains the list of items ("L annexes") to be submitted by the insurance and reinsurance undertakings and groups to the national competent authorities and specific instructions on what to submit.

S.01.01

Content of the submission

ITEM		INSTRUCTIONS
A1	Basic Information	Reported
A2	Balance Sheet	Close list: - Reported; - Not reported (in this case special justification is needed).
A4	List of assets	Close list: - Reported; - Not reported (in this case special justification is needed).
A5	Open derivatives	Close list: - Reported; - Not reported o/a no derivative transactions; - Not reported other reason (in this case special justification is needed).
A6	Life and Health SLT Technical Provisions	Close list: - Reported; - Not reported o/a no life and health SLT business; - Not reported o/a materiality threshold; - Not reported other reason (in this case special justification is needed).
A7	Non-Life Technical Provisions	Close list: - Reported; - Not reported o/a no non-life business; - Not reported o/a materiality threshold; - Not reported other reason (in this case special justification is needed).
A8	Own funds	Close list: - Reported; - Not reported (in this case special justification is needed).
A19	Minimum Capital Requirement	Close list: - Reported; - Not reported o/a composite undertaking; - Not reported other reason (in this case special justification is needed).
A20	Minimum Capital Requirement - Composite	Close list: - Reported; - Not reported o/a non-composite undertaking; - Not reported other reason (in this case special justification is needed).

Technical Annex II: List of quantitative reporting items

S.01.01

Content of the submission

	ITEM	INSTRUCTIONS
A1	Basic Information	Reported
A2	Balance Sheet	Close list: - Reported; - Not reported (in this case special justification is needed).
A3	Assets and liabilities by currency	Close list: - Reported; - Not reported o/a below threshold (of non-home currency total being <10% of assets and liabilities); - Not reported other reason (in this case special justification is needed).
A4	List of assets	Close list: - Reported; - Not reported (in this case special justification is needed).
A5	Open derivatives	Close list: - Reported; - Not reported o/a no derivative transactions; - Not reported other reason (in this case special justification is needed).
A6	Life and Health SLT Technical Provisions	Close list: - Reported; - Not reported o/a no life and health SLT business; - Not reported o/a materiality threshold; - Not reported other reason (in this case special justification is needed).
A7	Non-Life Technical Provisions	Close list: - Reported; - Not reported o/a no non-life business; - Not reported o/a materiality threshold; - Not reported other reason (in this case special justification is needed).
A8	Own funds	Close list: - Reported; - Not reported (in this case special justification is needed).
A9	Solvency Capital Requirement - SF	Close list: - Reported; - Not reported o/a full internal model; - Not reported other reason (in this case special justification is needed).
A10	Solvency Capital Requirement - PIM	Close list: - Reported; - Not reported o/a use Standard Formula; - Not reported o/a use full internal model; - Not reported other reason (in this case special justification is needed).
A11	Solvency Capital Requirement - IM	Close list: - Reported; - Not reported o/a use Standard Formula; - Not reported o/a use partial internal model; - Not reported other reason (in this case special justification is needed).
A12	Solvency Capital Requirement - Market risk	Close list: - Reported; - Not reported o/a full internal model; - Risk not existent; - Not reported other reason (in this case special justification is needed).
A13	Solvency Capital Requirement - Counterparty default risk	Close list: - Reported; - Not reported o/a full internal model; - Risk not existent; - Not reported other reason (in this case special justification is needed).

A14	Solvency Capital Requirement - Life underwriting risk	Close list: - Reported; - Not reported o/a full internal model; - Risk not existent; - Not reported other reason (in this case special justification is needed).
A15	Solvency Capital Requirement - Health underwriting risk	Close list: - Reported; - Not reported o/a full internal model; - Risk not existent; - Not reported other reason (in this case special justification is needed).
A16	Solvency Capital Requirement - Non-Life underwriting risk	Close list: - Reported; - Not reported o/a full internal model; - Risk not existent; - Not reported other reason (in this case special justification is needed).
A17	Solvency Capital Requirement - Operational risk	Close list: - Reported; - Not reported o/a full internal model; - Risk not existent; - Not reported other reason (in this case special justification is needed).
A18	Solvency Capital Requirement - Non-Life Catastrophe risk	Close list: - Reported; - Not reported o/a full internal model; - Risk not existent; - Not reported other reason (in this case special justification is needed).
A19	Minimum Capital Requirement	Close list: - Reported; - Not reported o/a composite undertaking; - Not reported other reason (in this case special justification is needed).
A20	Minimum Capital Requirement - Composite	Close list: - Reported; - Not reported o/a non-composite undertaking; - Not reported other reason (in this case special justification is needed).
A21	Undertakings in the scope of the group	Close list: - Reported; - Not reported (in this case special justification is needed).
A22	(Re)insurance individual requirements	Close list: - Reported; - Not reported (in this case special justification is needed).
A23	Non-(re)insurance individual requirements	Close list: - Reported; - Not reported o/a no non-(re)insurance business in the scope of the group; - Not reported other reason (in this case special justification is needed).
A24	Group - contribution of TP	Close list: - Reported; - Not reported (in this case special justification is needed).

Technical Annex II: List of quantitative reporting item

S.01.02

Basic information

ITEM		INSTRUCTIONS
A1	Identification code	<p>Identification code:</p> <ul style="list-style-type: none"> - Legal Entity Identifier (LEI); - Interim entity identifier (Pre-LEI); - Identification code used in the local market, attributed by group supervisor. <p>(by this order of priority if existent)</p>
A11	Type of code	<p>Identification of the code used in A1/A9:</p> <ul style="list-style-type: none"> - LEI - Pre-LEI - Local code
A2	Reporting date	Date when the report to the supervisory authority is made
A3	Reference date	Date identifying the last day of the reporting period
A4	Currency used for reporting	ISO 4217 Code of the currency of the monetary amounts used in each report
A5	Accounting standard	<p>Identification of the accounting standard used for reporting items in BS-C1, Statutory account valuation. The following closed list of options shall be used:</p> <p style="padding-left: 40px;">If the undertaking is using IFRS: IFRS;</p> <p style="padding-left: 40px;">If the undertaking is not using IFRS: Local GAAP</p>
A6	Type of internal model	<p>When the undertaking uses internal models to calculate SCR, identify the type of internal model. The following closed list of options shall be used:</p> <p style="padding-left: 40px;">Partial internal model(s): PIM;</p> <p style="padding-left: 40px;">Full internal model: FIM</p>
A7	Composite undertaking? (Y/N)	<p>Identify if the reporting undertaking is a composite undertaking. The following closed list of options shall be used:</p> <p style="padding-left: 40px;">Composite undertaking: Y;</p> <p style="padding-left: 40px;">Non-composite undertaking: N</p>
A8	RFF? (Y/N)	<p>Identify if the reporting undertaking is reporting activity by Ring Fenced Funds. The following closed list of options shall be used:</p> <p style="padding-left: 40px;">Reporting activity by RFF: Y;</p> <p style="padding-left: 40px;">Not reporting activity by RFF: N</p>
A9	Group identification code	<p>Identification code:</p> <ul style="list-style-type: none"> - Legal Entity Identifier (LEI); - Interim entity identifier (Pre-LEI); - Identification code used in the local market, attributed by group supervisor. <p>(by this order of priority if existent)</p> <p>This item is only reported when the report is made at group level</p>
A10	Consolidation method 1 or a combination of methods is used for calculating group solvency of at least one undertaking in the scope? (Y/N)	<p>Identify if at least one undertaking in the scope of consolidation is consolidated by using consolidation method 1. The following closed list of options shall be used:</p> <p style="padding-left: 40px;">Method 1 used: Y;</p> <p style="padding-left: 40px;">Method 1 not used: N</p>

Technical Annex II: List of quantitative reporting items

S.02.01

Balance sheet

ASSETS		ITEM	INSTRUCTIONS
AS1	Goodwill		Intangible asset that represents the economic value of assets that cannot be individually identified and separately recognised in a business combination.
AS24	Deferred acquisition costs		The part of acquisition costs allocated to future reporting periods
A2	Intangible assets		Intangible assets other than goodwill. An identifiable nonmonetary asset without physical substance. See cross-templates checks tab CAS 8
A26	Deferred tax assets		An asset that may be used to reduce any subsequent period's income tax expense. See cross-templates checks tab CAS 8
A25B	Pension benefit surplus		Net surplus related to staff pension scheme, if applicable according to pension system. See cross-templates checks tab CAS 8
A3	Property, plant & equipment held for own use		Tangible assets which are intended for permanent use and property held by the undertaking for own use. Corresponds to CIC categories 93 and 95 in Assets-D1 See cross-templates checks tab CAS 4
A4	Investments (other than assets held for index-linked and unit-linked funds)		Sum of the investments excluding assets held for index-linked and unit-linked funds. $A4=A5+A6+A7B+A8E+A9+A10A+A10B+A11$ See cross-templates checks tab CAS 3
A5	Property (other than for own use)		Property, excluding property for own use. Includes also property under construction that, when constructed, will be for own use. Corresponds to CIC categories 91, 92, 94 and 99
A6	Participations		Participation as defined in article 13(20) of Directive 2009/138/EC. It includes equity and subordinated liabilities. Corresponds to CIC categories 3# and 28 when item "Participation" of Assets-D1 is not "N" and item "Asset held in unit linked and index linked funds (Y/N)" in Assets-D1 is equal to "N". <u>Participations at group level will include:</u> - holdings in related but not subsidiary insurance or reinsurance undertakings or insurance holding companies as described in Art 323bis 1. (d) - holdings in related undertakings in other financial sectors as described in Art 323bis 1. (e) - other related undertakings as described in Art 323bis 1. (f) - insurance or reinsurance undertakings or insurance holding companies included with the deduction and aggregation method (when combination of methods is used)
A7B	Equities		Sum of equities. For the statutory accounts the split between listed and unlisted may not exist and if this is the case this item need to reflect the sum. $A7B=A7+A7A$
A7	Equities - listed		Shares representing corporations' capital, e.g. representing ownership in a corporation, listed on a public stock exchange. Excludes participations Corresponds to CIC categories 3#, excluding XL3# and XT3# and (3# when item "Participation" of Assets is "N")
A7A	Equities - unlisted		Shares representing corporations' capital, e.g. representing ownership in a corporation, not listed on a public stock exchange. It excludes participations. Corresponds to CIC categories XL3# and XT3#, excluding 3# where item "Participations" of Assets is "N"
A8E	Bonds		Sum of bonds. For the statutory accounts the split of bonds may not exist and if this is the case this item need to reflect the sum. $A8E=A8+A8A+A8C+A8D$
A8	Government Bonds		Bonds issued by public authorities, whether by central governments, supra-national government institutions, regional governments or municipal governments Corresponds to CIC category 1
A8A	Corporate Bonds		Bonds issued by corporations
A8C	Structured notes		Hybrid securities, combining a fixed income instrument with a series of derivative components. Excluded from this category are fixed income securities that are issued by sovereign governments. Concerns securities that have embedded all categories of derivatives, including Credit Default Swaps (CDS), Constant Maturity Swaps (CMS), Credit Default Options (CDOp) Corresponds to CIC category 5
A8D	Collateralised securities		Securities whose value and payments are derived from a portfolio of underlying assets. Includes Asset Backed Securities (ABS), Mortgage Backed securities (MBS), Commercial Mortgage Backed securities (CMBS), Collateralised Debt Obligations (CDO), Collateralised Loan Obligations (CLO), Collateralised Mortgage Obligations (CMO) Corresponds to CIC category 6
A9	Investment funds		Undertakings the sole purpose of which is the collective investment in transferrable securities and/or in other financial assets Corresponds to CIC category 4
A10A	Derivatives		Financial instruments that have values, based on the expected future price movements of the assets to which they are linked. SII value, only if positive, of the derivative as of the reporting date is reported here (in case of negative value, see L16). Corresponds to CIC categories A to F

ITEM		INSTRUCTIONS
A10B	Deposits other than cash equivalents	Deposits and cash equivalents that cannot be used to make payments at any time and that are not exchangeable for currency or transferable deposits without any kind of significant restriction or penalty. Corresponds to CIC categories 73, 74, 79
A11	Other investments	Other investments not covered by positions of Investments indicated above
A12	Assets held for index-linked and unit-linked funds	Assets held for insurance products where policyholder bears the risk (unit-linked) See cross-templates checks tab CAS 5
A14	Loans & mortgages	Financial assets created when creditors lend funds to debtors, with collateral or not, including cash pools. Corresponds to CIC category 8. A14=A14A+A14B+A14C See cross-templates checks tab CAS 4
A14B	Loans and mortgages to individuals	Financial assets created when creditors lend funds to debtors - individuals, with collateral or not, including cash pools
A14C	Other loans & mortgages	Financial assets created when creditors lend funds to debtors - others, not classifiable in item A14B, with collateral or not, including cash pools
A14A	Loans on policies	Loans made to policyholders, collateralized on policies See cross-templates checks tab CAS 4
A16	Reinsurance recoverables from:	Sum of reinsurance recoverables. Reinsurance recoverables as defined for TP templates. A16=A17A+A19B+A19A See cross-templates checks tab CAS 6 See cross-templates checks tab CQS 24 See cross-templates checks tab CAS 38
A17A	Non-life and health similar to non-life	A17A=A17+A18
A17	Non-life excluding health	Reinsurance recoverables from non-life business, excludes TP health-non SLT See cross-templates checks tab CQS 2 See cross-templates checks tab CAS 16
A18	Health similar to non-life	Reinsurance recoverables from TP health-non SLT See cross-templates checks tab CQS 3 See cross-templates checks tab CAS 17
A19B	Life and health similar to life, excluding health and index-linked and unit-linked	A19B=A18A+A19
A18A	Health similar to life	Reinsurance recoverables from TP health-SLT See cross-templates checks tab CQS 4 See cross-templates checks tab CAS 18
A19	Life excluding health and index-linked and unit-linked	Reinsurance recoverables from Life business, excludes TP health-SLT and TP index-linked and unit-linked See cross-templates checks tab CQS 5 See cross-templates checks tab CAS 19
A19A	Life index-linked and unit-linked	Reinsurance recoverables from life index-linked and unit-linked business See cross-templates checks tab CQS 6 See cross-templates checks tab CAS 20
A13	Deposits to cedants	Deposits relating to reinsurance accepted. Corresponds to CIC category 75 See cross-templates checks tab CAS 7
A21	Insurance & intermediaries receivables	Amounts due by policyholders, other insurers, and linked to insurance business, but that are not included in cash-in flows of technical provisions. Includes also amounts overdue by policyholders and insurance intermediaries (e.g. premiums due but not yet paid) See cross-templates checks tab CAS 7
A20	Reinsurance receivables	Amounts due by reinsurers and linked to reinsurance business, but that are not reinsurance recoverables. It might include: creditors from reinsurers that relate to settled claims of policyholders or beneficiaries; payments in relation to other than insurance events or settled insurance claims. See cross-templates checks tab CAS 7
A23	Receivables (trade, not insurance)	Includes amounts owed by employees or various business partners (not insurance-related), incl. public entities (no reason to have separate lines for current tax assets) See cross-templates checks tab CAS 8 See cross-templates checks tab CGS 13
A28A	Own shares	Own shares held by the undertakings. See cross-templates checks tab CAS 8 See cross-templates checks tab CGS 13
A28B	Amounts due in respect of own fund items or initial fund called up but not yet paid in	See cross-templates checks tab CAS 8 See cross-templates checks tab CGS 13
A27	Cash and cash equivalents	Notes and coins in circulation that are commonly used to make payments, and deposits exchangeable for currency on demand at par and which are directly usable for making payments by cheque, draft, giro order, direct debit/credit, or other direct payment facility, without penalty or restriction. Consistent with 'Cash' and 'Transferable deposits' provided in CIC Category 71 and 72 See cross-templates checks tab CAS 4
A29	Any other assets, not elsewhere shown	This includes any assets not included in the other Balance Sheet items. See cross-templates checks tab CAS 8

ITEM		INSTRUCTIONS
A30	Total assets	Sum of the assets For SII column : $A30=A2+A26+A25B+A3+A4+A12+A14+A16+A13+A20+A21+A23+A28A+A28B+A27+A29$ For statutory accounts column : $A30=AS1+AS24+A2+A26+A25B+A3+A4+A12+A14+A16+A13+A20+A21+A23+A28A+A28B+A27+A29$ See cross-templates checks tab CAS 1

LIABILITIES

LS0	Technical provisions – non-life	These cells are dotted lines. Either you can split your technical provisions between life or non-life and their linked health business, either you cannot and you directly fill in cell LS6F with the correct total value.
L1	Technical provisions – non-life (excluding health)	Formula (TP calculated as a whole and sum of BE + RM for TP not calculated as a whole, where BE is gross of reinsurance) $L1=L1A+L2+L3$ See cross-templates checks tab CAS 9 See cross-templates checks tab CGS 1 See cross-templates checks tab CQS 25 See cross-templates checks tab CAS 39
L1A	Technical provisions – non-life - TP calculated as a whole	In case TP are calculated as a whole (replicable / hedgeable portfolio) See cross-templates checks tab CQS 7 See cross-templates checks tab CAS 21
L2	Technical provisions – non-life - Best estimate	This is in case TP are not calculated as a whole => split between BE and RM BE here is gross of reinsurance See cross-templates checks tab CQS 8 See cross-templates checks tab CAS 22
L3	Technical provisions – non-life - Risk margin	This is in case TP are not calculated as a whole => split between BE and RM See cross-templates checks tab CQS 9 See cross-templates checks tab CAS 23
L4	Technical provisions – health (similar to non-life)	Formula $L4=L4A+L5+L6$ See cross-templates checks tab CAS 9 See cross-templates checks tab CGS 2 See cross-templates checks tab CGS 14 See cross-templates checks tab CQS 25 See cross-templates checks tab CAS 39
L4A	Technical provisions – health - TP calculated as a whole	In case TP are calculated as a whole (replicable / hedgeable portfolio) See cross-templates checks tab CQS 10 See cross-templates checks tab CAS 24
L5	Technical provisions – health - Best estimate	This is in case TP are not calculated as a whole => split between BE and RM BE here is gross of reinsurance See cross-templates checks tab CQS 11 See cross-templates checks tab CAS 25
L6	Technical provisions – health - Risk margin	This is in case TP are not calculated as a whole => split between BE and RM See cross-templates checks tab CQS 12 See cross-templates checks tab CAS 26
LS6F	Technical provisions - life (excluding index-linked and unit-linked)	These cells are dotted lines. Either you can split your technical provisions between life or non-life and their linked health business, either you cannot and you directly fill in cell LS6F with the correct total value. $LS6F=L6B+L7$
L6B	Technical provisions – health (similar to life)	Formula $L6B=L6C+L6D+L6E$ See cross-templates checks tab CAS 9 See cross-templates checks tab CGS 3 See cross-templates checks tab CQS 20 See cross-templates checks tab CAS 34
L6C	Technical provisions – health (similar to life) - TP calculated as a whole	In case TP are calculated as a whole (replicable / hedgeable portfolio) See cross-templates checks tab CQS 13 See cross-templates checks tab CQS 21 See cross-templates checks tab CAS 35
L6D	Technical provisions – health (similar to life) - Best estimate	This is in case TP are not calculated as a whole => split between BE and RM BE here is gross of reinsurance See cross-templates checks tab CQS 14 See cross-templates checks tab CQS 22 See cross-templates checks tab CAS 36
L6E	Technical provisions – health (similar to life) - Risk margin	This is in case TP are not calculated as a whole => split between BE and RM See cross-templates checks tab CQS 15 See cross-templates checks tab CQS 23 See cross-templates checks tab CAS 37
L7	Technical provisions – life (excl. health and index-linked and unit-linked)	Formula $L7=L7A+L8+L9$ See cross-templates checks tab CAS 9 See cross-templates checks tab CGS 4 See cross-templates checks tab CQS 20
L7A	Technical provisions – life (excl. health and index-linked and unit-linked) - TP calculated as a whole	In case TP are calculated as a whole (replicable / hedgeable portfolio) See cross-templates checks tab CQS 16 See cross-templates checks tab CQS 21

	ITEM	INSTRUCTIONS
L8	Technical provisions – life (excl. health and index-linked and unit-linked) - Best estimate	This is in case TP are not calculated as a whole => split between BE and RM BE here is gross of reinsurance See cross-templates checks tab CQS 17 See cross-templates checks tab CQS 22
L9	Technical provisions – life (excl. health and index-linked and unit-linked) - Risk margin	This is in case TP are not calculated as a whole => split between BE and RM See cross-templates checks tab CQS 18 See cross-templates checks tab CQS 23 See cross-templates checks tab CAS 37
L10	Technical provisions – index-linked and unit-linked	Formula $L10=L10A+L11+L12$ See cross-templates checks tab CAS 10 See cross-templates checks tab CGS 5 See cross-templates checks tab CQS 20 See cross-templates checks tab CAS 34
L10A	Technical provisions – index-linked and unit-linked - TP calculated as a whole	In case TP are calculated as a whole (replicable / hedgeable portfolio) See cross-templates checks tab CQS 21 See cross-templates checks tab CAS 35
L11	Technical provisions – index-linked and unit-linked - Best estimate	This is in case TP are not calculated as a whole => split between BE and RM BE here is gross of reinsurance See cross-templates checks tab CQS 19 See cross-templates checks tab CAS 33 See cross-templates checks tab CQS 22 See cross-templates checks tab CAS 36
L12	Technical provisions – index-linked and unit-linked - Risk margin	This is in case TP are not calculated as a whole => split between BE and RM See cross-templates checks tab CQS 23 See cross-templates checks tab CAS 37
LS14	Other technical provisions	Other technical provisions resulting from local GAAP.
L23	Contingent liabilities	A potential obligation that may be incurred depending on the outcome of a future event. A contingent liability is one where the outcome of an existing situation is uncertain, and this uncertainty will be resolved by a future event. A contingent liability is generally recognised only if the contingency is probable and the amount of the liability can be estimated. It should be equal to BS-C1B – cell B19. See cross-templates checks tab CAS 14
L18	Provisions other than technical provisions	Liabilities of uncertain timing of amount. Eg includes provisions for legal expenses or deferred income reserve See cross-templates checks tab CAS 15
L22	Pension benefit obligations	Net obligations related to staff pension scheme, if applicable according to pension system. See cross-templates checks tab CAS 15
L13	Deposits from reinsurers	Amounts (e.g. cash) received from reinsurer or deducted by the reinsurer according to the reinsurance contract. See cross-templates checks tab CAS 11
L17	Deferred tax liabilities	A tax liability that a company owes and does not pay at that current point, although it will be responsible for paying it at some point in the future. See cross-templates checks tab CAS 15 See cross-templates checks tab CGS 20
L16	Derivatives	Financial instruments that have values, based on the expected future price movements of the assets to which they are linked. SII value, only if negative, of the derivative as of the reporting date is reported here. Corresponds to CIC categories A to F. For the statutory accounts this item does not need to be filled for undertakings which do not value derivatives in their Local GAAP. See cross-templates checks tab CAS 12
L19	Debts owed to credit institutions	Debts, such as mortgage and loans, towards credit institutions (banks, etc.) Excludes bonds being held by credit institutions, since it is not possible for the undertaking to identify all the holders of the bonds it issues. Subordinated liabilities should not be included here. See cross-templates checks tab CAS 13
L20	Financial liabilities other than debts owed to credit institutions	Can include bonds issued by undertaking (whether they are held by credit institutions or not), and mortgage and loans due to other entities than credit institutions (sister insurance company, holding, etc.). Includes structured notes issued by undertaking itself (not by SPV). Subordinated liabilities should not be included here. See cross-templates checks tab CAS 13
L15A	Insurance and intermediaries payables	Amounts due to policyholders, other insurers, and linked to insurance business, but that are not technical provisions. Includes amounts due to (re)insurance intermediaries (e.g. commissions due to intermediaries but not yet paid by the undertaking). Excludes loans & mortgages due to insurance companies, if they are not linked to insurance business but are only related to financing (and are therefore included in financial liabilities). See cross-templates checks tab CAS 11
L15B	Reinsurance payables	Amounts due to reinsurers (esp. current accounts) other than deposits and linked to reinsurance business, but that are not included in reinsurance recoverables. Includes debtors to reinsurers that relate to settled claims of policyholders or beneficiaries. See cross-templates checks tab CAS 11
L15C	Payables (trade, not insurance)	Includes amounts due to employees, suppliers, etc. and not insurance-related, parallel to receivables (trade, not insurance) on asset side; includes public entities See cross-templates checks tab CAS 15

ITEM		INSTRUCTIONS
L15E	Subordinated liabilities	$L15E=L15D+L26$
L15D	Subordinated liabilities not in BOF	Subordinated liabilities are debts which rank after other debts when company is liquidated, only subordinated liabilities that are not classified in BOF should be presented here. See cross-templates checks tab CAS 15
L26	Subordinated liabilities in BOF	Subordinated liabilities classified in BOF. Should be equal to cell A13 in OF-B1 See cross-templates checks tab CAS 15 See cross-templates checks tab CQS 1 See cross-templates checks tab CGS 6 See cross-templates checks tab QCGS 1 See cross-templates checks tab CAS 78
L25	Any other liabilities, not elsewhere shown	This includes any liabilities not included in the other Balance Sheet items. See cross-templates checks tab CAS 15
L25A	Total liabilities	Sum of liabilities $L25A=L1+L4+L6B+L7+L10+L23+L18+L22+L13+L17+L16+L19+L20+L15A+L15B+L15C+L15D+L26+L25$ See cross-templates checks tab CAS 2
L27	Excess of assets over liabilities	Formula For Statutory accounts – amount of other items complementing the balance between Assets and Liabilities $L27=A30-L25A$ See cross-templates checks tab CQS 1 See cross-templates checks tab CGS 6 See cross-templates checks tab QCGS 1 See cross-templates checks tab CAS 78

Technical Annex II: List of quantitative reporting items

S.02.02

Assets and liabilities by currency

	ITEM	INSTRUCTIONS
	General Comment	The BS items presented here are based on BS-C1 (for SII BS only).
A1	Reporting currency	Currency code of the reporting currency
B1	Currency code	Currency code of other currencies
A3	Investments (other than assets held for index-linked and unit-linked funds)	Same as item A4 in BS-C1, by currency See cross-templates checks tab CAS 3
A4	Other assets within scope of Assets-D1 (other than index-linked and unit-linked funds)	Same as items A3 + A14 + A27 in BS-C1, by currency See cross-templates checks tab CAS 4
A5	Assets held for index-linked and unit-linked funds	Same as item A12 in BS-C1, by currency See cross-templates checks tab CAS 5
A5A	Reinsurance recoverables	Same as item A16 in BS-C1, by currency See cross-templates checks tab CAS 6
A6	Deposits to cedants, insurance and intermediaries receivables and reinsurance receivables	Same as items A13 +A20+ A21 in BS-C1, by currency See cross-templates checks tab CAS 7
A7	Any other assets	Same as items A2+A23+A25B+A26 +A28A+A28B+ A29 in BS-C1, by currency See cross-templates checks tab CAS 8
A7A	Total assets	A7A=sum (A3:A7), by currency See cross-templates checks tab CAS 1
A8	Technical provisions (excl. index-linked and unit-linked)	Same as items L1 + L4 + L6B + L7 in BS-C1 See cross-templates checks tab CAS 9
A9	Technical provisions - index-linked and unit-linked funds	Same as item L10 in BS-C1, by currency See cross-templates checks tab CAS 10
A10	Deposits from reinsurers and insurance, intermediaries and reinsurance payables	Same as items L13 + L15A+L15B in BS-C1, by currency See cross-templates checks tab CAS 11
A11	Derivatives	Same as cell L16 of BS-C1, by currency See cross-templates checks tab CAS 12
A12	Financial liabilities	Same as cells L19+L20 of BS-C1 See cross-templates checks tab CAS 13
A13	Contingent liabilities	Same as item L23 in BS-C1, by currency See cross-templates checks tab CAS 14
A14	Any other liabilities	Same as item L15D+L26+L25+ L22+L18+L17+L15C in BS-C1, by currency See cross-templates checks tab CAS 15
A15	Total liabilities	A15=sum (A8:A14) See cross-templates checks tab CAS 2

Technical Annex II: List of quantitative reporting items

S.06.02

List of assets

ITEM		INSTRUCTIONS
A1	Portfolio	Distinction between life, non-life, stakeholder's funds, general (no split) and ring fenced funds. One of the options in the following closed list shall be used: Life: L Non-life: NL Shareholders' funds: SF General: G Ring fenced funds: RF
A2	Fund Number	Applicable to assets held in ring-fenced or other internal funds (defined according to national markets). This number is attributed by the undertaking and must be consistent over time and with the fund number in TP (L) F3, cell A3
A3	Asset held in unit linked and index linked funds (Y/N)	Identify assets that are part of the fund which determines the benefits of the contract. One of the options in the following closed list shall be used: Yes: Y No : N
A4	ID Code	One of the options in the following list shall be used, by order of preference: ISO 6166 ISIN when available Other "recognized" codes (e.g.: CUSIP, Bloomberg Ticker, Reuters RIC) Code attributed by the undertaking, when the options above are not available, and must be consistent over time
A5	ID Code Type	Type of ID Code used for the "ID Code" item. One of the options in the following closed list shall be used: ISO 6166 ISIN: ISIN Other "recognized" codes: the designation of the code Code attributed by the undertaking: Undertaking
A6	Asset pledged as collateral	Identify assets kept in the undertaking balance-sheet and that are in the scope of reporting in template AS-D6. For partially pledge assets two lines for each asset shall be reported, one for the pledged amount and other for the remaining part. One of the options in the following list shall be used for the pledged part of the asset: Assets in the balance sheet that are collateral pledged: CP Collateral for reinsurance accepted: CR Collateral for securities borrowed: CB Repos: R
A7	Item Title	Identify the reported item by filling the name of the security or the address for property, with detail settled by the undertaking. This item is not applicable for CIC category 8 – Mortgages and Loans (for mortgages and loans on individuals, as those assets are not required to be individualized), and to CIC = 95 – Plant and equipment (for own use)
A8	Issuer Name	Name of the issuer, defined as the entity that offers securities for sale to investors, representing part of its capital, part of its debt, derivatives, etc. This item is not applicable to mortgages and loans on individuals within CIC category 8 – Mortgages and Loans, and to CIC category 9 – Property. For investment funds, the issuer name is the name of the fund manager
A31	Issuer Code	Identification code: - Legal Entity Identifier (LEI) if available; - Interim entity identifier (pre-LEI) if available. If none is available this item should not be reported
A33	Type of code	Identification of the code used in A31: - LEI - Pre-LEI
A9	Issuer Sector	Identify the economic sector of issuer based on the NACE code. The letter reference of the NACE code must be used for identifying sectors (e.g. A: Agriculture, hunting and forestry; Section B: Fishing, etc) except for the NACE relating to Financial intermediation, for which the 4 digits code should be used. For investment funds the NACE code would be 6712 (Security broking and fund management). This item is not applicable for CIC category 8 – Mortgages and Loans (for mortgages and loans on individuals, as those assets are not required to be individualized), and to CIC = 95 – Plant and equipment (for own use)
A10	Issuer Group	Name the ultimate parent undertaking of issuer. For investment funds the group relation is relative to the fund manager This item is not applicable for CIC category 8 – Mortgages and Loans (for mortgages and loans on individuals, as those assets are not required to be individualized), and to CIC = 95 – Plant and equipment (for own use)

	ITEM	INSTRUCTIONS
A32	Issuer Group Code	Identification code: - Legal Entity Identifier (LEI) if available; - Interim entity identifier (pre-LEI) if available. If none is available this item should not be reported
A33	Type of code	Identification of the code used in A31/A32: - LEI - Pre-LEI
A11	Issuer Country	Country of localization of the issuer. For investment funds, the country is relative to the fund manager. One of the options in the following closed list shall be used: ISO 3166-1 alpha-2 code Supranational issuers: XA European Union Institutions: EU This item is not applicable for CIC category 8 – Mortgages and Loans (for mortgages and loans on individuals, as those assets are not required to be individualized), and to CIC = 95 – Plant and equipment (for own use)
A12	Country of custody	ISO 3166-1 alpha-2 code of the country where undertaking assets are held in custody. For identifying international custodians, such as Euroclear, the country of custody will be the one corresponding to the legal establishment where the custody service was contractually defined
A13	Currency	ISO 4217 Code of the currency of the issue
A15	CIC	EIOPA Code used to classify securities, as set out in Annex CIC Table. When classifying an asset using the CIC table, undertakings shall take into consideration the most representative risk to which the asset is exposed to. For reporting at group level, if different CIC codes exist for the same asset, due to reporting regarding different entities in the group (because different stock exchanges), a line must be entered for each different CIC. This situation will only occur when reporting by groups using consolidation method 2, and in practice there will be only one CIC for each asset for the same entity in the scope of the group, also identifiable by item A50
A16	Participation	Identify if a equity and other share or subordinated liability is a participation by using the following criteria: included in group supervision except if deducted under art. 212 and / or strategic. <u>For solo reporting or group reporting where the Deduction and aggregation method is used,</u> the following options shall be used: Not a participation: N Is a participation but not consolidated at group level and not strategic: YNGNS Is a participation not consolidated at group level but strategic: YNGS Is a participation, consolidated at group level and not strategic: YGNS Is consolidated at group level and is strategic: YGS <u>For group reporting and only where accounting consolidation-based or a combination of</u> methods is used, the following options shall be used: Not a participation: N Non-controlled participations under method 1: NCP1 Other Financial Sectors: OFS Subsidiaries under method 2: SM2 Non-controlled participations under method 2: NCP2 Other related undertaking under method 1: ORUT1
A17	External rating	Rating given by external rating agency. Only applicable to CIC categories 1, 2, 5 and 6. Undertakings shall report the external rating which in their perspective is best representative, and used internally for SCR/MCR calculations
A18	Rating Agency	Identify the rating agency giving the external rating used by the undertaking
A20	Duration	Asset duration, defined as the 'residual modified duration'. For assets without fixed maturity the first call date shall be used. The duration shall be calculated based on economic value. Only applies to CIC categories 1, 2, 4 (when applicable, e.g. for investment funds mainly invested in bonds), 5 and 6
A22	Quantity	Number of securities or invested amount measured at par amount, depending on the type of Not applicable for CIC categories 7, 8 and 9
A23	Unit SII price	Amount in currency for asset categories 3 and 4, the percentage of par value (clean price consistent with IFRS definition), for asset categories 1, 2, 5 and 6. Not applicable for CIC categories 7, 8 and 9
A24	Valuation method SII	Identify the valuation method used when valuing assets. One of the options in the following closed list shall be used: Quoted market price in active markets for the same assets: QMP

	ITEM	INSTRUCTIONS
		Alternative valuation method: - quoted market price in active markets for similar assets: QMPS - other alternative valuation methods: AVM Adjusted equity methods (applicable for the valuation of participations): AEM IFRS equity methods (applicable for the valuation of participations): IEM
A25	Acquisition price	Acquisition price of each asset. When there are different acquisition prices due to acquisitions made at different dates, an average acquisition price must be used and consequently only one line is completed for one single asset, independently of having more than one acquisition. Not applicable to CIC categories 7 and 8
A26	Total SII amount	Formula, corresponding to the multiplication of "Quantity" by "Unit SII price" plus accrued interest for bonds and other interest bearing security. For CIC categories 7, 8 and 9, this should indicate the SII value of the line
A28	Maturity date	Only applicable for CIC categories 1, 2, 5, 6 and 8. Corresponds always to the maturity date, even for callable securities. For perpetual securities use "31/12/9999" For CIC category 8, regarding loans and mortgages to individuals, the weighed (based on the loan amount) maturity is to be reported.
A30	Accrued interest	Quantify the amount of accrued interest for interest bearing securities. Note that this value is also part of A26 – Total SII amount

Technical Annex II: List of quantitative reporting items

S.08.01

Open derivatives

	ITEM	INSTRUCTIONS
A1	Portfolio	<p>Distinction between life, non-life, stakeholder's funds, general (no split) and ring fenced funds. One of the options in the following closed list shall be used:</p> <p>Life: L Non-life: NL Shareholders' funds: SF General: G Ring fenced funds: RF</p> <p>Issued by the undertaking (I) Related to the undertakings' liabilities (U)</p> <p>The split is not mandatory, except for identifying ring fenced funds, but should be reported if the undertaking uses it internally. When an undertaking does not apply a split "general" must be used. For derivatives issued by the undertaking as an internal (group) derivative and derivatives related to the undertakings' liabilities, a split is also mandatory.</p>
A2	Fund Number	Applicable to assets held in ring-fenced or other internal funds (defined according to national markets). This number is attributed by the undertaking and must be consistent over time and with the fund number in TP (L) F3, cell A3
A3	Derivatives held in unit linked and index linked funds (Y/N)	Identify assets that are part of the fund which determines the benefits of the contract. One of the options in the following closed list shall be used: Yes: Y No : N
A4	ID Code	<p>One of the options in the following list shall be used, by order of preference:</p> <p>ISO 6166 ISIN when available Other "recognized" codes (e.g.: CUSIP, Bloomberg Ticker, Reuters RIC) Code attributed by the undertaking, when the options above are not available, and must be consistent over time</p>
A5	ID Code Type	Type of ID Code used for the "ID Code" item. One of the options in the following closed list shall be used: ISO 6166 ISIN: ISIN Other "recognized" codes: the designation of the code Code attributed by the undertaking: Undertaking
A6	Counterparty Name	Name of the counterparty of the derivative contract (derivatives exchange or the counterparty for OTC derivatives)
A36	Counterparty Code	<p>Identification code:</p> <ul style="list-style-type: none"> - Legal Entity Identifier (LEI) if available; - Interim entity identifier (pre-LEI) if available. <p>If none is available this item should not be reported</p>
A7	Counterparty group	Name of the ultimate parent undertaking of counterparty
A37	Counterparty group Code	<p>Identification code:</p> <ul style="list-style-type: none"> - Legal Entity Identifier (LEI) if available; - Interim entity identifier (pre-LEI) if available. <p>If none is available this item should not be reported</p>
A38	Type of code	<p>Identification of the code used in A36/A37:</p> <ul style="list-style-type: none"> - LEI - Pre-LEI
A8	Contract name	Name of the derivative contract
A9	Asset or liability underlying the derivative	ID Code (refer to A4) of the asset or liability underlying the derivative contract. This item is to be provided only for derivatives that have a single underlying instrument in the undertakings' portfolio
A10	Currency	ISO 4217 Code of the currency of the derivative, i.e., currency of the notional amount of the derivative (e.g.: option having as underlying an amount in USD, FX swap expressed in EUR, etc). For derivatives that have more than a pair of currencies, it should be split into the pair components and reported in different lines

A11	CIC	EIOPA Code used to classify securities, as set out in Annex CIC Table. When classifying an asset using the CIC table, undertakings shall take into consideration the most representative risk to which the asset is exposed to
A13	Use of derivative	Describe use of derivative (micro / macro hedge, efficient portfolio management). Micro hedge refers to derivatives covering a single financial instrument, forecasted transaction or liability. Macro hedge refers to derivatives covering a set of financial instruments, forecasted transactions or liabilities. One of the options in the following closed list shall be used: Micro hedge: MI Macro hedge: MA Efficient portfolio management: EPM
A14	Delta	Measures the rate of change of option value with respect to changes in the underlying asset's price. Only applicable to CIC categories B and C (Call and put options), with reference to the reporting date
A15	Notional amount	The amount covered or exposed to the derivative. For futures and options corresponds to contract size multiplied by the number of contracts; and for swaps and forwards corresponds to the contract amount. The nominal amount refers to the amount that is being hedged / invested (when not covering risks). If several trades occur, should be the net amount at the reporting date
A16	Long or short position	Only for futures and options, swaps and credit derivatives contracts (currency, credit and securities swaps). The long and short position for swaps is defined relatively to the notional amount. A holder of a long position owns the security or notional amount at the contract inception, while a holder of a short position will own the security or the nominal amount at the end of the derivatives contract. One of the options in the following closed list shall be used: Long position: L Short position: S For interest rate swaps: Fixed-for-floating: FX-FL Fixed-for-fixed: FX-FX Floating-for-fixed: FL-FX Floating-for-floating: FL-FL
A17	Premium paid/received to date	The payment received (if sold) or paid (if bought), for options and also up-front and periodical amounts paid / received for swaps, since inception
A19	Number of contracts	Number of derivative contracts in the portfolio. It shall be the number of contracts entered into. For OTC, e.g., one swap contract, 1 should be reported, if ten swaps with the same characteristics, 10 should be reported. The number of contracts shall be the ones outstanding at the reporting date
A20	Contract dimension	Number of underlying assets in the contract (e.g. for equity futures it is the Only for futures and options
A21	Trigger value	Reference price for futures, strike price for options, currency exchange rate or interest rate for forwards, etc. (not applicable to Interest rate and currency swaps). In the case of more than one trigger over time, report the trigger that refers to the reporting period. When the derivative has a range of trigger values, report the set separated by semi-columns
A22	Swap outflow amount	Amount delivered under the swap contract, during the reporting period. Corresponds to interest paid for IRS and amounts delivered for currency swaps, credit swaps, total return swaps and other swaps
A23	Swap inflow amount	Amount received under the swap contract, during the reporting period. Corresponds to interest received for IRS and amounts received for currency swaps, credit swaps, total return swaps and other swaps
A24	Swap delivered currency	Currency of the swap price (only for currency swaps and interest rate and currency swaps)
A25	Swap received currency	Currency of the swap notional amount (only for currency swaps and interest rate and currency swaps)
A26	Trade date	Date of the trade of the derivative contract.

		When various trades occur for the same derivative, report only the first trade date of the derivative and only one line for each derivative (no different lines for each trade)
A27	Maturity date	Contractually defined date of close of the derivative contract, whether at maturity date, expiring date for options (European or American), etc
A28	SII value	SII value of the derivative as of the reporting date. Can be positive, negative or zero
A29	Valuation method SII	Identify the valuation method used when valuing assets. Two possibilities : Mark to market and mark to model
A31	Unwind trigger of contract	Identify the event that causes the unwinding of the contract. One of the options in the following closed list shall be used: Bankruptcy of the underlying or reference entity: B Adverse fall in value of the underlying reference asset: F Adverse change in credit rating of the underlying assets or entity: R Novation, i.e. the act of replacing an obligation under the derivative with a new obligation, or replacing a party of the derivative with a new party: N Multiple events or a combination of events: M Other events: O
A32	Maximum loss under unwinding event	Maximum amount of loss if an unwinding event occurs. Applicable to CIC category F
A33	Duration	Derivative duration, defined as the 'residual modified duration', for derivatives for which a duration measure is applicable. Calculated as the net duration between in and out flows from the derivative, when applicable
A34	External rating	Rating of the counterparty given by external rating agency. Undertakings shall report the external rating that in their perspective is best representative, and used internally for SCR/MCR calculations. Only applicable to OTC or bespoke derivatives
A35	Rating Agency	Identify the rating agency giving the external rating used by the undertaking

The following cells should only be completed for group reporting

A50	Legal name of the undertaking	This item shall be filled in only when it relates to the line-by-line list of derivatives held by subsidiaries under method 2
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Technical Annex II: List of quantitative reporting items

S.12.01.a

Life and Health SLT Technical Provisions

ITEM		INSTRUCTIONS
Technical provisions calculated as a whole		
A1	Technical provisions calculated as a whole - Insurance with profit participation	Amount of Technical provisions calculated as a whole regarding LoB Insurance with profit participation See cross-templates checks tab CQS 16 See cross-templates checks tab CQS 20 See cross-templates checks tab CQS 21
A3	Technical provisions calculated as a whole - Index-linked and unit-linked insurance	Amount of Technical provisions calculated as a whole regarding LoB Index-linked and unit-linked insurance
A5	Technical provisions calculated as a whole - Other life insurance	Amount of Technical provisions calculated as a whole regarding LoB Other life insurance See cross-templates checks tab CQS 16
A6	Technical provisions calculated as a whole - Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Amount of Technical provisions calculated as a whole regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations See cross-templates checks tab CQS 16
A7	Technical provisions calculated as a whole - Accepted reinsurance	Amount of Technical provisions calculated as a whole regarding LoB Life accepted reinsurance $A7=A7A+A7B+A7C$ See cross-templates checks tab CQS 16
A7A	Technical provisions calculated as a whole - Accepted reinsurance, Of which WP (Insurance with profit participation on Accepted reinsurance (Gross))	Amount of Technical provisions calculated as a whole regarding LoB Life Accepted reinsurance, Of which WP (Insurance with profit participation on Accepted reinsurance (Gross))
A7B	Technical provisions calculated as a whole - Accepted reinsurance, Of which UL (Index-linked and unit-linked insurance on Accepted reinsurance (Gross))	Amount of Technical provisions calculated as a whole regarding LoB Life Accepted reinsurance, Of which UL (Index-linked and unit-linked insurance on Accepted reinsurance (Gross))
A7C	Technical provisions calculated as a whole - Accepted reinsurance, Of which OL (Other life insurance on Accepted reinsurance (Gross))	Amount of Technical provisions calculated as a whole regarding LoB Life Accepted reinsurance, Of which OL (Other life insurance on Accepted reinsurance (Gross))
A9	Technical provisions calculated as a whole - Total (Life other than health insurance, incl. Unit-Linked)	$A9=A1+A3+A5+A6+A7$
A10	Technical provisions calculated as a whole - Health insurance (direct business)	Amount of Technical provisions calculated as a whole regarding LoB Health SLT insurance (direct business) See cross-templates checks tab CQS 13
A12	Technical provisions calculated as a whole - Annuities stemming from non-life insurance contracts and relating to health insurance	Amount of Technical provisions calculated as a whole regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations See cross-templates checks tab CQS 13
A13	Technical provisions calculated as a whole - Health reinsurance (reinsurance accepted)	Amount of Technical provisions calculated as a whole regarding LoB Health SLT reinsurance (reinsurance accepted) See cross-templates checks tab CQS 13
A14	Technical provisions calculated as a whole - Total (Health similar to life insurance)	$A14=A10+A12+A13$

Technical provisions calculated as a sum of a best estimate and a risk margin - Best estimate

	ITEM	INSTRUCTIONS
B1	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Insurance with profit participation	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Insurance with profit participation See cross-templates checks tab CQS 17 See cross-templates checks tab CQS 20 See cross-templates checks tab CQS 22 See cross-templates checks tab CQS 42 See cross-templates checks tab CQS 43 See cross-templates checks tab CQS 44 See cross-templates checks tab CQS 61 See cross-templates checks tab CQS 62 See cross-templates checks tab CQS 63
B2	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Index-linked and unit-linked insurance, Contracts without options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Index-linked and unit-linked insurance, Contracts without options and guarantees See cross-templates checks tab CQS 19
B3	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Index-linked and unit-linked insurance, Contracts with options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Index-linked and unit-linked insurance, Contracts with options and guarantees See cross-templates checks tab CQS 19
B4	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Other life insurance, Contracts without options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Other life insurance, Contracts without options and guarantees See cross-templates checks tab CQS 17
B5	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Other life insurance, Contracts with options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Other life insurance, Contracts with options and guarantees See cross-templates checks tab CQS 17
B6	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations See cross-templates checks tab CQS 17
B7	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Accepted reinsurance	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Life Accepted reinsurance See cross-templates checks tab CQS 17
B9	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Total (Life other than health insurance, incl. Unit-Linked)	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1), Total (Life other than health insurance, incl. Unit-Linked) B9=SUM(B1:B7)
B10	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Health insurance (direct business), Contracts without options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Health SLT insurance (direct business), Contracts without options and guarantees See cross-templates checks tab CQS 14
B11	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Health insurance (direct business), Contracts with options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Health SLT insurance (direct business), Contracts with options and guarantees See cross-templates checks tab CQS 14

	ITEM	INSTRUCTIONS
B12	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross - Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations See cross-templates checks tab CQS 14
B13	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross - Health reinsurance (reinsurance accepted)	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Health reinsurance (reinsurance accepted) See cross-templates checks tab CQS 14
B14	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross - Total (Health similar to life insurance)	B14=SUM(B10:B13)
C1	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Insurance with profit participation	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Insurance with profit participation See cross-templates checks tab CQS 5 See cross-templates checks tab CQS 24 See cross-templates checks tab CQS 42 See cross-templates checks tab CQS 43 See cross-templates checks tab CQS 44 See cross-templates checks tab CQS 61 See cross-templates checks tab CQS 62 See cross-templates checks tab CQS 63
C2	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Index-linked and unit-linked insurance, Contracts without options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Index-linked and unit-linked insurance, Contracts without options and guarantees See cross-templates checks tab CQS 6
C3	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Index-linked and unit-linked insurance, Contracts with options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Index-linked and unit-linked insurance, Contracts with options and guarantees See cross-templates checks tab CQS 6
C4	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Other life insurance, Contracts without options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Other life insurance, Contracts without options and guarantees See cross-templates checks tab CQS 5
C5	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Other life insurance, Contracts with options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Other life insurance, Contracts with options and guarantees See cross-templates checks tab CQS 5
C6	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations See cross-templates checks tab CQS 5

	ITEM	INSTRUCTIONS
C7	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Accepted reinsurance	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Life Accepted reinsurance See cross-templates checks tab CQS 5
C9	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Total (Life other than health insurance, incl. Unit-Linked)	Total Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, Total (Life other than health insurance, incl. Unit-Linked) C9=SUM(C1:C7)
C10	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Health insurance (direct business), Contracts without options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Health SLT insurance (direct business), Contracts without options and guarantees See cross-templates checks tab CQS 4
C11	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Health insurance (direct business), Contracts with options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Health SLT insurance (direct business), Contracts with options and guarantees See cross-templates checks tab CQS 4
C12	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations See cross-templates checks tab CQS 4
C13	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Gross - Health reinsurance (reinsurance accepted)	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Health reinsurance (reinsurance accepted) See cross-templates checks tab CQS 4
C14	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Total (Health similar to life insurance)	C14=SUM(C10:C13)
E1	Risk Margin - Insurance with profit participation	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Insurance with profit participation See cross-templates checks tab CQS 18 See cross-templates checks tab CQS 20 See cross-templates checks tab CQS 23
E2	Risk Margin - Index-linked and unit-linked insurance	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Index-linked and unit-linked insurance
E4	Risk Margin - Other life insurance	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Other life insurance See cross-templates checks tab CQS 18
E6	Risk Margin - Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations See cross-templates checks tab CQS 18

ITEM		INSTRUCTIONS
E7	Risk Margin - Accepted reinsurance	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Life accepted reinsurance See cross-templates checks tab CQS 18
E9	Risk Margin - Total (Life other than health insurance, incl. Unit-Linked)	$E9=E1+E2+E4+E6+E7$
E10	Risk Margin - Health insurance (direct business)	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Health SLT insurance (direct business) See cross-templates checks tab CQS 15
E12	Risk Margin - Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations See cross-templates checks tab CQS 15
E13	Risk Margin - Health reinsurance (reinsurance accepted)	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Health SLT reinsurance (reinsurance accepted) See cross-templates checks tab CQS 15
E14	Risk Margin - Total (Health similar to life insurance)	$E14=E10+E12+E13$
Technical provisions - Total		
F1	Technical Provisions - Total - Insurance with profit participation	$F1=A1+B1+E1$
F2	Technical Provisions - Total - Index-linked and unit-linked insurance	$F2=A3+B2+B3+E2$
F4	Technical Provisions - Total - Other life insurance	$F4=A5+B4+B5+E4$
F6	Technical Provisions - Total - Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	$F6=A6+B6+E6$
F7	Technical Provisions - Total - Accepted reinsurance	$F7=A7+B7+E7$
F9	Technical Provisions - Total - Total (Life other than health insurance, incl. Unit-Linked)	$F9=F1+F2+F4+F6+F7$
F10	Technical Provisions - Total - Health insurance (direct business)	$F10=A10+B10+B11+E10$
F12	Technical Provisions - Total - Annuities stemming from non-life insurance contracts and relating to health insurance obligations	$F12=A12+B12+E12$
F13	Technical Provisions - Total - Health reinsurance (reinsurance accepted)	$F13=A13+B13+E13$
F14	Technical Provisions - Total - Total (Health similar to life insurance)	$F14=F10+F12+F13$

Technical Annex II: List of quantitative reporting items

S.12.01.b

Life and Health SLT Technical Provisions

ITEM		INSTRUCTIONS
<i>Technical provisions calculated as a whole</i>		
A1	Technical provisions calculated as a whole - Insurance with profit participation	Amount of Technical provisions calculated as a whole regarding LoB Insurance with profit participation See cross-templates checks tab CAS 30 See cross-templates checks tab CAS 34 See cross-templates checks tab CAS 35
A3	Technical provisions calculated as a whole - Index-linked and unit-linked insurance	Amount of Technical provisions calculated as a whole regarding LoB Index-linked and unit-linked insurance
A5	Technical provisions calculated as a whole - Other life insurance	Amount of Technical provisions calculated as a whole regarding LoB Other life insurance See cross-templates checks tab CAS 30
A6	Technical provisions calculated as a whole - Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Amount of Technical provisions calculated as a whole regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations See cross-templates checks tab CAS 30
A7	Technical provisions calculated as a whole - Accepted reinsurance	Amount of Technical provisions calculated as a whole regarding LoB Life accepted reinsurance $A7=A7A+A7B+A7C$ See cross-templates checks tab CAS 30
A7A	Technical provisions calculated as a whole - Accepted reinsurance, Of which WP (Insurance with profit participation on Accepted reinsurance (Gross))	Amount of Technical provisions calculated as a whole regarding LoB Life Accepted reinsurance, Of which WP (Insurance with profit participation on Accepted reinsurance (Gross))
A7B	Technical provisions calculated as a whole - Accepted reinsurance, Of which UL (Index-linked and unit-linked insurance on Accepted reinsurance (Gross))	Amount of Technical provisions calculated as a whole regarding LoB Life Accepted reinsurance, Of which UL (Index-linked and unit-linked insurance on Accepted reinsurance (Gross))
A7C	Technical provisions calculated as a whole - Accepted reinsurance, Of which OL (Other life insurance on Accepted reinsurance (Gross))	Amount of Technical provisions calculated as a whole regarding LoB Life Accepted reinsurance, Of which OL (Other life insurance on Accepted reinsurance (Gross))
A9	Technical provisions calculated as a whole - Total (Life other than health insurance, incl. Unit-Linked)	$A9=A1+A3+A5+A6+A7$
A10	Technical provisions calculated as a whole - Health insurance (direct business)	Amount of Technical provisions calculated as a whole regarding LoB Health SLT insurance (direct business) See cross-templates checks tab CAS 27
A12	Technical provisions calculated as a whole - Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Amount of Technical provisions calculated as a whole regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations See cross-templates checks tab CAS 27
A13	Technical provisions calculated as a whole - Health reinsurance (reinsurance accepted)	Amount of Technical provisions calculated as a whole regarding LoB Health SLT reinsurance (reinsurance accepted) See cross-templates checks tab CAS 27
A14	Technical provisions calculated as a whole - Total (Health similar to life insurance)	$A14=A10+A12+A13$

ITEM

INSTRUCTIONS

Technical provisions calculated as a sum of a best estimate and a risk margin - Best estimate

B1	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Insurance with profit participation	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Insurance with profit participation See cross-templates checks tab CAS 31 See cross-templates checks tab CAS 34 See cross-templates checks tab CAS 36 See cross-templates checks tab CAS 56 See cross-templates checks tab CAS 57 See cross-templates checks tab CAS 58 See cross-templates checks tab CAS 75 See cross-templates checks tab CAS 76 See cross-templates checks tab CAS 77
B2	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Index-linked and unit-linked insurance, Contracts without options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Index-linked and unit-linked insurance, Contracts without options and guarantees See cross-templates checks tab CAS 33
B3	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Index-linked and unit-linked insurance, Contracts with options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Index-linked and unit-linked insurance, Contracts with options and guarantees See cross-templates checks tab CAS 33
B4	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Other life insurance, Contracts without options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Other life insurance, Contracts without options and guarantees See cross-templates checks tab CAS 31
B5	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Other life insurance, Contracts with options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Other life insurance, Contracts with options and guarantees See cross-templates checks tab CAS 31
B6	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations See cross-templates checks tab CAS 31
B7	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Accepted reinsurance	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Life Accepted reinsurance See cross-templates checks tab CAS 31
B9	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Total (Life other than health insurance, incl. Unit-Linked)	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1), Total (Life other than health insurance, incl. Unit-Linked) B9=SUM(B1:B7)
B10	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Health insurance (direct business), Contracts without options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Health SLT insurance (direct business), Contracts without options and guarantees See cross-templates checks tab CAS 28

	ITEM	INSTRUCTIONS
B11	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Health insurance (direct business), Contracts with options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Health SLT insurance (direct business), Contracts with options and guarantees See cross-templates checks tab CAS 28
B12	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross - Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations See cross-templates checks tab CAS 28
B13	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross - Health reinsurance (reinsurance accepted)	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Health reinsurance (reinsurance accepted) See cross-templates checks tab CAS 28
B14	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross - Total (Health similar to life insurance)	'B14=SUM(B10:B13)
C1	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Insurance with profit participation	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Insurance with profit participation See cross-templates checks tab CAS 38 See cross-templates checks tab CAS 56 See cross-templates checks tab CAS 57 See cross-templates checks tab CAS 58 See cross-templates checks tab CAS 75 See cross-templates checks tab CAS 76 See cross-templates checks tab CAS 77 See cross-templates checks tab CAS 19
C2	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Index-linked and unit-linked insurance, Contracts without options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Index-linked and unit-linked insurance, Contracts without options and guarantees See cross-templates checks tab CAS 20
C3	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Index-linked and unit-linked insurance, Contracts with options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Index-linked and unit-linked insurance, Contracts with options and guarantees See cross-templates checks tab CAS 20
C4	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Other life insurance, Contracts without options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Other life insurance, Contracts without options and guarantees See cross-templates checks tab CAS 19
C5	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Other life insurance, Contracts with options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Other life insurance, Contracts with options and guarantees See cross-templates checks tab CAS 19

ITEM		INSTRUCTIONS
C6	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations See cross-templates checks tab CAS 19
C7	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Accepted reinsurance	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Life Accepted reinsurance See cross-templates checks tab CAS 19
C9	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Total (Life other than health insurance, incl. Unit-Linked)	Total Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, Total (Life other than health insurance, incl. Unit-Linked) C9=SUM(C1:C7)
C10	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Health insurance (direct business), Contracts without options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Health SLT insurance (direct business), Contracts without options and guarantees See cross-templates checks tab CAS 18
C11	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Health insurance (direct business), Contracts with options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Health SLT insurance (direct business), Contracts with options and guarantees See cross-templates checks tab CAS 18
C12	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations See cross-templates checks tab CAS 18
C13	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Gross - Health reinsurance (reinsurance accepted)	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Health reinsurance (reinsurance accepted) See cross-templates checks tab CAS 18
C14	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Total (Health similar to life insurance)	C14=SUM(C10:C13)
E1	Risk Margin - Insurance with profit participation	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Insurance with profit participation See cross-templates checks tab CAS 32 See cross-templates checks tab CAS 34 See cross-templates checks tab CAS 37
E2	Risk Margin - Index-linked and unit-linked insurance	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Index-linked and unit-linked insurance
E4	Risk Margin - Other life insurance	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Other life insurance See cross-templates checks tab CAS 32

	ITEM	INSTRUCTIONS
E6	Risk Margin - Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations See cross-templates checks tab CAS 32
E7	Risk Margin - Accepted reinsurance	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Life accepted reinsurance See cross-templates checks tab CAS 32
E9	Risk Margin - Total (Life other than health insurance, incl. Unit-Linked)	'E9=E1+E2+E4+E6+E7
E10	Risk Margin - Health insurance (direct business)	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Health SLT insurance (direct business) See cross-templates checks tab CAS 29
E12	Risk Margin - Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations See cross-templates checks tab CAS 29
E13	Risk Margin - Health reinsurance (reinsurance accepted)	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Health SLT reinsurance (reinsurance accepted) See cross-templates checks tab CAS 29
E14	Risk Margin - Total (Health similar to life insurance)	E14=E10+E12+E13
Technical provisions - Total		
F1	Technical Provisions - Total - Insurance with profit participation	'F1=A1+B1+E1
F2	Technical Provisions - Total - Index-linked and unit-linked insurance	'F2=A3+B2+B3+E2
F4	Technical Provisions - Total - Other life insurance	'F4=A5+B4+B5+E4
F6	Technical Provisions - Total - Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	'F6=A6+B6+E6
F7	Technical Provisions - Total - Accepted reinsurance	'F7=A7+B7+E7
F9	Technical Provisions - Total - Total (Life other than health insurance, incl. Unit-Linked)	'F9=F1+F2+F4+F6+F7
F10	Technical Provisions - Total - Health insurance (direct business)	F10=A10+B10+B11+E10
F12	Technical Provisions - Total - Annuities stemming from non-life insurance contracts and relating to health insurance obligations	F12=A12+B12+E12
F13	Technical Provisions - Total - Health reinsurance (reinsurance accepted)	F13=A13+B13+E13
F14	Technical Provisions - Total - Total (Health similar to life insurance)	F14=F10+F12+F13

ITEM

INSTRUCTIONS

Additional information

<p>J1, J2, J4, J6, J7, J9, J10, J12, J13, J14</p>	<p>Gross BE for different countries - Home country</p>	<p>Amount of gross BE by country of the location of risk underwritten, when the country is the home country, for each of the following Life LoB and totals (Life other than health insurance, incl. Unit-Linked and Health similar to life insurance):</p> <ul style="list-style-type: none"> 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 reinsurance Total (Life other than health insurance, incl. Unit-Linked) 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) <p>Regardless of the materiality threshold, the home country has to be reported.</p>
<p>JA1, JA2, JA4, JA6, JA7, JA9, JA10, JA12, JA13, JA14</p>	<p>Gross BE for different countries - For countries in the materiality threshold [one line for each country in the materiality threshold]</p>	<p>Amount of gross BE by country of the location of risk underwritten, for each of the countries in the materiality threshold, except the home country, for each of the following Life LoB and totals (Life other than health insurance, incl. Unit-Linked and Health similar to life insurance):</p> <ul style="list-style-type: none"> 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 reinsurance Total (Life other than health insurance, incl. Unit-Linked) 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)
<p>JE1, JE2, JE4, JE6, JE7, JE9, JE10, JE12, JE13, JE14</p>	<p>Gross BE for different countries - For EEA countries outside the materiality threshold</p>	<p>Amount of gross BE by country of the location of risk underwritten, for EEA countries outside the materiality threshold, except the home country, for each of the following Life LoB and totals (Life other than health insurance, incl. Unit-Linked and Health similar to life insurance):</p> <ul style="list-style-type: none"> 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 reinsurance Total (Life other than health insurance, incl. Unit-Linked) 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)
<p>JF1, JF2, JF4, JF6, JF7, JF9, JF10, JF12, JF13, JF14</p>	<p>Gross BE for different countries - For non-EEA countries outside the materiality threshold</p>	<p>Amount of gross BE by country of the location of risk underwritten, for non-EEA countries outside the materiality threshold, except the home country, for each of the following Life LoB and totals (Life other than health insurance, incl. Unit-Linked and Health similar to life insurance):</p> <ul style="list-style-type: none"> 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 reinsurance Total (Life other than health insurance, incl. Unit-Linked) Health SLT insurance (direct business) Annuities stemming from non-life insurance contracts and relating to health insurance obligations Health SLT reinsurance (reinsurance accepted) Total (Health similar to life insurance)

Technical Annex II: List of quantitative reporting items

S.17.01.a

Non-life Technical Provisions

ITEM		INSTRUCTIONS
<i>Technical provisions calculated as a whole</i>		
A1-P1	Technical provisions calculated as a whole (REPL.)	The amount of total TP in case of replicable or hedgeable (re) insurance obligations, as defined in art 77.4 of L1 Text, for each line of business See cross-templates checks tab CQS 7 See cross-templates checks tab CAS 21 See cross-templates checks tab CQS 10 See cross-templates checks tab CAS 24
Q1	Total Non-Life obligations, Technical provisions calculated as a whole	Q1=SUM(A1:P1)
<i>Technical provisions calculated as a sum of a best estimate and a risk margin - Best estimate</i>		
A5-P5	Premium provisions, Gross	The amount of best estimate for premium provisions, gross, for each line of business
A12-P12	Premium provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default, for each line of business	The amount of best estimate for premium provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default, for each line of business
A13-P13	Net best estimate of Premium provisions	The amount of net best estimate for premium provisions, for each line of business regarding direct business A13=A5-A12 B13=B5-B12 C13=C5-C12 D13=D5-D12 E13=E5-E12 F13=F5-F12 G13=G5-G12 H13=H5-H12 I13=I5-I12 J13=J5-J12 K13=K5-K12 L13=L5-L12 M13=M5-M12 N13=N5-N12 O13=O5-O12 P13=P5-P12
Q5-Q13	Total Non-Life obligations, Premium provisions	Q5=SUM(A5:P5) Q12=SUM(A12:P12) Q13=SUM(A13:P13)
A14-P14	Claims provisions, Gross	The amount of best estimate for claims provisions, gross, for each line of business
A21-P21	Claims provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default	The amount of best estimate for claims provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default, for each line of business

A22-P22	Net best estimate of Claims provisions	<p>The amount of net best estimate for claims provisions, for each line of business</p> <p>A22=A14-A21 B22=B14-B21 C22=C14-C21 D22=D14-D21 E22=E14-E21 F22=F14-F21 G22=G14-G21 H22=H14-H21 I22=I14-I21 J22=J14-J21 K22=K14-K21 L22=L14-L21 M22=M14-M21 N22=N14-N21 O22=O14-O21 P22=P14-P21</p>
Q14-Q22	Total Non-Life obligations, Claims provisions	<p>Q14=SUM(A14:P14) Q21=SUM(A21:P21) Q22=SUM(A22:P22)</p>
A23-P23	Total best estimate, Gross	<p>The amount of Total gross best estimate, for each line of business</p> <p>A23=A5+A14 See cross-templates checks tab CQS 11 & See cross-templates checks tab CAS 25 B23=B5+B14 See cross-templates checks tab CQS 11 & See cross-templates checks tab CAS 25 C23=C5+C14 See cross-templates checks tab CQS 11 & See cross-templates checks tab CAS 25 D23=D5+D14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22 E23=E5+E14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22 F23=F5+F14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22 G23=G5+G14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22 H23=H5+H14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22 I23=I5+I14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22 J23=J5+J14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22 K23=K5+K14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22 L23=L5+L14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22 M23=M5+M14 See cross-templates checks tab CQS 11 & See cross-templates checks tab CAS 25 N23=N5+N14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22 O23=O5+O14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22 P23=P5+P14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22</p>

A24-P24	Total best estimate, Net	<p>The amount of Total net best estimate, for each line of business</p> <p>A24=A13+A22 See cross-templates checks tab CQS 26 & See cross-templates checks tab CQS 45 & See cross-templates checks tab CAS 40 & See cross-templates checks tab CAS 59</p> <p>B24=B13+B22 See cross-templates checks tab CQS 27 & See cross-templates checks tab CQS 46 & See cross-templates checks tab CAS 41 & See cross-templates checks tab CAS 60</p> <p>C24=C13+C22 See cross-templates checks tab CQS 28 & See cross-templates checks tab CQS 47 & See cross-templates checks tab CAS 42 & See cross-templates checks tab CAS 61</p> <p>D24=D13+D22 See cross-templates checks tab CQS 29 & See cross-templates checks tab CQS 48 & See cross-templates checks tab CAS 43 & See cross-templates checks tab CAS 62</p> <p>E24=E13+E22 See cross-templates checks tab CQS 30 & See cross-templates checks tab CQS 49 & See cross-templates checks tab CAS 44 & See cross-templates checks tab CAS 63</p> <p>F24=F13+F22 See cross-templates checks tab CQS 31 & See cross-templates checks tab CQS 50 & See cross-templates checks tab CAS 45& See cross-templates checks tab CAS 64</p> <p>G24=G13+G22 See cross-templates checks tab CQS 32 & See cross-templates checks tab CQS 51 & See cross-templates checks tab CAS 46& See cross-templates checks tab CAS 65</p> <p>H24=H13+H22 See cross-templates checks tab CQS 33 & See cross-templates checks tab CQS 52 & See cross-templates checks tab CAS 47 & See cross-templates checks tab CAS 66</p> <p>I24=I13+I22 See cross-templates checks tab CQS 34 & See cross-templates checks tab CQS 53 & See cross-templates checks tab CAS 48 & See cross-templates checks tab CAS 67</p> <p>J24=J13+J22 See cross-templates checks tab CQS 35 & See cross-templates checks tab CQS 54 & See cross-templates checks tab CAS 49 & See cross-templates checks tab CAS 68</p> <p>K24=K13+K22 See cross-templates checks tab CQS 36 & See cross-templates checks tab CQS 55 & See cross-templates checks tab CAS 50 & See cross-templates checks tab CAS 69</p> <p>L24=L13+L22 See cross-templates checks tab CQS 37 & See cross-templates checks tab CQS 56 & See cross-templates checks tab CAS 51 & See cross-templates checks tab CAS 70</p> <p>M24=M13+M22 See cross-templates checks tab CQS 39 & See cross-templates checks tab CQS 58 & See cross-templates checks tab CAS 53 & See cross-templates checks tab CAS 72</p> <p>N24=N13+N22 See cross-templates checks tab CQS 38 & See cross-templates checks tab CQS 57 & See cross-templates checks tab CAS 52 & See cross-templates checks tab CAS 71</p> <p>O24=O13+O22 See cross-templates checks tab CQS 40 & See cross-templates checks tab CQS 60 & See cross-templates checks tab CAS 54 & See cross-templates checks tab CAS 74</p> <p>P24=P13+P22 See cross-templates checks tab CQS 41 & See cross-templates checks tab CQS 59 & See cross-templates checks tab CAS 55 & See cross-templates checks tab CAS 73</p>
A25-P25	Risk margin	<p>The amount of risk margin, as required by L1 (article 77 (3)). The risk margin is calculated to whole portfolio of (re) insurance obligations and then allocated to each single line of business</p> <p>See cross-templates checks tab CQS 9</p> <p>See cross-templates checks tab CAS 23</p> <p>See cross-templates checks tab CQS 12</p> <p>See cross-templates checks tab CAS 26</p>
Q23	Total Non-Life obligations, Total best estimate - Gross	<p>Q23=SUM(A23:P23)</p> <p>See cross-templates checks tab CQS 25</p>
Q24	Total Non-Life obligations, Total best estimate - Net	<p>Q24=SUM(A24:P24)</p>
Q25	Total Non-Life obligations, Total risk margin	<p>Q25=SUM(A25:P25)</p>

Technical provisions - Total

A26-P26	Technical provisions - Total	<p>The amount of Total technical provisions, for each line of business</p> <p>A26=A1+A23+A25 B26=B1+B23+B25 C26=C1+C23+C25 D26=D1+D23+D25 E26=E1+E23+E25 F26=F1+F23+F25 G26=G1+G23+G25 H26=H1+H23+H25 I26=I1+I23+I25 J26=J1+J23+J25 K26=K1+K23+K25 L26=L1+L23+L25 M26=M1+M23+M25 N26=N1+N23+N25 O26=O1+O23+O25 P26=P1+P23+P25</p>
A27-P27	Technical provisions, Recoverable from reinsurance contract/SPV after the adjustment for expected losses due to counterparty default - Total	<p>The amount of Recoverable from reinsurance contract/SPV after the adjustment for expected losses due to counterparty default, for each line of business</p> <p>A27=A12+A21 See cross-templates checks tab CQS 3 & See cross-templates checks CAS 17 B27=B12+B21 See cross-templates checks tab CQS 3 & See cross-templates checks CAS 17 C27=C12+C21 See cross-templates checks tab CQS 3 & See cross-templates checks CAS 17 D27=D12+D21 See cross-templates checks tab CAS 16 & See cross-templates checks tab CQS 2 E27=E12+E21 See cross-templates checks tab CAS 16 & See cross-templates checks tab CQS 2 F27=F12+F21 See cross-templates checks tab CAS 16 & See cross-templates checks tab COS 2 G27=G12+G21 See cross-templates checks tab CAS 16 & See cross-templates checks tab COS 2 H27=H12+H21 See cross-templates checks tab CAS 16 & See cross-templates checks tab CQS 2 I27=I12+I21 See cross-templates checks tab CAS 16 & See cross-templates checks tab CQS 2 J27=J12+J21 See cross-templates checks tab CAS 16 & See cross-templates checks tab COS 2 K27=K12+K21 See cross-templates checks tab CAS 16 & See cross-templates checks tab COS 2 L27=L12+L21 See cross-templates checks tab CAS 16 & See cross-templates checks tab COS 2 M27=M12+M21 See cross-templates checks tab CQS 3 & See cross-templates checks CAS 17 N27=N12+N21 See cross-templates checks tab CAS 16 & See cross-templates checks tab CQS 2 O27=O12+O21 See cross-templates checks tab CAS 16 & See cross-templates checks tab COS 2 P27=P12+P21 See cross-templates checks tab CAS 16 & See cross-templates checks tab CQS 2</p>
A28-P28	Technical provisions, Technical provisions minus recoverables from reinsurance and SPV - Total	<p>The amount of Technical provisions minus recoverables from reinsurance and SPV, for each line of business</p> <p>A28=A1+A24+A25 B28=B1+B24+B25 C28=C1+C24+C25 D28=D1+D24+D25 E28=E1+E24+E25 F28=F1+F24+F25 G28=G1+G24+G25 H28=H1+H24+H25 I28=I1+I24+I25 J28=J1+J24+J25 K28=K1+K24+K25 L28=L1+L24+L25 M28=M1+M24+M25 N28=N1+N24+N25 O28=O1+O24+O25 P28=P1+P24+P25</p>

Q26	Technical provisions - Total, Total non-life obligations	Q26=SUM(A26:P26) See cross-templates checks tab CQS 25 See cross-templates checks tab CAS 39
Q27	Technical provisions, Recoverable from reinsurance contract/SPV after the adjustment for expected losses due to counterparty default - Total, Total non-life obligations	Q27=SUM(A27:P27) See cross-templates checks tab CQS 24 See cross-templates checks tab CAS 38
Q28	Technical provisions, Technical provisions minus recoverables from reinsurance and SPV - Total, Total non-life obligations	Q28=SUM(A28:P28)

Technical Annex II: List of quantitative reporting items

TP-E1-L

Non-life Technical Provisions

	ITEM	INSTRUCTIONS
Technical provisions calculated as a whole - NOT APPLICABLE for the purpose of preparatory phase		
A1-L1	Technical provisions calculated as a whole (REPL.) - Direct business and accepted proportional reinsurance	The amount of total TP in case of replicable or hedgeable (re) insurance obligations, as defined in art 77.4 of L1 Text, for each line of business regarding direct business and accepted proportional reinsurance
M1-P1	Technical provisions calculated as a whole (REPL.) - Accepted non-proportional reinsurance	The amount of total TP, for the accepted non-proportional reinsurance business part, in case of replicable or hedgeable (re) insurance obligations, as defined in art 77.4 of L1 Text, for each line of business regarding accepted non-proportional reinsurance

Technical provisions calculated as a sum of a best estimate and a risk margin - Best estimate

A5A-L5A	Premium provisions, Gross	A5A=SUM(A5:A6) ... L5A=SUM(L5:L6)
M5A-P5A	Premium provisions, Gross	M5A=M7 ... P5A=P7
Q5A	Premium provisions, Gross	Q5A=SUM(Q5:Q7)
A12-L12	Premium provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default - Direct business and accepted proportional reinsurance	The amount of best estimate for premium provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default, for each line of business regarding direct business and accepted proportional reinsurance
A13-L13	Net best estimate of Premium provisions - Direct business and accepted proportional reinsurance	The amount of net best estimate for premium provisions, for each line of business A13=A5+A6-A12 B13=B5+B6-B12 C13=C5+C6-C12 D13=D5+D6-D12 E13=E5+E6-E12 F13=F5+F6-F12 G13=G5+G6-G12 H13=H5+H6-H12 I13=I5+I6-I12 J13=J5+J6-J12 K13=K5+K6-K12 L13=L5+L6-L12
M12-P12	Premium provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default - Accepted non-proportional reinsurance	The amount of best estimate for premium provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default, for each line of business regarding accepted non-proportional reinsurance
M13-P13	Net best estimate of Premium provisions - Accepted non-proportional reinsurance	The amount of net best estimate for premium provisions, for each line of business regarding accepted non-proportional reinsurance M13=M7-M12 N13=N7-N12 O13=O7-O12 P13=P7-P12
A14A-L14A	Claims provisions, Gross	A14A=SUM(A14:A15) ... L14A=SUM(L14:L15)
M14A-P14A	Claims provisions, Gross	M14A=M16 ... P14A=P16

	ITEM	INSTRUCTIONS
Q14A	Claims provisions, Gross	Q14A=SUM(Q14:Q16)
A21-L21	Claims provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default - Direct business and accepted proportional reinsurance	The amount of best estimate for claims provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default, for each line of business regarding direct business and accepted proportional reinsurance
A22-L22	Net best estimate of Claims provisions - Direct business and accepted proportional reinsurance	The amount of net best estimate for claims provisions, for each line of business regarding direct business and accepted proportional reinsurance A22=A14+A15-A21 B22=B14+B15-B21 C22=C14+C15-C21 D22=D14+D15-D21 E22=E14+E15-E21 F22=F14+F15-F21 G22=G14+G15-G21 H22=H14+H15-H21 I22=I14+I15-I21 J22=J14+J15-J21 K22=K14+K15-K21 L22=L14+L15-L21
M21-P21	Claims provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default - Accepted non-proportional reinsurance	The amount of best estimate for claims provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default, for each line of business regarding accepted non-proportional reinsurance
M22-P22	Net best estimate of Claims provisions - Accepted non-proportional reinsurance	The amount of net best estimate for claims provisions, for each line of business regarding accepted non-proportional reinsurance M22=M16-M21 N22=N16-N21 O21=O16-O21 P22=P16-P21
A23-L23	Total best estimate, Gross - Direct business and accepted proportional reinsurance	The amount of Total gross best estimate, for each line of business regarding direct business and accepted proportional reinsurance A23=A5+A6+A14+A15 B23=B5+B6+B14+B15 C23=C5+C6+C14+C15 D23=D5+D6+D14+D15 E23=E5+E6+E14+E15 F23=F5+F6+F14+F15 G23=G5+G6+G14+G15 H23=H5+H6+H14+H15 I23=I5+I6+I14+I15 J23=J5+J6+J14+J15 K23=K5+K6+K14+K15 L23=L5+L6+L14+L15
A24-L24	Total best estimate, Net - Direct business and accepted proportional reinsurance	The amount of Total net best estimate, for each line of business regarding direct business and accepted proportional reinsurance A24=A13+A22 B24=B13+B22 C24=C13+C22 D24=D13+D22 E24=E13+E22 F24=F13+F22 G24=G13+G22 H24=H13+H22 I24=I13+I22 J24=J13+J22 K24=K13+K22 L24=L13+L22
M23-P23	Total best estimate, Gross - Accepted non-proportional reinsurance	The amount of Total gross best estimate, for each line of business regarding accepted non-proportional reinsurance

	ITEM	INSTRUCTIONS
		M23=M7+M16 N23=N7+N16 O23=O7+O16 P23=P7+P16
M24-P24	Total best estimate, Net - Accepted non-proportional reinsurance	The amount of Total net best estimate, for each line of business regarding accepted non-proportional reinsurance M24=M13+M22 N24=N13+N22 O24=O13+O22 P24=P13+P22
A25-P25	Technical provisions calculated as a sum of a best estimate and a risk margin - Risk margin	The amount of risk margin, as required by L1 (article 77 (3)). The risk margin is calculated to whole portfolio of (re) insurance obligations and then allocated to each single line of business, regarding Direct business and accepted proportional reinsurance and Accepted non-proportional reinsurance
Q23	Total Non-Life obligations, Total best estimate - Gross	Q23=SUM(A23:P23)
Q24	Total Non-Life obligations, Total best estimate - Net	Q24=SUM(A24:P24)
Q25	Total Non-Life obligations, Total risk margin	Q25=SUM(A25:P25)
Technical provisions - Total		
A26-L26	Technical provisions, Total - Direct business and accepted proportional reinsurance	B26=B1+B23+B25 C26=C1+C23+C25 D26=D1+D23+D25 E26=E1+E23+E25 F26=F1+F23+F25 G26=G1+G23+G25 H26=H1+H23+H25 I26=I1+I23+I25 J26=J1+J23+J25 K26=K1+K23+K25 L26=L1+L23+L25
A27-L27	Technical provisions, Total - Recoverable from reinsurance contract/SPV after the adjustment for expected losses due to counterparty default - Direct business and accepted proportional reinsurance	B27=B12+B21 C27=C12+C21 D27=D12+D21 E27=E12+E21 F27=F12+F21 G27=G12+G21 H27=H12+H21 I27=I12+I21 J27=J12+J21 K27=K12+K21 L27=L12+L21
A28-L28	Technical provisions, Total - Technical provisions minus recoverables from reinsurance and SPV - Direct business and accepted proportional reinsurance	B28=B1+B24+B25 C28=C1+C24+C25 D28=D1+D24+D25 E28=E1+E24+E25 F28=F1+F24+F25 G28=G1+G24+G25 H28=H1+H24+H25 I28=I1+I24+I25 J28=J1+J24+J25 K28=K1+K24+K25 L28=L1+L24+L25
M26-P26	Technical provisions, Total - Accepted non-proportional reinsurance	N26=N1+N23+N25 O26=O1+O23+O25 P26=P1+P23+P25
M27-M27	Technical provisions, Total - Recoverable from reinsurance contract/SPV	N27=N12+N21 O27=O12+O21

	ITEM	INSTRUCTIONS
	after the adjustment for expected losses due to counterparty default - Accepted non-proportional reinsurance	P27=P12+P21
M28-P28	Technical provisions, Total - Technical provisions minus recoverables from reinsurance and SPV - Accepted non-proportional reinsurance	N28=N1+N24+N25 O28=O1+O24+O25 P28=P1+P24+P25
Q26	Technical provisions, Total	Q26=SUM(A26:P26)
Q27	Technical provisions, Total - Recoverable from reinsurance contract/SPV after the adjustment for expected losses due to counterparty default - Total	Q27=SUM(A27:P27)
Q28	Technical provisions, Total - Technical provisions minus recoverables from reinsurance and SPV - Total	Q28=SUM(A28:P28)

Additional information

A43-L43	Gross Best estimate for different countries - Home country	Amount of gross BE, direct business only (excluding accepted reinsurance) by country, according to the following criteria: -localization of risk for "Medical expense", "Income protection", "Workers' compensation", "Fire and other damage to property" and "Credit and suretyship" Line of business; -country of underwriting for all other Line of business. In some cases undertaking may need to use their judgment/approximations to provide correct data, in line with assumptions used for the calculation of TP. Application of a materiality threshold: are requested to be reported all the most important countries representing up to 90% of the BE (regarding direct business) for each Line of business, with the amount regarding countries outside the threshold being reported in the applicable "other-EEA" or "other-non EEA" elements. Regardless of the materiality threshold, the home country has to be reported
A44-L44 [one line for each country in the materiality threshold]	Gross Best estimate for different countries - For countries in the materiality threshold [one line for each country in the materiality threshold]	Amount of gross BE, direct business only (excluding accepted reinsurance) by country, according to the following criteria: -localization of risk for "Medical expense", "Income protection", "Workers' compensation", "Fire and other damage to property" and "Credit and suretyship" Line of business; -country of underwriting for all other Line of business. Application of a materiality threshold: are requested to be reported all the most important countries representing up to 90% of the BE (regarding direct business) for each Line of business, with the amount regarding countries outside the threshold being reported in the applicable "other-EEA" or "other-non EEA" elements. Regardless of the materiality threshold, the home country has to be reported
A45-L45	Total gross Best estimate for EEA countries outside the materiality threshold	Amount of gross BE, direct business only (excluding accepted reinsurance) by country, according to the following criteria: -localization of risk for "Medical expense", "Income protection", "Workers' compensation", "Fire and other damage to property" and "Credit and suretyship" Line of business; -country of underwriting for all other Line of business. Application of a materiality threshold: are requested to be reported all the most important countries representing up to 90% of the BE (regarding direct business) for each Line of business, with the amount regarding countries outside the threshold being reported in the applicable "other-EEA" or "other-non EEA" elements. Regardless of the materiality threshold, the home country has to be reported
A46-L46	Total gross Best estimate for non-EEA countries outside the materiality threshold	Amount of gross BE, direct business only (excluding accepted reinsurance) by country, according to the following criteria:

	<p style="text-align: center;">ITEM</p> <p>line materiality threshold</p>	<p style="text-align: center;">INSTRUCTIONS</p> <p>-localization of risk for "Medical expense", "Income protection", "Workers' compensation", "Fire and other damage to property" and "Credit and suretyship" Line of business; -country of underwriting for all other Line of business. Application of a materiality threshold: are requested to be reported all the most important countries representing up to 90% of the BE (regarding direct business) for each Line of business, with the amount regarding countries outside the threshold being reported in the applicable "other-EEA" or "other-non EEA" elements. Regardless of the materiality threshold, the home country has to be reported</p>
Q43-Q46	Total Non-Life obligations, Total amount of gross Best estimate by country	Q43=SUM(A43:L43) Q44=SUM(A44:L44) Q45=SUM(A45:L45) Q46=SUM(A46:L46)

Technical Annex II: List of quantitative reporting items
S.23.01.a.b
Own Funds

ITEM		INSTRUCTIONS
A1	Ordinary share capital (gross of own shares) – total	Ordinary share capital (gross of own shares). This is the ordinary share capital of the undertaking which fully satisfies the criteria for Tier 1 or Tier 2 items. Any share capital which does not fully satisfy the criteria should be treated as preference share capital notwithstanding their description or designation. A1=B1+C1
B1	Ordinary share capital (gross of own shares) – tier 1 unrestricted	This is the amount of paid up ordinary share capital which meets the criteria for Tier 1 - unrestricted
C1	Ordinary share capital (gross of own shares) – tier 2	This is the amount of called up ordinary share capital which meets the criteria for Tier 2
A2	Share premium account related to ordinary share capital - total	The total share premium account related to ordinary share capital of the undertaking. A2 = B2 + C2
B2	Share premium account related to ordinary shares – tier 1 unrestricted	This is the amount of the share premium account related to ordinary shares which meets the criteria for Tier 1 unrestricted because it relates to share capital treated as unrestricted Tier 1
C2	Share premium account related to ordinary shares – tier 2	This is the amount of the share premium account related to ordinary shares which meets the criteria for Tier 2 because it relates to share capital treated as Tier 2
A3	Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings - total	The initial fund, members' contributions or the equivalent basic own-funds item for mutual and mutual-type undertakings. A3 = B3 + C3
B3	Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings – tier 1 unrestricted	This is the amount of the initial fund, members' contributions or the equivalent basic own-funds item for mutual and mutual-type undertakings, which meets the criteria for Tier 1 unrestricted
C3	Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings – tier 2	This is the amount of the initial fund, members' contributions or the equivalent basic own-funds item for mutual and mutual-type undertakings, which meets the criteria for Tier 2
A4	Subordinated mutual member accounts – total	This is the total of subordinated mutual member accounts. A4 = B4 + C4 + D4
B4	Subordinated mutual member accounts – tier 1 restricted	This is the amount of subordinated mutual member accounts that meet the criteria for Tier 1 restricted
C4	Subordinated mutual member accounts – tier 2	This is the amount of subordinated mutual member accounts that meet the criteria for Tier 2
D4	Subordinated mutual member accounts – tier 3	This is the amount of subordinated mutual member accounts that meet the criteria for Tier 3
A6	Surplus funds – total	This is the total of surplus funds that fall under Article 91 (2) of the Solvency II Framework Directive (Directive 2009/138.EC). A6 = B6
B6	Surplus funds – tier 1 unrestricted	This is the surplus funds that fall under Article 91 (2) of the Solvency II Framework Directive (Directive 2009/138.EC) which are regarded as Tier 1, unrestricted items
A8	Preference shares – total	This is the total of preference shares issued by the undertaking. A8 = B8+ C8 + D8
B8	Preference shares – tier 1 restricted	This is the amount of the preference shares issued by the undertaking that meet the criteria for Tier 1 restricted
C8	Preference shares – tier 2	This is the amount of the preference shares issued by the undertaking that meet the criteria for Tier 2
D8	Preference shares – tier 3	This is the amount of the preference shares issued by the undertaking that meet the criteria for Tier 3
A9	Share premium account related to preference shares – total	The total share premium account related to preference share capital of the undertaking. A9=B9+C9+D9
B9	Share premium account related to preference shares – tier 1 restricted	This is the amount of the share premium account which relates to preference shares which meets the criteria for Tier 1 restricted items because it relates to preference shares treated as Tier 1 restricted items
C9	Share premium account related to preference shares – tier 2	This is the amount of the share premium account which relates to preference shares which meets the criteria for Tier 2 because it relates to preference shares treated as Tier 2
D9	Share premium account related to preference shares – tier 3	This is the amount of the share premium account which relates to preference shares which meets the criteria for Tier 3 because it relates to preference shares treated as Tier 3
A12	Reconciliation reserve (solo)	The reconciliation reserve represents reserves (e.g. retained earnings), net of adjustments (e.g. ring fenced funds) but it also reconciles difference between accounting valuation and Solvency 2 valuation A12 = B12
B12	Reconciliation reserve - tier 1 unrestricted (solo)	The reconciliation reserve represents reserves (e.g. retained earnings), net of adjustments (e.g. ring fenced funds) but it also reconciles difference between accounting valuation and Solvency 2 valuation B12 = B29

A13	Subordinated liabilities – total	This is the total of subordinated liabilities issued by the undertaking. A13 = B13 + C13 + D13
B13	Subordinated liabilities – tier 1 restricted	This is the amount of subordinated liabilities issued by the undertaking which meet the criteria for Tier 1 restricted items
C13	Subordinated liabilities – tier 2	This is the amount of subordinated liabilities issued by the undertaking which meet the criteria for Tier 2
D13	Subordinated liabilities – tier 3	This is the amount of subordinated liabilities issued by the undertaking which meet the criteria for Tier 3
A15	An amount equal to the value of net deferred tax assets - total	This is the total net deferred tax assets of the undertaking. A15 = D15
D15	An amount equal to the value of net deferred tax assets – tier 3	This is the amount of net deferred tax assets of the undertaking classified as tier 3
A16	Other items approved by supervisory authority as basic own funds not specified above	This is the total of any items of basic own funds not identified above. During preparatory phase this should only include those items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as available basic own funds under Solvency 2. A16=B16+B16A+C16+D16
B16	Other items approved by supervisory authority as basic own funds not specified above - tier 1 unrestricted items	This is the amount of any items of basic own funds not identified above which meet the criteria for Tier 1, unrestricted items. During preparatory phase this should only include those items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as available basic own funds under Solvency 2
B16A	Other items approved by supervisory authority as basic own funds not specified above - Tier 1 restricted items	This is the amount of any items of basic own funds not identified above which meet the criteria for Tier 1, restricted items. During preparatory phase this should only include those items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as available basic own funds under Solvency 2
C16	Other items approved by supervisory authority as basic own funds not specified above - tier 2	This is the amount of any items of basic own funds not identified above which meet the criteria for Tier 2. During preparatory phase this should only include those items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as available basic own funds under Solvency 2
D16	Other items approved by supervisory authority as basic own funds not specified above - tier 3	This is the amount of any items of basic own funds not identified above which meet the criteria for Tier 3. During preparatory phase this should only include those items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as available basic own funds under Solvency 2
B502	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	These items are either: i) items that appear in the lists of own fund items, but fail to meet the classification criteria or the transitional provisions; or ii) items intended to perform the role of own funds which are not on the list of own fund items and have not been approved by the supervisory authority, and do not appear on the balance sheet as liabilities. Subordinated liabilities which do not count as basic own funds should not be reported here, but as subordinated liabilities that do not count as basic own funds on the balance sheet (BS-C1 L15D). These should be deducted from Tier 1 as they are neither balance sheet liabilities nor basic own funds. Failure to deduct them would result in them being incorrectly included in the reconciliation reserve. See cross-templates checks tab CQS 1 See cross-templates checks tab CGS 6 See cross-templates checks tab CAS 78
A503	Deduction for participations in financial and credit institutions - solo - total	This is the total deduction for participations in financial and credit institutions. The reporting of this data item is only applicable to solo reporting A503 = B503 + C503 + D503 See cross-templates checks tab CQS 1 See cross-templates checks tab CGS 6 See cross-templates checks tab QCGS 1 See cross-templates checks tab CAS 78
B503	Deduction for participations in financial and credit institutions - tier 1 unrestricted items	This is the amount of the deduction for participations in financial and credit institutions that are deducted from tier 1 unrestricted. The reporting of this data item is only applicable to solo reporting
C503	Deduction for participations in financial and credit institutions - tier 1 restricted items	This is the amount of the deduction for participations in financial and credit institutions that are deducted from tier 1 restricted. The reporting of this data item is only applicable to solo reporting
D503	Deduction for participations in financial and credit institutions - tier 2	This is the amount of the deduction for participations in financial and credit institutions that are deducted from tier 2. The reporting of this data item is only applicable to solo reporting

A20	Total basic own funds after adjustments (solo)	This is the total of all items of basic own funds after adjustments for a solo undertaking. A20 = B20 + B20A + C20 + D20 or check formula: A20= A1+A2+A3+A4+A6+A8+A9+A12+A13+A15+A16-B502-A503 See cross-templates checks tab CQS 1 See cross-templates checks tab CGS 6 See cross-templates checks tab QCGS 1 See cross-templates checks tab CAS 78
B20	Total basic own funds after adjustments (solo) – tier 1 unrestricted items	This is the total of all items of basic own funds after adjustments which meet the criteria for Tier 1 unrestricted items for a solo undertaking. B20= B1+B2+B3+B6+B12+B16-B502-B503
B20A	Total basic own funds after adjustments (solo) – tier 1 restricted items	This is the total of all items of basic own funds after adjustments which meet the criteria for Tier 1 restricted items for a solo undertaking. B20A= B4+B8+B9+B13+B16A-C503
C20	Total basic own funds after adjustments (solo) – tier 2	This is the total of all items of basic own funds after adjustments which meet the criteria for Tier 2 for a solo undertaking. C20= C1+C2+C3+C4+C8+C9+C13+C16-D503
D20	Total basic own funds after adjustments (solo) – tier 3	This is the total of all items of basic own funds after adjustments which meet the criteria for Tier 3 for a solo undertaking. D20= D4+D8+D9+D13+D15+D16

Ancillary own funds

A42	Other ancillary own funds - total	During preparatory phase, this is the total of all items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as ancillary own funds under Solvency 2. A42 = C42 + D42
C42	Other ancillary own funds – tier 2	During preparatory phase, this the total of all items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as ancillary own funds under Solvency 2, that meet criteria for Tier 2
D42	Other ancillary own funds – tier 3	During preparatory phase, this the total of all items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as ancillary own funds under Solvency 2, that meet criteria for Tier 3
A43	Total ancillary own funds (solo)	This is the total of the items that comprise ancillary own funds for a solo undertaking. A43=C43+D43 or check formula: A43 = SUM(A33:A40) + A42
C43	Total ancillary own funds (solo)– tier 2	This is the amount of the items that comprise ancillary own funds for a solo undertaking, that meet the criteria for Tier 2. C43 = SUM(C33:C40) + C42
D43	Total ancillary own funds (solo) – tier 3	This is the amount of the items that comprise ancillary own funds for a solo undertaking, that meet the criteria for Tier 3. D43 = D35+D36+D38+D40+D42

Available and eligible own funds solo

A46	Total available own funds to meet the SCR (solo) - total	This is the total own funds of the undertaking, comprising basic own funds after adjustments plus ancillary own funds, that are available to meet the SCR for a solo undertaking. A46=B46+C46+D46+E46
B46	Total available own funds to meet the SCR (solo) – tier 1 unrestricted items	This is the total own funds of the undertaking, comprising basic own funds after adjustments, that are available to meet the SCR for a solo undertaking and that meet the criteria to be included in Tier 1 unrestricted items. B46 = B20
C46	Total available own funds to meet the SCR (solo) – tier 1 restricted items	This is the total own funds of the undertaking, comprising basic own funds after adjustments, that are available to meet the SCR for a solo undertaking and that meet the criteria to be included in Tier 1 restricted items. C46 = B20A
D46	Total available own funds to meet the SCR (solo) – tier 2	This is the total own funds of the undertaking, comprising basic own funds after adjustments plus ancillary own funds, that are available to meet the SCR for a solo undertaking and that meet the criteria to be included in Tier 2. D46=C20+C43
E46	Total available own funds to meet the SCR (solo) – tier 3	This is the total own funds of the undertaking, comprising basic own funds after adjustments plus ancillary own funds, that are available to meet the SCR for a solo undertaking and that meet the criteria to be included in Tier 3. E46=D20+D43
A47	Total available own funds to meet the MCR (solo)	This is the total own funds of the undertaking, comprising basic own funds after adjustments, that are available to meet the MCR for a solo undertaking. A47=B47+C47+D47
B47	Total available own funds to meet the MCR (solo) – tier 1 unrestricted items	This is the total own funds of the undertaking, comprising basic own funds after adjustments, that are available to meet the MCR for a solo undertaking and that meet the criteria to be included in Tier 1 unrestricted items. B47 =B46

C47	Total available own funds to meet the MCR (solo) – tier 1 restricted items	This is the total own funds of the undertaking, comprising basic own funds after adjustments, that are available to meet the MCR for a solo undertaking and that meet the criteria to be included in Tier 1 restricted items. C47 = C46
D47	Total available own funds to meet the MCR (solo) – tier 2	This is the total own funds of the undertaking, comprising basic own funds after adjustments, that are available to meet the MCR for a solo undertaking and that meet the criteria to be included in Tier 2. D47 = C20
A50	Total eligible own funds to meet the SCR	This is the total own funds which are eligible under the limits. A50=B50+C50+D50+E50
B50	Total eligible own funds to meet the SCR – tier 1 unrestricted items	This is the total own funds which are eligible under the limits set out to meet the SCR, that meet the criteria for Tier 1 unrestricted items. B50=max(B46,0)
C50	Total eligible own funds to meet the SCR – tier 1 restricted items	This is the total own funds which are eligible under the limits to meet the SCR, that meet the criteria for Tier 1 restricted items. C50=MAX(0,(MIN(B50*0.25, C46)))
D50	Total eligible own funds to meet the SCR – tier 2	This is the total own funds which are eligible under the limits to meet the SCR, that meet the criteria for Tier 2. D50=MAX(0,(MIN(0.5*A52,((C46)-C50)+ (D46))))
E50	Total eligible own funds to meet the SCR – tier 3	This is the total own funds which are eligible under the limits to meet the SCR, that meet the criteria for Tier 3. E50=MAX(0,MIN(((0.5*A52)-D50), 0.15*A52, (E46)))
A51	Total eligible own funds to meet the MCR	This is the total own funds which are eligible under the limits to meet the MCR. A51=B51+C51+D51
B51	Total eligible own funds to meet the MCR – tier 1 unrestricted items	This is the total own funds which are eligible under the limits to meet the MCR, that meet the criteria for Tier 1 unrestricted items. B51=B50
C51	Total eligible own funds to meet the MCR – tier 1 restricted items	This is the total own funds which are eligible under the limits to meet the MCR, that meet the criteria for Tier 1 restricted items C51=C50
D51	Total eligible own funds to meet the MCR – tier 2	This is the total own funds which are eligible under the limits to meet the MCR, that meet the criteria for Tier 2. D51=MAX(0,(MIN(0.2*A53,((C47)-C51)+ (D47))))
A52	SCR (solo)	This is the total SCR of the undertaking and should correspond to SCR number disclosed on relevant SCR template: if the undertaking is using a full internal model (SCR B2C) or a partial internal model or the standard formula (SCR B2A).
A53	MCR (solo)	This is the MCR of the undertaking and should correspond to the total MCR disclosed in MCR B4A or MCR B4B for composite undertakings (where relevant)

Reconciliation Reserve

B23	Excess of assets over liabilities	This is an excess of assets over liabilities as disclosed on the Solvency 2 balance sheet; the cell 'B23=BSC-C1 "L27" When this data item is applicable to groups, it is only applicable for consolidation method
B24	Own shares (included as assets on the balance sheet)	This is the amount of own shares held by the undertaking When this data item is applicable to groups, it is only applicable for consolidation method See cross-templates checks tab CQS 1 See cross-templates checks tab CGS 6 See cross-templates checks tab QCGS 1 See cross-templates checks tab CAS 78
B25	Foreseeable dividends and distributions	This is the foreseeable dividends and distributions of the undertaking. When this data item is applicable to groups, it is only applicable for consolidation method See cross-templates checks tab CQS 1 See cross-templates checks tab CGS 6 See cross-templates checks tab QCGS 1 See cross-templates checks tab CAS 78
B26	Other basic own fund items	This is the total amount of other basic own funds items included in the reconciliation reserve. When this data item is applicable to groups, it is only applicable for consolidation method Solo formula- 'B26= A1-+A2+A3+A4 +A6+A8+A9+A15+A16
B27	Adjustment for restricted own fund items in respect of ring fenced funds	This is the amount of adjustment for restricted own fund items in respect of ring fenced funds. See cross-templates checks tab CQS 1 See cross-templates checks tab CGS 6 See cross-templates checks tab QCGS 1 See cross-templates checks tab CAS 78
B28	Other non available own funds	This are other non available own funds of related undertaking When this data item is applicable to groups, it is only applicable for consolidation method
B29	Reconciliation reserve - total (solo)	This the total reconciliation reserve for a solo undertaking. B29 = B23-B24-B25-B26-B27

A30	Expected profits included in future premiums (EPIFP) - Life business	The reconciliation reserve includes an amount of the excess of assets over liabilities that corresponds to the expected profit in future premiums (EPIFP). This cell represents that amount for the life business of the undertaking and is included for disclosure purposes. Calculation methodology to be provided in Level III. A30=B30
A31	Expected profits included in future premiums (EPIFP) - Non- life business	The reconciliation reserve includes an amount of the excess of assets over liabilities that corresponds to the expected profit in future premiums (EPIFP). This cell represents that amount for the non-life business of the undertaking and is included for disclosure purposes. Calculation methodology to be provided in Level III.
A32	Total EPIFP	This is the total amount calculated as EPIFP. Calculation methodology to be provided in Level III. A32=A30+A31
A56	Paid in - total	This is the total of paid in ordinary share capital. A56 = B56
B56	Paid in – tier 1	This is the total of paid in ordinary share capital, that meets the criteria for Tier 1; B56 = D60
A57	Called up but not yet paid in - total	This is the total amount of ordinary shares which have been called up but not yet paid in. A57 = C57
C57	Called up but not yet paid in – tier 2	This is the amount of ordinary shares which have been called up but not yet paid in that meet the criteria for Tier 2. C57 = D61
A58	Own shares held	This is the total amount of own shares held by the undertaking. A58 = B58
B58	Own shares held – tier 1	This is the total amount of own shares held by the undertaking, that meets the criteria for tier 1. B58 = "BS-C1 A28A"
A59	Total ordinary share capital	This is the total of ordinary share capital. Note, own shares held will be included in either paid in or called up but not paid in. A59=A56+A57
B59	Total ordinary share capital – tier 1	This is the total of ordinary share capital that meets the criteria for Tier 1. B59 = B56 + B58
C59	Total ordinary share capital – tier 2	This is the total of ordinary share capital that meets the criteria for Tier 2. C59 =C57
A67	Paid in – total	This is the total of paid in initial fund members' contributions or the equivalent basic own - fund items for mutual and mutual - type undertaking. A67 = B67
B67	Pain in – tier 1	This is the total of initial fund members' contributions or the equivalent basic own - fund item for mutual and mutual - type undertaking that meets the criteria for Tier 1. B67 = D70
A68	Called up but not yet paid in – total	This is the total of called up but not yet paid in initial fund members' contributions or the equivalent basic own - fund items for mutual and mutual - type undertaking A68 = C68
C68	Called up but not yet paid in – tier 2	This is the total of initial fund members' contributions or the equivalent basic own - fund item for mutual and mutual - type undertaking that meets the criteria for Tier 2. C68 = D71
A69	Total initial fund	This is the total initial fund A69 = B69 + C69
B69	Total initial fund – tier 1	This is the total of the initial fund that meets the criteria for Tier 1. B69 = B67
C69	Total initial fund – tier 2	This is the total of the initial fund that meets the criteria for Tier 2. C69 = C68
A73	Dated subordinated MMA – total	This is the total amount of dated subordinated MMA A73= B73+D73+F73
B73	Dated subordinated MMA – tier 1	This is the total amount of date subordinated MMA that meet the criteria for Tier 1.
C73	Dated subordinated MMA – tier 1 of which counted under transitionals	This is the total amount of date subordinated MMA that meet the criteria for Tier 1 which are counted under the transitional provisions.
D73	Dated subordinated MMA – tier 2	This is the total amount of date subordinated MMA that meet the criteria for Tier 2.
E73	Dated subordinated MMA – tier 2 of which counted under transitionals	This is the total amount of date subordinated MMA that meet the criteria for Tier 2 which are counted under the transitional provisions.
F73	Dated subordinated MMA – tier 3	This is the total amount of date subordinated MMA that meet the criteria for Tier 3.
A74	Undated subordinated MMA with a call option - total	This is the total of undated subordinated MMA with a call option. A74= B74+D74+F74
B74	Undated subordinated MMA with a call option – tier 1	This is the total of undated subordinated MMA with a call option that meet the criteria for Tier 1.
C74	Undated subordinated MMA with a call option – tier 1 of which counted under transitionals	This is the total of undated subordinated MMA with a call option that meet the criteria for Tier 1 which are counted under the transitional provisions.
D74	Undated subordinated MMA with a call option – tier 2	This is the total of undated subordinated MMA with a call option that meet the criteria for Tier 2.

E74	Undated subordinated MMA with a call option – tier 2 of which counted under transitionals	This is the total of undated subordinated MMA with a call option that meet the criteria for Tier 2 which are counted under the transitional provisions.
F74	Undated subordinated MMA with a call option – tier 3	This is the total of undated subordinated MMA with a call option that meet the criteria for Tier 3.
A75	Undated subordinated MMA with no contractual opportunity to redeem – total	This is the total of undated subordinated MMA with no contractual opportunity to redeem. A75= B75+D75+F75
B75	Undated subordinated MMA with no contractual opportunity to redeem – tier 1	This is the total of undated subordinated MMA with no contractual opportunity to redeem that meet the criteria for Tier 1.
C75	Undated subordinated MMA with no contractual opportunity to redeem – tier 1 of which counted under transitionals	This is the total of undated subordinated MMA with no contractual opportunity to redeem that meet the criteria for Tier 1 which are counted under the transitional provisions.
D75	Undated subordinated MMA with no contractual opportunity to redeem – tier 2	This is the total of undated subordinated MMA with no contractual opportunity to redeem that meet the criteria for Tier 2.
E75	Undated subordinated MMA with no contractual opportunity to redeem – tier 2 of which counted under transitionals	This is the total of undated subordinated MMA with no contractual opportunity to redeem that meet the criteria for Tier 2 which are counted under the transitional provisions.
F75	Undated subordinated MMA with no contractual opportunity to redeem – tier 3	This is the total of undated subordinated MMA with no contractual opportunity to redeem that meet the criteria for Tier 3.
A76	Total subordinated MMA – total	This is the total subordinated MMA. A76=A73+A74+A75
B76	Total subordinated MMA – tier 1	This is the total of the subordinated MMA that meet the criteria for Tier 1. B76=B73+B74+B75
C76	Total subordinated MMA – tier 1 of which counted under transitionals	This is the total of the subordinated MMA that meet the criteria for Tier 1 which are counted under the transitional provisions. C76=C73+C74+C75
D76	Total subordinated MMA – tier 2	This is the total of the subordinated MMA that meet the criteria for Tier 2. D76=D73+D74+D75
E76	Total subordinated MMA – tier 2 of which counted under transitionals	This is the total of the subordinated MMA that meet the criteria for Tier 2 which are counted under the transitional provisions. E76=E73+E74+E75
F76	Total subordinated MMA – tier 3	This is the total of the subordinated MMA that meet the criteria for Tier 3. F76=F73+F74+F75
A79	Dated preference shares – total	This is the total dated preference shares. A79=C79+D79+F79
B79	Dated preference shares – tier 1	This is the total of dated preference shares that meet the criteria for Tier 1.
C79	Dated preference shares – tier 1 of which counted under transitionals	This is the total of dated preference shares that meet the criteria for Tier 1 which are counted under the transitional provisions.
D79	Dated preference shares – tier 2	This is the total of dated preference shares that meet the criteria for Tier 2.
E79	Dated preference shares – tier 2 of which counted under transitionals	This is the total of dated preference shares that meet the criteria for Tier 2 which are counted under the transitional provisions.
F79	Dated preference shares – tier 3	This is the total of dated preference shares that meet the criteria for Tier 3.
A80	Undated preference shares with a call option – total	This is the total undated preference shares with a call option. A80=B80+D80+F80
B80	Undated preference shares with a call option – tier 1	This is the total of undated preference shares with a call option that meet the criteria for Tier 1.
C80	Undated preference shares with a call option – tier 1 of which counted under transitionals	This is the total of undated preference shares with a call option that meet the criteria for Tier 1 which are counted under the transitional provisions.
D80	Undated preference shares with a call option – tier 2	This is the total of undated preference shares with a call option that meet the criteria for Tier 2 .
E80	Undated preference shares with a call option – tier 2 of which counted under transitionals	This is the total of undated preference shares with a call option that meet the criteria for Tier 2 which are counted under the transitional provisions.
F80	Undated preference shares with a call option – tier 3	This is the total of undated preference shares with a call option that meet the criteria for Tier 3.
A81	Undated preference shares with no contractual opportunity to redeem – total	This is the total undated preference shares with no contractual opportunity to redeem.
B81	Undated preference shares with no contractual opportunity to redeem – tier 1	This is the total of undated preference shares with no contractual opportunity to redeem that meet the criteria for Tier 1.
C81	Undated preference shares with no contractual opportunity to redeem – tier 1 of which counted under transitionals	This is the total of undated preference shares with no contractual opportunity to redeem that meet the criteria for Tier 1 which are counted under the transitional provisions.

D81	Undated preference shares with no contractual opportunity to redeem – tier 2	This is the total of undated preference shares with no contractual opportunity to redeem that meet the criteria for Tier 2.
E81	Undated preference shares with no contractual opportunity to redeem – tier 2 of which counted under transitionals	This is the total of undated preference shares with no contractual opportunity to redeem that meet the criteria for Tier 2 which are counted under the transitional provisions.
F81	Undated preference shares with no contractual opportunity to redeem – tier 3	This is the total of undated preference shares with no contractual opportunity to redeem that meet the criteria for Tier 3.
A82	Total preference shares - total	This is the total preference shares. $A82=B82+D82+F82$
B82	Total preference shares – tier 1	This is the total of preference shares that meet the criteria for Tier 1. $B82=B79+B80+B81$
C82	Total preference shares – tier 1 of which counted under transitionals	This is the total of preference shares that meet the criteria for Tier 1 which are counted under the transitional provisions. $C82=C79+C80+C81$
D82	Total preference shares – tier 2	This is the total of preference shares that meet the criteria for Tier 2. $D82=D79+D80+D81$
E82	Total preference shares – tier 2 of which counted under transitionals	This is the total of preference shares that meet the criteria for Tier 2 which are counted under the transitional provisions. $E82=E79+E80+E81$
F82	Total preference shares – tier 3	This is the total of preference shares that meet the criteria for Tier 3. $F82=F79+F80+F81$
A92	Dated subordinated liabilities - total	This is the total of dated subordinated liabilities. $A92=B92+D92+F92$
B92	Dated subordinated liabilities– tier 1	This is the amount of dated subordinated liabilities that meets the criteria for Tier 1.
C92	Dated subordinated liabilities – tier 1 of which counted under transitionals	This is the amount of dated subordinated liabilities that meets the criteria for Tier 1 which are counted under the transitional provisions.
D92	Dated subordinated liabilities– tier 2	This is the amount of dated subordinated liabilities that meets the criteria for Tier 2.
E92	Dated subordinated liabilities– tier 2 of which counted under transitionals	This is the amount of dated subordinated liabilities that meets the criteria for Tier 2 which are counted under the transitional provisions.
F92	Dated subordinated liabilities– tier 3	This is the amount of dated subordinated liabilities that meets the criteria for Tier 3.
A93	Undated subordinated liabilities with a call option - total	This is the total of undated subordinated liabilities that have a call option. $A93=B93+D93+F93$
B93	Undated subordinated liabilities with a call option – tier 1	This is the amount of undated subordinated liabilities with a call option that meets the criteria for Tier 1.
C93	Undated subordinated liabilities with a call option – tier 1 of which counted under transitionals	This is the amount of undated subordinated liabilities with a call option that meets the criteria for Tier 1 which are counted under the transitional provisions.
D93	Undated subordinated liabilities with a call option – tier 2	This is the amount of undated subordinated liabilities with a call option that meets the criteria for Tier 2.
E93	Undated subordinated liabilities with a call option – tier 2 of which counted under transitionals	This is the amount of undated subordinated liabilities with a call option that meets the criteria for Tier 2 which are counted under the transitional provisions.
F93	Undated subordinated liabilities with a call option – tier 3	This is the amount of undated subordinated liabilities with a call option that meets the criteria for Tier 3.
A94	Undated subordinated liabilities with no contractual opportunity to redeem - total	This is the total of undated subordinated liabilities with no contractual opportunity to redeem. $A94=B94+D94+F94$
B94	Undated subordinated liabilities with no contractual opportunity to redeem – tier 1	This is the amount of undated subordinated liabilities with no contractual opportunity to redeem that meets the criteria for Tier 1.
C94	Undated subordinated liabilities with no contractual opportunity to redeem – tier 1 of which counted under transitionals	This is the amount of undated subordinated liabilities with no contractual opportunity to redeem that meets the criteria for Tier 1 which are counted under the transitional provisions.
D94	Undated subordinated liabilities with no contractual opportunity to redeem – tier 2	This is the amount of undated subordinated liabilities with no contractual opportunity to redeem that meets the criteria for Tier 2.
E94	Undated subordinated liabilities with no contractual opportunity to redeem – tier 2 of which counted under transitionals	This is the amount of undated subordinated liabilities with no contractual opportunity to redeem that meets the criteria for Tier 2 which are counted under the transitional provisions.
F94	Undated subordinated liabilities with no contractual opportunity to redeem – tier 3	This is the amount of undated subordinated liabilities with no contractual opportunity to redeem that meets the criteria for Tier 3.
A95	Total subordinated liabilities – total	This is the total of subordinated liabilities. $A95=A92+A93+A94$

B95	Total subordinated liabilities – tier 1	This is the total of subordinated liabilities that meets the criteria for Tier 1. $B95=B92+B93+B94$
C95	Total subordinated liabilities – tier 1 of which counted under transitionals	This is the total of subordinated liabilities that meets the criteria for Tier 1 which are counted under the transitional provisions $C95=C92+C93+C94$
D95	Total subordinated liabilities – tier 2	This is the amount of subordinated liabilities that meets the criteria for Tier 2. $D95=D92+D93+D94$
E95	Total subordinated liabilities – tier 2 of which counted under transitionals	This is the amount of subordinated liabilities that meets the criteria for Tier 2 which are counted under the transitional provisions. $E95=E92+E93+E94$
F95	Total subordinated liabilities – tier 3	This is the amount of subordinated liabilities that meets the criteria for Tier 3. $F95=F92+F93+F94$
A108	Items for which an amount was approved – tier 2 initial amounts	This is the initial amount approved for ancillary own funds for which an amount was approved under tier 2.
B108	Items for which an amount was approved – tier 2 current amounts	This is the current amount for ancillary own funds for which an amount was approved under tier 2.
C108	Items for which an amount was approved – tier 3 initial amounts	This is the initial amount approved for ancillary own funds for which an amount was approved under tier 3.
D108	Items for which an amount was approved – tier 3 current amounts	This is the current amount for ancillary own funds for which an amount was approved under tier 3.
B109	Items for which a method was approved – tier 2 current amounts	This is the current amount for ancillary own funds for which a method was approved under tier 2.
D109	Items for which a method was approved – tier 3 current amounts	This is the current amount for ancillary own funds for which a method was approved under tier 3.
Q1	Difference in the valuation of assets	Cells A30 and AS30 are taken from BS-C1 $Q1 = A30 - AS30$
Q2	Difference in the valuation of technical provisions	Cells L1, L4, L6B, L7, L10, LS1, LS4, LS6B, LS7, LS10 and AS14 are taken from BS-C1 $Q2 = (L1+L4+L6B+L7+L10) - (LS1+LS4+LS6B+LS7+LS10+AS14)$
Q3	Difference in the valuation of other liabilities	Cells L25A and LS25A are taken from BS-C1 $Q3 = (L25A - LS25A) - Q2$
Q4	Total of reserves and retained earnings from financial statements	This is total reserves and retained earnings taken from the financial statements.
Q5	Other, please explain why you need to use this line.	
Q6	Reserves from financial statements adjusted for Solvency II valuation differences	$Q6 = Q1-Q2-Q3+Q4+Q5$
Q7	Excess of assets over liabilities attributable to basic own fund items (excluding the reconciliation reserve)	$Q7 = B26$
Q8	Excess of assets over liabilities	$Q8 = B23 = Q6+ Q7$

Technical Annex II: List of quantitative reporting items
S.23.01.f.g.
Own Funds

ITEM		INSTRUCTIONS
A1	Ordinary share capital (gross of own shares) – total	Ordinary share capital (gross of own shares). This is the ordinary share capital of the undertaking which fully satisfies the criteria for Tier 1 or Tier 2 items. Any share capital which does not fully satisfy the criteria should be treated as preference share capital notwithstanding their description or designation. A1=B1+C1
B1	Ordinary share capital (gross of own shares) – tier 1 unrestricted	This is the amount of paid up ordinary share capital which meets the criteria for Tier 1 - unrestricted
C1	Ordinary share capital (gross of own shares) – tier 2	This is the amount of called up ordinary share capital which meets the criteria for Tier 2
A1A	Non-available called but not paid in ordinary share capital at group level	This is the total amount of called but not paid in ordinary share capital which is deemed non-available as defined in Article 222(2)-(5) of the Directive. This data item is only applicable when reporting at group level. A1A=C1A
C1A	Non-available called but not paid in ordinary share capital at group level – tier 2	This is the total amount of called but not paid in ordinary share capital which is deemed non-available as defined in Article 222(2)-(5) of the Directive which meets the criteria for Tier 2. This data item is only applicable when reporting at group level
A2	Share premium account related to ordinary share capital - total	The total share premium account related to ordinary share capital of the undertaking. A2 = B2 + C2
B2	Share premium account related to ordinary shares – tier 1 unrestricted	This is the amount of the share premium account related to ordinary shares which meets the criteria for Tier 1 unrestricted because it relates to share capital treated as unrestricted Tier 1
C2	Share premium account related to ordinary shares – tier 2	This is the amount of the share premium account related to ordinary shares which meets the criteria for Tier 2 because it relates to share capital treated as Tier 2
A3	Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings - total	The initial fund, members' contributions or the equivalent basic own-funds item for mutual and mutual-type undertakings. A3 = B3 + C3
B3	Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings – tier 1 unrestricted	This is the amount of the initial fund, members' contributions or the equivalent basic own-funds item for mutual and mutual-type undertakings, which meets the criteria for Tier 1 unrestricted
C3	Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings – tier 2	This is the amount of the initial fund, members' contributions or the equivalent basic own-funds item for mutual and mutual-type undertakings, which meets the criteria for Tier 2
A4	Subordinated mutual member accounts – total	This is the total of subordinated mutual member accounts. A4 = B4 + C4 + D4
B4	Subordinated mutual member accounts – tier 1 restricted	This is the amount of subordinated mutual member accounts that meet the criteria for Tier 1 restricted
C4	Subordinated mutual member accounts – tier 2	This is the amount of subordinated mutual member accounts that meet the criteria for Tier 2
D4	Subordinated mutual member accounts – tier 3	This is the amount of subordinated mutual member accounts that meet the criteria for Tier 3
A5	Non-available subordinated mutual member accounts at group level - total	This is the total amount of subordinated mutual member accounts which are deemed not available at group level, as defined in Article 222(2)-(5) of the Directive. This data item is only applicable when reporting at group level. A5 = B5 + C5 + D5
B5	Non-available subordinated mutual member accounts at group level – tier 1 restricted	This is the amount of subordinated mutual member accounts which are deemed non-available as defined in Article 222(2)-(5) of Solvency II Framework Directive (Directive 2009/138.EC) that meet the criteria for Tier 1 restricted This data item is only applicable when reporting at group level
C5	Non-available subordinated mutual member accounts at group level – tier 2	This is the amount of subordinated mutual member accounts which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 2. This data item is only applicable when reporting at group level
D5	Non-available subordinated mutual member accounts at group level – tier 3	This is the amount of subordinated mutual member accounts which are deemed non-available as defined in Article 222(2)-(5) of Solvency II Framework Directive (Directive 2009/138.EC) that meet the criteria for Tier 3. This data item is only applicable when reporting at group level
A6	Surplus funds – total	This is the total of surplus funds that fall under Article 91 (2) of the Solvency II Framework Directive (Directive 2009/138.EC). A6 = B6
B6	Surplus funds – tier 1 unrestricted	This is the surplus funds that fall under Article 91 (2) of the Solvency II Framework Directive (Directive 2009/138.EC) which are regarded as Tier 1, unrestricted items

A7	Non-available surplus funds at group level) -total	This is the total amount of surplus funds which are deemed non-available as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC). A7=B7 This data item is only applicable when reporting at group level
B7	Non-available surplus funds at group level) – tier 1 unrestricted	This is the amount of subordinated mutual member accounts which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 1 unrestricted items. This data item is only applicable when reporting at group level
A8	Preference shares – total	This is the total of preference shares issued by the undertaking. A8 = B8+ C8 + D8
B8	Preference shares – tier 1 restricted	This is the amount of the preference shares issued by the undertaking that meet the criteria for Tier 1 restricted
C8	Preference shares – tier 2	This is the amount of the preference shares issued by the undertaking that meet the criteria for Tier 2
D8	Preference shares – tier 3	This is the amount of the preference shares issued by the undertaking that meet the criteria for Tier 3
A9	Share premium account related to preference shares – total	The total share premium account related to preference share capital of the undertaking. A9=B9+C9+D9
B9	Share premium account related to preference shares – tier 1 restricted	This is the amount of the share premium account which relates to preference shares which meets the criteria for Tier 1 restricted items because it relates to preference shares treated as Tier 1 restricted items
C9	Share premium account related to preference shares – tier 2	This is the amount of the share premium account which relates to preference shares which meets the criteria for Tier 2 because it relates to preference shares treated as Tier 2
D9	Share premium account related to preference shares – tier 3	This is the amount of the share premium account which relates to preference shares which meets the criteria for Tier 3 because it relates to preference shares treated as Tier 3
A10	Non-available preference shares at group level – total	This is the total amount of preference shares which are deemed non-available as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC). This data item is only applicable when reporting at group level. A10=B10+C10+D10
B10	Non-available preference shares at group level – tier 1 restricted	This is the amount of preference shares which are deemed non - available as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC) that meet the criteria for Tier 1 restricted items. This data item is only applicable when reporting at group level
C10	Non-available preference shares at group level – tier 2	This is the amount of preference shares which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 2. This data item is only applicable when reporting at group level
D10	Non-available preference shares at group level – tier 3	This is the amount of preference shares which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 3. This data item is only applicable when reporting at group level
A11	Non-available share premium account related to preference shares at group level – total	This is the total amount of the share premium account relating to preference shares that is deemed non-available as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC). This data item is only applicable when reporting at group level A11=B11+C11+D11
B11	Non-available share premium account related to preference shares at group level – tier 1 restricted items	This is the amount of the share premium account relating to preference shares that is deemed non-available as defined in Article 222(2)-(5) of the Directive which meets the criteria for Tier 1 restricted items (see B9 for definition). This data item is only applicable when reporting at group level
C11	Non-available share premium account related to preference shares at group level – tier 2	This is the amount of the share premium account relating to preference shares that is deemed non-available as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC) which meets the criteria for Tier 2. This data item is only applicable when reporting at group level
D11	Non-available share premium account related to preference shares at group level – tier 3	This is the amount of the share premium account relating to preference shares that is deemed non-available as defined in Article 222(2)-(5) of the Directive which meets the criteria for Tier 3. This data item is only applicable when reporting at group level
A12A	Reconciliation reserve (group)	The reconciliation reserve represents reserves (e.g. retained earnings), net of adjustments (e.g. for ring fenced funds), but is also reconciles differences between accounting valuation and Solvency II valuation. A12A = B12A This data item is only applicable when reporting at group level
B12A	Reconciliation reserve – tier 1 unrestricted (group)	The reconciliation reserve represents reserves (e.g. retained earnings), net of adjustments (e.g. for ring fenced funds), but is also reconciles differences between accounting valuation and Solvency II valuation. B12A = B29A This data item is only applicable when reporting at group level
A13	Subordinated liabilities – total	This is the total of subordinated liabilities issued by the undertaking. A13 = B13 + C13 + D13

B13	Subordinated liabilities – tier 1 restricted	This is the amount of subordinated liabilities issued by the undertaking which meet the criteria for Tier 1 restricted items
C13	Subordinated liabilities – tier 2	This is the amount of subordinated liabilities issued by the undertaking which meet the criteria for Tier 2
D13	Subordinated liabilities – tier 3	This is the amount of subordinated liabilities issued by the undertaking which meet the criteria for Tier 3
A14	Non-available subordinated liabilities at group level - total	This is the total amount of subordinated liabilities which are deemed non-available as defined in Article 222(2)-(5) of the Directive. A14 = B14+C14+ D14 This data item is only applicable when reporting at group level
B14	Non-available subordinated liabilities at group level – tier 1 restricted	This is the amount of subordinate liabilities which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 1 restricted items. This data item is only applicable when reporting at group level
C14	Non-available subordinated liabilities at group level – tier 2	This is the amount of subordinated liabilities which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 2. This data item is only applicable when reporting at group level
D14	Non-available subordinated liabilities at group level – tier 3	This is the amount of subordinated liabilities which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 3. This data item is only applicable when reporting at group level
A15	An amount equal to the value of net deferred tax assets - total	This is the total net deferred tax assets of the undertaking. A15 = D15
D15	An amount equal to the value of net deferred tax assets – tier 3	This is the amount of net deferred tax assets of the undertaking classified as tier 3
A15A	Non available deferred tax assets at group level –total	This is the amount of net deferred tax assets which are deemed non-available as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC). A15A = D15A This data item is only applicable when reporting at group level
D15A	Non available deferred tax assets at group level –tier 3	This is the amount of net deferred tax assets which are deemed non-available as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC). This data item is only applicable when reporting at group level
A16	Other items approved by supervisory authority as basic own funds not specified above	This is the total of any items of basic own funds not identified above. During preparatory phase this should only include those items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as available basic own funds under Solvency 2. A16=B16+B16A+C16+D16
B16	Other items approved by supervisory authority as basic own funds not specified above - tier 1 unrestricted items	This is the amount of any items of basic own funds not identified above which meet the criteria for Tier 1, unrestricted items. During preparatory phase this should only include those items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as available basic own funds under Solvency 2
B16A	Other items approved by supervisory authority as basic own funds not specified above - Tier 1 restricted items	This is the amount of any items of basic own funds not identified above which meet the criteria for Tier 1, restricted items. During preparatory phase this should only include those items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as available basic own funds under Solvency 2
C16	Other items approved by supervisory authority as basic own funds not specified above - tier 2	This is the amount of any items of basic own funds not identified above which meet the criteria for Tier 2. During preparatory phase this should only include those items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as available basic own funds under Solvency 2
D16	Other items approved by supervisory authority as basic own funds not specified above - tier 3	This is the amount of any items of basic own funds not identified above which meet the criteria for Tier 3. During preparatory phase this should only include those items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as available basic own funds under Solvency 2
A17	Non-available own funds related to non-EEA entities, due to local restrictions: regulatory or otherwise, at group level - total	This is the total amount of own fund items related to non - EEA entities which are deemed non-available (due to local restrictions: regulatory or otherwise), as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC). This represents non available non-EEA own funds at group level when all the own funds of a non-EEA entity are considered to be non available at group level due to the restrictions to their availability and fungibility (in this case they should not be counted twice and consequently they should not be indicated separately in other cells) A17=B17+B17A+C17+D17 This data item is only applicable when reporting at group level

B17	Non-available own funds related to non-EEA entities, due to local restrictions: regulatory or otherwise, at group level – tier 1 unrestricted items	This is the amount of own fund items related to non - EEA entities, which are deemed non-available (due to local restrictions: regulatory or otherwise) as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC) that meet the criteria for Tier 1 unrestricted items. This data item is only applicable when reporting at group level
B17A	Non-available own funds related to non-EEA entities, due to local restrictions: regulatory or otherwise, at group level - tier 1 restricted	This is the amount of own fund items related to non - EEA entities, which are deemed non-available (due to local restrictions: regulatory or otherwise) as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC) that meet the criteria for Tier 1 restricted items. This data item is only applicable when reporting at group level
C17	Non-available own funds related to non-EEA entities, due to local restrictions: regulatory or otherwise, at group level – tier 2	This is the amount of own fund items related to non - EEA entities, which are deemed non-available (due to local restrictions: regulatory or otherwise) as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC) that meet the criteria for Tier 2. This data item is only applicable when reporting at group level
D17	Non-available own funds related to non-EEA entities, due to local restrictions: regulatory or otherwise, at group level – tier 3	This is the amount of own fund items related to non - EEA entities, which are deemed non-available (due to local restrictions: regulatory or otherwise) as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC) that meet the criteria for Tier 3. This data item is only applicable when reporting at group level
A18	Minority interests at group level (if not reported as part of another own fund item)– total	This may only be completed by groups and is the total of minority interests in the group being reported upon. This lines should be reported if minority interests have not been already included in other items of BOF (i.e. minority interests should not be counted twice). $A18=B18+B18A +C18+D18$
B18	Minority interests at group level (if not reported as part of another own fund item)– tier 1 unrestricted items	he amount of minority interests in the group being reported upon that meets the criteria for Tier 1 unrestricted items. This is only reported by groups
B18A	Minority interests at group level (if not reported as part of another own fund item)– tier 1 restricted items	This may only be completed by groups and is the amount of minority interests in the group being reported upon that meets the criteria for Tier 1 restricted items
C18	Minority interests at group level (if not reported as part of another own fund item)– tier 2	This may only be completed by groups and is the amount of minority interests in the group being reported upon that meets the criteria for Tier 2
D18	Minority interests at group level (if not reported as part of another own fund item)– tier 3	This may only be completed by groups and is the amount of minority interests in the group being reported upon that meets the criteria for Tier 3
A19	Non available minority interests at group level – total	This is the total amount of minority interests which are deemed non-available as defined in Article 222(2)-(5) of the Directive. This is only applicable when reporting at group level. $A19=B19+B19A +C19+D19$
B19	Non available minority interests at group level – tier 1 unrestricted	This is the amount of minority interests which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 1 unrestricted. This data item is only applicable at group level
B19A	Non available minority interests at group level – tier 1 restricted	This is the amount of minority interests which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 1 restricted. This data item is only applicable at group level
C19	Non available minority interests at group level – tier 2	This is the amount of minority interests which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 2. This data item is only applicable at group level
D19	Non available minority interests at group level – tier 3	This is the amount of minority interests which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 3. This data item is only applicable when reporting at group level
B502	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	These items are either: i) items that appear in the lists of own fund items, but fail to meet the classification criteria or the transitional provisions; or ii) items intended to perform the role of own funds which are not on the list of own fund items and have not been approved by the supervisory authority, and do not appear on the balance sheet as liabilities. Subordinated liabilities which do not count as basic own funds should not be reported here, but as subordinated liabilities that do not count as basic own funds on the balance sheet (BS-C1 L15D). These should be deducted from Tier 1 as they are neither balance sheet liabilities nor basic own funds. Failure to deduct them would result in them being incorrectly included in the reconciliation reserve. See cross-templates checks tab CQS 1 See cross-templates checks tab CGS 6 See cross-templates checks tab CAS 78

A603	Deductions for participations related credit institutions, investment firms and financial institutions (Level I Article 228) - total	This is the total of deductions of the participations in other financial entities, including non regulated financial entities carrying out financial activities, according to art. 228 (paragraphs 1 and 2) of the directive. A603= B603 + C603+ D603 This data item is only applicable when reporting at group level
B603	Deductions for participations related credit institutions, investment firms and financial institutions (Level I Article 228) – tier 1 unrestricted items	This is the deduction of the participations in other financial entities, including non regulated financial entities carrying out financial activities, according to art. 228 (paragraphs 1 and 2) of the directive, – tier 1 unrestricted items. This data item is only applicable when reporting at group level
C603	Deductions for participations related credit institutions, investment firms and financial institutions (Level I Article 228) – tier 1 restricted items	This is the deduction of the participations in other financial entities, including non regulated financial entities carrying out financial activities, according to art. 228 (paragraphs 1 and 2) of the directive, – tier 1 restricted items. This data item is only applicable when reporting at group level
D603	Deductions for participations related credit institutions, investment firms and financial institutions (Level I Article 228) – tier 2	This is the deduction of the participations in other financial entities, including non regulated financial entities carrying out financial activities, according to art. 228 (paragraphs 1 and 2) of the directive., tier 2. This data item is only applicable when reporting at group level
A604	Deductions for participations where there is non-availability of information (Article 229) – total	This is the total deduction of the participations in related undertakings when the information necessary for calculating the group solvency is not available, according to art. 229 of the directive. A604 = B604 + C604 + D604 + E604 This data item is only applicable when reporting at group level
B604	Deductions for participations where there is non-availability of information (Article 229) – tier 1 unrestricted items.	This is the deduction of the participations in related undertakings when the information necessary for calculating the group solvency is not available, according to art. 229 of the directive, tier 1 unrestricted items. This data item is only applicable when reporting at group level
C604	Deductions for participations where there is non-availability of information (Article 229) – tier 1 restricted items	This is the deduction of the participations in related undertakings when the information necessary for calculating the group solvency is not available, according to art. 229 of the directive, – tier 1 restricted items. This data item is only applicable when reporting at group level
D604	Deductions for participations where there is non-availability of information (Article 229) – tier 2	This is the deduction of the participations in related undertakings when the information necessary for calculating the group solvency is not available, according to art. 229 of the directive, Tier 2. This data item is only applicable when reporting at group level
E604	Deductions for participations where there is non-availability of information (Article 229) – tier 3	This is the deduction of the participations in related undertakings when the information necessary for calculating the group solvency is not available, according to art. 229 of the directive, Tier 3. This data item is only applicable when reporting at group level
A605	Deduction for participations included by using D&A when a combination of methods is used – total	This is the deduction of the participations in related undertakings included with the D&A when a combination of methods is used. A605 = B605 + C605 + D605 + E605 This data item is only applicable when reporting at group level
B605	Deduction for participations included by using D&A when a combination of methods is used– tier 1 unrestricted items	This is the deduction of the participations in related undertakings included with the D&A when a combination of methods is used – tier 1 unrestricted items. This data item is only applicable when reporting at group level
C605	Deduction for participations included by using D&A when a combination of methods is used – tier 1 restricted items	This is the deduction of the participations in related undertakings included with the D&A when a combination of methods is used -tier 1 restricted items. This data item is only applicable when reporting at group level
D605	Deduction for participations included by using D&A when a combination of methods is used – tier 2	This is the deduction of the participations in related undertakings included with the D&A when a combination of methods is used - tier 2. This data item is only applicable when reporting at group level
E605	Deduction for participations included by using D&A when a combination of methods is used – tier 3	This is the deduction of the participations in related undertakings included with the D&A when a combination of methods is used - tier 3 . This data item is only applicable when reporting at group level
A606	Total of non-available own fund items at group level – total	This is the total of non- available own funds items. A606 = A1A+A5+A7+A10+A11+A14+A15A+A17+A19 This data item is only applicable when reporting at group level
B606	Total of non-available own fund items – Tier 1 unrestricted items	This is the total of non- available own funds items in Tier 1 unrestricted items. B606= B7+B17+B19 This data item is only applicable when reporting at group level
C606	Total of non-available own fund items – tier 1 restricted items	This is the total of non-available own fund items – tier 1 restricted items. C606= B5+B10+B11+B14+B17A+B19A This data item is only applicable when reporting at group level
D606	Total of non-available own fund items – tier 2	This is the total of non-available own fund items – tier 2. D606=C1A+C5+C10+C11+C14+C17+C19 This data item is only applicable when reporting at group level

E606	Total of non-available own fund items – tier 3	This is the total of non-available own fund items – tier 3. E606=D5+D10+D11+D14+D15A+D17+D19 This data item is only applicable when reporting at group level
A607	Total deductions – total	This is a total amount of deductions not included in the reconciliation reserves. A607= B607+ C607+D607+E607 or check formulae: A607 = A603+A604+A605+A606 This data item is only applicable when reporting at group level
B607	Total deductions – tier 1 unrestricted items	This is a total amount of deductions from tier 1 unrestricted not included in the reconciliation reserves. B607=B603+B604+B605+B606 This data item is only applicable when reporting at group level
C607	Total deductions – tier 1 restricted items	This is a total amount of deductions from tier 1 restricted not included in the reconciliation reserves. C607=C603+C604+C605+C606 This data item is only applicable when reporting at group level
D607	Total deductions – tier 2	This is a total amount of deductions from tier 2 not included in the reconciliation reserves. D607=D603+D604+D605+D606 This data item is only applicable when reporting at group level
E607	Total deductions – tier 3	This is a total amount of deductions from tier 3 not included in the reconciliation reserves. E607=E604+E605+E606 This data item is only applicable when reporting at group level
A21	Total basic own funds after adjustment (group)	This is the total of all items of basic own funds after adjustments for a group. A21 = B21 + B21A + C21 + D21 or check formula: A21= A1+A2+A3+A4+A6+A8+A9+A12A+A13+ A15 + A16+A18 -A502 - A607
B21	Total basic own funds after adjustment (group) - tier 1 unrestricted	This is the total of all items of basic own funds after adjustments which meet the criteria for Tier 1 unrestricted for a group. B21= B1+B2+B3+B6+B12A+B16+B18 -B502 - B607
B21A	Total basic own funds after adjustment (group) - tier 1 restricted	These are the total basic own funds after adjustments (group) – tier 1 restricted items B21A=B4+B8+B9+B13+B16A+B18A -C607
C21	Total basic own funds after adjustment (group) - tier 2	This is the total of all items of basic own funds after adjustments which meet the criteria for Tier 2 for a group. C21= C1+C2+C3+C4+C8+C9+C13+C16+C18 -D607
D21	Total basic own funds after adjustment (group) - tier 3	This is the total of all items of basic own funds after adjustments which meet the criteria for Tier 3 for a group. D21= D4+D8+D9+D13+D15+D16+D18 -E607

Ancillary own funds

A42	Other ancillary own funds - total	During interim reporting, this is the total of all items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as ancillary own funds under Solvency 2.
C42	Other ancillary own funds – tier 2	During interim reporting, this the total of all items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as ancillary own funds under Solvency 2, that meet criteria for Tier 2
D42	Other ancillary own funds – tier 3	During interim reporting, this the total of all items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as ancillary own funds under Solvency 2, that meet criteria for Tier 3
A44	Total ancillary own funds (group)	This is the total of the items that comprise ancillary own funds for a group. A44 = C44 + D44
C44	Total ancillary own funds (group)- tier 2	This is the amount of the items that comprise ancillary own funds for a group for that meet the criteria for Tier 2. C44 = SUM(C33:C40) - C41 + C42
D44	Total ancillary own funds (group) – tier 3	This is the amount of the items that comprise ancillary own funds for a group, that meet the criteria for Tier 3. D44 = D35+D36+D38+D40-D41+D42
A45	Investment firms and financial institutions	Own funds in investment firms and financial institutions.
A45A	Institutions for occupational retirement provision	Own funds in institutions for occupational retirement provision.
A45B	Non regulated entities carrying out financial activities	Own funds in Non regulated entities carrying out financial activities.
A45C	Total own funds of other financial sectors	Total own funds in other financial sectors. A45C = A45+A45A+A45B

A45D	Own funds aggregated when using the D&A and or a combination of method - Total - NET	These are the total own funds of the related undertakings that have to be added for the calculation of the aggregated own funds when using the D&A or a combination of methods. The own funds figure reported here should be net of non available own funds and of the deduction ex Art. 228 and Art. 229. The total OF reported in the cell derives from the "manual" aggregation of the solo OF of insurance, reinsurance undertakings and insurance holding companies. When only D&A method is used for group solvency calculation, the value in the participating undertaking of related undertakings will be deducted in the cell.
B45D	Own funds aggregated when using the D&A and or a combination of method - Tier 1 unrestricted - NET	These are the total own funds of the related undertakings that have to be added for the calculation of the aggregated own funds when using the D&A or a combination of methods, classified as Tier 1 unrestricted
C45D	Own funds aggregated when using the D&A and or a combination of method - Tier 1 restricted - NET	These are the total own funds of the related undertakings that have to be added for the calculation of the aggregated own funds when using the D&A or a combination of methods, classified as Tier 1 restricted
D45D	Own funds aggregated when using the D&A and or a combination of method - Tier 2 - NET	These are the total own funds of the related undertakings that have to be added for the calculation of the aggregated own funds when using the D&A or a combination of methods, classified as Tier 2
E45D	Own funds aggregated when using the D&A and or a combination of method - Tier 3	These are the total own funds of the related undertakings that have to be added for the calculation of the aggregated own funds when using the D&A or a combination of methods, classified as Tier 3
A45E	Own funds aggregated when using the D&A and a combination of method net of IGT - Total	These are the own funds reported in cell A45D net of the intra-group transactions for the calculation of the aggregated group eligible own funds.
B45E	Own funds aggregated when using the D&A and a combination of method net of IGT - Tier 1 unrestricted items	These are the own funds net of the intra-group transactions for the calculation of the aggregated group eligible own funds , classified as Tier 1 unrestricted items
C45E	Own funds aggregated when using the D&A and a combination of method without IGT - Tier 1 restricted items	These are the own funds without the intra-group transactions for the calculation of the aggregated group eligible own funds, classified as Tier 1 restricted
D45E	Own funds aggregated when using the D&A and a combination of method net of IGT - Tier 2	These are the own funds net of the intra-group transactions for the calculation of the aggregated group eligible own funds, classified as Tier 2
E45E	Own funds aggregated when using the D&A and a combination of method net of IGT - Tier 3	These are the own funds net of the intra-group transactions for the calculation of the aggregated group eligible own funds, classified as Tier 3

Technical Annex II: List of quantitative reporting items

S.25.01

Solvency Capital Requirement - for undertakings on Standard Formula or Partial Internal Models

ITEM		INSTRUCTIONS
A30	Ring Fenced Fund? (Y/N)	Identifies whether the reported figures are with regard to RFF or with regard to remaining part. One of the options in the following list shall be used: When the items reported refer to a RFF: Y When the items reported refer to a Remaining part: N
A0	Fund number	Identification number for a ring fenced fund; This number is attributed by the undertaking and must be consistent over time and with the fund number in TP (L) F3, item A3, Assets D1 item A2 and Own Funds items A0115.1 ...n. This item is to be completed only when item A30 = Y.
A1	Net solvency capital requirement (including the loss absorbing capacity of technical provisions) – market risk	Amount of the capital charge, including adjustment for the loss absorbing capacity of technical provisions, for market risk, as calculated using the standard formula. If the undertaking does not use the standard formula to calculate any market risks, this item shall not be reported, otherwise it will only reflect either those elements of the market risk calculated using the standard formula, or the part of the undertaking's business for which market risk SCR is calculated using the standard formula. This item equals item C23 on SCR-B3A.
B1	Gross solvency capital requirement (excluding the loss absorbing capacity of technical provisions) – market risk	Amount of the capital charge, excluding adjustment for the loss absorbing capacity of technical provisions, for market risk, as calculated using the standard formula. If the undertaking does not use the standard formula to calculate any market risks, this item shall not be reported, otherwise it will only reflect either those elements of the market risk calculated using the standard formula, or the part of the undertaking's business for which market risk SCR is calculated using the standard formula. This item equals item D23 on SCR-B3A.
AA01 - AA013	Elements of standard formula sub risk modules are covered by partial internal model ? (Y/N)	Identifies whether some elements/or all of the risk within standard formula sub risk modules are calculated using partial internal model if Y, means that some elements/or all of the risks within standard formula sub risk modules are calculated using partial internal model if N, means that all risks within standard formula sub risk modules are covered by the standard formula
A2	Net solvency capital requirement (including the loss absorbing capacity of technical provisions) – counterparty default risk	Amount of capital charge, including adjustment for the loss absorbing capacity of technical provisions, for counterparty default risk, as calculated using the standard formula. If the undertaking does not use the standard formula to calculate any counterparty default risks, this item shall not be reported, otherwise it will only reflect either those elements of the counterparty default risk calculated using the standard formula, or the part of the undertaking's business for which counterparty default risk SCR is calculated using the standard formula. This item equals item D4 on SCR-B3B.
B2	Gross solvency capital requirement (excluding the loss absorbing capacity of technical provisions) – counterparty default risk	Amount of the capital charge, excluding adjustment for the loss absorbing capacity of technical provisions, for counterparty default risk, as calculated using the standard formula. If the undertaking does not use the standard formula to calculate any counterparty default risks, this item shall not be reported, otherwise it will only reflect either those elements of the counterparty default risk calculated using the standard formula, or the part of the undertaking's business for which counterparty default risk SCR is calculated using the standard formula. This item equals item C4 on SCR-B3B.
A02	Elements of standard formula sub risk modules are covered by partial internal model ? (Y/N)	Identifies whether some elements/or all of the risk within standard formula sub risk modules are calculated using partial internal model if N, means that all risks within standard formula sub risk modules are covered by the standard formula
A3	Net solvency capital requirement (including the loss absorbing capacity of technical provisions) – life underwriting risk	Amount of the capital charge, including adjustment for the loss absorbing capacity of technical provisions, for life underwriting risk, as calculated using the standard formula. If the undertaking does not use the standard formula to calculate any life underwriting risk, this item shall not be reported, otherwise it will only reflect either those elements of the life underwriting risk calculated using the standard formula, or the part of the undertaking's business for which life underwriting risk SCR is calculated using the standard formula. This item equals item C11 on SCR-B3C.
B3	Gross solvency capital requirement (excluding the loss absorbing capacity of technical provisions) – life underwriting risk	Amount of the capital charge, excluding adjustment for the loss absorbing capacity of technical provisions, for life underwriting risk, as calculated using the standard formula. If the undertaking does not use the standard formula to calculate any life underwriting risk, this item shall not be reported, otherwise it will only reflect either those elements of the life underwriting risk calculated using the standard formula, or the part of the undertaking's business for which life underwriting risk SCR is calculated using the standard formula. This item equals item D11 on SCR-B3C.
A03	Elements of standard formula sub risk modules are covered by partial internal model ? (Y/N)	Identifies whether some elements/or all of the risk within standard formula sub risk modules are calculated using partial internal model if Y, means that some elements/or all of the risks within standard formula sub risk modules are calculated using partial internal model if N, means that all risks within standard formula sub risk modules are covered by the standard formula
A4	Net solvency capital requirement (including the loss absorbing capacity of technical provisions) – health underwriting risk	Amount of the capital charge, including adjustment for the loss absorbing capacity of technical provisions, for health underwriting risk, as calculated using the standard formula. If the undertaking does not use the standard formula to calculate any health underwriting risk, this item shall not be reported, otherwise it will only reflect either those elements of the health underwriting risk calculated using the standard formula, or the part of the undertaking's business for which health underwriting risk SCR is calculated using the standard formula. This item equals item B27 on SCR-B3D.

B4	Gross solvency capital requirement (excluding the loss absorbing capacity of technical provisions) – health underwriting risk	Amount of the capital charge, excluding adjustment for the loss absorbing capacity of technical provisions, for health underwriting risk, as calculated using the standard formula. If the undertaking does not use the standard formula to calculate any health underwriting risk, this item shall not be reported, otherwise it will only reflect either those elements of the health underwriting risk calculated using the standard formula, or the part of the undertaking's business for which health underwriting risk SCR is calculated using the standard formula. This item equals item A27 on SCR-B3D.
A04	Elements of standard formula sub risk modules are covered by partial internal model ? (Y/N)	Identifies whether some elements/or all of the risk within standard formula sub risk modules are calculated using partial internal model. if Y, means that some elements/or all of the risks within standard fomula sub risk modules are calculated using partial internal model if N, means that all risks within standard fomula sub risk modules are covered by the standard formula.
A5	Net solvency capital requirement (including the loss absorbing capacity of technical provisions) – non-life underwriting risk	Amount of the capital charge, including adjustment for the loss absorbing capacity of technical provisions, for non-life underwriting risk, as calculated using the standard formula. If the undertaking does not use the standard formula to calculate any non-life underwriting risk, this item shall not be reported, otherwise it will only reflect either those elements of the non-life underwriting risk calculated using the standard formula, or the part of the undertaking's business for which non-life underwriting risk SCR is calculated using the standard formula. This item equals item A18 on SCR-B3E.
B5	Gross solvency capital requirement (excluding the loss absorbing capacity of technical provisions) – non-life underwriting risk	Capital charge for health underwriting risk cannot be expressed gross of the loss absorbing capacity of technical provisions, considering the structure of the calculation of the capital charge. Hence B5=A5
A05	Elements of standard formula sub risk modules are covered by partial internal model ? (Y/N)	Identifies whether elements of standard formula sub risk modules are calculated using covered by partial internal mode. if Y, means that some elements or all of the risks within standard fomula sub risk modules are by partial internal model if N, means that all risks within standard fomula sub risk modules are covered by the standard formula
A6	Diversification – net components	Amount of the diversification effects between Basic SCR net components
B6	Diversification – gross components	Amount of the diversification effects between Basic SCR gross components
A7	Net solvency capital requirement (including the loss absorbing capacity of technical provisions) - Intangible asset risk	Amount of the capital charge for intangible assets risk
B7	Gross solvency capital requirement (excluding the loss absorbing capacity of technical provisions) - Intangible assets risk	Capital charge for intangible assets risk cannot be expressed gross of the loss absorbing capacity of technical provisions, considering the structure of the calculation of the capital charge. Hence B7=A7
A07	Elements of standard formula sub risk modules are covered by partial internal model ? (Y/N)	Identifies whether elements of standard formula sub risk modules are calculated using covered by partial internal model if Y, means that some elements or all of the risks within standard fomula sub risk modules are by partial internal model if N, means that all risks within standard fomula sub risk modules are covered by the standard formula
A10	Basic Solvency Capital Requirement – Net	Amount of the basic capital requirements, including adjustment for the loss absorbing capacity of technical provisions, as calculated using the standard formula. If the undertaking does not use the standard formula, this item shall not be reported, otherwise it will only reflect either those elements calculated using the standard formula, or the part of the undertaking's business for which SCR is calculated using the standard formula. This amount shall be calculated as a sum of the net capital charges for each risk module within the standard formula, including adjustment for diversification effect within standard formula. A10 = sum (A1....A7).
B10	Basic Solvency Capital Requirement – Gross	Amount of the basic capital requirements, excluding adjustment for the loss absorbing capacity of technical provisions, as calculated using the standard formula. If the undertaking does not use the standard formula, this item shall not be reported, otherwise it will only reflect either those elements calculated using the standard formula, or the part of the undertaking's business for which SCR is calculated using the standard formula. This amount shall be calculated as a sum of the net capital charges for each risk module within the standard formula, including adjustment for diversification effect within standard formula B10 = sum (B1....B7).
A11	Loss – absorbing capacity of technical provisions	Amount of the overall adjustment for loss absorbing capacity of technical provisions. A11=max (min(B10-A10;A11B);0)
A12	Loss – absorbing capacity of deferred taxes	Amount of the adjustment for loss absorbing capacity of deferred taxes.
A13	Capital requirement for operational risk	Amount of the capital requirements for operational risk module as calculated using the standard formula. If the undertaking does not use the standard formula to calculate any operational risk , this item shall not be reported, otherwise it will only reflect either those elements of the market risk calculated using the standard formula, or the part of the undertaking's business for which market risk SCR is calculated using the standard formula. This item equals item A16 on SCR-B3G.

A013	Elements of standard formula sub risk modules are covered by partial internal model ? (Y/N)	Identifies whether elements of standard formula sub risk modules are calculated using covered by partial internal model if Y, means that some elements or all of the risks within standard fomula sub risk modules are by partial internal model if N, means that all risks within standard fomula sub risk modules are covered by the standard formula
A31	Individual Notional SCR for the rind fenced fund/remaining part	NOT APPLICABLE when reporting at undertaking level Amount of the notional SCR for the ring fenced fund or for the remaining part. This item has to be reported only when reporting SCR calculation for a ring fenced fund or when reporting SCR calculation for the remaining part. $A31 = A10 - A11 - A12 + A13$
A14A	Diversification between ring fenced funds and between ring fenced funds and remaining part	Amount of the adjustment for a diversification effect between ring fenced funds and between ring fenced funds and remaining part, when the supervisor has approved such diversification. This item has to be reported only when reporting SCR calculation at undertaking level, for the undertaking with ring fenced funds. This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level
A14C	Net Solvency Capital Requirementnet calculated using standard formula	Amount of the capital requirements, including adjustment for the loss absorbing capacity of technical provisions, as calculated using the standard formula. If the undertaking does not use the standard formula, this item shall not be reported, otherwise it will only reflect either those elements calculated using the standard formula, or the part of the business for which SCR is calculated using the standard formula. This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level
A8	Remaining part of the Solvency Capital Requirement calculated using partial internal model : Net solvency capital requirement (including the loss absorbing capacity of technical provisions and/or deferred taxes when applicable)	Amount of the capital charge, including adjustment for the loss absorbing capacity of technical provisions, as calculated using a partial internal model if any. This amount will only reflect either those elements of the SCR calculated using the partial internal model, or the part of the business for which SCR is calculated using the partial internal model. This item equals item B7 on SCR-B2B. This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level
A9	Diversification effects (between standard formula and partial internal model components) - Net	Amount of the adjustment for the diversification effect between risk modules calculated using the standard formula and components calculated using partial internal models, including the loss absorbing capacity of technical provisions. This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level
A17	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional)	Amount of the capital requirement, calculated according to the rules stated in Art. 17 of Directive 2003/41/EC, for ring-fenced funds relating to pension business operated under Art. 4 of Directive 2003/41/EC. This item is be reported only during the transitional period. This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level
A15	Capital requirement for other financial sectors (Non-insurance capital requirements) (groups only)	Amount of capital requirement for other financial sectors. This item is only applicable to group reporting where the group includes an undertaking which is subject to non-insurance capital requirements, such as a bank, and is the capital requirement calculated in accordance with the appropriate requirements. $A15 = A15A + A15B + A15C$ This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level
A15A	Capital requirement for credit institutions, investment firms and financial institutions	Amount of capital requirement for credit institutions, investment firms and financial institutions. This item is only applicable to group reporting where the group includes undertakings which are credit institutions, investment firms and financial institutions and they are subject to capital requirements, calculated in accordance with the relevant sectoral rules.
A15B	Capital requirement for Institutions for occupational retirement provisions	Amount of capital requirement for institutions for occupational retirement provisions. This item is only applicable to group reporting where the group includes undertaking which are Institutions for occupational retirement provision and subject to non-insurance capital requirements calculated in accordance with the relevant sectoral rules.
A15C	Capital requirement for non regulated entities carrying out financial activities	Amount of capital requirement for non regulated entities carrying out financial activities. This item is only applicable to group reporting where the group includes undertakings which are non - regulated entities carrying out financial activities. This figure represents a notional solvency requirement, calculated if the relevant sectoral rules were to be applied. This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level
A16	Capital requirement for non-controlled participation requirements (groups only)	Amount of the proportional share of the Solvency Capital Requirements of the related insurance and reinsurance undertakings and insurance holding companies which are not controlled participations. This item is only applicable to group reporting and corresponds, for those non controlled entities, to the capital requirement calculated in accordance with the appropriate requirements (whether S2 or sectoral rules depending on the types of undertakings). This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level
A18	Solvency capital requirement, excluding capital add-on	Amount of the total diversified SCR before any capital add-on. $A18 = A14C + A8 + A9 + A17 + A15 + A16$ This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level

A20	Solvency capital requirement	<p>Amount of the SCR. This item has to be reported only when reporting SCR calculation at undertaking level. $A20 = A18 + A19$</p> <p>This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level</p>
A21	Minimum consolidated group solvency capital requirement (groups only)	<p>Amount of the minimum consolidated group Solvency Capital Requirement as stated in art. 230 of Directive 2009/138/EC. This item is applicable to group reporting only.</p> <p>This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level</p>
A14B	Total amount of notional Solvency Capital Requirements for ring fenced funds (other than those related to business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional))	<p>Amount of the sum of notional SCRs of all ring-fenced funds. In case of partial internal model, this item will include notional SCR of ring fenced funds calculated by using the standard formula only. The particular ring-fenced funds relating to business operated in accordance with Art. 4 of Directive 2003/41/EC shall be excluded from this item.</p> <p>This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level</p>
A14	Total amount of notional Solvency Capital Requirements for remaining part	<p>Amount of the notional SCRs of remaining part (A31 on SCR B2A Remaining Part).</p> <p>In case of partial internal model, this item will include notional SCR of remaining part calculated by using the standard formula only.</p> <p>This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level</p>
A11B	Net future discretionary benefits	<p>Amount of technical provisions without risk margin in relation to future discretionary benefits net of reinsurance.</p> <p>This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level</p>

Technical Annex II: List of quantitative reporting items

S.25.02

Solvency Capital Requirement - for undertakings on Partial Internal Models

	ITEM	INSTRUCTIONS
A1	Components in descending order of size	<p>Identification, using free text, of each of the components that can be identified by the undertaking within the partial internal model. These components may not exactly align with the risks defined for the standard formula. Each component shall be identified using a separate entry, in descending order. The order will depend on the size of the components reported in item B1 (if they are reported, otherwise, according to item C1).</p> <p>Undertakings shall identify and report components consistently across different reporting periods, unless there has been some change to internal model affecting the categories.</p>
A1A	Unique number of component	<p>Unique number of each component of the partial internal model, agreed with their national supervisory authority to identify uniquely components from their model. This number shall always be used with the appropriate component description reported in each item A1.</p>
A1B	Modelling approach to calculation of loss absorbing capacity of technical provisions	<p>To identify modelling approach to a calculation of the loss absorbing capacity of technical provisions . The following closed list of options shall be used:</p> <ul style="list-style-type: none"> . Modelled and identifiable; . Modelled but not identifiable; . Not modelled. <p>Depending on each case, the information reported in cell B1, C1 and B5 will vary:</p> <ul style="list-style-type: none"> - if it is modelled and identifiable, B1 and C1 will be respectively reported for the capital charge including and excluding this loss absorbing capacity, and B5 will not be reported and an estimate of an adjustment will be reported for information only in C5 . if it is modelled but not identifiable, B1 and C1 will both be reported for the capital charge including this loss absorbing capacity,i.e. net basis; and B5 will not be reported and an estimate of an adjustment will be reported for information only in C5 - if it is not modelled, B1 and C1 will both be reported for the capital charge excluding this loss absorbing capacity, i.e. on gross basis and B5 will be reported.
A1C	Modelling approach to calculation of loss absorbing capacity of deferred taxes	<p>To identify modelling approach to a calculation of the loss absorbing capacity of deferred taxes . The following closed list of options shall be used:</p> <ul style="list-style-type: none"> . Modelled and identifiable; . Modelled but not identifiable; . Not modelled. <p>Depending on each case, the information reported in cell B1, C1 and B6 will vary:</p> <ul style="list-style-type: none"> - if it is modelled and identifiable, B1 and C1 will be respectively reported for the capital charge including/ and excluding loss absorbing capacity, and B6 will not be reported and an estimate of an adjustment will be reported for information only in C6 . if it is modelled but not identifiable, B1 and C1 will both be reported for the capital charge including this loss absorbing capacity,i.e. net basis; and B6 will not be reported and an estimate of an adjustment will be reported for information only in C6 - if it is not modelled, B1 and C1 will both be reported for the capital charge excluding this loss absorbing capacity, i.e. on gross basis and B6 will be reported.
B1	Net solvency capital requirement (including the loss absorbing capacity of technical provisions and /or deferred taxes when applicable) of each component	<p>Amount of the net capital charge for each component, including adjustments for loss absorbing capacity of technical provision or deferred taxes when applicable, calculated by the partial internal model on an undiversified basis, to the extent that these adjustments are modeled within components.</p> <p>The capital charges shall be reported in decreasing order of size (which may of course change from one reporting period to another).</p> <ul style="list-style-type: none"> - if modelled and identifiable or not identifiable, B1 represents net capital charge, including loss absorbing capacity, for each component: B5 and/ or B6 will not be reported: an estimate of an adjustment will be reported for information only in C5 and/or C6 '- if not modelled, B1 represents gross capital charge, excluding loss absorbing capacity, for each component; i.e. B5 and/or B6 will be reported.
C1	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions and/or deferred taxes when applicable) of each component	<p>Amount of the gross capital charge for each component (gross of adjustments for loss absorbing capacity of technical provision or deferred taxes when applicable) calculated by the partial internal model on an undiversified basis, to the extent that these adjustments are modeled within components.</p>

		-if modelled and identifiable,C1 represents gross capital charge i.e. excluding this loss absorbing capacity,for each component; B5 and or B6 will not be reported; an estimate of an adjustment will be reported for information only in C5 and/or C6 '- if modelled but not identifiable, C1 will be reported for the capital charge including this loss absorbing capacity,i.e. net basis; B5 and /or B6 will not be reported; an estimate of an adjustment will be reported for information only in C5 and/or C6 - if not modelled, C1 represents gross capital charge, i.e. excluding this loss absorbing capacity; B5 and/or B6 will be reported.
B2	Total of undiversified components – net	B2 = Sum (all B1 items)
C2	Total of undiversified components - gross	C2 = Sum (all C1 items)
B3	Diversification – net components	The total amount of the diversification within net components calculated using the partial internal model.
C3	Diversification – gross components	The total amount of the diversification within gross components calculated using the partial internal model.
B4	Net solvency capital requirement calculated using partial internal model including the loss absorbing capacity of technical provisions and/or deferred taxes ,if modelled within components	The amount of the total solvency capital requirement calculated using partial internal model after diversification and including adjustments for loss absorbing capacity of technical provisions and deferred tax, to the extent that those adjustments are modelled within components and are identifiable or not identifiable (in such cases, B5 and B6 will not be reported and an estimate of an adjustment will be reported for information only in C5 and C6 respectively). In cases where those adjustments for loss absorbing capacity of technical provisions and deferred tax are not modeled within components, B4 represents the SCR on gross basis, excluding those adjustments, B4= C4. B4= B2+B3
C4	Gross solvency capital requirement calculated using partial internal model excluding the loss absorbing capacity of technical provisions and/or deferred taxes, if modelled within components	The amount of the total solvency capital requirement calculated using partial internal model after diversification and excluding adjustments for loss absorbing capacity of technical provisions and deferred tax, to the extent that those adjustments are modelled and identifiable within components. When adjustments are modelled and identifiable by component, the amounts in item C4 will differ from the corresponding amounts in item B4 to the extent of this loss absorbing capacity; An estimate of respective adjustments will be reported for information only in C5 and C6 as appropriate. When adjustments for loss absorbing capacity of technical provisions and deferred tax are modelled but non identifiable by component, both items B4 and C4 will be reported on net basis, i.e. including those adjustments. An estimate of the respective adjustments will reported for information only in C5 and C6. as When adjustment is not modelled within components , both items B4 and C4 will be reported on gross basis.; the adjustment are to be reported in B5 and/or B6 as appropriate C4=C2+C3
B5	Loss-absorbing capacity of technical provisions if not modelled within partial internal model	Amount of the overall adjustment for net loss absorbing capacity of technical provision. This item is to be reported only if adjustments are not modeled within each component.
B6	Loss absorbing capacity for deferred taxes if not modelled within partial internal model	Amount of the adjustment for net deferred taxation. This item is to be reported only if adjustments are not modeled within each component.
B7	Solvency capital requirement calculated using a partial internal model	Amount of the net solvency capital charge calculated using partial internal models.B7= B4+ B5+B6 This item equals item A8 on SCR B2A.
C5	Estimate of loss-absorbing capacity of technical provisions if modelled within components	This item is only reported for information, in cases where adjustments for loss absorbing capacity of technical provision are modelled within components. C5 = if(B5<>0,0,max (min(C4-B4-C6;A11B);0))
C6	Estimate of loss-absorbing capacity of deferred tax if modelled within components	This item is only reported for information, in cases where adjustments for loss absorbing capacity of deferred taxes are modelled within components.
B8	Total amount of Notional Solvency Capital Requirements for ring fenced funds (other than those related to business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional) and remaining part	An amount of the sum of notional SCRs of all ring-fenced funds calculated by partial internal model
B8AA	Total amount of Notional Solvency Capital Requirements for remaining part	An amount on notional SCR for remaining part calculated using partial internal model
A11A	Gross future discretionary benefits	Amount of technical provisions without risk margin in relation to future discretionary benefits gross of reinsurance
A11B	Net future discretionary benefits	Amount of technical provisions without risk margin in relation to future discretionary benefits net of reinsurance

Technical Annex II: List of quantitative reporting items

S.25.03

Solvency Capital Requirement - for undertakings on Full Internal Models

ITEM		INSTRUCTIONS
A1	Components in descending order of size	Identification, using free text, of each of the components that can be identified by the undertaking within the full internal model. These components may not exactly align with the risks defined for the standard formula. Each component shall be identified using a separate entry, in descending order. The order will depend on the size of the components reported in item B1. Undertakings shall identify and report components consistently across different reporting periods, unless there has been some change to internal model affecting the categories.
A1A	Unique number of component	Unique number of each component of the full internal model, agreed with their national supervisory authority to identify uniquely components from their model. This number shall always be used with the appropriate component description reported in each item A1.
A1B	Modelling approach to calculation of loss absorbing capacity of technical provisions	To identify modelling approach to a calculation of the loss absorbing capacity of technical provisions . The following closed list of options shall be used: . Modelled and identifiable; . Modelled but not identifiable; . Not modelled. Depending on each case, the information reported in cell B1, C1 and B5 will vary: - if it is modelled and identifiable, B1 and C1 will be respectively reported for the capital charge including and excluding this loss absorbing capacity, and B5 will not be reported and an estimate of an adjustment will be reported for information only in C5 - if it is modelled but not identifiable, B1 and C1 will both be reported for the capital charge including this loss absorbing capacity,i.e. net basis; and B5 will not be reported and an estimate of an adjustment will be reported for information only in C5 - if it is not modelled, B1 and C1 will both be reported for the capital charge excluding this loss absorbing capacity, i.e. on gross basis and B5 will be reported.
A1C	Modelling approach to calculation of loss absorbing capacity of deferred taxes	To identify modelling approach to a calculation of the loss absorbing capacity of deferred taxes . The following closed list of options shall be used: . Modelled and identifiable; . Modelled but not identifiable; . Not modelled. Depending on each case, the information reported in cell B1, C1 and B6 will vary: - if it is modelled and identifiable, B1 and C1 will be respectively reported for the capital charge including/ and excluding loss absorbing capacity, and B6 will not be reported and an estimate of an adjustment will be reported for information only in C6 - if it is modelled but not identifiable, B1 and C1 will both be reported for the capital charge including this loss absorbing capacity,i.e. net basis; and B6 will not be reported and an estimate of an adjustment will be reported for information only in C6 - if it is not modelled, B1 and C1 will both be reported for the capital charge excluding this loss absorbing capacity, i.e. on gross basis and B6 will be reported.
B1	Net solvency capital requirement (including the loss absorbing capacity of technical provisions and /or deferred taxes when applicable) of each component	Amount of the capital charge for each component, including adjustments for loss absorbing capacity of technical provision and/ or deferred taxes when applicable, calculated by the full internal model on an undiversified basis, to the extent that these adjustments are modeled within components. The capital charges shall be reported in decreasing order of size (which may of course change from one reporting period to another). - if modelled and identifiable or not identifiable, B1 represents net capital charge, including loss absorbing capacity, for each component: B5 and/ or B6 will not be reported: an estimate of an adjustment will be reported for information only in C5 and/or C6 - if not modelled, B1 represents gross capital charge, excluding loss absorbing capacity, for each component; i.e. B5 and/or B6 will be reported.
C1	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions and/or deferred taxes when applicable)	Amount of the gross capital charge for each component (gross of adjustments for loss absorbing capacity of technical provision or deferred taxes when applicable) calculated by the full internal model on an undiversified basis, to the extent that these adjustments are modeled and identifiable within components.

		<p>-if modelled and identifiable, C1 represents gross capital charge i.e. excluding this loss absorbing capacity, for each component; B5 and or B6 will not be reported; an estimate of an adjustment will be reported for information only in C5 and/or C6</p> <p>- if modelled but not identifiable, C1 will be reported for the capital charge including this loss absorbing capacity, i.e. net basis; B5 and /or B6 will not be reported; an estimate of an adjustment will be reported for information only in C5 and/or C6</p> <p>- if not modelled, C1 represents gross capital charge, i.e. excluding this loss absorbing capacity; B5 and/or B6 will be reported.</p>
B2	Total of undiversified components - net	$B2 = \text{Sum (all B1 items)}$
C2	Total of undiversified components - gross	$C2 = \text{Sum (all C1 items)}$
B3	Diversification - net components	The total amount of the diversification within net solvency capital requirements per components calculated using the full internal model.
C3	Diversification - gross components	The total amount of the diversification within gross solvency capital requirement per components calculated using the full internal model.
B4	Net solvency capital requirement calculated using full internal model before adjustments	The amount of the total solvency capital requirement calculated using full internal model after diversification and including adjustments for loss absorbing capacity of technical provisions and deferred tax, to the extent that those adjustments are modelled within components and are identifiable or not identifiable (in such cases, B5 and B6 will not be reported and an estimate of an adjustment will be reported for $B4 = B2 + B3$)
C4	Gross solvency capital requirement calculated using full internal model before adjustments	<p>The amount of the total solvency capital requirement calculated using full internal model after diversification and excluding adjustments for loss absorbing capacity of technical provisions and deferred tax, to the extent that those adjustments are modelled and identifiable within components.</p> <p>When adjustments are modelled and identifiable by component, the amounts in item C4 will differ from the corresponding amounts in item B4 to the extent of this loss absorbing capacity; An estimate of respective adjustments will be reported for information only in C5 and C6 as appropriate.</p> <p>When adjustments for loss absorbing capacity of technical provisions and deferred tax are modelled but non identifiable by component, both items B4 and C4 will be reported on net basis, i.e. including those adjustments. An estimate of the respective adjustments will reported for information only in C5 and C6. as appropriate.</p> <p>When adjustment is not modelled within components, both items B4 and C4 will be reported on gross basis.; the adjustment are to be reported in B5 and/or B6 as $C4 = C2 + C3$</p>
B5	Loss-absorbing capacity of technical provisions if not modelled within components	Amount of the overall adjustment for net loss absorbing capacity of technical provision. This item is to be reported only if adjustments are not modeled within each component.
B6	Loss absorbing capacity for deferred taxes if not modelled within components	Amount of the adjustment for net deferred taxation. This item is to be reported only if adjustments are not modeled within each component.
B7	Capital requirement for other financial sectors (Non-insurance capital requirements) (groups only)	<p>Amount of capital requirement for other financial sectors. This item is only applicable to group reporting where the group includes an undertaking which is subject to non-insurance capital requirements, such as a bank, and is the capital requirement calculated in accordance with the appropriate requirements.</p> <p>$B7 = B7A + B7B + B7C$</p>
B7A	Capital requirement for credit institutions, investment firms and financial institutions	Amount of capital requirement for credit institutions, investment firms and financial institutions. This item is only applicable to group reporting where the group includes undertakings which are credit institutions, investment firms and financial institutions and they are subject to capital requirements, calculated in accordance with the relevant sectoral rules.
B7B	Capital requirement for institutions for occupational retirement provision	Amount of capital requirement for institutions for occupational retirement provisions. This item is only applicable to group reporting where the group includes undertaking which are Institutions for occupational retirement provision and subject to non-insurance capital requirements calculated in accordance with the relevant sectoral rules.
B7C	Capital requirement for non regulated entities carrying out financial activities	Amount of capital requirement for non regulated entities carrying out financial activities. This item is only applicable to group reporting where the group includes undertakings which are non - regulated entities carrying out financial activities. This figure represents a notional solvency requirement, calculated if the relevant sectoral rules were to be applied.

B8	Capital requirement for non-controlled participation requirements (groups only)	Amount of the proportional share of the Solvency Capital Requirements of the related insurance and reinsurance undertakings and insurance holding companies which are not controlled participations. This item is only applicable to group reporting and corresponds, for those non controlled entities, to the capital requirement calculated in accordance with the appropriate requirements (whether S2 or sectoral rules depending on the types of undertakings).
B9	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional)	Amount of the capital requirement, calculated according to the rules stated in Art. 17 of Directive 2003/41/EC, for ring-fenced funds relating to pension business operated under Art. 4 of Directive 2003/41/EC. This item is reported only during the transitional period.
B10	The net capital requirement calculated using full internal model, excluding capital add-on	Amount of the total diversified SCR before any capital add-on. $B10 = B4 + B5 + B6 + B7 + B8 + B9$
B12	Solvency capital requirement calculated using full internal model	Amount of total SCR calculated using full internal model $B12 = B10 + B11$
B13	Minimum consolidated group solvency capital requirement (groups only)	Amount of the minimum consolidated group Solvency Capital Requirement as stated in art. 230 of Directive 2009/138/EC. This item is applicable to group reporting only. This item has to be reported only when reporting SCR calculation at the undertaking level.
C5	Estimate of loss-absorbing capacity of technical provisions if modelled within components	This item is only reported for information, in cases where adjustments for loss absorbing capacity of technical provision are modelled within components. $C5 = \text{if}(B5 < > 0, 0, \max(\min(C4 - B4 - C6; A11B); 0))$
C6	Estimate of loss-absorbing capacity of deferred tax if modelled within components	This item is only reported for information, in cases where adjustments for loss absorbing capacity of deferred taxes are modelled within components.
B14	Total amount of Notional Solvency Capital Requirements for ring fenced funds (other than those related to business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional) and remaining part	An amount of the sum of notional SCRs of all ring-fenced funds calculated by full internal model
B14AA	Total amount of Notional Solvency Capital Requirements for remaining part	Amount on notional SCR for remaining part calculated using full internal model
A11A	Gross future discretionary benefits	Amount of technical provisions without risk margin in relation to future discretionary benefits gross of reinsurance
A11B	Net future discretionary benefits	Amount of technical provisions without risk margin in relation to future discretionary benefits net of reinsurance

Technical Annex II: List of quantitative reporting items

S.26.01

Solvency Capital Requirement - Market risk

ITEM		INSTRUCTIONS
A00	Simplifications spread risk ; bonds and loans (Y/N)	Identify whether an undertakings used simplifications for the calculation of spread risk with regard to bonds and loans. The following options shall be used: Y; N.
AA01	Captives simplifications – interest rate risk (Y/N)	Identify whether a captive undertaking used simplifications for the calculation of interest rate risk. The following options shall be used: Y; N.
AA02	Captives simplifications – spread risk (Y/N)	Identify whether a captive undertakings used simplifications for the calculation of spread risk. The following options shall be used: Y; N.
AA03	Captives simplifications – market risk concentration (Y/N)	Identify whether a captive undertaking used simplifications for the calculation of market risk concentration. The following options shall be used: Y; N.
A30	Ring Fenced Fund? (Y/N)	Identifies whether the reported figures are with regard to RFF or with regard to remaining part . One of the options in the following list shall be used: When the items reported refer to a RFF: Y When the items reported refer to a Remaining part: N
A0	Fund number	Identification number for a ring fenced fund; This number is attributed by the undertaking and must be consistent over time and with the fund number in TP (L) F3, item A3, Assets D1 item A2 and Own Funds items A0115.1 ...n. This item is to be reported only when item A30 = Y.

Interest rate risk

C0	Absolute value after shock – Net solvency capital requirement (including the loss absorbing capacity of technical provisions) - interest rate risk	This is the net capital charge for interest rate risk, i.e after adjustment for the loss absorbing capacity of technical provisions: If AA01=Y, this item represents the net capital charge for interest rate risk calculated using simplified calculations for captive undertakings.
D0	Absolute value after shock – Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions) – interest rate risk	This is the gross capital charge for interest rate risk, i.e before adjustment for the loss absorbing capacity of technical provisions: If AA01=Y, this item represents the net capital charge for interest rate risk calculated using simplified calculations for captive undertakings.
A1	Initial absolute values before shock – Assets – Interest rate risk	This is the total value of the assets sensitive to interest rate down shock risk, before shock
A2	Initial absolute values before shock – Assets – Interest rate risk	This is the total value of the asset-sensitive to interest rate up shock risk , before shock
A1A	Initial absolute values before shock – Liabilities – Interest rate risk	This is the total value of the liabilities sensitive to interest rate down shock risk, before shock
A2A	Initial absolute values before shock – Liabilities – Interest rate risk	This is the total value of the liabilities sensitive to interest rate up shock risk , before shock
B1	Absolute values after shock – Assets – Interest rate risk – interest rate down shock	This is the absolute value of assets subject to interest rate down risks after the shock.
B2	Absolute values after shock – Assets – Interest rate risk – interest rate up shock	This is the absolute value of assets subject to interest rate up risks after the shock.
B1A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Interest rate risk-interest rate down shock	This is the absolute value of liabilities (including the loss absorbing capacity of technical provisions) subject to interest rate down risks after the shock.
B2A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provision – Interest rate risk-interest rate up shock	This is the absolute value of liabilities (including the loss absorbing capacity of technical provisions) subject to interest rate up risks after the shock.
C1	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – interest rate risk- interest rate down shock	This is the net capital charge for interest rate down risk, after adjustment for the loss absorbing capacity of technical provisions. $C1 = (A1 - B1) - (A1A - B1A)$ If AA01=Y, item C1 represents the net capital charge for interest rate down risk calculated using simplifications.
C2	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – interest rate risk- interest rate up shock	This is the net capital charge for interest rate up risk, after adjustment for the loss absorbing capacity of technical provisions. $C2 = (A2 - B2) - (A2A - B2A)$. The value of $C2 \geq 0$ If AA01=Y, item C2 represents the net capital charge for interest rate up risk calculated using simplifications.
B1B	Absolute values after shock – Liabilities Interest rate risk- interest rate down shock (excluding the loss-absorbing capacity of technical provisions)	This is the absolute value of liabilities (excluding the loss absorbing capacity of technical provisions) subject to interest rate down risks after the shock.
B2B	Absolute values after shock – Liabilities Interest rate risk- interest rate up shock (excluding the loss-absorbing capacity of technical provisions)	This is the absolute value of liabilities (excluding the loss absorbing capacity of technical provisions) subject to interest rate up risks after the shock.

D1	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- interest rate risk - interest rate down shock	This is the gross capital charge for the interest rate down risk, i.e excluding the loss absorbing capacity of Technical provisions The $D1 = (A1 - B1) - (A1A - B1B)$, the value of $D1 \geq 0$ If $AA01=Y$, D1 represents the gross capital charge for interest rate down risk calculated using simplifications.
D2	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- interest rate up shock	This is the gross capital charge for interest rate up risk i.e excluding the loss absorbing capacity of Technical provisions. $D2 = (A2 - B2) - (A2A - B2B)$ If $AA01=Y$, item D2 represents the net capital charge for interest rate up risk calculated using simplifications.
Equity risk		
C3	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – equity risk	This is the net capital charge for equity risk, i.e after adjustment for the loss absorbing capacity of technical provisions. The value of $C3 \geq 0$.
D3	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- equity risk	This is the gross capital charge for equity risk, i.e before adjustment for the loss absorbing capacity of technical provisions. The value of $D3 \geq 0$.
A4	Initial absolute values before shock – Assets – equity risk – type 1 equities	This is the initial absolute value of the assets subject to the equity risk charge related to type 1 equities $A4 = A5 + A6 + A7$
A4A	Initial absolute values before shock – Liabilities – equity risk – type 1 equities	This is the initial absolute value of the liabilities subject to equity risk related to type 1 equities.
B4	Absolute values after shock – Assets – Equity risk – type 1 equities	This is the absolute value of the assets underlying equity risk charge for type 1 equities category, after the shock. $B4 = B5 + B6 + B7$
B4A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provision – Equity risk –type 1 equities	This is the absolute value of the liabilities underlying equity risk charge for type 1 equities, after the shock and including the loss absorbing capacity of technical provisions.
C4	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – equity risk –type 1 equities	This is the net capital charge for equity risk (for type 1 equities), after adjustment for the loss absorbing capacity of technical provisions. $C4 = (A4 - B4) - (A4A - B4A)$ The value of $C4 \geq 0$.
B4B	Absolute values after shock – Liabilities (excluding the loss absorbing capacity of technical provisions) - equity risk –type 1 equities	This is the absolute value of the liabilities underlying equity risk charge (for type 1 equities), after the shock but excluding the loss absorbing capacity of technical provisions.
D4	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- Equity risk –type 1 equities	This is the gross capital charge for equity risk for type 1 equities, i.e excluding the loss absorbing capacity of technical provisions $D4 = (A4 - B4) - (A4A - B4B)$ The value of $D4 \geq 0$.
A5	Initial absolute values before shock – Assets – equity risk –type 1 equities – type 1 equity	This is the initial absolute value of the assets subject to the equity risk,(for type 1 equities, type 1 equity).
B5	Absolute values after shock – Assets – equity risk –type 1 equities –type 1 equity	This is the absolute value of the assets subject the equity risk charge , (for type 1 equities, type 1 equity), after the shock.
A6	Initial absolute values before shock – Assets – equity risk –type 1 equities – strategic participation	This is the initial absolute value of the assets subject to the equity risk (for type 1 equities, strategic participations).
B6	Absolute values after shock – Assets – equity risk –type 1 equities – strategic participation	This is the absolute value of the assets subject to equity risk (for type 1 equities, strategic participations). after the shock.
A7	Absolute values before shock – Assets – equity risk – type 1 equities – duration based	This is the absolute value of the assets subject to the equity risk (for type 1 equities, duration based).
B7	Absolute values after shock – Assets – equity risk – type 1 equities – duration based	This is the absolute value of the assets subject to equity risk (for type 1 equities, duration based), after the shock
A8	Initial absolute values before shock – Assets – equity risk –type 2 equities	This is the initial absolute value of the assets subject to the equity risk for type 2 equities $A8 = A9 + A10 + A11$
A8A	Initial absolute values before shock – Liabilities – equity risk –type 2 equities	This is the initial absolute value of liabilities subject to the equity risk-for type 2 equities
B8	Absolute values after shock – Assets – Equity risk – type 2 equities	This is the absolute value of the assets subject to equity risk charge for type 2 equities, after the shock. $B8 = B9 + B10 + B11$
B8A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provision – Equity risk –type 2 equities	This is the absolute value of liabilities subject to equity risk (for type 2 equities), after the shock and including the loss absorbing capacity of technical provisions

C8	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – equity risk –type 2 equities	This is the net capital charge for equity risk (for type 2 equities) after adjustment for the loss absorbing capacity of technical provisions. C8 = (A8 – B8) – (A8A- B8A) The value of C8 >= 0.
B8B	Absolute values after shock – Liabilities (excluding the loss absorbing capacity of technical provisions) equity risk –type 2 equities	This is the absolute value of the liabilities subject to equity risk (for type 2 equities), after the shock but excluding the loss absorbing capacity of technical provisions.
D8	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- Equity risk –type 2 equities	This is the gross capital charge for equity risk for type 2 equities, i.e excluding the loss absorbing capacity of technical provisions The D8 = (A8 – B8) – (A8A- B8B) The value of D8 >= 0
A9	Initial absolute values before shock – Assets – equity risk –type 2 equities –type 2 equity	This is the value of the assets subject to the equity risk for type 2 equities
B9	Absolute values after shock – Assets – equity risk –type 2 equities –type 2 equity	This is the absolute value of the assets subject to equity risk (for type 2 equities), after the equity shock.
A10	Initial absolute values before shock – Assets – equity risk – type 2 equities – strategic participations	This is the value of the assets subject to the equity risk for type 2 equities, strategic participations).
B10	Absolute values after shock – Assets – equity risk –type 2 equities – strategic participations	This is the absolute value of the assets subject to equity risk (for type 2 equities, strategic participations), after the equity shock.
A11	Initial absolute values before shock – Assets – equity risk – type 2 equities - duration based	This is the absolute value of the assets subject to the equity risk (for type 2 equities, duration based)
B11	Absolute values after shock – Assets – Equity risk – type 2 equities - duration based	This is the absolute value of the assets subject to equity risk for type 2 equities category, duration based, after the shock
Property risk		
A12	Initial absolute values before shock – Assets – Property risk	This is the absolute value of the assets subject to the property risk-
A12A	Initial absolute values before shock – Liabilities – Property risk	This is the value of the liabilities value subject to the property risk charge.
B12	Absolute values after shock – Assets – Property risk	This is the absolute value of the assets subject to property risk charge, after the property shock.
B12A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provision – Property risk	This is the absolute value of the liabilities underlying property risk charge, after the property shock and including the loss absorbing capacity of technical provisions
C12	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – property risk	This is the net capital charge for property risk, after adjustment for the loss absorbing capacity of technical provisions. C12 = (A12 – B12) – (A12A- B12A) The value of C12 >= 0.
B12B	Absolute values after shock – Liabilities (excluding the loss absorbing capacity of technical provisions) - property risk	This is the absolute value of the liabilities underlying property risk charge, after the property shock but excluding the loss absorbing capacity of technical provisions.
D12	Absolute value after shock – Gross solvency capital(excluding the loss-absorbing capacity of technical provisions)- Property risk	This is the gross capital charge for property risk, i.e excluding the loss absorbing capacity of technical provisions. D12 = (A12 – B12) – (A12A- B12B) The value of D12 >= 0
Spread risk		
C13	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – spread risk	This is the net capital charge for spread risk, after adjustment for the loss absorbing capacity of technical provisions. C13 = (C14+C15+C18) The value of C13 >= 0.
D13	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- spread risk	This is the gross capital charge for spread risk, before adjustment for the loss absorbing capacity of technical provisions. D13 = (D14+D15+D18) The value of D13 >= 0
A14	Initial absolute values before shock – Assets – spread risk – bonds and loans	This is the absolute value of the assets subject to the spread risk-for bonds and loans.
A14A	Initial absolute values before shock – Liabilities – spread risk – bonds and loans	This is the absolute value of the liabilities subject to the spread risk for bonds and loans-

B14	Absolute values after shock – Assets – spread risk – bonds and loans	This is the absolute value of the assets subject to the spread risk for bonds and loans, after the shock.
B14A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provision – spread risk – bonds and loans	This is the absolute value of the liabilities underlying the spread risk charge for bonds and loans, after the shock and including the loss absorbing capacity of technical provisions.
C14	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – spread risk - bonds and loans	This is the net capital charge for spread risk on bonds and loans, after adjustment for the loss absorbing capacity of technical provisions. $C14 = (A14 - B14) - (A14A - B14A)$ The value of $C14 \geq 0$. If $Y00 = Y$, $C14$ represents the net solvency capital requirement for spread risk - bonds and loans, calculated using simplifications
B14B	Absolute values after shock – Liabilities (excluding the loss absorbing capacity of technical provisions)– spread risk – bonds and loans	This is the absolute value of the liabilities subject to the spread risk for bonds and loans, after the shock but excluding the loss absorbing capacity of technical provisions.
D14	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- spread risk - bonds and loans	This is the gross capital charge for spread risk on bonds and loans, i.e excluding the loss absorbing capacity of technical provisions . $D14 = (A14 - B14) - (A14A - B14B)$ The value of $D14 \geq 0$. If $A00 = Y$, $D14$ represents gross solvency capital requirement for spread risk - bonds and loans calculated using simplifications. -
C15	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – spread risk - credit derivatives	This is the net capital charge for spread risk on credit derivatives, after adjustment for the loss absorbing capacity of technical provisions. The value of $C15 \geq 0$
D15	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- spread risk - credit derivatives	This is the gross capital charge for spread risk on credit derivatives, i.e before adjustment for the loss absorbing capacity of technical provisions. . The value of $D15 \geq 0$.
A16	Initial absolute values before shock – Assets - spread risk – credit derivatives – downward shock on credit derivatives	This is the absolute value of assets subject to the downward shock in respect to the spread risk on credit derivatives.
A16A	Initial absolute values before shock – Liabilities - spread risk – credit derivatives – downward shock on credit derivatives	This is the absolute value of the liabilities subject to the downward shock in respect to spread risk on credit derivatives.
B16	Absolute values after shock – Assets – spread risk – credit derivatives – downward shock on credit derivatives	This is the absolute value of the assets subject the downward shock for spread risk on credit derivatives, after the shock.
B16A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provision – spread risk –credit derivatives – downward shock on credit derivatives	This is the absolute value of the liabilities subject to the downward shock for spread risk on credit derivatives, after the shock and including the loss absorbing capacity of technical provisions.
C16	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – spread risk - credit derivatives – downward shock on credit derivatives	This is the net capital charge for the downward shock for spread risk on credit derivatives, after adjustment for the loss absorbing capacity of technical provisions. $C16 = (A16 - B16) - (A16A - B16A)$ The value of $C16 \geq 0$.
B16B	Absolute values after shock – Liabilities (excluding the loss absorbing capacity of technical provisions)– spread risk –credit derivatives – downward shock on credit derivatives	This is the absolute value of the liabilities subject to the downward shock for spread risk on credit derivatives, after the shock but excluding the loss absorbing capacity of technical provisions.
D16	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- spread risk - credit derivatives – downward shock on credit derivatives	This is the gross capital charge for the downward shock for spread risk on credit derivatives, i.e excluding the loss absorbing capacity of technical provisions. $D16 = (A16 - B16) - (A16A - B16B)$ The value of $D16 \geq 0$.
A17	Initial absolute values before shock – Assets - spread risk – credit derivatives - upward shock on credit derivatives	This is the absolute-value of assets subject to the upward shock in respect to the spread risk on credit derivatives-
A17A	Initial absolute values before shock – Liabilities - spread risk – credit derivatives - upward shock on credit derivatives	This is the absolute value of the liabilities subject to-the upward shock in respect to spread risk on credit derivatives.
B17	Absolute values after shock – Assets – spread risk –credit derivatives – upward shock on credit derivatives	This is the absolute value of the assets subject to the upward shock for spread risk on credit derivatives, after the shock

B17A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provision – spread risk – credit derivatives – upward shock on credit derivatives	This is the absolute value of the liabilities subject to the upward shock for spread risk on credit derivatives, after the shock and including the loss absorbing capacity of technical provisions.
C17	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – spread risk - credit derivatives – upward shock on credit derivatives	This is the net capital charge for the upward shock for spread risk on credit derivatives, after adjustment for the loss absorbing capacity of technical provisions. C17 = (A17 – B17) – (A17A- B17A) The value of C17 >= 0.
B17B	Absolute values after shock – Liabilities (excluding the loss absorbing capacity of technical provisions) – spread risk – credit derivatives – upward shock on credit derivatives	This is the absolute value of the liabilities subject to the upward shock for spread risk on credit derivatives, after the shock but excluding the loss absorbing capacity of technical provisions.
D17	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- spread risk - credit derivatives –upward shock on credit derivatives	This is the gross capital charge for the upward shock for spread risk on credit derivatives, i.e excluding the loss absorbing capacity of technical provisions. D17 = (A17 – B17) – (A17A- B17B) The value of D17 >= 0.
A18	Initial absolute values before shock – Assets – spread risk – tradable securities or other financial instruments based on repackage loans	This is the absolute value of the assets subject to the spread risk for tradable securities or other financial instruments based on repackage loans.
A18A	Initial absolute values before shock – Liabilities – spread risk – tradable securities or other financial instruments based on repackage loans	This is the absolute value of the liabilities subject to the spread risk on tradable securities or other financial instruments based on repackage loans.
B18	Absolute values after shock – Assets – spread risk – tradable securities or other financial instruments based on repackage loans	This is the absolute value of the assets subject to the spread risk on tradable securities or other financial instruments based on repackage loans, after the shock.
B18A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provision – spread risk – tradable securities or other financial instruments based on repackage loans)	This is the absolute value of the liabilities subject to the spread risk on tradable securities or other financial instruments based on repackage loans, after the shock and including the loss absorbing capacity of technical provisions.
C18	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – spread risk - tradable securities or other financial instruments based on repackage loans	This is the net capital charge for spread risk on tradable securities or other financial instruments based on repackage loans, after adjustment for the loss absorbing capacity of technical provisions. C18 = (A18 – B18) – (A18A- B18A) The value of C18 >= 0.
B18B	Absolute values after shock – Liabilities (excluding the loss absorbing capacity of technical provisions)- spread risk – tradable securities or other financial instruments based on repackage loans	This is the absolute value of the liabilities subject to the spread risk on tradable securities or other financial instruments based on repackage loans, after the shock but excluding the loss absorbing capacity of technical provisions.
D18	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- spread risk - tradable securities or other financial instruments based on repackage loans	This is the gross capital charge for spread risk on tradable securities or other financial instruments based on repackage loans, i.e excluding the loss absorbing capacity of technical provisions. D18 = (A18 – B18) – (A18A- B18B)

Concentration risk

A19	Initial absolute values before shock – Assets – market risk concentrations	This is the absolute value of the asset subject to the market risk concentrations For captive undertakings, if A003=Y, item A19 represents the absolute value of the assets subject to the market risk concentration, after taking into account exemptions allowed for captives.
A19A	Initial absolute values before shock – Liabilities – market risk concentrations	This is the absolute value of the liabilities subject to the market risk concentration.

		For captive undertakings, if A003=Y, item A19A represents the absolute value of the assets subject to the market risk concentration, after taking into account exemptions allowed for by captives.
C19	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – market risk concentrations	This is the net capital charge for market risk concentrations, after adjustment for the loss absorbing capacity of technical provisions, aggregated for each single name exposure. For captive undertakings, if cell A003=Y, the item C19 represents net capital charge for market risk concentration, calculated using simplified calculation.
D19	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- market risk concentrations	This is the gross capital charge for market risk concentrations, aggregated for each single name exposure, i.e excluding the loss absorbing capacity of technical provisions.
Currency risk		
A20	Initial absolute values before shock – Assets – currency risk	This is the absolute value of assets subject to the currency risk
A20A	Initial absolute values before shock – Liabilities – currency risk	This is the value of the liabilities subject to the currency risk.
C20	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – currency risk	This is the sum for the different currencies of: - the capital requirement (including the loss absorbing capacity of technical provisions) for an increase in value of the foreign currency against the local currency; - the capital requirement (including the loss absorbing capacity of technical provisions) for a decrease in value of the foreign currency against the local currency.
D20	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions) currency risk	This is the sum for the different currencies of: - the capital requirement (excluding the loss absorbing capacity of technical provisions) for an increase in value of the foreign currency against the local currency; - the capital requirement (excluding the loss absorbing capacity of technical provisions) for a decrease in value of the foreign currency against the local currency.
Diversification within market risk module		
C22	Diversification within market risk module -net	This is the diversification effect within the market risk module as a result of the aggregation of the net capital requirements (including loss absorbing capacity of technical provisions) of the single risk sub-modules.
D22	Diversification within market risk module - gross	This is the diversification effect within the market risk module as a result of the aggregation of the gross capital requirements (excluding loss absorbing capacity of technical provisions) of the single risk sub-modules.
Total solvency capital requirement for market risk		
C23	Total net solvency capital requirements (including the loss absorbing capacity of technical provisions) for market risk	This is the total net capital charge for all market risks, including loss absorbing capacity of technical provisions, calculated using the standard formula. Without precluding the final design of reporting on SCR, it should be the same as reported on SCR B2A, item A1 For the purpose of preparatory phase, in case of undertakings with ring fenced funds, and when reporting the most material ring fenced fund and the remaining part, the reference between item C23 and item A1 on SCR B2A is not applicable
D23	Gross solvency capital (excluding the loss-absorbing capacity of technical provisions) for market risk	This is the total gross capital charge for all market risks, excluding loss absorbing capacity of technical provisions, calculated using the standard formula. It should be the same as reported on SCR B2A. item B1. For the purpose of preparatory phase, in case of undertakings with ring fenced funds and when reporting the most material ring fenced funds and the remaining part, the reference between item D23 and item B1 on SCR B2A is not applicable.

Technical Annex II: List of quantitative reporting items

S.26.02

Solvency Capital Requirement - Counterparty default risk

	ITEM	INSTRUCTIONS
A00	Simplifications used (Y/N)	Identify whether an undertakings used simplifications for the calculation of counter party default risk. The following options shall be used: Y; N.
A001	Captive simplifications (Y/N)	Identify whether a captive undertakings used simplifications for the calculation of counter party default risk. The following options shall be used: Y; N.
A30	Ring Fenced Fund? (Y/N)	Identifies whether the reported figures are with regard to RFF or with regard to remaining part . One of the options in the following list shall be used: When the items reported refer to a RFF: Y When the items reported refer to a Remaining part: N
A0	Fund number	Identification number for a ring fenced fund; This number is attributed by the undertaking and must be consistent over time and with the fund number in TP (L) F3, item A3, Assets D1 item A2 and Own Funds items A0115.1 ...n. This item is to be reported only when item A30 = Y.
A10	Name of a single name exposure	Identify, for each of the 10 largest single name exposures in terms of the Loss Given Default, the name of the exposure
AA10	Code of single name exposure	Identification code: - Legal Entity Identifier (LEI) if available; - Interim entity identifier (pre-LEI) if available. If none is available this item should not be reported
AB10	Type of code	Identification of the code used in AB10: - LEI - Pre-LEI
A1	Type 1 exposures – Single name exposure X – Loss Given Default	The value of the Loss Given Default for each of the 10 largest single name exposure.
B1	Type 1 exposures – Single name exposure X – Probability of Default	The-Probability of Default for each of the 10 largest single name exposure.
C0	Type 1 exposures – Gross solvency capital requirement (excluding the loss-absorbency capacity of technical provisions)	This is the gross capital charge (excluding the loss-absorbency capacity of technical provisions) for counterparty default risk arising from all Type 1 exposures as defined for Solvency 2 purposes.
C1	Type 2 exposures – Gross solvency capital requirement (excluding the loss-absorbency capacity of technical provisions)	This is the gross capital charge (excluding the loss-absorbency capacity of technical provisions) for counterparty default risk arising from all Type 2 exposures, as defined for Solvency 2 purposes
A2	Type 2 exposures - Receivables from Intermediaries due for more than 3 months – Loss Given Default	This is the value of Loss Given Default for Type 2 counterparty risk arising from intermediaries due for more than 3 months.
A3	Type 2 exposures - All type 2 exposures other than receivables from Intermediaries due for more than 3 months – Loss Given Default	This is the value of Loss Given Default for Type 2 counterparty risk arising from all type 2 exposures other than receivables from Intermediaries due for more than 3 months.
C3	Diversification within counterparty default risk module – gross solvency capital requirement	This is the amount of gross diversification effect allowed in aggregation of capital requirements for counterparty default risk for Type 1 and Type 2 exposures. $C3 = C4 - (C0 + C1)$
D4	Total net solvency capital requirement (including the loss absorbing capacity of technical provisions) for counterparty default risk	This is the total amount of the net capital charge (including the loss-absorbency capacity of technical provisions) for counterparty default risk. The amount should agree with the figures reported in item A2 of SCR-B2A.
C4	Total gross solvency capital requirement (excluding the loss - absorbing capacity of technical provisions) for counterparty default risk	This is the total amount of the gross capital charge (excluding the loss-absorbency capacity of technical provisions) for counterparty default risk. The amount should agree with the amount reported in item B2 of SCR-B2A.

Technical Annex II: List of quantitative reporting items

S.26.03

Solvency Capital Requirement - Life underwriting risk

ITEM		INSTRUCTIONS
A01	Simplifications used : mortality risk - (Y/N)	Identify whether an undertaking used simplifications for a calculation of mortality risk. The following options shall be used: Y; N.
A02	Simplifications used - longevity (Y/N)	Identify whether an undertaking used simplifications for the calculation of longevity risks. The following options shall be used: Y; N.
A03	Simplifications used : disability-morbidity risk - (Y/N)	Identify whether an undertaking used simplifications for the calculation of disability - morbidity risk. The following options shall be used: Y; N.
A04	Simplifications used : lapse risk - (Y/N)	Identify whether an undertaking used simplifications for the calculation of lapse risk. The following options shall be used: Y; N.
A05	Simplifications used : life expense risk - (Y/N)	Identify whether an undertaking used simplifications for the calculation of life expense risk. The following options shall be used: Y; N.
A06	Simplifications used : life catastrophe risk - (Y/N)	Identify whether an undertaking used simplifications for the calculation of life catastrophe risk. The following options shall be used: Y; N.
A001	Captives simplifications (Y/N)	Identify whether a captive undertaking used simplifications for the calculation of life underwriting risk. The following options shall be used: Y; N. If item A001=Y, items A01 to A06 are applicable where relevant.
A30	Ring Fenced Fund? (Y/N)	Identifies whether the reported figures are with regard to RFF or with regard to remaining part. One of the options in the following list shall be used: When the items reported refer to a RFF: Y When the items reported refer to a Remaining part: N
A0	Fund number	Identification number for a ring fenced fund; This number is attributed by the undertaking and must be consistent over time and with the fund number in TP (L) F3, item A3, Assets D1 item A2 and Own Funds items A0115.1 ...n. This item is to be reported only when item A30 = Y.

Mortality risk

A1	Initial absolute values before shock – Assets – Mortality risk	This is the absolute value of the assets subject to mortality risk, before the shock.
A1A	Initial absolute values before shock – Liabilities – Mortality risk	This is the absolute value of liabilities subject to mortality risk, before the shock.
B1	Absolute values after shock – Assets – Mortality risk	This is the absolute value of the assets subject to mortality risk after the shock (i.e. permanent increase in mortality rates).
B1A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Mortality risk	This is the absolute value of the liabilities (including the loss absorbing capacity of technical provisions) subject to risk, after the shock (i.e. permanent increase in mortality rates).
C1	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Mortality risk	This is the net capital charge for mortality risk after the shock (after adjustment for the loss absorbing capacity of technical provisions). $C1 = (A1 - A1A) - (B1 - B1A)$, $C1 \geq 0$. If A01=Y, C1 represents net capital charge for mortality risk calculated using simplifications.
B1B	Absolute values after shock – Liabilities (excluding the loss-absorbing capacity of technical provisions) – Mortality risk	This is the absolute value of the liabilities subject to mortality risk, after the shock (permanent increase in mortality rates).
D1	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions) - Mortality risk	This is the gross capital charge for mortality risk. $D1 = (A1 - A1A) - (B1 - B1B)$, $D1 \geq 0$. If A01=Y, D1 represents gross capital charge for mortality risk calculated using simplifications.

Longevity risk

A2	Initial absolute values before shock – Assets – Longevity risk	This is the absolute value of the assets subject to longevity risk, before the shock.
A2A	Initial absolute values before shock – Liabilities – Longevity risk	This is the absolute value of liabilities subject to longevity risk charge, before the shock.
B2	Absolute values after shock – Assets – Longevity risk	This is the absolute value of the assets subject to longevity risk, after the shock (i.e. permanent decrease in mortality rates).

B2A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Longevity risk	This is the absolute value of the liabilities (including the loss absorbing capacity of technical provisions subject to longevity risk, after the shock (i.e. permanent decrease in mortality rates).
C2	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Longevity risk	This is the net capital charge for longevity risk after the shock (after adjustment for the loss absorbing capacity of technical provisions). $C2 = (A2-A2A)-(B2-B2A)$, $C2 \geq 0$. If A02=Y, C2 represents net capital charge for longevity risk calculated using simplifications
B2B	Absolute values after shock – Liabilities (excluding the loss-absorbing capacity of technical provisions)– Longevity risk	This is the absolute value of the liabilities subject to longevity risk charge, after the shock (permanent decrease in mortality rates).
D2	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- Longevity risk	This is the gross capital charge for longevity risk. $D2 = (A2-A2A)-(B2-B2B)$, $D2 \geq 0$. If A02=Y, D2 represents gross capital charge for longevity risk calculated using simplifications.
Disability – morbidity risk		
A3	Initial absolute values before shock – Assets – Disability - morbidity risk	This is the absolute value of the assets subject to disability - morbidity risk, before the shock.
A3A	Initial absolute values before shock – Liabilities – Disability- morbidity risk	This is the absolute value of liabilities subject to disability – morbidity risk, before the shock.
B3	Absolute values after shock – Assets – Disability - morbidity risk	This is the absolute value of the assets subject to disability – morbidity risk, after the shock (i.e. as prescribed by standard formula: an increase in disability and morbidity rates which are used in calculation of technical provisions to reflect the disability and morbidity experience in the next following 12 months , and for all months after the following 12 months and a decrease in the disability and morbidity rates recovery rates used in the calculation of technical provisions in respect of next 12 months and for all year thereafter.
B3A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Disability - morbidity risk	This is the absolute value of liabilities (including the loss absorbing capacity of technical provisions) subject to disability - morbidity risk , after the shock (i.e. as prescribed by standard formula, see description provided in definition to cell B3).
C3	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Disability – morbidity risk	This is the net capital charge for disability - morbidity risk, after adjustment for the loss absorbing capacity of technical provisions. $C3 = (A3-A3A)-(B3-B3A)$, $C3 \geq 0$. If A03=Y, C3 represents net capital charge for disability and morbidity risk calculated using simplifications.
B3B	Absolute values after shock – Liabilities – Disability - morbidity risk (excluding the loss-absorbing capacity of technical provisions)	This is the absolute value of the liabilities subject to disability - morbidity risk, after the shock (i.e. as prescribed by standard formula, see description provided in definition to cell B3).
D3	Absolute value after shock – Gross solvency capital- Disability - morbidity risk (excluding the loss-absorbing capacity of technical provisions)	This is the gross capital charge for disability – morbidity risk. $D3 = (A3-A3A)-(B3-B3B)$, $D3 \geq 0$. If A03=Y, D3 represents gross capital charge for disability and morbidity risk calculated using simplifications.
Lapse risk		
C04	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Lapse risk	This is the overall net capital charge for lapse risk, after adjustment for the loss absorbing capacity of technical provisions. $C04 = \text{Max} (C4, C5, C6)$ If A04=Y, C04 represents net capital charge for lapse risk calculated using simplifications.
D04	Absolute value after shock – Gross solvency capital- Lapse risk (excluding the loss-absorbing capacity of technical provisions)	This is the overall gross capital charge (excluding the loss-absorbing capacity of technical provisions) for lapse risk. If A04=Y, D04 represents gross capital charge for lapse risk calculated using simplifications.
A4	Initial absolute values before shock – Assets – Lapse risk- risk of increase in lapse rates	This is the absolute value of the assets subject to the risk of an increase in lapse rates, before the shock

A4A	Initial absolute values before shock – Liabilities – Lapse risk – risk of increase in lapse rates	This is the absolute value of liabilities subject to the risk of an increase in lapse rates, before the shock.
B4	Absolute values after shock – Assets – Lapse risk –risk of increase in lapse rates	This is the absolute value of the assets subject to the risk of an increase in lapse rates, after the shock (i.e. permanent increase in the lapse rates). If A04=Y, B4 is calculated using simplified calculation for lapse rates.
B4A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Lapse risk –risk of increase in lapse rates	This is the absolute value of liabilities (including the loss absorbing capacity of technical provisions) subject to the risk of an increase in lapse rates, after the shock (i.e. permanent increase in the lapse rates). If A04=Y, B4A is calculated using simplified calculation for lapse rates.
C4	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Lapse risk –risk of increase in lapse rates	This is the net capital charge for the risk of a permanent increase in lapse rates, after adjustment for the loss absorbing capacity of technical provisions. $C4 = (A4 - A4A) - (B4 - B4A)$, $C4 \geq 0$. If A04=Y, C4 represents net capital charge for a permanent increase in lapse rates, calculated using simplified calculation for lapse rate, after adjustment for the loss absorbing capacity of technical provisions.
B4B	Absolute values after shock – Liabilities (excluding the loss-absorbing capacity of technical provisions) – Lapse risk –risk of increase in lapse rates)	This is the absolute value of the liabilities subject to the risk of a permanent increase in lapsation rates, after the shock (permanent increase in lapse rates). If A04=Y, B4B is calculated using simplified calculation for lapse rates.
D4	Absolute value after shock – Gross solvency capital- Lapse risk –risk of increase lapse rates (excluding the loss-absorbing capacity of technical provisions)	This is the gross capital charge (excluding the loss-absorbing capacity of technical provisions) for the risk of a permanent increase in lapse rates. . $D4 = (A4 - A4A) - (B4 - B4B)$, $D4 \geq 0$. If A04=Y, C4 represents gross capital charge for a permanent increase in lapse rates, calculated using simplified calculation for lapse rate.
A5	Initial absolute values before shock – Assets – Lapse risk- risk of decrease in lapse rates	This is the absolute value of the assets subject to the risk of a permanent decrease in lapse rates, before the shock.
A5A	Initial absolute values before shock – Liabilities – Lapse risk – risk of decrease in lapse rates	This is the absolute value of liabilities subject to the risk of a permanent decrease in lapse rates, before the shock.
B5	Absolute values after shock – Assets – Lapse risk –risk of decrease in lapse rates	This is the absolute value of the assets subject to the risk of a permanent decrease in lapse rates, after the shock (i.e. permanent decrease in the rates of lapse rates). If A04=Y, B5 is calculated using simplified calculation for lapse rates.
B5A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Lapse risk –risk of decrease in lapse rates	This is the absolute value of the liabilities (including the loss absorbing capacity of technical provisions) subject to the risk of a permanent decrease in lapse rates, after the shock (i.e. permanent decrease of the rates of lapse rates). If A04=Y, B5A is calculated using simplified calculation for lapse rates.
C5	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Lapse risk –risk of decrease in lapse rates	This is the net capital charge for the risk of a permanent decrease in lapse rates, after adjustment for the loss absorbing capacity of technical provisions. $C5 = (A5 - A5A) - (B5 - B5A)$, $C5 \geq 0$. If A04=Y, C5 represents net capital charge for a permanent decrease in lapse rates, calculated using simplified calculation for lapse rate, after adjustment for the loss absorbing capacity of technical provisions.
B5B	Absolute values after shock – Liabilities (excluding the loss-absorbing capacity of technical provisions)– Lapse risk –risk of decrease in lapse rates	This is the absolute value of the liabilities subject to the risk of a permanent decrease in lapse rates, after the shock (permanent decrease in lapse rates). If A04=Y, B5B is calculated using simplified calculation for lapse rates.
D5	Absolute value after shock – Gross solvency capital- Lapse risk (excluding the loss-absorbing capacity of technical provisions) –risk of decrease in lapse rates	This is the gross capital charge for the risk of a decrease in lapse rates as used to compute the risk. $D5 = (A5 - A5A) - (B5 - B5B)$, $D5 \geq 0$. If A04=Y, C5 represents gross capital charge for a permanent decrease in lapse rates, calculated using simplified calculation for lapse rate
A6	Initial absolute values before shock – Assets – Lapse risk- mass lapse risk	This is the absolute value of the assets subject to mass lapse risk, before the shock.
A6A	Initial absolute values before shock – Liabilities – Lapse risk –mass lapse risk	This is the absolute value of liabilities subject to mass lapse risk, before the shock.

B6	Absolute values after shock – Assets – Lapse risk – mass lapse risk	This is the absolute value of the assets subject to mass lapse risk charge, after the shock.
B6A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Lapse risk – mass lapse risk	This is the absolute value of the liabilities (including the loss absorbing capacity of technical provisions) subject to mass lapse risk charge, after the shock.
C6	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Lapse risk – mass lapse risk	This is the net capital charge for mass lapse risk, after adjustment for the loss absorbing capacity of technical provisions. Net capital charge $C6 = (A6-A6A)-(B6-B6A)$, $C6 \geq 0$.
B6B	Absolute values after shock – Liabilities (excluding the loss-absorbing capacity of technical provisions)– Lapse risk – mass lapse risk	This is the absolute value of the liabilities subject to mass lapse risk charge, after the shock.
D6	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- Lapse risk – mass lapse risk	This is the gross capital charge for mass lapse risk, after the shock. Gross capital charge $D6 = (A6-A6A)-(B6-B6B)$, $D6 \geq 0$.

Life - expense risk

A7	Initial absolute values before shock – Assets – Life - expense risk	This is the absolute value of the assets subject to life - expense risk, before the shock
A7A	Initial absolute values before shock – Liabilities – Life - expense risk	This is the absolute value of liabilities subject to life -expense risk, before the shock
B7	Absolute values after shock – Assets – Life - expense risk	This is the absolute value of the assets subject to life expense risk, after the shock (i.e.shock as prescribed by standard formula: a % increase the amount of expenses taken into account in the calculation of technical provisions and increase in 1 percentage point to the expense inflation rate (expressed as a percentage) used for the calculation of technical provision) If $A05=Y$, $B7 = 0$
B7A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Life - expense risk	This is the absolute value of liabilities (including the loss absorbing capacity of technical provisions) subject to expense risk, after the shock (i.e a shock. as prescribed by standard formula, refer to description provided within definition to cell B7)). If $A05=Y$, $B7A = 0$
C7	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Life expense risk	This is the net capital charge for expense risk, including adjustment for the loss absorbing capacity of technical provisions. Net capital charge $C7 = (A7-A7A)-(B7-B7A)$, $C7 \geq 0$. If $A05=Y$, $C7$ represents net capital charge for life expense risk calculated using simplified calculation
B7B	Initial absolute values after shock – Liabilities (excluding the loss-absorbing capacity of technical provisions) – Life - expense risk	This is the absolute value of the liabilities subject to expense risk, after the shock (i.e.shock as prescribed by standard formula, refer to description provided within definition to cell B7).
D7	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- Life -expense risk	This is the gross capital charge for expense risk. Gross capital charge $D7 = (A7-A7A)-(B7-B7B)$, $D7 \geq 0$. If $A05=Y$, $D7$ represents gross capital charge for life expense risk calculated using simplified calculations.

Revision risk

A8	Initial absolute values before shock – Assets – Revision risk	This is the absolute value of the assets subject to revision risk,before the shock.
A8A	Initial absolute values before shock – Liabilities – Revision risk	This is the absolute value of liabilities subject to revision risk,before the shock.
B8	Absolute values after shock – Assets – Revision risk	This is the absolute value of the assets subject to revision risk, after the shock (i.e. shock as prescribed by standard formula: a % increase in the amount of annuity benefits taken into account in the calculation of technical provisions.
B8A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical	This is the absolute value of liabilities (including the loss absorbing capacity of technical provisions) subject to revision risk charge, after the shock (i.e. as prescribed by standard formula, refer to a definition in item B8).

	provisions) – Revision risk	
C8	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Revision risk	This is the net capital charge for revision risk including adjustment for the loss absorbing capacity of technical provisions. Net capital charge $C8 = (A8-A8A)-(B8-B8A)$, $C8 \geq 0$.
B8B	Absolute values after shock – Liabilities (excluding the loss-absorbing capacity of technical provisions) – Revision risk	This is the absolute value of the liabilities (excluding the loss-absorbing capacity of technical provisions) underlying revision risk charge, after the shock ((i.e. shock as prescribed by standard formula, refer to a definition provided in item B8), as used to compute the risk.
D8	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- Revision risk	This is the gross capital charge (excluding the loss-absorbing capacity of technical provisions) for revision risk. Gross capital charge $D8 = (A8-A8A)-(B8-B8B)$, $D8 \geq 0$.
Catastrophe risk		
A9	Initial absolute values before shock – Assets – Life Catastrophe risk	This is the absolute value of the assets subject to life catastrophe risk, before the shock.
A9A	Initial absolute values before shock – Liabilities – Life Catastrophe risk	This is the absolute value of liabilities subject to life catastrophe risk, before the shock.
B9	Absolute values after shock – Assets – Life Catastrophe risk	This is the absolute value of the assets subject to life catastrophe risk, after the shock.
B9A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Life catastrophe risk	This is the absolute value of liabilities (including the loss absorbing capacity of technical provisions) subject to life catastrophe risk charge, after the shock
C9	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – life catastrophe risk	This is the net capital charge for life catastrophe risk including adjustment for the loss absorbing capacity of technical provisions. Net capital charge $C9 = (A9-A9A)-(B9-B9A)$, $C9 \geq 0$. If $A06=Y$, $C9$ represents net capital charge for life catastrophe risk calculated using simplified calculations.
B9B	Absolute values after shock – Liabilities (excluding the loss-absorbing capacity of technical provisions) - life catastrophe risk	This is the absolute value of the liabilities subject to life catastrophe risk, after the shock
D9	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- life catastrophe risk	This is the gross capital charge for life catastrophe risk. Gross capital charge $D9 = (A9-A9A)-(B9-B9B)$, $D9 \geq 0$. If $A06=Y$, $D9$ represents gross capital charge for life catastrophe risk calculated using simplified calculations.
Diversification within life underwriting risk module		
C10	Diversification within life underwriting risk module – Net	This is the diversification effect within the life underwriting risk module as a result of the aggregation of the net capital requirements (after adjustment for the loss absorbing capacity of technical provisions) of the single risk sub-modules. $C10 = C11 - C1 - C2 - C3 - C04 - C7 - C8 - C9$
D10	Diversification within life underwriting risk module –Gross	This is the diversification effect within the life underwriting risk module as a result of the aggregation of the gross capital requirements (after adjustment for the loss absorbing capacity of technical provisions) of the single risk sub-modules. $D10 = D11 - D1 - D2 - D3 - D04 - D7 - D8 - D9$
Total life underwriting risk		
C11	Total net solvency capital requirement (including the loss - absorbing capacity of technical provisions) for life underwriting risk	This is the total net capital charge for life underwriting risk, after adjustment for the loss absorbing capacity of technical provisions. The amount reported will correspond with that reported in item A3 on SCR-B2A.
D11	Total gross solvency capital requirement (excluding the loss - absorbing capacity of technical provisions) for life underwriting risk	This is the total gross capital charge for life underwriting risk, before adjustment for the loss absorbing capacity of technical provisions. The amount reported will correspond with that reported in item B3 on SCR-B2A.

Technical Annex II: List of quantitative reporting items
S.26.04
Solvency Capital Requirement - Health underwriting risk

ITEM		INSTRUCTIONS
A01	Simplifications used – health mortality (Y/N)	Identify whether an undetaking used simplifications for the calculation of health mortality risk. The following options shall be used: Y; N.
A02	Simplifications used – health longevity (Y/N)	Identify whether an undetaking used simplifications for the calculation of health longevity risks. The following options shall be used: Y; N.
A03	Simplifications used : health disability-morbidity risk - (Y/N)	Identify whether an undetaking used simplifications for the calculation of health disability morbidity risk. The following options shall be used: Y; N.
A04	Simplifications used : SLT lapse risk - (Y/N)	Identify whether an undetaking used simplifications for the calculation of SLT lapse risk. The following options shall be used: Y; N.
A05	Simplifications used : health expense risk - (Y/N)	Identify whether an undetaking used simplifications for the calculation of health expense risk. The following options shall be used: Y; N.
A001	Captives simplifications (Y/N)	Identify whether a captive undetaking used simplifications for the calculation of health underwriting risk. The following options shall be used: Y; N. If cell A001=Y, cell A01 ...A05 are applicable where relevant
A30	Ring Fenced Fund? (Y/N)	Identifies whether the reported figures are with regard to RFF or with regard to remaining part . One of the options in the following list shall be used: When the items reported refer to a RFF: Y When the items reported refer to a Remaining part: N
A0	Fund number	Identification number for a ring fenced fund; This number is attributed by the undetaking and must be consistent over time and with the fund number in TP (L) F3, item A3, Assets D1 item A2 and Own Funds items A0115.1 ...n. This item is to be reported only when item A30 = Y

SLT HEALTH UNDERWRITING RISK

Health mortality risk

A1	Initial absolute values before shock – Assets – Health mortality risk	This is the absolute value of the assets subject to health mortality risk, before the shock .
A1A	Initial absolute values before shock – Liabilities –Health mortality risk	This is the absolute value of liabilities subject to health mortality risk, before the shock.
B1	Absolute values after shock – Assets – Health mortality risk	This is the absolute value of the assets subject to health mortality risk charge, after the shock (i.e. permanent increase in mortality rates).
B1A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Health mortality risk	This is the absolute value of the liabilities (including the loss absorbing capacity of technical provisions) subject to health mortality risk charge, after the shock (i.e. permanent increase in mortality rates).
C1	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) –Health mortality risk	This is the net capital charge for health mortality risk, after adjustment for the loss absorbing capacity of technical provisions. $C1 = (A1-A1A)-(B1-B1A)$, $C1 \geq 0$. If A01=Y, C1 represents net capital charge for health mortality risk calculated using simplifications.
B1B	Initial absolute values before shock – Liabilities –Health mortality risk	This is the absolute value of the liabilities subject to health mortality risk charge, after the shock (permanent increase in mortality rates).
D1	Absolute value after shock – Gross solvency capital (excluding the loss absorbing capacity of technical provisions) –Health mortality risk	This is the gross capital charge (excluding the loss absorbing capacity of technical provisions) for health mortality risk. $D1 = (A1-A1A)-(B1-B1B)$, $D1 \geq 0$. If A01=Y, D1 represents gross capital charge for health mortality risk calculated using simplifications.

Health longevity risk

A2	Initial absolute values before shock – Assets – Health longevity risk	This is the absolute value of the assets subject to health longevity risk, before the shock.
A2A	Initial absolute values before shock – Liabilities – Health longevity risk	This is the absolute value of liabilities subject to health longevity risk, before the shock.
B2	Absolute values after shock – Assets – Health longevity risk	This is the absolute value of the assets subject to health longevity risk after the shock (i.e. permanent decrease in mortality rates).
B2A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Health longevity risk	This is the absolute value of the liabilities (including the loss absorbing capacity of technical provisions) subject to health longevity risk, after the shock (i.e. permanent decrease in mortality rates).
C2	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Health longevity risk	This is the net capital charge for health longevity risk, after adjustment for the loss absorbing capacity of technical provisions. $C2 = (A2-A2A)-(B2-B2A)$, $C2 \geq 0$. If A02=Y, C2 represents net capital charge for health longevity risk calculated using simplifications.
B2B	Initial absolute values after shock – Liabilities – Health longevity risk	This is the absolute value of the liabilities subject to health longevity risk , after the shock (permanent decrease in mortality rates).
D2	Absolute value after shock – Gross solvency capital (excluding the loss absorbing capacity of technical provisions) – Health longevity risk	This is the gross capital charge (excluding the loss absorbing capacity of technical provisions) for health longevity risk. $D2 = (A2-A2A)-(B2-B2B)$, $D2 \geq 0$. If A02=Y, D2 represents gross capital charge for health longevity risk calculated using simplifications.

Health disability – morbidity risk

A3	Initial absolute values before shock – Assets – Health disability - morbidity risk	This is the absolute value of the assets subject to health disability- morbidity risk, before the shock.
A3A	Initial absolute values before shock – Liabilities – Health disability - morbidity risk	This is the absolute value of liabilities subject to health disability – morbidity risk charge, before the shock.
B3	Absolute values after shock – Assets – Health disability - morbidity risk	This is the absolute value of the assets subject to health disability – morbidity risk charge, after the shock (i.e. as prescribed by standard formula)
B3A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Health disability - morbidity risk	This is the absolute value of liabilities (including the loss absorbing capacity of technical provisions) subject to health disability – morbidity risk, after the shock (i.e. as prescribed by standard formula).
C3	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Health disability - morbidity risk	This is the net capital charge for health disability - morbidity risk, after adjustment for the loss absorbing capacity of technical provisions. $C3 = (A3-A3A)-(B3-B3A)$, $C3 \geq 0$. If $A03=Y$, C3 represents net capital charge for health disability – morbidity risk calculated using simplifications.
B3B	Initial absolute values after shock – Liabilities – Health disability - morbidity risk	This is the absolute value of the liabilities underlying health disability - morbidity risk charge, after the shock (i.e. as prescribed by standard formula) as used to compute the risk.
D3	Absolute value after shock – Gross solvency capital (excluding the loss absorbing capacity of technical provisions) – Health disability - morbidity risk	This is the gross capital charge (excluding the loss absorbing capacity of technical provisions) for health disability - morbidity risk. $D3 = (A3-A3A)-(B3-B3B)$, $D3 \geq 0$. If $A03=Y$, D3 represents gross capital charge for health disability – morbidity risk calculated using simplifications.

SLT Health lapse risk

C04	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – SLT Health lapse risk	This is the overall net capital charge for SLT health lapse risk, after adjustment for the loss absorbing capacity of technical provisions If $A04=Y$, C04 represents net capital charge for SLT health lapse risk calculated using simplifications.
D04	Absolute value after shock – Gross solvency capital (excluding the loss absorbing capacity of technical provisions) - SLT Health lapse risk	This is the overall gross capital charge (excluding the loss absorbing capacity for technical provisions) for SLT health lapse risk. If $A04=Y$, D04 represents gross capital charge for SLT health lapse risk calculated using simplifications.
A4	Initial absolute values before shock – Assets – SLT health lapse risk- risk of increase in lapsation	This is the absolute value of the assets subject to the risk of an increase in lapsation rates, before the shock.
A4A	Initial absolute values before shock – Liabilities – SLT health lapse risk – risk of increase in lapsation	This is the absolute value of liabilities subject to the risk of an increase in lapsation rates, before the shock.
B4	Absolute values after shock – Assets – SLT health lapse risk –risk of increase in lapsation	This is the absolute value of the assets subject to the risk of an increase in lapsation rates after the shock (i.e. permanent increase in the rates of lapsation). If $A04=Y$, B4 is calculated using simplified calculation for SLT health lapse rates.
B4A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – SLT health lapse risk –risk of increase in lapsation	This is the absolute value of the liabilities (including the loss absorbing capacity of technical provisions) subject to the risk of an increase in lapsation rates, after the shock (i.e. permanent increase of the rates of lapsation). If $A04=Y$, B4A is calculated using simplified calculation for SLT health lapse rates.
C4	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – SLT health lapse risk –risk of increase in lapsation	This is the net capital charge for the risk of a permanent increase in lapsation rates, after adjustment for the loss absorbing capacity of technical provisions. $C4 = (A4-A4A)-(B4-B4A)$, $C4 \geq 0$. If $A04=Y$, C4 represents net capital charge for a permanent increase in SLT health lapse rates, calculated using simplified calculation for SLT health lapse rate, after adjustment for the loss absorbing capacity of technical provisions.
B4B	Initial absolute values after shock – Liabilities – SLT health lapse risk –risk of increase in lapsation	This is the absolute value of the liabilities underlying the risk of a permanent increase in lapsation rates, after the shock (permanent increase in lapsation rates) as used to compute the risk. If $A04=Y$, B4B is calculated using simplified calculation for SLT health lapse rates.
D4	Absolute value after shock – Gross solvency capital (excluding the loss absorbing capacity of technical provisions) - SLT health lapse risk –risk of increase in lapsation	This is the gross capital charge (excluding the loss absorbing capacity for technical provisions) for the risk of a permanent increase in lapsation rates . $D4 = (A4-A4A)-(B4-B4B)$, $D4 \geq 0$. If $A04=Y$, D4 represents gross capital charge for a permanent increase in lapse rates, calculated using simplified calculation for SLT health lapse rate.
A5	Initial absolute values before shock – Assets – SLT health lapse risk- risk of decrease in lapsation	This is the absolute value of the assets subject to the risk of a permanent decrease in lapsation rates, before the shock.
A5A	Initial absolute values before shock – Liabilities – SLT health lapse risk – risk of decrease in lapsation	This is the absolute value of liabilities subject to the risk of a permanent decrease in lapsation rates, before the shock.
B5	Absolute values after shock – Assets – SLT health lapse risk –risk of decrease in lapsation	This is the absolute value of the assets subject to the risk of a permanent decrease in lapsation rates, after the shock (i.e. permanent decrease in the rates of lapsation). If $A04=Y$, B5 is calculated using simplified calculation for SLT health lapse rates.

B5A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – SLT health lapse risk –risk of decrease in lapsation	This is the absolute value of the liabilities (including the loss absorbing capacity of technical provisions) subject to the risk of a permanent decrease in lapsation rates, after the shock (i.e. permanent decrease of the rates of lapsation). If A04=Y, B5A is calculated using simplified calculation for SLT health lapse rates.
C5	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – SLT health lapse risk –risk of decrease in lapsation	This is the net capital charge for the risk of a permanent decrease in lapsation rates, after adjustment for the loss absorbing capacity of technical provisions. $C5 = (A5-A5A)-(B5-B5A)$, $C5 \geq 0$. If A04=Y, C5 represents net capital charge for a permanent decrease in SLT health lapse rates, calculated using simplified calculation for SLT health lapse rate, after adjustment for the loss absorbing capacity of technical provisions
B5B	Initial absolute values after shock – Liabilities – SLT health lapse risk –risk of decrease in lapsation	This is the absolute value of the liabilities subject to the risk of a permanent decrease in lapsation rates, after the shock (permanent decrease in lapsation rates). If A04=Y, B5B is calculated using simplified calculation for lapse rates.
D5	Absolute value after shock – Gross solvency capital (excluding the loss absorbing capacity of technical provisions) - SLT health lapse risk –risk of decrease in lapsation	This is the gross capital charge (excluding the loss absorbing capacity for technical provisions) for the risk of a permanent decrease in lapsation rates $D5 = (A5-A5A)-(B5-B5B)$, $D5 \geq 0$. If A04=Y, C5 represents gross capital charge for a permanent decrease in SLT health lapse rates, calculated using simplified calculation for SLT health lapse rate
A6	Initial absolute values before shock – Assets – SLT health lapse risk- mass lapse risk	This is the absolute value of the assets subject to mass lapse risk, before the shock.
A6A	Initial absolute values before shock – Liabilities – SLT health lapse risk –mass lapse risk	This is the absolute value of liabilities subject to mass lapse risk , before the shock.
B6	Absolute values after shock – Assets – SLT health lapse risk – mass lapse risk	This is the absolute value of the assets subject to ass lapse risk, after the shock.
B6A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – SLT health lapse risk – mass lapse risk	This is the absolute value of liabilities (including the loss absorbing capacity of technical provisions) subject to mass lapse risk, after the shock.
C6	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – SLT health lapse risk – mass lapse risk	This is the net capital charge for SLT health lapse risk - mass lapse risk, after adjustment for the loss absorbing capacity of technical provisions. Net capital charge $C6 = (A6-A6A)-(B6-B6A)$, $C6 \geq 0$.
B6B	Initial absolute values after shock – Liabilities – SLT health lapse risk – mass lapse risk	This is the absolute value of the liabilities subject to mass lapse risk, after the shock.
D6	Absolute value after shock – Gross solvency capital (excluding the loss absorbing capacity of technical provisions) - SLT health lapse risk – mass lapse risk	This is the gross capital charge (excluding the loss absorbing capacity for technical provisions) for SLT health lapse risk - mass lapse risk. Gross capital charge $D6 = (A6-A6A)-(B6-B6B)$, $D6 \geq 0$.
Health expense risk		
A7	Initial absolute values before shock – Assets – Health expense risk	This is the absolute value of the assets subject to expense risk, before the shock.
A7A	Initial absolute values before shock – Liabilities – Health expense risk	This is the absolute value of liabilities subject to expense risk, before the shock.
B7	Absolute values after shock – Assets – Health expense risk	This is the absolute value of the assets subject to health expense risk, after the shock
B7A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Health expense risk	This is the absolute value of liabilities (including the loss absorbing capacity of technical provisions) subject to health expense risk , after the shock
C7	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Health expense risk	This is the net capital charge for health expense risk, after adjustment for the loss absorbing capacity of technical provisions. Net capital charge $C7 = (A7-A7A)-(B7-B7A)$, $C7 \geq 0$. If A05=Y, C7 represents net capital charge for health expense risk calculated using simplified calculations.
B7B	Initial absolute values after shock – Liabilities – Health expense risk	This is the absolute value of the liabilities subject to expense risk charge, after the shock
D7	Absolute value after shock – Gross solvency capital (excluding the loss absorbing capacity of technical provisions) - Health expense risk	This is the gross capital charge (excluding the loss absorbing capacity of technical provisions) for health expense risk. Gross capital charge $D7 = (A7-A7A)-(B7-B7B)$, $D7 \geq 0$. If A05=Y, D7 represents gross capital charge for health expense risk calculated using simplified calculations.
Health revision risk		
A8	Initial absolute values before shock – Assets – Health revision risk	This is the absolute value of the assets subject to health revision risk, before the shock.
A8A	Initial absolute values before shock – Liabilities –Health revision risk	This is the absolute value of liabilities subject to health revision risk charge, before the shock.
B8	Absolute values after shock – Assets – Health revision risk	This is the absolute value of the assets subject to health revision risk , after the shock

B8A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Health revision risk	This is the absolute value of liabilities (including the loss absorbing capacity of technical provisions) subject to health revision risk, after the shock
C8	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) –Health revision risk	This is the net capital charge for health revision risk, after adjustment for the loss absorbing capacity of technical provisions. Net capital charge $C8 = (A8-A8A)-(B8-B8A)$, $C8 \geq 0$.
B8B	Initial absolute values after shock – Liabilities – Health revision risk	This is the absolute value of the liabilities subject to health revision risk charge, after the shock ((i.e. as prescribed by standard formula, a % increase in the annual amount payable for annuities exposed to revision risk).
D8	Absolute value after shock – Gross solvency capital (excluding the loss absorbing capacity of technical provisions) - Health revision risk	This is the gross capital charge (excluding the loss absorbing capacity of technical provisions) for health revision risk. Gross capital charge $D8 = (A8-A8A)-(B8-B8B)$, $D8 \geq 0$.

Diversification within module

C9	-Diversification within SLT health underwriting risk module - Net	This is the diversification effect within the SLT health underwriting risk module as a result of the aggregation of the net capital requirements (after adjustment for the loss absorbing capacity of technical provisions) of the single risk sub-modules. $C9 = C10 - C1 - C2 - C3 - C04 - C7 - C8$
D9	Diversification within SLT health underwriting risk module - Gross	This is the diversification effect within the SLT health underwriting risk module as a result of the aggregation of the gross capital requirements (after adjustment for the loss absorbing capacity of technical provisions) of the single risk sub-modules. $D9 = D10 - D1 - D2 - D3 - D04 - D7 - D8$

Total SLT health underwriting risk

C10	Net solvency capital requirements (including the loss absorbing capacity of technical provisions) for - SLT health underwriting risk	This is the total net capital charge for SLT health underwriting risk, after adjustment the loss absorbing capacity of technical provisions.
D10	Gross solvency capital (excluding the loss absorbing capacity of technical provisions) - SLT health underwriting risk	This is the total gross capital charge for SLT health underwriting risk.

NSLT HEALTH UNDERWRITING RISK

NSLT Health premium and reserve risk

C12	Volume measure for premium and reserve risk – volume measure for premium risk: Vprem - Medical expenses insurance and proportional reinsurance	The volume measure for premium risk for medical expenses and proportional reinsurance line of business
D12	Volume measure for premium and reserve risk –Volume measure reserve risk: Vres - Medical expenses insurance and proportional reinsurance	The volume measure for reserve risk for medical expenses and proportional reinsurance line of business
E12	Volume measure for premium and reserve risk – Geographical Diversification - Medical expenses insurance and proportional reinsurance	This represents the geographical diversification to be used for the volume measure for premium and reserve risk for medical expenses and proportional reinsurance. If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F12	Volume measure for premium and reserve risk - V - Medical expenses insurance and proportional reinsurance	The volume measure for NSLT health premium and reserve risk for medical expenses and proportional reinsurance line of business
C13	Volume measure for premium and reserve risk – volume measure for premium risk: Vprem – Income protection insurance and proportional reinsurance	The volume measure for premium risk for income protection and proportional reinsurance line of business
D13	Volume measure for premium and reserve risk –Volume measure reserve risk: Vres – Income protection insurance and proportional reinsurance	The volume measure for reserve risk for income protection and proportional reinsurance line of business
E13	Volume measure for premium and reserve risk – Geographical Diversification – Income protection insurance and proportional reinsurance	This represents the geographical diversification to be used for the volume measure for premium and reserve risk for income protection undertakings and proportional reinsurance If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F13	Volume measure for premium and reserve risk - V – Income protection insurance and proportional reinsurance	The volume measure for NSLT health premium and reserve risk for income protection and proportional reinsurance line of business
C14	Volume measure for premium and reserve risk – volume measure for premium risk: Vprem - Workers' compensation insurance and proportional reinsurance	The volume measure for premium risk for workers' compensation and proportional reinsurance line of business

D14	Volume measure for premium and reserve risk –Volume measure reserve risk: Vres - Workers' compensation insurance and proportional reinsurance	The volume measure for reserve risk for workers' compensation and proportional reinsurance line of business
E14	Volume measure for premium and reserve risk – Geographical Diversification - Workers' compensation insurance and proportional reinsurance	This represents the geographical diversification to be used for the volume measure for workers' compensation and proportional reinsurance If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F14	Volume measure for premium and reserve risk - V - Workers' compensation insurance and proportional reinsurance	The volume measure for NSLT health premium and reserve risk for workers' compensation and proportional reinsurance line of business
C15	Volume measure for premium and reserve risk – volume measure for premium risk: Vprem - Non -proportional health reinsurance	The volume measure for premium risk for non -proportional health reinsurance line of business
D15	Volume measure for premium and reserve risk –Volume measure reserve risk: Vres - Non -proportional health reinsurance	The volume measure for reserve risk for non-proportional health reinsurance line of business
E15	Volume measure for premium and reserve risk – Geographical Diversification - Non -proportional health reinsurance	This represents the geographical diversification to be used for the volume measure for non-proportional health reinsurance If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F15	Volume measure for premium and reserve risk - V - Non -proportional health reinsurance	The volume measure for NSLT health premium and reserve risk for non-proportional health reinsurance line of business
A16	Combined standard deviation	This is the combined standard deviation for premium and reserve risk for all segments.
F16	Total Volume measure for premium and reserve risk	The total volume measure for premium and reserve risk, equal to the sum of the volume measures for premium and reserve risk for all lines of business: $F16 = \text{sum}(F12 : F15)$
A17	Total NSLT health premium and reserve risk	This is the total capital charge for the NSLT health premium and reserve risk sub module.
NSLT Health lapse risk		
A18	Initial absolute values before shock – Assets – Lapse risk	This is the absolute value of the assets subject to the NSLT health lapse risk, before the shock.
A18A	Initial absolute values before shock – Liabilities – Lapse risk	This is the absolute value of liabilities subject to the NSLT health lapse risk, before the shock.
B18	Absolute values after shock – Assets – Lapse risk	This is the absolute value of the assets subject to the NSLT health lapse risk, after the shock.
B18B	Absolute values after shock (excluding the loss absorbing capacity of technical provisions) – Liabilities – Lapse risk	This is the absolute value of the liabilities (excluding the loss absorbing capacity of technical provisions) subject to lapse risk, after the shock.
D18	Absolute value after shock (excluding the loss absorbing capacity of technical provisions) – Solvency capital requirement - Lapse risk	This is the capital charge (excluding the loss absorbing capacity of technical provisions) for NSLT health lapse risk. $\text{Solvency capital requirement } D18 = (A18 - A18A) - (B18 - B18B), D18 >= 0.$
D19	Diversification within NSLT health underwriting risk - gross	This is the diversification effect within the NSLT health underwriting risk sub-module (excluding the loss absorbing capacity of technical provisions), as a result of the aggregation of the capital requirements for NSLT health premium and reserve risk and NSLT health lapse risk.
D20	Total gross solvency capital requirement (excluding the loss absorbing capacity of technical provisions) for NSLT health underwriting	This is the total capital charge for the NSLT health underwriting risk sub module (excluding the loss absorbing capacity of technical provisions) .
Health Catastrophe risk		
B21	Net solvency capital requirement (including loss absorbing capacity of technical provisions) for health catastrophe risks - Mass accident risk sub module	The net solvency capital requirement for the mass risk sub-module calculated including loss absorbing capacity of technical provisions
A21	Gross solvency capital requirement (excluding loss absorbing capacity of technical provisions) for health catastrophe risks - Mass accident risk sub module	The gross solvency capital requirement for the mass risk sub-module, calculated excluding loss absorbing capacity of technical provisions. It should be equal to the item A23 of SCR – B3F.
B22	Net solvency capital requirement (including loss absorbing capacity of technical provisions) for health catastrophe risks - Accident concentration risk	The net solvency capital requirement for the accident concentration risk sub-module, calculated including loss absorbing capacity of technical provisions

A22	Gross solvency capital requirement (excluding loss absorbing capacity of technical provisions) for health catastrophe risks- Accident concentration risk	The gross solvency capital requirement for the accident concentration risk sub-module calculated excluding loss absorbing capacity of technical provisions. It should be equal to the item A24 of SCR – B3F.
B23	Net solvency capital requirement (including loss absorbing capacity of technical provisions) for health catastrophe risks - Pandemic risk	The net solvency capital requirement for the pandemic risk sub-module, calculated including loss absorbing capacity of technical provisions.
A23	Gross solvency capital requirement (excluding loss absorbing capacity of technical provisions) for health catastrophe risks - Pandemic risk	The gross solvency capital requirement for the pandemic risk sub-module is calculated excluding loss absorbing capacity of technical provisions. It should be equal to the item A25 of SCR – B3F.
B24	Diversification within health catastrophe risk - Net	This is the diversification effect within the health catastrophe risk sub-module as a result of the aggregation of the capital requirements for the risks of a mass accident, accident concentration and pandemic risk, calculated including loss absorbing capacity of technical provisions
A24	Diversification within health catastrophe risk - Gross	This is the diversification effect within the health catastrophe risk sub-module as a result of the aggregation of the capital requirements for the risks of a mass accident, accident concentration and pandemic risk, calculated excluding loss absorbing capacity of technical provisions.
B25	Total net solvency capital requirement for health catastrophe risk (including loss absorbing capacity of technical provisions)	This is the total net capital charge (including loss absorbing capacity of technical provisions) for the health catastrophe risk sub –module
A25	Total gross solvency capital requirement (excluding loss absorbing capacity of technical provisions) for health catastrophe risk	This is the total gross capital charge for the health catastrophe risk sub – module (excluding loss absorbing capacity of technical provisions)
B26	-Diversification within health underwriting risk module – Net	This is the diversification effect within the health underwriting risk sub-module as a result of the aggregation of the capital requirements SLT health underwriting risk sub-module, NSLT health underwriting risk sub-module and health catastrophe risk sub-module, calculated including loss absorbing capacity of technical provision. B26=SUM(C10, A17, D20,B25) -B27
A26	Diversification within health underwriting risk module – Gross	This is the diversification effect within the health underwriting risk sub-module as a result of the aggregation of the capital requirements SLT health underwriting risk sub-module, NSLT health underwriting risk sub-module and health catastrophe risk sub-module, calculated excluding loss absorbing capacity of technical provisions A26=SUM(D10, A17, D20, A25) - A27
B27	Total net solvency capital requirement for health underwriting risk (including loss absorbing capacity of technical provisions)	This is the total net solvency capital requirement for the health underwriting risk module. The item B27 should agree with item A4 on SCR – B2A.
A27	Total gross solvency capital requirement (excluding loss - absorbing capacity of technical provisions) for health underwriting risk	This is the total gross solvency capital requirement for the health underwriting risk module. The item A27 should agree with item B4 on SCR – B2A.

Technical Annex II: List of quantitative reporting items

S.26.05

Solvency Capital Requirement - Non-life underwriting risk

ITEM		INSTRUCTIONS
A001	Captives simplifications – non life premium and reserve risk (Y/N)	Identify whether a captive undertaking used simplifications for the calculation of non-life premium and reserve risk. The following options shall be used: Y; N.
A30	Ring Fenced Fund? (Y/N)	Identifies whether the reported figures are with regard to RFF or with regard to remaining part . One of the options in the following list shall be used: When the items reported refer to a RFF: Y When the items reported refer to a Remaining part: N
A0	Fund number	Identification number for a ring fenced fund; This number is attributed by the undertaking and must be consistent over time and with the fund number in TP (L) F3, item A3, Assets D1 item A2 and Own Funds items A0115.1 ...n. This item is to be reported only when item A30 = Y.
Premium and Reserve Risk		
C1	Volume measure for premium and reserve risk – volume measure for premium risk: Vprem - Motor vehicle liability	The volume measure for premium risk for motor vehicle liability line of business
D1	Volume measure for premium and reserve risk –Volume measure reserve risk: Vres - Motor vehicle liability	The volume measure for reserve risk for motor vehicle liability line of business, equal to the best estimate for the provisions for claims outstanding for the segment, after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles.
E1	Volume measure for premium and reserve risk – Geographical Diversification - Motor vehicle liability	The volume measure for motor vehicle liability line of business If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F1	Volume measure for premium and reserve risk - V - Motor vehicle liability	The volume measure for non – life premium and reserve risk for motor vehicle liability line of business $F1 = (C1 + D1) \times (0.75 + 0.25E1)$
C2	Volume measure for premium and reserve risk – Vprem - Motor, other classes	The volume measure for premium risk for Motor, other classes , line of business
D2	Volume measure for premium and reserve risk – Vres - Motor, other classes	The volume measure for reserve risk for Motor, other classes, line of business, equal to the best estimate for the provisions for claims outstanding for the segment, after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles.
E2	Volume measure for premium and reserve risk – Geographical Diversification - Motor, other classes	The volume measure for Motor, other classes, line of business If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F2	Volume measure for premium and reserve risk - V - Motor, other classes	The volume measure for non-life premium and reserve risk for Motor, other classes $F2 = (C2 + D2) \times (0.75 + 0.25E2)$
C3	Volume measure for premium and reserve risk – Vprem - Marine, aviation, transport (MAT)	The volume measure for premium risk for Marine, aviation, transport (MAT) line of business
D3	Volume measure for premium and reserve risk – Vres - Marine, aviation, transport (MAT)	The volume measure for reserve risk for Marine, aviation, transport (MAT) line of business, equal to the best estimate for the provisions for claims outstanding for the segment, after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles.
E3	Volume measure for premium and reserve risk – Geographical Diversification - Marine, aviation, transport (MAT)	The volume measure for Marine, aviation, transport (MAT) line of business If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F3	Volume measure for premium and reserve risk - V - Marine, aviation, transport (MAT)	The volume measure for non-life premium and reserve risk for Marine, aviation, transport (MAT) line of business $F3 = (C3 + D3) \times (0.75 + 0.25E3)$
C4	Volume measure for premium and reserve risk – Vprem - Fire and other property damage	The volume measure for premium risk for Fire and other property damage line of business
D4	Volume measure for premium and reserve risk – Vres - Fire and other property damage	The volume measure for reserve risk for Fire and other property damage line of business, equal to the best estimate for the provisions for claims outstanding for the segment, after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles.

E4	Volume measure for premium and reserve risk – Geographical Diversification - Fire and other property damage	For Fire and other property damage line of business undertakings may calculate the factor for geographical diversification DIV_s according to Solvency II requirements. If the factor for geographical diversification is not calculated, then E4 is set to the default value of 1. IF $A001 = Y$, $E4 = 0$
F4	Volume measure for premium and reserve risk - V - Fire and other property damage	The volume measure for non-life premium and reserve risk for Fire and other property damage line of business $F4 = (C4 + D4) \times (0.75 + 0.25E4)$
C5	Volume measure for premium and reserve risk – Vprem - Third party liability	The volume measure for premium risk for Third party liability line of business
D5	Volume measure for premium and reserve risk – Vres - Third party liability	The volume measure for reserve risk for Third party liability line of business, equal to the best estimate for the provisions for claims outstanding for the segment, after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles.
E5	Volume measure for premium and reserve risk – Geographical Diversification - Third party liability	The volume measure for Third party liability line of business undertakings If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F5	Volume measure for premium and reserve risk - V - Third party liability	The volume measure for non-life premium and reserve risk for Third party liability line of business $F5 = (C5 + D5) \times (0.75 + 0.25E5)$
C6	Volume measure for premium and reserve risk – Vprem - Credit and suretyship	The volume measure for premium risk for Credit and suretyship line of business
D6	Volume measure for premium and reserve risk – Vres - Credit and suretyship	The volume measure for reserve risk for Credit and suretyship line of business, equal to the best estimate for the provisions for claims outstanding for the segment, after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles.
E6	Volume measure for premium and reserve risk – Geographical Diversification - Credit and suretyship	The volume measure for Credit and suretyship line of business undertakings If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F6	Volume measure for premium and reserve risk - V - Credit and suretyship	The volume measure for non-life premium and reserve risk for Credit and suretyship line of business $F6 = (C6 + D6) \times (0.75 + 0.25E6)$
C7	Volume measure for premium and reserve risk – Vprem - Legal expenses	The volume measure for premium risk for Legal expenses line of business
D7	Volume measure for premium and reserve risk – Vres - Legal expenses	The volume measure for reserve risk for Legal expenses line of business, equal to the best estimate for the provisions for claims outstanding for the segment, after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles.
E7	Volume measure for premium and reserve risk – Geographical Diversification - Legal expenses	The volume measure for Legal expenses line of business If the factor for geographical diversification is not calculated, then E7 is set to the default value of 1.
F7	Volume measure for premium and reserve risk - V - Legal expenses	The volume measure for non-life premium and reserve risk for Legal expenses line of business $F7 = (C7 + D7) \times (0.75 + 0.25E7)$
C8	Volume measure for premium and reserve risk – Vprem – Assistance	The volume measure for premium risk for Assistance line of business
D8	Volume measure for premium and reserve risk – Vres - Assistance	The volume measure for reserve risk for Assistance line of business, equal to the best estimate for the provisions for claims outstanding for the segment, after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles.
E8	Volume measure for premium and reserve risk – Geographical Diversification - Assistance	The volume measure for Assistance line of business If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F8	Volume measure for premium and reserve risk - V - Assistance	The volume measure for non-life premium and reserve risk for Assistance line of business $F8 = (C8 + D8) \times (0.75 + 0.25E8)$
C9	Volume measure for premium and reserve risk – Vprem - Miscellaneous	The volume measure for premium risk for Miscellaneous line of business
D9	Volume measure for premium and reserve risk – Vres - Miscellaneous	The volume measure for reserve risk for Miscellaneous line of business, equal to the best estimate for the provisions for claims outstanding for the Miscellaneous line of business, after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles.

E9	Volume measure for premium and reserve risk – Geographical Diversification - Miscellaneous	The volume measure for Miscellaneous line of business If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F9	Volume measure for premium and reserve risk - V - Miscellaneous	The volume measure for non-life premium and reserve risk $F9 = (C9 + D9) \times (0.75 + 0.25E9)$
C10	Volume measure for premium and reserve risk – Vprem - Non – proportional reinsurance - property	The volume measure for premium risk for Non-proportional reinsurance – property line of business
D10	Volume measure for premium and reserve risk – Vres - Non – proportional reinsurance - property	The volume measure for reserve risk for Non-proportional reinsurance – property line of business, equal to the best estimate for the provisions for claims outstanding for the Non-proportional reinsurance – property , after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles.
E10	Volume measure for premium and reserve risk – Geographical Diversification - Non – proportional reinsurance - property	The volume measure for Non-proportional reinsurance – property line of business IF A001 = Y, E10 = 0
F10	Volume measure for premium and reserve risk - V - Non – proportional reinsurance - property	The volume measure for non-life premium and reserve risk for Non-proportional reinsurance – property $F10 = (C10 + D10) \times (0.75 + 0.25E10)$ IF A001 = Y, F10 = 0
C11	Volume measure for premium and reserve risk – Vprem - Non – proportional reinsurance – casualty	The volume measure for premium risk for Non-proportional reinsurance – casualty line of business
D11	Volume measure for premium and reserve risk – Vres - Non – proportional reinsurance - casualty	The volume measure for reserve risk for Non-proportional reinsurance – casualty line of business, equal to the best estimate for the provisions for claims outstanding for the Non-proportional reinsurance – casualty, after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles.
E11	Volume measure for premium and reserve risk – Geographical Diversification - Non – proportional reinsurance – casualty	The volume measure for Non-proportional reinsurance – casualty line of business If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F11	Volume measure for premium and reserve risk - V - Non – proportional reinsurance – casualty	The volume measure for non-life premium and reserve risk for Non-proportional reinsurance – casualty line of business $F11 = (C11 + D11) \times (0.75 + 0.25E11)$
C12	Volume measure for premium and reserve risk – Vprem - Non – proportional reinsurance – MAT	The volume measure for premium risk for Non-proportional reinsurance – MAT line of business
D12	Volume measure for premium and reserve risk – Vprem - Non – proportional reinsurance – MAT	The volume measure for reserve risk for Non-proportional reinsurance – MAT line of business, equal to the best estimate for the provisions for claims outstanding for the Non-proportional reinsurance – MAT, after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles.
E12	Volume measure for premium and reserve risk – Geographical Diversification - Non – proportional reinsurance – MAT	The volume measure for Non-proportional reinsurance – MAT line of business If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F12	Volume measure for premium and reserve risk - V - Non – proportional reinsurance - MAT	The volume measure for non-life premium and reserve risk for Non-proportional reinsurance – MAT $F12 = (C12 + D12) \times (0.75 + 0.25E12)$
A13	Combined standard deviation	This is the combined standard deviation for premium and reserve risk for all segments.
F13	Total Volume measure for premium and reserve risk	The total volume measure for premium and reserve risk, equal to the sum of the volume measures for premium and reserve risk for all lines of business: $F13 = \text{sum}(F1:F12)$
A14	Total capital requirement for non – life premium and reserve risk	This is the total capital charge for the non-life premium and reserve risk sub module. IF A001=Y, item A14 represents total capital charge for non-life premium and reserve risk sub module calculated using simplified calculation.

Non life lapse risk

A15	Initial absolute values before shock – Assets – Non-life underwriting risk - Lapse risk	This is the absolute value of the assets subject to the Non-life lapse risk, before the shock.
A15A	Initial absolute values before shock – Liabilities – Non-life underwriting risk - Lapse risk	This is the absolute value of liabilities subject to the Non-life lapse risk, before the shock.
B15	Absolute values after shock – Assets – Non-life underwriting risk - Lapse risk	This is the absolute value of the assets subject to non life lapse risk, after the shock.
B15A	Absolute values after shock – Liabilities – Non-life underwriting risk - Lapse risk	This is the absolute value of the liabilities subject to non life lapse risk, after the shock.
C15	Solvency capital requirement - Non-life underwriting risk - Lapse risk	This is the capital charge for non life underwriting lapse risk. $C15 = (A15 - A15A) - (B15 - B15A)$, $C15 \geq 0$.

Non – life catastrophe risk

A16	Capital requirement for non - life catastrophe risk	This is the total non life catastrophe risk capital requirement. This cell should agree with C21 on template SCR – B3F.
A17	Diversification within non - life underwriting risk module	This is the diversification effect within the non-life underwriting risk sub-module as a result of the aggregation of the capital requirements premium and reserve risk, catastrophe risk and lapse risk. $A17 = A18 - C15 - A16 - A14$
A18	Total capital requirement for non-life underwriting risk	This is the solvency capital requirement for non-life underwriting risk sub module. This item should agree with A5 on SCR – B2A.

Technical Annex II: List of quantitative reporting items
S.26.06
Solvency Capital Requirement - Operational risk

ITEM		INSTRUCTIONS
A30	Ring Fenced Fund? (Y/N)	Identifies whether the reported figures are with regard to RFF or with regard to remaining part . One of the options in the following list shall be used: When the items reported refer to a RFF: Y When the items reported refer to a Remaining part: N
A0	Fund number	Identification number for a ring fenced fund; This number is attributed by the undertaking and must be consistent over time and with the fund number in TP (L) F3, item A3, Assets D1 item A2 and Own Funds items A0115.1 ...n. This item is to be reported only when item A30 = Y.
A1	Life gross technical provisions (excluding risk margin)	This is technical provisions for life insurance obligations. For these purposes, technical provisions should not include the risk margin, and should be without deduction of recoverables from reinsurance contracts and special purpose vehicles.
A2	Life gross technical provisions unit-linked (excluding risk margin)	This is technical provisions for life insurance obligations where the investment risk is borne by the policyholders. For these purposes, technical provisions should not include the risk margin, and should be without deduction of recoverables from reinsurance contracts and special purpose vehicles.
A3	Non-life gross technical provisions (excluding risk margin)	This is technical provisions for non-life insurance obligations. For these purposes, technical provisions should not include the risk margin, and should be without deduction of recoverables from reinsurance contracts and special purpose vehicles.
A4	Capital requirement for operational risk based on technical provisions	This is the capital requirement for operational risk based on technical provisions $A4 = 0.0045 * \max(0, (A1 - A2)) + 0.03 * \max(0, A3)$
A5	Earned life gross premiums (previous 12 months)	Premium earned during the previous 12 months for life insurance obligations, without deducting premium ceded to reinsurance
A6	Earned life gross premiums unit-linked (previous 12 months)	Premium earned during the previous 12 months for life insurance obligations where the investment risk is borne by the policyholders without deducting premium ceded to reinsurance
A7	Earned non-life gross premiums (previous 12 months)	Premium earned during the previous 12 months for non-life insurance obligations, without deducting premiums ceded to reinsurance
A8	Earned life gross premiums (12 months prior to the previous 12 months)	Premium earned during the 12 months prior to the previous 12 months for life insurance obligations, without deducting premium ceded to reinsurance
A9	Earned life gross premiums unit-linked (12 months prior to the previous 12 months)	Premium earned during the 12 months prior to the previous 12 months for life insurance obligations where the investment risk is borne by the policy holders without deducting premium ceded to reinsurance.
A10	Earned non-life gross premiums (12 months prior to the previous 12 months)	Premium earned during the 12 months prior to the previous 12 months for non-life insurance obligations, without deducting premiums ceded to reinsurance
A11	Capital requirement for operational risk based on earned premiums	This is the capital requirement for operational risks based on earned premiums.

A12	Capital requirement for operational risk charge before capping	This is the capital requirement for operational risk before capping adjustment A12 = Max (A4,A11)
A13	Percentage of Basic Solvency Capital Requirement	Without precluding the final design of reporting on SCR, this is the result of the percentage applied to the Basic SCR reported in item B10 on SCR-B2A
A14	Capital requirement for operational risk charge after capping	This is the capital requirement for operational risk after capping adjustment. A14 = min (A12, A13)
A15	Expenses incurred in respect of unit linked business (previous 12 months)	This is the amount of expenses incurred in the previous 12 months in respect of life insurance where the investment risk is borne by the policyholders.
A16	The total capital requirement for operational risk	This is the capital charge for operational risk. Without precluding the final design of reporting on SCR, the figure will correspond to in item A13 on SCR-B2A

Technical Annex II: List of quantitative reporting items

S.27.01

Solvency Capital Requirement - Non-life catastrophe risk

	ITEM	INSTRUCTIONS
A0	Fund number	Identification number for a ring fenced fund; This number is attributed by the undertaking and must be consistent over time and with the fund number in TP (L) F3, item A3, Assets D1 item A2 and Own Funds items A0115.1 ...n. This item is to be reported only when item A30 = Y.
A30	Ring Fenced Fund? (Y/N)	Identifies whether the reported figures are with regard to RFF or with regard to remaining part . One of the options in the following list shall be used: When the items reported refer to a RFF: Y When the items reported refer to a Remaining part: N
Non-life catastrophe risk – Summary		
A1	Gross SCR – Natural catastrophe risk	This is the total gross catastrophe risk arising from all natural catastrophe perils and taking into consideration the diversification effect between the perils given in A7.
A2:A6	Gross SCR – Natural catastrophe risk perils	This is the total gross capital requirement per natural catastrophe peril, taking into consideration the diversification effect between zones and regions. Amounts for the following risk perils are to be reported, when present: Windstorm Earthquake Flood Hail Subsidence Per natural peril this amount is equal to the Gross Catastrophe Risk Charge: A2=AF39 A3=BE39 A4=CF33 A5=DF28 A6=EE3
A7	Gross SCR – Diversification between perils	Diversification effect arising from the aggregation of the total gross capital charges relating to different natural catastrophe perils. A7=SUM(A2:A6)-A1
B1	Total risk mitigation – Natural catastrophe risk	This is the total risk mitigation effect of the undertaking’s specific reinsurance contracts and special purpose vehicles arising from all natural catastrophe perils and taking into consideration the diversification effect between the perils given in B7. B1=C1-A1
B2:B6	Total risk mitigation – Natural catastrophe risk perils	This is the total risk mitigation effect of the undertaking’s specific reinsurance contracts and special purpose vehicles per natural catastrophe peril. Amounts for the following risk perils are to be reported, when present: Windstorm Earthquake Flood Hail Subsidence B2=A2-C2 B3=A3-C3 B4=A4-C4 B5=A5-C5 B6=A6-C6
B7	Total risk mitigation – Diversification between perils	Diversification effect arising from the aggregation of the risk mitigation effect of the undertaking’s specific reinsurance contracts and special purpose vehicles relating to different natural catastrophe perils. B7=A7-C7
C1	Net SCR – Natural catastrophe risk	This is the total net catastrophe risk arising from all natural catastrophe perils and taking into consideration the diversification effect between the perils given in C7.
C2:C6	Net SCR – Natural catastrophe risk perils	This is the total net capital requirement per natural catastrophe peril, taking into consideration the diversification effect between zones and regions. Amounts for the following risk perils are to be reported, when present: Windstorm Earthquake Flood Hail Subsidence Per natural peril this amount is equal to the Net Catastrophe Risk Charge: C2=A139 C3=BH39 C4=C133 C5=DI28 C6=EH3

	ITEM	INSTRUCTIONS
C7	Net SCR – Diversification between perils	Diversification effect arising from the aggregation of the total net capital charges relating to different natural catastrophe perils. C7=SUM(C2:C6)-C1
A8	Gross SCR – Catastrophe risk non-proportional property	This is the total gross catastrophe risk arising from non-proportional property reinsurance. A8=FB1
B8	Total risk mitigation – Catastrophe risk non-proportional property reinsurance	This is the total risk mitigation effect of the undertaking’s specific reinsurance contracts and special purpose vehicles for non-proportional property reinsurance. B8=A8-C8
C8	Net SCR – Catastrophe risk non-proportional property reinsurance	This is the total net catastrophe risk arising from non-proportional property reinsurance. C8=FE1
A9	Gross SCR – Man-made catastrophe risk	This is the total gross catastrophe risk arising from all man-made perils and taking into consideration the diversification between the perils given in A16.
A10:A15	Gross SCR – Man-made catastrophe risk perils	This is the total gross capital requirement per man-made peril, taking into consideration the diversification effect between sub-perils. Amounts for the following risk perils are to be reported, when present: Motor vehicle liability Marine Aviation Fire Liability Credit & Suretyship Per man-made peril this amount is equal to the Gross Catastrophe Risk Charge: A10=GA3 A11=HC3 A12=IC1 A13=JA1 A14=KC8 A15=LC12
A16	Gross SCR – Diversification between perils	Diversification effect arising from the aggregation of the total gross capital charges relating to different man-made perils. A16=SUM(A10:A15)-A9
B9	Total risk mitigation – Man-made catastrophe risk	This is the total risk mitigation effect of the undertaking’s specific reinsurance contracts and special purpose vehicles arising from all man-made perils and taking into consideration the diversification effect between the perils given in B16. B9=A9-C9
B10:B15	Total risk mitigation – Man-made catastrophe risk perils	This is the total risk mitigation effect of the undertaking’s specific reinsurance contracts and special purpose vehicles per man-made catastrophe peril. Amounts for the following risk perils are to be reported, when present: Motor vehicle liability Marine Aviation Fire Liability Credit & Suretyship B10=A10-C10 B11=A11-C11 B12=A12-C12 B13=A13-C13 B14=A14-C14 B15=A15-C15
B16	Total risk mitigation – Diversification between perils	Diversification effect arising from the aggregation of the risk mitigation effect of the undertaking’s specific reinsurance contracts and special purpose vehicles relating to different man-made perils. B16=A16-C16
C9	Net SCR – Man-made catastrophe risk	This is the total net catastrophe risk arising from all man-made catastrophe perils and taking into consideration the diversification effect between the perils given in C16.

	ITEM	INSTRUCTIONS
C10:C15	Net SCR – Man-made catastrophe risk perils	This is the total net capital requirement per man-made catastrophe peril, taking into consideration the diversification effect between zones and regions. Amounts for the following risk perils are to be reported, when present: Motor vehicle liability Marine Aviation Fire Liability Credit & Suretyship Per man-made peril this amount is equal to the Net Catastrophe Risk Charge: C10=GA6 C11=HC5 C12=IF1 C13=JA4 C14=KC10 C15=LC14
C16	Net SCR – Diversification between perils	Diversification effect arising from the aggregation of the total net capital charges relating to different man-made catastrophe perils. C16=SUM(C10:C15)-C9
A17	Gross SCR – Other non-life catastrophe risk	This is the total gross catastrophe risk arising from all “other non-life” perils and taking into consideration the diversification between the perils given in A18.
A18	Gross SCR – Diversification between perils	Diversification effect arising from the aggregation of the total gross capital charges relating to different “other non-life” perils. A18=MG2
B17	Total risk mitigation – Other non-life catastrophe risk	This is the total risk mitigation effect of the undertaking’s specific reinsurance contracts and special purpose vehicles arising from all “other non-life” perils and taking into consideration the diversification effect between the perils given in B18. B17=A17-C17
B18	Total risk mitigation – Diversification between perils	Diversification effect arising from the aggregation of the risk mitigation effect of the undertaking’s specific reinsurance contracts and special purpose vehicles relating to different “other non-life” perils. B18=A18-C18
C17	Net SCR – Other non-life catastrophe risk	This is the total net catastrophe risk arising from all “other non-life” catastrophe perils and taking into consideration the diversification effect between the perils given in C18.
C18	Net SCR – Diversification between perils	Diversification effect arising from the aggregation of the total net capital charges relating to different “other non-life” catastrophe perils. C18=MG4
A19	Gross SCR - Total Non-life catastrophe risk before diversification	This is the total gross catastrophe risk arising from all the sub-modules (Natural catastrophe, Non-proportional property reinsurance, Man-made and “Other non-life” catastrophe risks) before the diversification between the sub-modules. A19=A1+A8+A9+A17
A20	Gross SCR - Diversification between sub-modules	Diversification effect arising from the aggregation of the total gross capital charges relating to different sub-modules (Natural catastrophe, Non-proportional property reinsurance, Man-made and “Other non-life” catastrophe risks). A20=A19-A21
A21	Gross SCR - Total Non-life catastrophe risk after diversification	This is the total gross catastrophe risk arising from all the sub-modules (Natural catastrophe, Non-proportional property reinsurance, Man-made and “Other non-life” catastrophe risks), taking into consideration the diversification between the sub-modules given in A20.
B19	Total risk mitigation – Total Non-life catastrophe risk before diversification	This is the total risk mitigation effect of the undertaking’s specific reinsurance contracts and special purpose vehicles arising from all the sub-modules (Natural catastrophe, Non-proportional property reinsurance, Man-made and “Other non-life” catastrophe risks), before the diversification between the sub-modules. B19=A19-C19
B20	Total risk mitigation – Diversification between sub-modules	Diversification effect arising from the aggregation of the risk mitigation effect of the undertaking’s specific reinsurance contracts and special purpose vehicles relating to different sub-modules (Natural catastrophe, Non-proportional property reinsurance, Man-made and “Other non-life” catastrophe risks). B20=A20-C20
B21	Total risk mitigation – Total Non-life catastrophe risk after diversification	This is the total risk mitigation effect of the undertaking’s specific reinsurance contracts and special purpose vehicles arising from all the sub-modules (Natural catastrophe, Non-proportional property reinsurance, Man-made and “Other non-life” catastrophe risks), taking into consideration the diversification effect between the sub-modules given in B20. B21=A21-C21

	ITEM	INSTRUCTIONS
C19	Net SCR - Total Non-life catastrophe risk before diversification	This is the total net catastrophe risk arising from all the sub-modules (Natural catastrophe, Non-proportional property reinsurance, Man-made and "Other non-life" catastrophe risks), before the diversification between the sub-modules. C19=C1+C8+C9+C17
C20	Net SCR - Diversification between sub-modules	Diversification effect arising from the aggregation of the total net capital charges relating to different sub-modules (Natural catastrophe, Non-proportional property reinsurance, Man-made and "Other non-life" catastrophe risks). C20=C19-C21
C21	Net SCR - Total Non-life catastrophe risk after diversification	This is the total net catastrophe risk arising from all the sub-modules (Natural catastrophe, Non-proportional property reinsurance, Man-made and "Other non-life" catastrophe risks), taking into consideration the diversification between the sub-modules given in item C20.
Health catastrophe risk – Summary		
A22	Gross SCR – Health catastrophe risk	This is the total gross catastrophe risk arising from all Health catastrophe risk sub-modules and taking into consideration the diversification between the sub-modules given in A26.
A23:A25	Gross SCR – Health catastrophe risk sub-modules	This is the total gross capital requirement per Health catastrophe risk sub-modules, taking into consideration the diversification effect between the countries. Amounts for the following risk perils are to be reported, when present: Mass accident Accident concentration Pandemic Per Health catastrophe risk sub-module this amount is equal to the Gross Catastrophe Risk Charge: A23=NK34 A24=OG34 A25=PJ33
A26	Gross SCR – Diversification between sub-modules	Diversification effect arising from the aggregation of the total gross capital charges relating to different Health risk catastrophe sub-modules. A26=SUM(A23:A25)-A22
B22	Total risk mitigation – Health catastrophe risk	This is the total risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles arising from all Health risk catastrophe sub-modules and taking into consideration the diversification effect between the sub-modules given in B26. B22=A22-C22
B23:B25	Total risk mitigation – Health catastrophe risk sub-modules	This is the total risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles per Health catastrophe risk sub-module. Amounts for the following risk perils are to be reported, when present: Mass accident Accident concentration Pandemic B23=A23-C23 B24=A24-C24 B25=A25-C25
B26	Total risk mitigation – Diversification between sub-modules	Diversification effect arising from the aggregation of the risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to different Health catastrophe risk sub-modules. B26=A26-C26
C22	Net SCR – Health catastrophe risk	This is the total net catastrophe risk arising from all Health catastrophe risk sub-modules and taking into consideration the diversification effect between the sub-modules given in C26. Amount must be equal with the amount for Total capital requirement for health catastrophe risk (item A25) mentioned in the template for SCR Health underwriting risk (SCR-B3D).
C23:C25	Net SCR – Health catastrophe risk sub-modules	This is the total net capital requirement per Health catastrophe risk sub-module, taking into consideration the diversification effect between countries. Amounts for the following risk perils are to be reported, when present: Mass accident Accident concentration Pandemic Per Health catastrophe risk sub-module this amount is equal to the Net Catastrophe Risk Charge: C23=NN34 C24=OJ34 C25=PM33
C26	Net SCR – Diversification between sub-modules	Diversification effect arising from the aggregation of the total net capital charges relating to different Health catastrophe risk sub-modules. C26=SUM(C23:C25)-C22

ITEM

INSTRUCTIONS

Natural catastrophe risk – Windstorm

AA1:AA20	Estimation of the gross premium to be earned – EEA Region	<p>An estimate of the premiums to be earned by the insurance or reinsurance undertaking, during the following year in relation to the 20 EEA regions for the contract in relation to the obligations of lines of business :</p> <ul style="list-style-type: none"> · Fire and other damage, including the proportional reinsurance obligations; · Marine, aviation and transport insurance, including the proportional reinsurance obligations. <p>Premiums shall be gross, without deduction of premiums for reinsurance contracts. EEA regions are the following ones:</p> <p>Republic of Austria Kingdom of Belgium Czech Republic Swiss Confederation; Principality of Lichtenstein Kingdom of Denmark French Republic [except Guadeloupe, Martinique, the Collectivity of Saint Martin and Réunion] Federal Republic of Germany Republic of Iceland Ireland Grand Duchy of Luxemburg Kingdom of the Netherlands Kingdom of Norway Republic of Poland Kingdom of Spain; Principality of Andorra Kingdom of Sweden United Kingdom of Great Britain and Northern Ireland Guadeloupe Martinique Collectivity of Saint Martin Réunion</p>
AA21	Estimation of the gross premium to be earned – Total Windstorm EEA Regions before diversification	AA21=SUM(AA1:AA20)
AA22:AA35	Estimation of the gross premium to be earned – Other Regions	<p>An estimate of the premiums to be earned by the insurance or reinsurance undertaking, during the following year in relation to the 14 regions other than the EEA regions, for the contract in relation to the obligations of lines of business :</p> <ul style="list-style-type: none"> · Fire and other damage, including the proportional reinsurance obligations; · Marine, aviation and transport insurance, including the proportional reinsurance obligations. <p>Premiums shall be gross, without deduction of premiums for reinsurance contracts. The 14 other that the EEA regions are the following ones:</p> <p>Central and Western Asia Eastern Asia South and South-Eastern Asia Oceania Northern Africa Southern Africa Northern America excluding the United States of America Caribbean and Central America Eastern South America Northern, southern and western South America North-east United States of America South-east United States of America Mid-west United States of America Western United States of America</p>
AA36	Estimation of the gross premium to be earned - Total Windstorm Other Regions before diversifications	AA36=SUM(AA22:AA35)
AA37	Estimation of the gross premium to be earned - Total Windstorm all Regions before diversification	AA37=AA21+AA36
AB1:AB20	Exposure – EEA Region	<p>The sum of the total sum insured per each of the 20 EEA regions:</p> <ul style="list-style-type: none"> · For lines of business Fire and other damage, including the proportional reinsurance obligations, in relation to contracts that cover windstorm risk and where the risk is situated in this particular EEA region and

	ITEM	INSTRUCTIONS
		<ul style="list-style-type: none"> For lines of business Marine, aviation and transport insurance, including the proportional reinsurance obligations, in relation to contracts that cover onshore property damage by Windstorm and where the risk is situated in this particular EEA region. <p>The 20 EEA regions are the ones identifies in the instructions for items AA1:AA20</p>
AB21	Exposure – Total Windstorm EEA Regions before diversification	$AB21 = \text{SUM}(AB1:AB20)$
AB22:AB35	Exposure – Other Regions	<p>The sum of the total sum insured in relation to the 14 regions other than the EEA regions:</p> <ul style="list-style-type: none"> Fire and other damage, including the proportional reinsurance obligations; Marine, aviation and transport insurance, including the proportional reinsurance obligations. <p>The 14 other that the EEA regions are the ones identifies in the instructions for items AA22:AA35</p>
AB36	Exposure - Total Windstorm Other Regions before diversifications	$AB36 = \text{SUM}(AB22:AB35)$
AB37	Exposure - Total Windstorm all Regions before diversification	$AB37 = AB21 + AB36$
AC1:AC20	Specified Gross Loss – EEA Region	Specified gross windstorm loss per each of the 20 EEA regions, taking into consideration the effect of diversification between zones. The 20 EEA regions are the ones identifies in the instructions for items AA1:AA20.
AC21	Specified Gross Loss – Total Windstorm EEA Regions before diversification	$AC21 = \text{SUM}(AC1:AC20)$
AD1:AD20	Gross Cat Risk Charge Factor – EEA Region	<p>The Risk Charge Factor per each of the 20 EEA regions for Windstorm according to the Standard Formula, taking into consideration the effect of diversification between zones. The 20 EEA regions are the ones identifies in the instructions for items AA1:AA20.</p> <p> $AD1 = AC1/AB1$ $AD2 = AC2/AB2$ $AD3 = AC3/AB3$ $AD4 = AC4/AB4$ $AD5 = AC4/AB5$ $AD6 = AC6/AB6$ $AD7 = AC7/AB7$ $AD8 = AC8/AB8$ $AD9 = AC9/AB9$ $AD10 = AC10/AB10$ $AD11 = AC11/AB11$ $AD12 = AC12/AB12$ $AD13 = AC13/AB13$ $AD14 = AC14/AB14$ $AD15 = AC15/AB15$ $AD16 = AC16/AB16$ $AD17 = AC17/AB17$ $AD18 = AC18/AB18$ $AD19 = AC19/AB19$ $AD20 = AC20/AB20$ </p>
AD21	Gross Cat Risk Charge Factor – Total Windstorm EEA Regions before diversification	$AD21 = \text{SUM}(AD1:AD20)$
AE1:AE20	Scenario A or B – EEA Region	<p>The larger of the capital requirement for Windstorm risk for each of the 20 EEA regions according to scenario A or scenario B. The 20 EEA regions are the ones identifies in the instructions for items AA1:AA20.</p> <p>By determining the largest amount of scenario A and B, the risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, must be taken into account.</p>
AF1:AF20	Gross Catastrophe Risk Charge – EEA Region	Gross capital requirement arising from Windstorm for each of the 20 EEA Regions corresponding to the larger of scenario A or B. The 20 EEA regions are the ones identifies in the instructions for items AA1:AA20.

	ITEM	INSTRUCTIONS
AF21	Gross Catastrophe Risk Charge – Total Windstorm EEA Regions before diversification	AF21=SUM(AF1:AF20)
AF36	Gross Catastrophe Risk Charge – Total Windstorm Other Regions before diversifications	The gross capital requirement for Windstorm risk in regions other than the EEA Regions. It is the amount of the instantaneous loss, without deduction of the amounts recoverable from reinsurance contracts and Special Purpose Vehicles. The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35
AF37	Gross Catastrophe Risk Charge – Total Windstorm all Regions before diversification	AF37=AF21+AF36
AF38	Gross Catastrophe Risk Charge – Diversification effect between regions	Diversification effect arising from the aggregation of the Windstorm risks relating to the different regions (both EEA Regions and "other regions") The EEA regions are the ones identified in the instructions for items AA1:AA20. The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35. AF38=AF37-AF39
AF39	Gross Catastrophe Risk Charge – Total Windstorm after diversification	This is the total gross capital requirement for Windstorm risk, taking into consideration the diversification effect reported in item AF38.
AG1:AG20	Estimated Risk Mitigation – EEA Region	Per each of the 20 EEA Regions, the estimated risk mitigation effect, corresponding to the selected scenario, of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated reinstatement premiums. The EEA regions are the ones identified in the instructions for items AA1:AA20.
AG21	Estimated Risk Mitigation – Total Windstorm EEA Regions before diversification	AG21=SUM(AG1:AG20)
AG36	Estimated Risk Mitigation – Total Windstorm Other Regions before diversifications	For all the regions other the EEA Regions, the estimated risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated reinstatement premiums. The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35
AG37	Estimated Risk Mitigation – Total Windstorm all Regions before diversification	AG37=AG21+AG36
AH1:AH20	Estimated Reinstatement Premiums – EEA Region	For each of the 20 EEA Regions, the estimated reinstatement premiums, corresponding to the selected scenario, as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril. The EEA regions are the ones identified in the instructions for items AA1:AA20.
AH21	Estimated Reinstatement Premiums – Total Windstorm EEA Regions before diversification	AH21=SUM(AH1:AH20)
AH36	Estimated Reinstatement Premiums – Total Windstorm Other Regions before diversifications	For all the regions other than the EEA Regions, the estimated reinstatement premiums, as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril. The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35
AH37	Estimated Reinstatement Premiums – Total Windstorm all Regions before diversification	AH37=AH21+AH36

	ITEM	INSTRUCTIONS
AI1:AI20	Net Catastrophe Risk Charge – EEA Region	<p>Net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, arising from Windstorms in each of the EEA regions, corresponding to the selected scenario.</p> <p>The EEA regions are the ones identified in the instructions for items AA1:AA20.</p> <p>AI1=AF1-AG1+AH1 AI2=AF2-AG2+AH2 AI3=AF3-AG3+AH3 AI4=AF4-AG4+AH4 AI5=AF5-AG5+AH5 AI6=AF6-AG6+AH6 AI7=AF7-AG7+AH7 AI8=AF8-AG8+AH8 AI9=AF9-AG9+AH9 AI10=AF10-AG10+AH10 AI11=AF11-AG11+AH11 AI12=AF12-AG12+AH12 AI13=AF13-AG13+AH13 AI14=AF14-AG14+AH14 AI15=AF15-AG15+AH15 AI16=AF16-AG16+AH16 AI17=AF17-AG17+AH17 AI18=AF18-AG18+AH18 AI19=AF19-AG19+AH19 AI20=AF20-AG20+AH20</p>
AI21	Net Catastrophe Risk Charge – Total Windstorm EEA Regions before diversification	AI21=SUM(AI1:AI20)
AI36	Net Catastrophe Risk Charge – Total Windstorm Other Regions before diversifications	<p>Net capital requirement for Windstorm risk in regions other than the EEA Regions. It is the amount of the instantaneous loss, including the deduction of the amounts recoverable from reinsurance contracts and Special Purpose Vehicles.</p> <p>The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35</p>
AI37	Net Catastrophe Risk Charge - Total Windstorm all Regions before diversification	AI37=AI21+AI36
AI38	Net Catastrophe Risk Charge – Diversification effect between regions	<p>Diversification effect arising from the aggregation of the net capital requirements for Windstorm risks relating to the different regions (both EEA Regions and "other regions").</p> <p>The EEA regions are the ones identified in the instructions for items AA1:AA20. The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35.</p> <p>AI38=AI37-AI39</p>
AI39	Net Catastrophe Risk Charge – Total Windstorm after diversification	This is the total net capital requirement for Windstorm risk, taking into consideration the diversification effect given in item AI38.

ITEM
Natural catastrophe risk – Earthquake

INSTRUCTIONS

BA1:BA20	Estimation of the gross premium to be earned – EEA Region	<p>An estimate of the premiums to be earned, by the insurance or reinsurance undertaking, during the following year in relation to the 20 EEA regions, for the contract in relation to the obligations of lines of business:</p> <ul style="list-style-type: none"> · Fire and other damage, including the proportional reinsurance obligations; · Marine, aviation and transport insurance, including the proportional reinsurance obligations. <p>Premiums shall be gross, without deduction of premiums for reinsurance contracts. The 20 EEA regions are the following ones:</p> <p>Republic of Austria Kingdom of Belgium Republic of Bulgaria Republic of Croatia Republic of Cyprus Czech Republic Swiss Confederation; Principality of Lichtenstein French Republic [except Guadeloupe, Martinique, the Collectivity of Saint Martin and Réunion] Federal Republic of Germany Hellenic Republic Republic of Hungary Italian Republic; Republic of San Marino; Vatican City State Republic of Malta Portuguese Republic Romania Slovak Republic Republic of Slovenia Guadeloupe Martinique Collectivity of Saint Martin</p>
BA21	Estimation of the gross premium to be earned – Total Earthquake EEA Regions before diversification	BA21=SUM(BA1:BA20)
BA22:BA35	Estimation of the gross premium to be earned – Other Regions	<p>An estimate of the premiums to be earned by the insurance or reinsurance undertaking, during the following year in relation to each of the 14 regions other than the EEA Regions, for the contract in relation to the obligations of lines of business :</p> <ul style="list-style-type: none"> · Fire and other damage, including the proportional reinsurance obligations; · Marine, aviation and transport insurance, including the proportional reinsurance obligations. <p>Premiums shall be gross, without deduction of premiums for reinsurance contracts. The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35</p>
BA36	Estimation of the gross premium to be earned – Total Earthquake Other Regions before diversification	BA36=SUM(BA22:BA35)
BA37	Estimation of the gross premium to be earned – Total Earthquake all Regions before diversification	BA37=BA21+BA36
BB1:BB20	Exposure – EEA Region	<p>The sum of the total sum insured per each of the 20 EEA regions:</p> <ul style="list-style-type: none"> · For lines of business Fire and other damage, including the proportional reinsurance obligations, in relation to contracts that cover Earthquake risk and where the risk is situated in this particular EEA region and · For lines of business Marine, aviation and transport insurance, including the proportional reinsurance obligations, in relation to contracts that cover onshore property damage by Earthquake and where the risk is situated in this particular EEA region. <p>The 20 EEA regions are the ones identifies in the instructions for items BA1:BA20.</p>
BB21	Exposure – Total Earthquake EEA Regions before diversification	BB21=SUM(BB1:BB20)

ITEM		INSTRUCTIONS
BB22:BB35	Exposure – Other Regions	The sum of the total sum insured in relation to each of the 14 regions other than the EEA Regions: <ul style="list-style-type: none"> · Fire and other damage, including the proportional reinsurance obligations; · Marine, aviation and transport insurance, including the proportional reinsurance obligations. The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35
BB36	Exposure – Total Earthquake Other Regions before diversification	BB36=SUM(BB22:BB35)
BB37	Exposure – Total Earthquake All Regions before diversification	BB37=BB21+BB36
BC1:BC20	Specified Gross Loss – EEA Region	Specified gross Earthquake loss for each of the 20 EEA regions, taking into consideration the effect of diversification between zones. The 20 EEA regions are the ones identifies in the instructions for items BA1:BA20.
BC21	Specified Gross Loss – Total Earthquake EEA Regions before diversification	BC21=SUM(BC1:BC20)
BD1:BD20	Gross Cat Risk Charge Factor – EEA Region	The Risk Charge Factor per each of the 20 EEA regions for Earthquake according to the Standard Formula, taking into consideration the effect of diversification between zones. The 20 EEA regions are the ones identifies in the instructions for items BA1:BA20. BD1=BC1/BB1 BD2=BC2/BB2 BD3=BC3/BB3 BD4=BC4/BB4 BD5=BC5/BB5 BD6=BC6/BB6 BD7=BC7/BB7 BD8=BC8/BB8 BD9=BC9/BB9 BD10=BC10/BB10 BD11=BC11/BB11 BD12=BC12/BB12 BD13=BC13/BB13 BD14=BC14/BB14 BD15=BC15/BB15 BD16=BC16/BB16 BD17=BC17/BB17 BD18=BC18/BB18 BD19=BC19/BB19 BD20=BC20/BB20
BD21	Gross Cat Risk Charge Factor – Total Earthquake EEA Regions before diversification	BD21=BC21/BB21
BE1:BE20	Gross Catastrophe Risk Charge – EEA Region	Gross capital requirement arising from Earthquakes in each of the 20 EEA Regions. The 20 EEA regions are the ones identifies in the instructions for items BA1:BA20.
BE21	Gross Catastrophe Risk Charge – Total Earthquake EEA Regions before diversification	BE21=SUM(BE1:BE20)
BE36	Gross Catastrophe Risk Charge – Other Regions before diversification	The gross capital requirement for Earthquake risk in regions other than the EEA Regions. It is the amount of the instantaneous loss, without deduction of the amounts recoverable from reinsurance contracts and Special Purpose Vehicles.
BE37	Gross Catastrophe Risk Charge – All Regions before diversification	BE37=BE21+BE36
BE38	Gross Catastrophe Risk Charge – Diversification effect between regions	Diversification effect arising from the aggregation of the Earthquake risks relating to the different regions (both EEA Regions and Other regions). BE38=BE37-BE39

	ITEM	INSTRUCTIONS
BE39	Gross Catastrophe Risk Charge – Total Earthquake	This is the total gross capital requirement for Earthquake risk, taking into consideration the diversification effect given in BE38.
BF1:BF20	Estimated Risk Mitigation – EEA Region	Per each of the 20 EEA Regions the estimated risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated reinstatement premiums. The 20 EEA regions are the ones identifies in the instructions for items BA1:BA20.
BF21	Estimated Risk Mitigation – Total Earthquake EEA Regions before diversification	BF21=SUM(BF1:BF20)
BF36	Estimated Risk Mitigation – Other Regions before diversification	For all the regions other than the EEA Regions, the estimated risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated reinstatement premiums.
BF37	Estimated Risk Mitigation – All Regions before diversification	BF37=BF21+BF36
BG1:BG20	Estimated Reinstatement Premiums – EEA Region	Per each of the 20 EEA Regions the estimated reinstatement premiums as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril. The 20 EEA regions are the ones identifies in the instructions for items BA1:BA20.
BG21	Estimated Reinstatement Premiums – Total Earthquake EEA Regions before diversification	BG21=SUM(BG1:BG20)
BG36	Estimated Reinstatement Premiums – Other Regions before diversification	For all the regions other than the EEA Regions, the estimated reinstatement premiums, as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril.
BG37	Estimated Reinstatement Premiums – All Regions before diversification	BG37=BG21+BG36
BH1:BH20	Net Catastrophe Risk Charge – EEA Region	Net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, arising from Earthquake in each of the 20 EEA regions. The 20 EEA regions are the ones identifies in the instructions for items BA1:BA20. BH1=BE1-BF1+BG1 BH2=BE2-BF2+BG2 BH3=BE3-BF3+BG3 BH4=BE4-BF4+BG4 BH5=BE5-BF5+BG5 BH6=BE6-BF6+BG6 BH7=BE7-BF7+BG7 BH8=BE8-BF8+BG8 BH9=BE9-BF9+BG9 BH10=BE10-BF10+BG10 BH11=BE11-BF11+BG11 BH12=BE12-BF12+BG12 BH13=BE13-BF13+BG13 BH14=BE14-BF14+BG14 BH15=BE15-BF15+BG15 BH16=BE16-BF16+BG16 BH17=BE17-BF17+BG17 BH18=BE18-BF18+BG18 BH19=BE19-BF19+BG19 BH20=BE20-BF20+BG20
BH21	Net Catastrophe Risk Charge – Total Earthquake EEA Region before diversification	BH21=SUM(BH1:BH20)

	ITEM	INSTRUCTIONS
BH36	Net Catastrophe Risk Charge – Other Regions before diversification	Net capital requirement for Earthquake risk in regions other than the EEA Regions. It is the amount of the instantaneous loss, including the deduction of the amounts recoverable from reinsurance contracts and Special Purpose Vehicles. BH36=BE36-BF36+BG36
BH37	Net Catastrophe Risk Charge – All Regions before diversification	BH37=BH21+BH36
BH38	Net Catastrophe Risk Charge – Diversification effect between regions	Diversification effect arising from the aggregation of the net capital requirements for Earthquake risks relating to the different regions (both EEA Regions and Other regions). BH38=BH37-BH39
BH39	Net Catastrophe Risk Charge – Total Earthquake	This is the total net capital requirement for Earthquake risk, taking into consideration the diversification effect given in BH38.
Natural catastrophe risk – Flood		
CA1:CA14	Estimation of the gross premium to be earned – EEA Region	An estimate of the premiums to be earned, by the insurance or reinsurance undertaking, during the following year in relation to each of the 14 EEA regions, for the contract in relation to the obligations of lines of business : <ul style="list-style-type: none"> · Fire and other damage, including the proportional reinsurance obligations; · Marine, aviation and transport insurance, including the proportional reinsurance obligations; · Other motor insurance, including the proportional reinsurance obligations. Premiums shall be gross, without deduction of premiums for reinsurance contracts. The 14 EEA regions are the ones defined in Annex NLUR7 from Level II Implementing Measures: <p>Republic of Austria Kingdom of Belgium Republic of Bulgaria Czech Republic Swiss Confederation; Principality of Lichtenstein French Republic [except Guadeloupe, Martinique, the Collectivity of Saint Martin and Réunion]; Principality of Monaco Federal Republic of Germany Republic of Hungary Italian Republic; Republic of San Marino; Vatican City State Republic of Poland Romania Slovak Republic Republic of Slovenia United Kingdom of Great Britain and Northern Ireland</p>
CA15	Estimation of the gross premium to be earned – Total Flood EEA Regions before diversification	CA15=SUM(CA1:CA14)
CA16:CA29	Estimation of the gross premium to be earned – Other Regions	An estimate of the premiums to be earned by the insurance or reinsurance undertaking, during the following year in relation to each of the 14 regions other than the EEA Regions, for the contract in relation to the obligations of lines of business : <ul style="list-style-type: none"> · Fire and other damage, including the proportional reinsurance obligations; · Marine, aviation and transport insurance, including the proportional reinsurance obligations; · Other motor insurance, including the proportional reinsurance obligations. Premiums shall be gross, without deduction of premiums for reinsurance contracts. The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35
CA30	Estimation of the gross premium to be earned – Total Flood Other Regions before diversification	CA30=SUM(CA16:CA29)
CA31	Estimation of the gross premium to be earned – Total Flood All Regions before diversification	CA31=CA15+CA30

ITEM		INSTRUCTIONS
CB1:CB14	Exposure – EEA Region	<p>The sum of the total sum insured per each of the 20 EEA regions:</p> <ul style="list-style-type: none"> · For lines of business Fire and other damage, including the proportional reinsurance obligations, in relation to contracts that cover Flood risk and where the risk is situated in this particular EEA region and · For lines of business Marine, aviation and transport insurance, including the proportional reinsurance obligations, in relation to contracts that cover onshore property damage by Flood and where the risk is situated in this particular EEA region and · For lines of business Other motor insurance, including the proportional reinsurance obligations, multiplied by 1.5, in relation to contracts that cover onshore property damage by Flood and where the risk is situated in this particular EEA region. <p>The 14 EEA regions are the ones identifies in the instructions for items CA1:CA14.</p>
CB15	Exposure – Total Flood EEA Regions before diversification	CB15=SUM(CB1:CB14)
CB16:CB29	Exposure – Other Regions	<p>The sum of the total sum insured in relation to each of the 14 regions other than the EEA Regions:</p> <ul style="list-style-type: none"> · Fire and other damage, including the proportional reinsurance obligations; · Marine, aviation and transport insurance, including the proportional reinsurance obligations; · Other motor insurance, including the proportional reinsurance obligations. <p>The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35</p>
CB30	Exposure – Total Flood Other Regions before diversification	CB30=SUM(CB16:CB29)
CB31	Exposure – Total Flood All Regions before diversification	CB31=CB15+CB30
CC1:CC14	Specified Gross Loss – EEA Region	<p>Specified gross Flood loss in each of the 14 EEA regions, taking into consideration the effect of diversification between zones.</p> <p>The 14 EEA regions are the ones identifies in the instructions for items CA1:CA14.</p>
CC15	Specified Gross Loss – Total Flood EEA Regions before diversification	CC15=SUM(CC1:CC14)
CD1:CD14	Gross Cat Risk Charge Factor – EEA Region	<p>The Risk Charge Factor per each of the 14 EEA regions for Flood according to the Standard Formula, taking into consideration the effect of diversification between zones.</p> <p>The 14 EEA regions are the ones identifies in the instructions for items CA1:CA14.</p> <p>CD1=CC1/CB1 CD2=CC2/CB2 CD3=CC3/CB3 CD4=CC4/CB4 CD5=CC5/CB5 CD6=CC6/CB6 CD7=CC7/CB7 CD8=CC8/CB8 CD9=CC9/CB9 CD10=CC10/CB10 CD11=CC11/CB11 CD12=CC12/CB12 CD13=CC13/CB13 CD14=CC14/CB14</p>
CD15	Gross Cat Risk Charge Factor – Total Flood EEA Regions before diversification	CD15=CC15/CB15
CE1:CE14	Scenario A or B – EEA Region	<p>The larger of the capital requirement for Flood risk in each of the 14 EEA regions according to scenario A or scenario B.</p> <p>The 14 EEA regions are the ones identifies in the instructions for items CA1:CA14.</p> <p>By determining the largest amount of scenario A and B, the risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, must be taken into account.</p>
CF1:CF14	Gross Catastrophe Risk Charge – EEA Region	<p>Gross capital requirement arising from Floods in each of th 14 EEA Regions, corresponding to the larger of scenario A or B.</p> <p>The 14 EEA regions are the ones identifies in the instructions for items CA1:CA14.</p>

	ITEM	INSTRUCTIONS
CF15	Gross Catastrophe Risk Charge – Total Flood EEA Regions before diversification	$CF15 = \text{SUM}(CF1:CF14)$
CF30	Gross Catastrophe Risk Charge – Total Flood Other Regions before diversification	The gross capital requirement for Flood risk in regions other than the EEA Regions. It is the amount of the instantaneous loss, without deduction of the amounts recoverable from reinsurance contracts and Special Purpose Vehicles.
CF31	Gross Catastrophe Risk Charge – Total Flood All Regions before diversification	$CF31 = CF15 + CF30$
CF32	Gross Catastrophe Risk Charge – Diversification effect between regions	Diversification effect arising from the aggregation of the Flood risks relating to the different regions (both EEA Regions and Other regions). $CF32 = CF31 - CF33$
CF33	Gross Catastrophe Risk Charge – Total Flood after diversification	This is the total gross capital requirement for Flood risk, taking into consideration the diversification effect given in CF32.
CG1:CG14	Estimated Risk Mitigation – EEA Region	Per each of the 14 EEA Regions the estimated risk mitigation effect, corresponding to the selected scenario, of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated reinstatement premiums. The 14 EEA regions are the ones identifies in the instructions for items CA1:CA14.
CG15	Estimated Risk Mitigation – Total Flood EEA Regions before diversification	$CG15 = \text{SUM}(CG1:CG14)$
CG30	Estimated Risk Mitigation – Flood Other Regions before diversification	For all the regions other than the EEA Regions, the estimated risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated reinstatement premiums.
CG31	Estimated Risk Mitigation – Flood All Regions before diversification	$CG31 = CG15 + CG30$
CH1:CH14	Estimated Reinstatement Premiums – EEA Region	Per each of the 14 EEA Regions the estimated reinstatement premiums, corresponding to the selected scenario, as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril. The 14 EEA regions are the ones identifies in the instructions for items CA1:CA14.
CH15	Estimated Reinstatement Premiums – EEA Regions before diversification	$CH15 = \text{SUM}(CH1:CH14)$
CH30	Estimated Reinstatement Premiums – Other Regions before diversification	For all the regions other than the EEA Regions, the estimated reinstatement premiums, as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril.
CH31	Estimated Reinstatement Premiums – All Regions before diversification	$CH31 = CH15 + CH30$

	ITEM	INSTRUCTIONS
CI1:CI14	Net Catastrophe Risk Charge – EEA Region before diversification	<p>Net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, arising from Flood in each of the 14 EEA regions, corresponding to the selected scenario.</p> <p>The 14 EEA regions are the ones identifies in the instructions for items CA1:CA14.</p> <p>CI1=CF1-CG1+CH1 CI2=CF2-CG2+CH2 CI3=CF3-CG3+CH3 CI4=CF4-CG4+CH4 CI5=CF5-CG5+CH5 CI6=CF6-CG6+CH6 CI7=CF7-CG7+CH7 CI8=CF8-CG8+CH8 CI9=CF9-CG9+CH9 CI10=CF10-CG10+CH10 CI11=CF11-CG11+CH11 CI12=CF12-CG12+CH12 CI13=CF13-CG13+CH13 CI14=CF14-CG14+CH14</p>
CI15	Net Catastrophe Risk Charge – Flood EEA Regions before diversification	CI15=SUM(CI1:CI14)
CI30	Net Catastrophe Risk Charge – Flood Other Regions before diversification	<p>Net capital requirement for Flood risk in regions other than the EEA Regions. It is the amount of the instantaneous loss, including the deduction of the amounts recoverable from reinsurance contracts and Special Purpose Vehicles.</p> <p>CI30=CF30-CG30+CH30</p>
CI31	Net Catastrophe Risk Charge – Flood All Regions before diversification	CI31=CI15+CI30
CI32	Net Catastrophe Risk Charge – Diversification effect between regions	<p>Diversification effect arising from the aggregation of the net capital requirements for Flood risks relating to the different regions (both EEA Regions and Other regions).</p> <p>CI32=CI31-CI33</p>
CI33	Net Catastrophe Risk Charge – Total Flood after diversification	This is the total net capital requirement for Flood risk, taking into consideration the diversification effect given in CI32.

Natural catastrophe risk – Hail

DA1:DA9	Estimation of the gross premium to be earned – EEA Region	<p>An estimate of the premiums to be earned, by the insurance or reinsurance undertaking, during the following year in relation to each of the 9 EEA regions, for the contract in relation to the obligations of lines of business :</p> <ul style="list-style-type: none"> · Fire and other damage, including the proportional reinsurance obligations; · Marine, aviation and transport insurance, including the proportional reinsurance obligations; · Other motor insurance, including the proportional reinsurance obligations. <p>Premiums shall be gross, without deduction of premiums for reinsurance contracts.</p> <p>The 9 EEA regions are the ones defined in Annex NLUR8 from Level II Implementing Measures:</p> <p>Republic of Austria Kingdom of Belgium Swiss Confederation; Principality of Lichtenstein French Republic [except Guadeloupe, Martinique, the Collectivity of Saint Martin and Réunion]; Principality of Monaco Federal Republic of Germany Italian Republic; Republic of San Marino; Vatican City State Grand Duchy of Luxemburg Kingdom of the Netherlands Kingdom of Spain; Principality of Andorra</p>
DA10	Estimation of the gross premium to be earned – Total Hail EEA Regions before diversification	DA10=SUM(DA1:DA9)

	ITEM	INSTRUCTIONS
DA11:DA24	Estimation of the gross premium to be earned – Other Regions	An estimate of the premiums to be earned by the insurance or reinsurance undertaking, during the following year and in relation to each of the 14 regions other than the EEA Regions, for the contract in relation to the obligations of lines of business : <ul style="list-style-type: none"> · Fire and other damage, including the proportional reinsurance obligations; · Marine, aviation and transport insurance, including the proportional reinsurance obligations; · Other motor insurance, including the proportional reinsurance obligations. Premiums shall be gross, without deduction of premiums for reinsurance contracts. The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35
DA25	Estimation of the gross premium to be earned – Total Hail Other Regions before diversification	DA25=SUM(DA11:DA24)
DA26	Estimation of the gross premium to be earned – Total Hail All Regions before diversification	DA26=DA10+DA25
DB1:DB9	Exposure – EEA Region	The sum of the total sum insured per each of th 9 EEA regions: <ul style="list-style-type: none"> · For lines of business Fire and other damage, including the proportional reinsurance obligations, in relation to contracts that cover Hail risk and where the risk is situated in this particular EEA region and · For lines of business Marine, aviation and transport insurance, including the proportional reinsurance obligations, in relation to contracts that cover onshore property damage by Hail and where the risk is situated in this particular EEA region and · For lines of business Other motor insurance, including the proportional reinsurance obligations, multiplied by 5, in relation to contracts that cover onshore property damage by Hail and where the risk is situated in this particular EEA region. The 9 EEA regions are the ones identifies in the instructions for items DA1:DA9.
DB10	Exposure – Total Hail EEA Regions before diversification	DB10=SUM(DB1:DB9)
DB11:DB24	Exposure – Other Regions	The sum of the total sum insured in relation to each of the 14 regions other than the EEA Regions: <ul style="list-style-type: none"> · Fire and other damage, including the proportional reinsurance obligations; · Marine, aviation and transport insurance, including the proportional reinsurance obligations; · Other motor insurance, including the proportional reinsurance obligations. The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35
DB25	Exposure – Total Hail Other Regions before diversification	DB25=SUM(DB11:DB24)
DB26	Exposure – Total Hail All Regions before diversification	DB26=DB10+DB25
DC1:DC9	Specified Gross Loss – EEA Region	Specified gross Hail loss in each of the 9 EEA regions, taking into consideration the effect of diversification between zones. The 9 EEA regions are the ones identifies in the instructions for items DA1:DA9.
DC10	Specified Gross Loss – Total Hail EEA Regions before diversification	DC10=SUM(DC1:DC9)
DD1:DD9	Gross Cat Risk Charge Factor – EEA Region	The Risk Charge Factor per each of the 9 EEA region for Hail according to the Standard Formula, taking into consideration the effect of diversification between zones. The 9 EEA regions are the ones identifies in the instructions for items DA1:DA9. DD1=DC1/DB1 DD2=DC2/DB2 DD3=DC3/DB3 DD4=DC4/DB4 DD5=DC5/DB5 DD6=DC6/DB6 DD7=DC7/DB7 DD8=DC8/DB8

	ITEM	INSTRUCTIONS
		DD9=DC9/DB9
DD10	Gross Cat Risk Charge Factor – Total Hail EEA Regions before diversification	DD10=DC10/DB10
DE1:DE9	Scenario A or B – EEA Region	The larger of the capital requirement for Hail risk in each of the 9 EEA regions according to scenario A or scenario B. The 9 EEA regions are the ones identifies in the instructions for items DA1:DA9. By determining the largest amount of scenario A and B, the risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, must be taken into account.
DF1:DF9	Gross Catastrophe Risk Charge – EEA Region	Gross capital requirement arising from Hails in each of the 9 EEA Regions corresponding to the larger of scenario A or B. The 9 EEA regions are the ones identifies in the instructions for items DA1:DA9.
DF10	Gross Catastrophe Risk Charge – Total Hail EEA Regions before diversification	DF10=SUM(DF1:DF9)
DF25	Gross Catastrophe Risk Charge – Total Hail Other Regions before diversification	The gross capital requirement for Hail risk in regions other than the EEA Regions. It is the amount of the instantaneous loss, without deduction of the amounts recoverable from reinsurance contracts and Special Purpose Vehicles.
DF26	Gross Catastrophe Risk Charge – Total Hail All Regions before diversification	DF26=DF10+DF25
DF27	Gross Catastrophe Risk Charge – Diversification effect between regions	Diversification effect arising from the aggregation of the Hail risks relating to the different regions (both EEA Regions and other regions) DF27=DF26-DF28
DF28	Gross Catastrophe Risk Charge – Total Hail after diversification	This is the total gross capital requirement for Hail risk, taking into consideration the diversification effect given in DF27.
DG1:DG9	Estimated Risk Mitigation – EEA Region	Per each of the 9 EEA Regions the estimated risk mitigation effect, corresponding to the selected scenario, of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated reinstatement premiums. The 9 EEA regions are the ones identifies in the instructions for items DA1:DA9.
DG10	Estimated Risk Mitigation – Total Hail EEA Region before diversification	DG10=SUM(DG1:DG9)
DG25	Estimated Risk Mitigation – Total Hail Other Regions before diversification	For all the regions other than the EEA Regions, the estimated risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated reinstatement premiums.
DG26	Estimated Risk Mitigation – Total Hail All Regions before diversification	DG26=DG10+DG25
DH1:DH9	Estimated Reinstatement Premiums – EEA Region	Per each of the 9 EEA Regions the estimated reinstatement premiums, corresponding to the selected scenario, as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril. The 9 EEA regions are the ones identifies in the instructions for items DA1:DA9.
DH10	Estimated Reinstatement Premiums – Total Hail EEA Regions before diversification	DH10=SUM(DH1:DH9)
DH25	Estimated Reinstatement Premiums – Total Hail Other Regions before diversification	For all the regions other than the EEA Regions, the estimated reinstatement premiums, as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril.

	ITEM	INSTRUCTIONS
DH26	Estimated Reinstatement Premiums – Total Hail All Regions before diversification	DH26=DH10+DH25
DI1:DI9	Net Catastrophe Risk Charge – EEA Region	Net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, arising from Hail in each of the 9 EEA Regions, corresponding to the selected scenario. The 9 EEA regions are the ones identifies in the instructions for items DA1:DA9. DI1=DF1-DG1+DH1 DI2=DF2-DG2+DH2 DI3=DF3-DG3+DH3 DI4=DF4-DG4+DH4 DI5=DF5-DG5+DH5 DI6=DF6-DG6+DH6 DI7=DF7-DG7+DH7 DI8=DF8-DG8+DH8 DI9=DF9-DG9+DH9
DI10	Net Catastrophe Risk Charge – Total Hail EEA Regions before diversification	DI10=SUM(DI1:DI9)
DI25	Net Catastrophe Risk Charge – Total Hail Other Regions before diversification	Net capital requirement for Hail risk in regions other than the EEA Regions. It is the amount of the instantaneous loss, including the deduction of the amounts recoverable from reinsurance contracts and Special Purpose Vehicles. DI25=DF25-DG25+DH25
DI26	Net Catastrophe Risk Charge – Total Hail All Regions before diversification	DI26=DI10+DI25
DI27	Net Catastrophe Risk Charge – Diversification effect between regions	Diversification effect arising from the aggregation of the net capital requirements for Hail risks relating to the different regions (both EEA Regions and Other regions). DI27=DI26-DI28
DI28	Net Catastrophe Risk Charge – Total Hail after diversification	This is the total net capital requirement for Hail risk, taking into consideration the diversification effect given in DI27.

Natural catastrophe risk – Subsidence

EA1	Estimation of the gross premium to be earned	An estimate of the premiums to be earned, by the insurance or reinsurance undertaking, during the following year, for the contract in relation to the obligations of lines of business : · Fire and other damage, including the proportional reinsurance obligations. Premiums shall be gross, without deduction of premiums for reinsurance contracts, and in relation to the territory of the French Republic.
EB1	Exposure	The sum of the total sum insured made up of the geographical divisions of the territory of the French Republic: · For lines of business Fire and other damage, including the proportional reinsurance obligations, which are sufficiently homogeneous in relation to the subsidence risk that the insurance and reinsurance undertakings are exposed to in relation to the territory. Together the zones shall comprise the whole territory.
EC1	Specified Gross Loss	Specified gross Subsidence loss, taking into consideration the effect of diversification between zones.
ED1	Gross Cat Risk Charge Factor	The Risk Charge Factor of the territory of the French Republic for Subsidence according to the Standard Formula, taking into consideration the effect of diversification between zones. ED1=EC1/EB1
EE1	Gross Catastrophe Risk Charge	The gross capital requirement for Subsidence risk in the territory of the French Republic. It is the amount of the instantaneous loss, without deduction of the amounts recoverable from reinsurance contracts and Special Purpose Vehicles, which for Subsidence is equal to the Specified Gross Loss (item EC1).
EE2	Gross Catastrophe Risk Charge – Diversification effect between zones	Diversification effect arising from the aggregation of the Subsidence risks relating to the different zones of the territory of the French Republic. EE2=EE1-EE3
EE3	Gross Catastrophe Risk Charge – Total Subsidence	This is the total gross capital requirement for Subsidence risk, taking into consideration the diversification effect given in item EE2.

	ITEM	INSTRUCTIONS
EF1	Estimated Risk Mitigation	The estimated risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated reinstatement premiums.
EG1	Estimated Reinstatement Premiums	The estimated reinstatement premiums as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril.
EH1	Net Catastrophe Risk Charge	Net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, arising from Subsidence. EH1=EE1-EF1+EG1
EH2	Net Catastrophe Risk Charge – Diversification effect between zones	Diversification effect arising from the aggregation of the net capital requirements for Subsidence risks relating to the different zones of the territory of the French Republic. EH2=EH1-EH3
EH3	Net Catastrophe Risk Charge – Total Subsidence	This is the total net capital requirement for Subsidence risk, taking into consideration the diversification effect given in item EH2.
Natural catastrophe risk – Non-proportional property reinsurance		
FA1	Estimation of the gross premium to be earned	An estimate of the premiums to be earned, by the insurance or reinsurance undertaking, during the following year, for the contract in relation to the obligations of the line of business Non-proportional property reinsurance. Premiums shall be gross, without deduction of premiums for reinsurance contracts.
FB1	Gross Catastrophe Risk Charge	The gross capital requirement for non-proportional property reinsurance. It is the amount of the instantaneous loss, without deduction of the amounts recoverable from reinsurance contracts and Special Purpose Vehicles.
FC1	Estimated Risk Mitigation	The estimated risk mitigation effect of the undertaking's specific retrocession contracts and special purpose vehicles relating to risks arising from accepted non-proportional property reinsurance, excluding the estimated reinstatement premiums.
FD1	Estimated Reinstatement Premiums	The estimated reinstatement premiums as a result of the undertaking's specific retrocession contracts and special purpose vehicles relating to risks arising from accepted non-proportional property reinsurance.
FE1	Net Catastrophe Risk Charge	Net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific retrocession contracts and special purpose vehicles relating to risks arising from accepted non-proportional property reinsurance. FE1=FB1-FC1+FD1
Man-made catastrophe risk – Motor Vehicle Liability		
GA1	Number of vehicles policy limit above 24M€	Number of vehicles insured by the insurance or reinsurance undertaking in lines of business Motor vehicle liability insurance, including proportional reinsurance obligations, with a deemed policy limit above 24,000,000 Euro.
GA2	Number of vehicles policy limit below or equal to 24M€	Number of vehicles insured by the insurance or reinsurance undertaking in lines of business lines of business Motor vehicle liability insurance, including proportional reinsurance obligations, with a deemed policy limit below or equal to 24,000,000 Euro.
GA3	Gross Cat Risk Charge Motor Vehicle Liability	This is the total gross capital requirement for Motor Vehicle Liability risk.
GA4	Estimated Risk Mitigation	The estimated risk mitigation effect of the undertaking's specific retrocession contracts and special purpose vehicles relating to risks arising from Motor Vehicle Liability, excluding the estimated reinstatement premiums.
GA5	Estimated Reinstatement Premiums	The estimated reinstatement premiums as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from Motor Vehicle Liability.
GA6	Net Catastrophe Risk Charge Motor Vehicle Liability	Net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific retrocession contracts and special purpose vehicles, relating to risks arising from Motor Vehicle Liability. GA6=GA3-GA4+GA5
Man-made catastrophe risk – Marine Tanker Collision		
HA1	Type of cover Gross Cat Risk Charge Share marine hull in tanker t	This is the gross capital requirement, per each marine hull cover, for risks arising from Marine Tanker Collision. The maximum relates to all oil and gas tankers insured by the insurance or reinsurance undertaking in respect of tanker collision in lines of business: <ul style="list-style-type: none"> · Marine, aviation and transport, including proportional reinsurance obligations; · Non-proportional marine, aviation and transport reinsurance. The amount for this cover is equal to the sum insured accepted by the insurance or reinsurance undertaking for marine insurance and reinsurance in relation to each tanker.

	ITEM	INSTRUCTIONS
HB1	Gross Cat Risk Charge Share marine liability in tanker t	This is the gross capital requirement, per marine liability cover, for risks arising from Marine Tanker Collision. The maximum relates to all oil and gas tankers insured by the insurance or reinsurance undertaking in respect of tanker collision in lines of business: <ul style="list-style-type: none"> · Marine, aviation and transport, including proportional reinsurance obligations; · Non-proportional marine, aviation and transport reinsurance. The amount for this cover is equal to the sum insured accepted by the insurance or reinsurance undertaking for marine insurance and reinsurance in relation to each tanker.
HC1	Gross Cat Risk Charge Share marine oil pollution liability in tanker t	This is the gross capital requirement, per marine oil pollution liability cover, for risks arising from Marine Tanker Collision. The maximum relates to all oil and gas tankers insured by the insurance or reinsurance undertaking in respect of tanker collision in lines of business: <ul style="list-style-type: none"> · Marine, aviation and transport, including proportional reinsurance obligations; · Non-proportional marine, aviation and transport reinsurance. The amount for this cover is equal to the sum insured accepted by the insurance or reinsurance undertaking for marine insurance and reinsurance in relation to each tanker.
HD1	Gross Cat Risk Charge Marine Tanker Collision	This is the total gross capital requirement for risks arising from Marine Tanker Collision. $HD1 = \text{SUM}(HA1:HC1)$
HE1	Estimated Risk Mitigation	The estimated risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from Marine Tanker Collision, excluding the estimated reinstatement premiums.
HF1	Estimated Reinstatement Premiums	The estimated reinstatement premiums as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from Marine Tanker Collision.
HG1	Net Catastrophe Risk Charge Marine Tanker Collision	The total net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific retrocession contracts and special purpose vehicles, relating to risks arising from Marine Tanker Collision. $HG1 = HD1 - HE1 + HF1$
HH1	Name vessel	Name of the corresponding vessel.
Man-made catastrophe risk – Marine Platform Explosion		
HA2:HE2	Gross Cat Risk Charge Marine Platform Explosion – Type of cover	This is the gross capital requirement, per type of cover (Property damage, Removal of wreckage, Loss of production income, Capping of the well or making the well secure, Liability insurance and reinsurance obligations), for risks arising from Marine Platform Explosion. The maximum relates to all oil and gas offshore platforms insured by the insurance or reinsurance undertaking in respect of platform explosion in lines of business: <ul style="list-style-type: none"> · Marine, aviation and transport, including proportional reinsurance obligations; · Non-proportional marine, aviation and transport reinsurance. The amount per type of cover is equal to the sum insured for the specific type of cover accepted by the insurance or reinsurance undertaking in relation to the selected platform.
HF2	Gross Cat Risk Charge Marine Platform Explosion	This is the total gross capital requirement for risks arising from Marine Platform Explosion. $HF2 = \text{SUM}(HA2:HE2)$
HG2	Estimated Risk Mitigation	The estimated risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from Marine Platform Explosion, excluding the estimated reinstatement premiums.
HH2	Estimated Reinstatement Premiums	The estimated reinstatement premiums as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from Marine Platform Explosion.
HI2	Net Catastrophe Risk Charge Marine Platform Explosion	Net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific retrocession contracts and special purpose vehicles, relating to risks arising from Marine Platform Explosion. $HI2 = HF2 - HG2 + HH2$
HJ2	Name platform	Name of the corresponding platform.
Man-made catastrophe risk – Marine		
HA3	Gross Cat Risk Charge Marine – Total before diversification	This is the total gross capital requirement, before diversification between types of events, for marine risks. $HA3 = HD1 + HF2$

	ITEM	INSTRUCTIONS
HB3	Gross Cat Risk Charge Marine – Diversification between type of event	Diversification effect arising from the aggregation of the total gross capital charges relating to different type of events for marine risks. HB3=HA3-HC3
HC3	Gross Cat Risk Charge Marine – Total after diversification	This is the total gross capital requirement, after diversification between the types of events, for marine risks.
HA4	Estimated Total Risk Mitigation - Total before diversification	This is the total risk mitigation effect, before diversification between types of events, of the undertaking's specific reinsurance contracts and special purpose vehicles arising from the marine risks. HA4=HA3-HA5
HB4	Estimated Total Risk Mitigation - Diversification between type of event	Diversification effect arising from the aggregation of the estimated total risk mitigation relating to different type of events for marine risks. HB4=HA4-HC4
HC4	Estimated Total Risk Mitigation - Total after diversification	This is the total risk mitigation effect, after diversification between types of events, of the undertaking's specific reinsurance contracts and special purpose vehicles arising from the marine risks. HC4=HC3-HC5
HA5	Net Cat Risk Charge Marine – Total before diversification	This is the total net capital requirement, before diversification between types of events, for marine risks. HA5=HG1+HI2
HB5	Net Cat Risk Charge Marine – Diversification between type of event	Diversification effect arising from the aggregation of the total net capital charges relating to different type of events for marine risks. HB5=HA5-HC5
HC5	Net Cat Risk Charge Marine – Total after diversification	This is the total net capital requirement, after diversification between the types of events, for marine risks.

Man-made catastrophe risk – Aviation

IA1:IB1	Gross Cat Risk Charge Aviation – Type of cover	This is the gross capital requirement, per type of cover (Aviation hull and Aviation liability), for risks arising from Aviation. The maximum relates to all aircrafts insured by the insurance or reinsurance undertaking in lines of business: <ul style="list-style-type: none"> · Marine, aviation and transport, including proportional reinsurance obligations; · Non-proportional marine, aviation and transport reinsurance. The amount per type of cover is equal to the sum insured for the specific type of cover accepted by the insurance or reinsurance undertaking for aviation insurance and reinsurance and in relation to the selected aircraft.
IC1	Gross Cat Risk Charge Aviation	This is the total gross capital requirement for risks arising from Aviation. IC1=IA1+IB1
ID1	Estimated Risk Mitigation	The estimated risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from Aviation, excluding the estimated reinstatement premiums.
IE1	Estimated Reinstatement Premiums	The estimated reinstatement premiums as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from Aviation.
IF1	Net Catastrophe Risk Charge Aviation – Total (row)	The total net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific retrocession contracts and special purpose vehicles, relating to risks arising from Aviation. IF1=IC1-ID1+IE1

Man-made catastrophe risk – Fire

JA1	Gross Cat Risk Charge Fire	This is the total gross capital requirement for Fire risks. Amount is equal to the largest fire risk concentration of an insurance or reinsurance undertaking being the set of buildings with the largest sum insured that meets the following conditions: <ul style="list-style-type: none"> · The insurance or reinsurance undertaking has insurance or reinsurance obligations in lines of business Fire and other damage to property insurance, including proportional reinsurance obligations, in relation to each building which cover damage due to fire or explosion, including as a result of terrorist attacks. · All buildings are partly or fully located within a radius of 200 meters.
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	ITEM	INSTRUCTIONS
JA2	Estimated Risk Mitigation	The estimated risk mitigation effect of the undertaking's specific retrocession contracts and special purpose vehicles relating to risks arising from Fire, excluding the estimated reinstatement premiums.
JA3	Estimated Reinstatement Premiums	The estimated reinstatement premiums as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from Fire.
JA4	Net Catastrophe Risk Charge Fire	The total net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific retrocession contracts and special purpose vehicles, relating to risks arising from Fire. JA4=JA1-JA2+JA3
Man-made catastrophe risk – Liability		
KA1:KE1	Earned premium last 12 months	Premiums earned, per type of cover, by the insurance or reinsurance undertaking, during the last 12 months, in relation to insurance and reinsurance obligations in liability risks, for the following type of covers: <ol style="list-style-type: none"> 1. Professional malpractice liability insurance and proportional reinsurance obligations other than professional malpractice liability insurance and reinsurance for self-employed crafts persons or artisans; 2. Employers liability insurance and proportional reinsurance obligations; 3. Directors and officers liability insurance and proportional reinsurance obligations; 4. Liability insurance and reinsurance obligations included in lines of business General liability insurance, including proportional reinsurance obligations, other than obligations included in liability risk groups 1 to 3 and other than personal liability insurance and proportional reinsurance and other than professional malpractice liability insurance and reinsurance for self-employed crafts persons or artisans; 5. Non-proportional reinsurance. <p>For this purpose premiums shall be gross, without deduction of premiums for reinsurance contracts</p>
KA2:KE2	Largest liability limit provided	The largest liability limit, per type of cover, provided by the insurance or reinsurance undertaking in liability risks.
KA3:KE3	Number of claims	The number of claims, per type of cover, which is equal to the lowest integer that exceeds the amount according to the provided formula.
KA4:KE4	Gross Cat Risk Charge Liability –Type of cover	This is the gross capital requirement, per type of cover, for liability risks.
KA5:KE5	Estimated Risk Mitigation – Type of cover	The estimated risk mitigation effect, per type of cover, of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from Liability, excluding the estimated reinstatement premiums.
KA6:KE6	Estimated Reinstatement Premiums – Type of cover	The estimated reinstatement premiums, per type of cover, as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from Liability.
KA7:KE7	Net Catastrophe Risk Charge Liability - Type of cover	Net capital requirement, per type of cover, after the deduction of the risk mitigating effect of the undertaking's specific retrocession contracts and special purpose vehicles, relating to risks arising from Liability.
KF1	Earned premium last 12 months - Total	KF1=SUM(KA1:KE1)
KF4	Gross Cat Risk Charge Liability – Total	KF4=SUM(KA4:KE4)
KF5	Estimated Risk Mitigation – Total	KF5=SUM(KA5:KE5)
KF6	Estimated Reinstatement Premiums – Total	KF6=SUM(KA6:KE6)
KF7	Net Catastrophe Risk Charge Liability - Total	KF7=SUM(KA7:KE7)
KA8	Gross Cat Risk Charge Liability – Total before diversification	This is the total gross capital requirement, before diversification between types of cover, for liability risks. KA8=KF4
KB8	Gross Cat Risk Charge Liability – Diversification between type of cover	Diversification effect arising from the aggregation of the total gross capital charges relating to different type of covers for liability risks. KB8=KA8-KC8

	ITEM	INSTRUCTIONS
KC8	Gross Cat Risk Charge Liability – Total after diversification	This is the total gross capital requirement, after diversification between the types of covers, for liability risks.
KA9	Estimated Total Risk Mitigation – Total before diversification	This is the estimated total risk mitigation, before diversification between types of cover, for liability risks. KA9=KF5+KF6
KB9	Estimated Total Risk Mitigation – Diversification between type of cover	Diversification effect arising from the aggregation of the estimated total risk mitigation relating to different type of covers for liability risks. KB9=KA9-KC9
KC9	Estimated Total Risk Mitigation – Total after diversification	This is the estimated total risk mitigation, after diversification between the types of covers, for liability risks. KC9=KC8-KC10
KA10	Net Cat Risk Charge Liability – Total before diversification	This is the total net capital requirement, before diversification between types of cover, for liability risks. KA10=KF7
KB10	Net Cat Risk Charge Liability – Diversification between type of cover	Diversification effect arising from the aggregation of the total net capital charges relating to different type of covers for liability risks. KB10=KA10-KC10
KC10	Net Cat Risk Charge Liability – Total after diversification	This is the total net capital requirement, after diversification between the types of covers, for liability risks.

Man-made catastrophe risk – Credit & Suretyship

LA1:LB1	Exposure (individual or group) – Largest exposure	Two largest gross credit insurance exposures of the insurance or reinsurance undertaking based on a comparison of the net loss-given-default of the credit insurance exposures, being the loss-given-default after deduction of the amounts recoverable from reinsurance contracts and special purpose vehicles.
LC1	Exposure (individual or group) – Total	Total of the two largest gross credit insurance exposures of the insurance or reinsurance undertaking based on a comparison of the net loss-given-default of the credit insurance exposures, being the loss-given-default after deduction of the amounts recoverable from reinsurance contracts and special purpose vehicles. LC1=LA1+LB1
LA2:LB2	Proportion of damaged caused by scenario – Largest exposure	Percentage representing the loss given default of the gross credit exposure without deduction of the amounts recoverable from reinsurance contracts and special purpose vehicles, for each of the two largest gross credit insurance exposures of the insurance or reinsurance undertaking.
LC2	Proportion of damaged caused by scenario – Total	Average loss given default of the two largest gross credit exposures without deduction of the amounts recoverable from reinsurance contracts and special purpose vehicles. LC2=LC3/LC1
LA3:LB3	Gross Cat Risk Charge Credit & Suretyship – Large Credit Default –Largest exposure	This is the gross capital requirement, per largest exposure, arising from the Large Credit Default scenario of Credit & Suretyship risks. LA3=LA1 x LA2 LB3=LB1 x LB2
LC3	Gross Cat Risk Charge Credit & Suretyship – Large Credit Default – Total	This is the total gross capital requirement arising from the Large Credit Default scenario of Credit & Suretyship risks. LC3=LA3+LB3
LA4:LB4	Estimated Risk Mitigation – Largest exposure	The estimated risk mitigation effect, per largest exposure, of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from the Large Credit Default scenario of Credit & Suretyship, excluding the estimated reinstatement premiums.
LC4	Estimated Risk Mitigation – Total	The estimated risk mitigation effect, for the two largest exposures, of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from the Large Credit Default scenario of Credit & Suretyship, excluding the estimated reinstatement premiums. LC4=LA4+LB4
LA5:LB5	Estimated Reinstatement Premiums – Largest exposure	The estimated reinstatement premiums, per largest exposure, as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from the Large Credit Default scenario of Credit & Suretyship.

	ITEM	INSTRUCTIONS
LC5	Estimated Reinstatement Premiums – Total	The estimated reinstatement premiums, for the two largest exposures, as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from the Large Credit Default scenario of Credit & Suretyship. LC5=LA5+LB5
LA6:LB6	Net Catastrophe Risk Charge Credit & Suretyship – Large Credit Default – Type of cover	Net capital requirement, per largest exposure, after the deduction of the risk mitigating effect of the undertaking's specific retrocession contracts and special purpose vehicles, relating to risks arising from the Large Credit Default scenario of Credit & Suretyship. LA6=LA3-LA4+LA5 LB6=LB3-LB4+LB5
LC6	Net Catastrophe Risk Charge Credit & Suretyship – Large Credit Default – Total	The total net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific retrocession contracts and special purpose vehicles, relating to risks arising from the Large Credit Default scenario of Credit & Suretyship. LC6=LA6+LB6
LA7	Earned premium last 12 months	Gross premiums earned by the insurance or reinsurance undertaking, during the last 12 months, in lines of business Credit and Suretyship insurance.
LA8	Gross Cat Risk Charge Credit & Suretyship – Recession Risk	This is the total gross capital requirement for the Recession scenario of Credit & Suretyship risks.
LA9	Estimated Risk Mitigation	The estimated risk mitigation effect of the undertaking's specific retrocession contracts and special purpose vehicles relating to risks arising from the Recession scenario of Credit & Suretyship, excluding the estimated reinstatement premiums.
LA10	Estimated Reinstatement Premiums	The estimated reinstatement premiums as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from the Recession scenario of Credit & Suretyship.
LA11	Net Catastrophe Risk Charge Credit & Suretyship – Recession Risk	The total net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific retrocession contracts and special purpose vehicles, relating to risks arising from the Recession scenario of Credit & Suretyship. LA11=LA8-LA9+LA10
LA12	Gross Cat Risk Charge Credit & Suretyship – Total before diversification	This is the total gross capital requirement, before diversification between types of events, for Credit & Suretyship risks. LA12=LC3+LA8
LB12	Gross Cat Risk Charge Credit & Suretyship – Diversification between type of event	Diversification effect arising from the aggregation of the total gross capital charges relating to different type of events for Credit & Suretyship risks. LB12=LA12-LC12
LC12	Gross Cat Risk Charge Credit & Suretyship – Total after diversification	This is the total gross capital requirement, after diversification between the types of events, for Credit & Suretyship risks.
LA13	Estimated Total Risk Mitigation - Total before diversification	This is the total risk mitigation effect, before diversification between types of events, of the undertaking's specific reinsurance contracts and special purpose vehicles arising from the Credit & Suretyship risks. LA13=LA12-LA14
LB13	Estimated Total Risk Mitigation - Diversification between type of event	Diversification effect arising from the aggregation of the estimated total risk mitigation relating to different type of events for Credit & Suretyship risks. LB13=LB12-LB14
LC13	Estimated Total Risk Mitigation - Total after diversification	This is the total risk mitigation effect, after diversification between types of events, of the undertaking's specific reinsurance contracts and special purpose vehicles arising from the Credit & Suretyship risks. LC13=LC12-LC14
LA14	Net Cat Risk Charge Credit & Suretyship – Total before diversification	This is the total net capital requirement, before diversification between types of events, for Credit & Suretyship risks. LA14=LC6+LA11
LB14	Net Cat Risk Charge Credit & Suretyship – Diversification between type of event	Diversification effect arising from the aggregation of the total net capital charges relating to different type of events for Credit & Suretyship risks. LB14=LA13-LC14

	ITEM	INSTRUCTIONS
LC14	Net Cat Risk Charge Credit & Suretyship – Total after diversification	This is the total net capital requirement, after diversification between the types of events, for Credit & Suretyship risks.
Man-made catastrophe risk – Other non-life catastrophe risk		
MA1:ME1	Estimation of the gross premium to be earned	An estimate of the premiums to be earned by the insurance or reinsurance undertaking, during the following year, for the contracts in relation to the following group of obligations: 1. Insurance and reinsurance obligations included in lines of business Marine, aviation and transport insurance, including proportional reinsurance obligations, other than marine insurance and reinsurance and aviation insurance and reinsurance; 2. Reinsurance obligations included in line of business Non-proportional marine, aviation and transport reinsurance, other than marine reinsurance and aviation reinsurance; 3. Insurance and reinsurance obligations included in lines of business Miscellaneous financial loss, including proportional reinsurance obligations; 4. Reinsurance obligations included in line of business Non-proportional casualty reinsurance, other than general liability reinsurance; 5. Non-proportional reinsurance obligations relating to insurance obligations included in lines of business Credit and Suretyship insurance. Premiums shall be gross, without deduction of premiums for reinsurance contracts.
MA2:ME2	Gross Cat Risk Charge Other non-life catastrophe – Group of obligations	This is the gross capital requirement, per group of obligations, for Other non-life catastrophe risks.
MF2	Gross Cat Risk Charge Other non-life catastrophe – Total before diversification	This is the total gross capital requirement, before diversification between groups of obligations, for Other non-life catastrophe risks. $MF2 = \text{SUM}(MA2:ME2)$
MG2	Gross Cat Risk Charge Other non-life catastrophe – Diversification between groups of obligations	Diversification effect arising from the aggregation of the total gross capital charges relating to different groups of obligations for Other non-life catastrophe risks. $MG2 = MF2 - MH2$
MH2	Gross Cat Risk Charge Other non-life catastrophe – Total after diversification	This is the total gross capital requirement, after diversification between groups of obligations, for Other non-life catastrophe risks.
MF3	Estimated Total Risk Mitigation – Total before diversification	This is the estimated total risk mitigation, before diversification between groups of obligations, for Other non-life catastrophe risks.
MG3	Estimated Total Risk Mitigation – Diversification between groups of obligations	Diversification effect arising from the aggregation of the estimated total risk mitigation relating to different groups of obligations for Other non-life catastrophe risks. $MG3 = MG2 - MG4$
MH3	Estimated Total Risk Mitigation – Total after diversification	This is the estimated total risk mitigation, after diversification between groups of obligations, for Other non-life catastrophe risks. $MH3 = MH2 - MH4$
MF4	Net Cat Risk Charge Other non-life catastrophe – Total before diversification	This is the total net capital requirement, before diversification between groups of obligations, for Other non-life catastrophe risks.
MG4	Net Cat Risk Charge Other non-life catastrophe – Diversification between groups of obligations	Diversification effect arising from the aggregation of the total net capital charges relating to different groups of obligations for Other non-life catastrophe risks. $MG4 = MF4 - MH4$
MH4	Net Cat Risk Charge Other non-life catastrophe – Total after diversification	This is the total net capital requirement, after diversification between groups of obligations, for Other non-life catastrophe risks.

ITEM

INSTRUCTIONS

Health catastrophe risk – Mass accident

<p>NA1:NA31, NC1:NC31, NE1:NE31, NG1:NG31, NT1:NT31</p>	<p>Policyholders per type of event – Countries</p>	<p>All insured persons of the insurance or reinsurance undertaking who are inhabitants of each of the following countries:</p> <ul style="list-style-type: none"> Republic of Austria Kingdom of Belgium Republic of Bulgaria Republic of Croatia Republic of Cyprus Czech Republic Kingdom of Denmark Republic of Estonia Republic of Finland French Republic Hellenic Republic Federal Republic of Germany Republic of Hungary Republic of Iceland Ireland Italian Republic Republic of Latvia Republic of Lithuania Grand Duchy of Luxemburg Republic of Malta Kingdom of the Netherlands Kingdom of Norway Republic of Poland Portuguese Republic Romania Slovak Republic Republic of Slovenia Kingdom of Spain Kingdom of Sweden Swiss Confederation United Kingdom of Great Britain and Northern Ireland <p>and are insured against the following types of event:</p> <ol style="list-style-type: none"> 1. Death caused by an accident; 2. Permanent disability caused by an accident; 3. Disability that lasts 10 years caused by an accident; 4. Disability that lasts 12 months caused by an accident; 5. Medical treatment caused by an accident.
<p>NB1:NB31, ND1:ND31, NF1:NF31, NH1:NH31, NI1:NI31</p>	<p>Value of benefits payable per type of event – Countries</p>	<p>The value of the benefits shall be the sum insured or where the insurance contract provides for recurring benefit payments the best estimate of the benefit payments, using the cash-flow projection, in case of event type 1-5 identified in Items NA1 to NI31, for each of the countries identified in Items NA1 to NI31.</p> <p>Where the benefits of an insurance contract depend on the nature or extent of any injury resulting from event 1-5 identified in Items NA1 to NI31, the calculation of the value of the benefits shall be based on the maximum benefits obtainable under the contract which are consistent with the event.</p> <p>For medical expense insurance and reinsurance obligations the value of the benefits shall be based on an estimate of the average amounts paid in case of event 1-5 identified in Items NA1 to NI31, taking into account the specific guarantees the obligations include.</p>
<p>NK1:NK31</p>	<p>Gross Catastrophe Risk Charge – Countries</p>	<p>Gross capital requirement, for each of the countries identified in Items NA1 to NI31, arising from the health sub-module mass accident.</p>
<p>NK32</p>	<p>Gross Catastrophe Risk Charge - Total Mass accident all countries before diversification</p>	<p>This is the total gross capital requirement, before diversification between countries, for the health sub-module mass accident. NK32=SUM(NK1:NK31)</p>
<p>NK33</p>	<p>Gross Catastrophe Risk Charge – Diversification effect between countries</p>	<p>Diversification effect arising from the aggregation of the health sub-module mass accident relating to the different countries. NK33=NK32-NK34</p>
<p>NK34</p>	<p>Gross Catastrophe Risk Charge - Total Mass accident all countries after diversification</p>	<p>This is the total gross capital requirement, after diversification between countries, for the health sub-module mass accident.</p>

	ITEM	INSTRUCTIONS
NL1:NL31	Estimated Risk Mitigation – Countries	For each of the countries identified in Items NA1 to NI31, the estimated risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated reinstatement premiums.
NL32	Estimated Risk Mitigation – Total	$NL32 = \text{SUM}(NL1:NL31)$
NM1:NM31	Estimated Reinstatement Premiums – Countries	For each of the countries identified in Items NA1 to NI31, the estimated reinstatement premiums as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril.
NM32	Estimated Reinstatement Premiums – Total	$NM32 = \text{SUM}(NM1:NM31)$
NN1:NN31	Net Catastrophe Risk Charge – Countries	Net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, arising from the health sub-module mass accident, for each of the countries identified in Items NA1 to NI31. $NN1 = NK1 - NL1 + NM1$
NN32	Net Catastrophe Risk Charge - Total Mass accident all countries before diversification	This is the total net capital requirement, before diversification between countries, for the health sub-module mass accident. $NN32 = \text{SUM}(NN1:NN31)$
NN33	Net Catastrophe Risk Charge – Diversification effect between countries	Diversification effect arising from the aggregation of the net capital requirements for the health sub-module mass accident risks relating to the different countries. $NN33 = NN32 - NN34$
NN34	Net Catastrophe Risk Charge – Total Mass accident all countries after diversification	This is the total net capital requirement for the health sub-module mass accident risk, taking into consideration the diversification effect given in NN33.

Health catastrophe risk – Concentration accident

OA1:OA31	Largest known accident risk concentration – Countries	The largest accident risk concentration of an insurance or reinsurance undertaking, for each of the countries identified in Items NA1 to NI31, shall be equal to the largest number of persons for which the following conditions are met: <ul style="list-style-type: none"> · The insurance or reinsurance undertaking has a workers' compensation insurance or reinsurance obligation or a group income protection insurance or reinsurance obligation in relation to each of the persons; · The obligations in relation to each of the persons cover at least one of the events set out in the next item; · The persons are working in the same building which is situated in this particular country. <p>These persons are insured against the following types of event:</p> <ol style="list-style-type: none"> 1. Death caused by an accident; 2. Permanent disability caused by an accident; 3. Disability that lasts 10 years caused by an accident; 4. Disability that lasts 12 months caused by an accident; 5. Medical treatment caused by an accident.
OB1:OB31, OC1:OC31, OD1:OD31, OE1:OE31, OF1:OF31	Average sum insured per type of event – Countries	The value of the benefits shall be the sum insured or where the insurance contract provides for recurring benefit payments the best estimate of the benefit payments in case of event type 1-5 identified in Item NA1 to NI31. <p>Where the benefits of an insurance contract depend on the nature or extent of any injury resulting from event 1-5, the calculation of the value of the benefits shall be based on the maximum benefits obtainable under the contract which are consistent with the event.</p> <p>For medical expense insurance and reinsurance obligations the value of the benefits shall be based on an estimate of the average amounts paid in case of event 1-5, taking into account the specific guarantees the obligations include.</p>
OG1:OG31	Gross Catastrophe Risk Charge – Countries	Gross capital requirement, for each of the countries identified in Items NA1 to NI31, arising from the health sub-module concentration accident.

	ITEM	INSTRUCTIONS
OG32	Gross Catastrophe Risk Charge - Total Concentration accident all countries before diversification	This is the total gross capital requirement, before diversification between countries, for the health sub-module concentration accident. OG32=SUM(OG1:OG31)
OG33	Gross Catastrophe Risk Charge - Diversification effect between countries	Diversification effect arising from the aggregation of the health sub-module concentration accident relating to the different countries. OG33=OG34-OG32
OG34	Gross Catastrophe Risk Charge - Total Concentration accident all countries after diversification	This is the total gross capital requirement, after diversification between countries, for the health sub-module concentration accident.
OH1:OH31	Estimated Risk Mitigation - Countries	For each of the countries identified in Items NA1 to NI31, the estimated risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated reinstatement premiums.
OH32	Estimated Risk Mitigation - Total	OH32=SUM(OH1:OH31)
OI1:OI31	Estimated Reinstatement Premiums - Countries	For each of the countries identified in Items NA1 to NI31, the estimated reinstatement premiums as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril.
OI32	Estimated Reinstatement Premiums - Total	OI32=SUM(OI1:OI31)
OJ1:OJ31	Net Catastrophe Risk Charge - Countries	Net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, arising from the health sub-module concentration accident for each of the countries identified in Items NA1 to NI31.
OJ32	Net Catastrophe Risk Charge - Total Concentration accident all countries before diversification	The total net capital requirement, before diversification between countries, for the health sub-module concentration accident. OJ32=SUM(OJ1:OJ31)
OJ33	Net Catastrophe Risk Charge - Diversification effect between countries	Diversification effect arising from the aggregation of the net capital requirements for the health sub-module concentration accident risks relating to the different countries. OJ33=OJ34-OJ32
OJ34	Net Catastrophe Risk Charge - Total Concentration accident all countries after diversification	This is the total net capital requirement for the health sub-module concentration accident risk, taking into consideration the diversification effect given in OJ33.

Health catastrophe risk – Pandemic

PA32	Income protection - Number of insured persons - Total all countries	Total number of insured persons for all countries covered by the income protection insurance or reinsurance obligations other than workers' compensation insurance or reinsurance obligations.
PB32	Income protection - Total pandemic exposure - Total all countries	The total of all income protection pandemic exposure for all countries of insurance and reinsurance undertakings. The value of the benefits payable for the insured person shall be the sum insured or where the insurance contract provides for recurring benefit payments the best estimate of the benefit payments assuming that the insured person is permanently disabled and will not recover.
PC1:PC31	Medical expense - Number of insured persons - Countries	The number of insured persons of insurance and reinsurance undertakings, for each of the countries identified in Items NA1 to NI31, which meet the following conditions: <ul style="list-style-type: none"> · The insured persons are inhabitants of this particular country; · The insured persons are covered by medical expense insurance or reinsurance obligations, other than workers' compensation insurance or reinsurance obligations that cover medical expenses resulting from an infectious disease. <p>These insured persons may claim benefits for the following healthcare utilisation:</p> <ol style="list-style-type: none"> 1. Hospitalisation; 2. Consultation with a medical practitioner; 3. No formal medical care sought.

ITEM		INSTRUCTIONS
PD1:PD31, PF1:PF31, PH1:PH31	Medical expense – Unit claim cost per type of healthcare - Countries	Best estimate of the amounts payable, using the cash-flow projection, by insurance and reinsurance undertakings for an insured person in relation to medical expense insurance or reinsurance obligations, other than workers' compensation insurance or reinsurance obligations per healthcare utilisation type 1-3, as identified in item PC1 to PC31, in the event of a pandemic, for each of the countries identified in Items NA1 to NI31.
PE1:PE31, PG1:PG31, PI1:PI31	Medical expense – Expected number of uses per type of healthcare – Countries	The ratio of insured persons with clinical symptoms utilising healthcare type 1-3, as identified in item PC1 to PC31, for each of the countries identified in Items NA1 to NI31.
PJ1:PJ31	Gross Catastrophe Risk Charge – Countries	Gross capital requirement, for each of the countries identified in Items NA1 to NI31, arising from the health sub-module pandemic.
PJ32	Gross Catastrophe Risk Charge – Total income protection - Total all countries	This is the total gross capital requirement for the income protection pandemic exposure for all countries of insurance and reinsurance undertakings based on the total income protection pandemic exposure multiplied with the ratio.
PJ33	Gross Catastrophe Risk Charge - Total Pandemic all countries	This is the total gross capital requirement for the health sub-module pandemic. $PJ33 = \text{SUM}(PJ1:PJ31) + PJ32$
PK33	Estimated Risk Mitigation	The total estimated risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated reinstatement premiums.
PL33	Estimated Reinstatement Premiums	The total estimated reinstatement premiums as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril.
PM33	Net Catastrophe Risk Charge - Total Pandemic all countries	The total net capital requirement for the health sub-module pandemic. $PM33 = PJ33 - PK33 + PL33$

Technical Annex II: List of quantitative reporting items

S.28.01

Minimum Capital Requirement (except for composite undertakings)

	ITEM	INSTRUCTIONS
A1	Linear Formula component for non-life insurance or reinsurance obligations	This is the linear formula component for non-life insurance or reinsurance obligations and is calculated in accordance with Solvency 2 requirements.
B2	Medical expense insurance and proportional reinsurance – net best estimate	This is the technical provisions for medical expense insurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero. See cross-templates checks tab CQS 45 See cross-templates checks tab CAS 59
C2	Medical expense insurance and proportional reinsurance – net written premiums	This is the premiums written for medical expense insurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B3	Income protection insurance and proportional reinsurance – net best estimate	This is the technical provisions for income protection insurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 46 See cross-templates checks tab CAS 60
C3	Income protection insurance and proportional reinsurance – net written premiums	This is the premiums written for income protections insurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B4	Workers' compensation insurance and proportional reinsurance – net best estimate	This is the technical provisions for workers' compensation insurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 47 See cross-templates checks tab CAS 61
C4	Workers' compensation insurance and proportional reinsurance – net written premiums	This is the premiums written for workers' compensations insurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B5	Motor vehicle liability insurance and proportional reinsurance – net best estimate	This is the technical provisions for motor vehicle liability insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 48 See cross-templates checks tab CAS 62
C5	Motor vehicle liability insurance and proportional reinsurance – net written premiums	This is the premiums written for motor vehicle liability insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B6	Other motor insurance and proportional reinsurance – net best estimate	This is the technical provisions for other motor insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 49 See cross-templates checks tab CAS 63
C6	Other motor insurance and proportional reinsurance – net written premiums	This is the premiums written for other motor insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B7	Marine, aviation and transport insurance and proportional reinsurance – net best estimate	This is the technical provisions for marine, aviation and transport insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 50 See cross-templates checks tab CAS 64

C7	Marine, aviation and transport insurance and proportional reinsurance – net written premiums	This is the premiums written for marine, aviation and transport insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B8	Fire and other damage to property insurance and proportional reinsurance – net best estimate	This is the technical provisions for fire and other damage to property insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 51 See cross-templates checks tab CAS 65
C8	Fire and other damage to property insurance and proportional reinsurance – net written premiums	This is the premiums written for fire and other damage to property insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B9	General liability insurance and proportional reinsurance – net best estimate	This is the technical provisions for general liability insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 52 See cross-templates checks tab CAS 66
C9	General liability insurance and proportional reinsurance – net written premiums	This is the premiums written for general liability insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B10	Credit and suretyship insurance and proportional reinsurance – net best estimate	This is the technical provisions for credit and suretyship insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 53 See cross-templates checks tab CAS 67
C10	Credit and suretyship insurance and proportional reinsurance – net written premiums	This is the premiums written for credit and suretyship insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B11	Legal expenses insurance and proportional reinsurance – net best estimate	This is the technical provisions for legal expenses insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 54 See cross-templates checks tab CAS 68
C11	Legal expenses insurance and proportional reinsurance – net written premiums	This is the premiums written for legal expenses insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B12	Assistance and its proportional reinsurance – net best estimate	This is the technical provisions for assistance and its proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 55 See cross-templates checks tab CAS 69
C12	Assistance and its proportional reinsurance – net written premiums	This is the premiums written for assistance and its proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B13	Miscellaneous financial loss insurance and proportional reinsurance – net best estimate	This is the technical provisions for miscellaneous financial loss insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 56 See cross-templates checks tab CAS 70

C13	Miscellaneous financial loss insurance and proportional reinsurance – net written premiums	This is the premiums written for miscellaneous financial loss insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B14	Non-proportional casualty reinsurance – net best estimate	This is the technical provisions for non-proportional casualty reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 57 See cross-templates checks tab CAS 71
C14	Non-proportional casualty reinsurance – net written premiums	This is the premiums written for non-proportional casualty reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B15	Non-proportional property reinsurance – net best estimate	This is the technical provisions for non-proportional property reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 60 See cross-templates checks tab CAS 74
C15	Non-proportional property reinsurance – net written premiums	This is the premiums written for non-proportional property reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B16	Non-proportional marine, aviation and transport reinsurance – net best estimate	This is the technical provisions for non-proportional marine, aviation and transport reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 59 See cross-templates checks tab CAS 73
C16	Non-proportional marine, aviation and transport reinsurance – net written premiums	This is the premiums written for non-proportional marine, aviation and transport reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B17	Non-proportional health reinsurance – net best estimate	This is the technical provisions for non-proportional health reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 58 See cross-templates checks tab CAS 72
C17	Non-proportional health reinsurance – net written premiums	This is the premiums written for non-proportional health reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
A18	MCR _L result	This is the result of the linear formula component for life insurance or reinsurance obligations in accordance with Solvency 2 requirements. 'A18=(0.05+B19)-(0.088*B20)+(0.005*B21)+(0.029*B22)+(0.001*C23)
B19	Net best estimate for obligations with profit participation – guaranteed benefits	This is the technical provisions without a risk margin in relation to guaranteed benefits for life insurance obligations with profit participation, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero and technical provisions without a risk margin for reinsurance obligations where the underlying life insurance obligations include profit participation, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 61 See cross-templates checks tab CAS 75
B20	Net best estimate for obligations with profit participation – future discretionary benefits	This is the technical provisions without a risk margin in relation to future discretionary benefits for life insurance obligations with profit participation, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 61 See cross-templates checks tab CAS 75

B21	Net best estimate for index-linked and unit-linked obligations	This is the technical provisions without a risk margin for index-linked and unit-linked life insurance obligations and reinsurance obligations relating to such insurance obligations, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero. See cross-templates checks tab CQS 62 See cross-templates checks tab CAS 76
B22	Net best estimate for other life (re)insurance obligations	This is the technical provisions without a risk margin for all other life insurance obligations and reinsurance obligations relating to such insurance obligations, after deduction of the amounts recoverable from reinsurance contracts and SPV, with a floor equal to zero Annuities related to non-life contracts should be reported here. See cross-templates checks tab CQS 63 See cross-templates checks tab CAS 77
C23	Capital at risk for all life (re)insurance obligations	This is the capital at risk, being the sum in relation to all contracts that give rise to life insurance or reinsurance obligations of the capital at risk of the contracts.
A24	Linear MCR	The linear Minimum Capital Requirement shall equal to the sum of the MCR linear formula component for non life insurance and reinsurance and the MCR the linear formula component for life insurance and reinsurance obligations. $A24=A1+A18$
A25	SCR	This is the latest SCR to be calculated, either the annual one or a more recent one in case the SCR has been recalculated (e.g. due to a change in risk profile) since the last value of the SCR was reported, including capital add on. Undertakings using internal models to calculate the SCR should refer to IM SCR, except where under L1 Article 129(3) the national supervisor requires standard formula reference.
A26	MCR cap	This is calculated as 45% of the SCR including any capital add-on in accordance with Art 129(3) of the Solvency II Directive
A27	MCR floor	This is calculated as 25% of the SCR including any capital add-on in accordance with Art 129(3) of the Solvency II Directive
A28	Combined MCR	This is calculated in accordance with Solvency 2 requirements. $A28=\min(\max(A24,A27),A26)$
A29	Absolute floor of the MCR	This is as defined in Art 129(1)d of the Solvency II Directive
A30	MCR	This is calculated in accordance with Solvency 2 requirements. $A31=\max(A29,A30)$

Technical Annex II: List of quantitative reporting items

S.28.02

Minimum capital Requirement - Composite undertakings

ITEM	INSTRUCTIONS	
B1	Linear Formula component for non-life insurance or reinsurance obligations – $MCR_{(NL,NL)}$ result	This is the linear formula component for non-life insurance or reinsurance obligations of non-life insurance activities, and is calculated in accordance with Solvency 2 requirements.
C1	Linear Formula component for non-life insurance or reinsurance obligations – $MCR_{(NL,L)}$ result	This is the linear formula component for non-life insurance or reinsurance obligations of life insurance activities, and is calculated in accordance with Solvency 2 requirements
D2	Medical expense insurance and proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for medical expense insurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 26 See cross-templates checks tab CAS 40
E2	Medical expense insurance and proportional reinsurance – net written premiums – non-life activities	This is the premiums written for medical expense insurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F2	Medical expense insurance – net best estimate – life activities	This is the technical provisions for medical expense insurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 26 See cross-templates checks tab CAS 40
G2	Medical expense insurance and proportional reinsurance – net written premiums – life activities	This is the premiums written for medical expense insurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D3	Income protection insurance and proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for income protection insurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 27 See cross-templates checks tab CAS 41
E3	Income protection insurance and proportional reinsurance – net written premiums – non-life activities	This is the premiums written for income protections insurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F3	Income protection insurance and proportional reinsurance – net best estimate – life activities	This is the technical provisions for income protection insurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 27 See cross-templates checks tab CAS 41
G3	Income protection insurance and proportional reinsurance – net written premiums – life activities	This is the premiums written for income protections insurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D4	Workers' compensation insurance and proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for workers' compensation insurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 28 See cross-templates checks tab CAS 42
E4	Workers' compensation insurance – net written premiums – non-life activities	This is the premiums written for workers' compensations insurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero , relating to non-life activities
F4	Workers' compensation insurance and proportional reinsurance – net best estimate – life activities	This is the technical provisions for workers' compensation insurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 28 See cross-templates checks tab CAS 42
G4	Workers' compensation insurance and proportional reinsurance – net written premiums – life activities	This is the premiums written for workers' compensations insurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero , relating to life activities

D5	Motor vehicle liability insurance and proportional reinsurance and proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for motor vehicle liability insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 29 See cross-templates checks tab CAS 43
E5	Motor vehicle liability insurance and proportional reinsurance – net written premiums – non-life activities	This is the premiums written for motor vehicle liability insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F5	Motor vehicle liability insurance and proportional reinsurance – net best estimate – life activities	This is the technical provisions for motor vehicle liability insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 29 See cross-templates checks tab CAS 43
G5	Motor vehicle liability insurance and proportional reinsurance – net written premiums – life activities	This is the premiums written for motor vehicle liability insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D6	Other motor insurance and proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for other motor insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 30 See cross-templates checks tab CAS 44
E6	Other motor insurance and proportional reinsurance – net written premiums – non-life activities	This is the premiums written for other motor insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F6	Other motor insurance and proportional reinsurance – net best estimate – life activities	This is the technical provisions for other motor insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 30 See cross-templates checks tab CAS 44
G6	Other motor insurance and proportional reinsurance – net written premiums – life activities	This is the premiums written for other motor insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D7	Marine, aviation and transport insurance and proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for marine, aviation and transport insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 31 See cross-templates checks tab CAS 45
E7	Marine, aviation and transport insurance and proportional reinsurance – net written premiums – non-life activities	This is the premiums written for marine, aviation and transport insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F7	Marine, aviation and transport insurance and proportional reinsurance – net best estimate – life activities	This is the technical provisions for marine, aviation and transport insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 31 See cross-templates checks tab CAS 45
G7	Marine, aviation and transport insurance and proportional reinsurance – net written premiums – life activities	This is the premiums written for marine, aviation and transport insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D8	Fire and other damage to property insurance and proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for fire and other damage to property insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 32 See cross-templates checks tab CAS 46

E8	Fire and other damage to property insurance and proportional reinsurance – net written premiums – non-life activities	This is the premiums written for fire and other damage to property insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F8	Fire and other damage to property insurance and proportional reinsurance – net best estimate – life activities	This is the technical provisions for fire and other damage to property insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 32 See cross-templates checks tab CAS 46
G8	Fire and other damage to property insurance and proportional reinsurance – net written premiums – life activities	This is the premiums written for fire and other damage to property insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D9	General liability insurance and proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for general liability insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 33 See cross-templates checks tab CAS 47
E9	General liability insurance and proportional reinsurance – net written premiums – non-life activities	This is the premiums written for general liability insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F9	General liability insurance and proportional reinsurance – net best estimate – life activities	This is the technical provisions for general liability insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 33 See cross-templates checks tab CAS 47
G9	General liability insurance and proportional reinsurance – net written premiums – life activities	This is the premiums written for general liability insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D10	Credit and suretyship insurance and proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for credit and suretyship insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 34 See cross-templates checks tab CAS 48
E10	Credit and suretyship insurance and proportional reinsurance – net written premiums – non-life activities	This is the premiums written for credit and suretyship insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F10	Credit and suretyship insurance and proportional reinsurance – net best estimate – life activities	This is the technical provisions for credit and suretyship insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 34 See cross-templates checks tab CAS 48
G10	Credit and suretyship insurance and proportional reinsurance – net written premiums – life activities	This is the premiums written for credit and suretyship insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D11	Legal expenses insurance and proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for legal expenses insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 35 See cross-templates checks tab CAS 49
E11	Legal expenses insurance and proportional reinsurance – net written premiums – non-life activities	This is the premiums written for legal expenses insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities

F11	Legal expenses insurance and proportional reinsurance – net best estimate – life activities	This is the technical provisions for legal expenses insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 35 See cross-templates checks tab CAS 49
G11	Legal expenses insurance and proportional reinsurance – net written premiums – life activities	This is the premiums written for legal expenses insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D12	Assistance and its proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for assistance and its proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 36 See cross-templates checks tab CAS 50
E12	Assistance and its proportional reinsurance – net written premiums – non-life activities	This is the premiums written for assistance and its proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F12	Assistance and its proportional reinsurance – net best estimate – life activities	This is the technical provisions for assistance and its proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 36 See cross-templates checks tab CAS 50
G12	Assistance and its proportional reinsurance – net written premiums – life activities	This is the premiums written for assistance and its proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D13	Miscellaneous financial loss insurance and proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for miscellaneous financial loss insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 37 See cross-templates checks tab CAS 51
E13	Miscellaneous financial loss insurance and proportional reinsurance – net written premiums – non-life activities	This is the premiums written for miscellaneous financial loss insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F13	Miscellaneous financial loss insurance and proportional reinsurance – net best estimate – life activities	This is the technical provisions for miscellaneous financial loss insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 37 See cross-templates checks tab CAS 51
G13	Miscellaneous financial loss insurance and proportional reinsurance – net written premiums – life activities	This is the premiums written for miscellaneous financial loss insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D14	Non-proportional casualty reinsurance – net best estimate – non-life activities	This is the technical provisions for non-proportional casualty reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 38 See cross-templates checks tab CAS 52
E14	Non-proportional casualty reinsurance – net written premiums – non-life activities	This is the premiums written for non-proportional casualty reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F14	Non-proportional casualty reinsurance – net best estimate – life activities	This is the technical provisions for non-proportional casualty reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 38 See cross-templates checks tab CAS 52
G14	Non-proportional casualty reinsurance – net written premiums – life activities	This is the premiums written for non-proportional casualty reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities

D15	Non-proportional property reinsurance – net best estimate – non-life activities	This is the technical provisions for non-proportional property reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 41 See cross-templates checks tab CAS 55
E15	Non-proportional property reinsurance – net written premiums – non-life activities	This is the premiums written for non-proportional property reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F15	Non-proportional property reinsurance – net best estimate – life activities	This is the technical provisions for non-proportional property reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 41 See cross-templates checks tab CAS 55
G15	Non-proportional property reinsurance – net written premiums – life activities	This is the premiums written for non-proportional property reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D16	Non-proportional marine, aviation and transport reinsurance – net best estimate – non-life activities	This is the technical provisions for non-proportional marine, aviation and transport reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 40 See cross-templates checks tab CAS 54
E16	Non-proportional marine, aviation and transport reinsurance – net written premiums – non-life activities	This is the premiums written for non-proportional marine, aviation and transport reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F16	Non-proportional marine, aviation and transport reinsurance – net best estimate – life activities	This is the technical provisions for non-proportional marine, aviation and transport reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 40 See cross-templates checks tab CAS 54
G16	Non-proportional marine, aviation and transport reinsurance – net written premiums – life activities	This is the premiums written for non-proportional marine, aviation and transport reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D17	Non-proportional health reinsurance – net best estimate – non-life activities	This is the technical provisions for non-proportional health reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 39 See cross-templates checks tab CAS 53
E17	Non-proportional health reinsurance – net written premiums – non-life activities	This is the premiums written for non-proportional health reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F17	Non-proportional health reinsurance – net best estimate – life activities	This is the technical provisions for non-proportional health reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 39 See cross-templates checks tab CAS 53
G17	Non-proportional health reinsurance – net written premiums – life activities	This is the premiums written for non-proportional health reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
B18	$MCR_{(L,NI)}$ result	This is the linear formula component for life insurance or reinsurance obligations of non-life insurance activities, and is calculated in accordance with Solvency 2 requirements $B18 = (0.05 + D19) - (0.088 * D20) + (0.005 * D21) + (0.029 * D22) + (0.001 * E23)$
C18	$MCR_{(L,L)}$ result	This is the linear formula component for life insurance or reinsurance obligations of life insurance activities, and is calculated in accordance with Solvency 2 requirements $C18 = (0.05 + F19) - (0.088 * F20) + (0.005 * F21) + (0.029 * F22) + (0.001 * G23)$

D19	Net best estimate for obligations with profit participation – guaranteed benefits – non-life activities	This is the technical provisions without a risk margin for guaranteed benefits in respect of life insurance obligations with profit participation, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities and technical provisions without a risk margin for reinsurance obligations where the underlying insurance obligations include profit participation, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 42 See cross-templates checks tab CAS 56
F19	Net best estimate provisions for obligations with profit participation – guaranteed benefits – life activities	This is the technical provisions without a risk margin for guaranteed benefits in respect of life insurance obligations with profit participation, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities and technical provisions without a risk margin for reinsurance obligations where the underlying insurance obligations include profit participation, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 42 See cross-templates checks tab CAS 56
D20	Net best estimate for obligations with profit participation – future discretionary benefits – non-life activities	This is the technical provisions without a risk margin for future discretionary benefits in respect of life insurance obligations with profit participation, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 42 See cross-templates checks tab CAS 56
F20	Net best estimate for obligations with profit participation – future discretionary benefits – life activities	This is the technical provisions without a risk margin for future discretionary benefits in respect of life insurance obligations with profit participation, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 42 See cross-templates checks tab CAS 56
D21	Net best estimate for index-linked and unit-linked obligations – non-life activities	This is the technical provisions without a risk margin for index-linked and unit-linked life insurance obligations and reinsurance obligations relating to such insurance obligations, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities. See cross-templates checks tab CQS 43 See cross-templates checks tab CAS 57
F21	Net best estimate for index-linked and unit-linked obligations – life activities	This is the technical provisions without a risk margin for index-linked and unit-linked life insurance obligations and reinsurance obligations relating to such insurance obligations, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities. See cross-templates checks tab CQS 43 See cross-templates checks tab CAS 57
D22	Net best estimate for other life (re)insurance obligations – non-life activities	This is the technical provisions without a risk margin for other life insurance obligations and reinsurance obligations relating to such insurance obligations, after deduction of the amounts recoverable from reinsurance contracts and SPV, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 44 See cross-templates checks tab CAS 58
F22	Net best estimate for other life (re)insurance obligations – life activities	This is the technical provisions without a risk margin for other life insurance obligations and reinsurance obligations relating to such insurance obligations, after deduction of the amounts recoverable from reinsurance contracts and SPV, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 44 See cross-templates checks tab CAS 58
E23	Capital at risk for all life (re)insurance obligations – non-life activities	This is the capital at risk, being the sum over all contracts that give rise to life insurance or reinsurance obligations of the highest amounts that the insurance or reinsurance undertaking would pay in the event of the death or disability of the persons insured under the contract after deduction of the amounts recoverable from reinsurance contracts and special purpose vehicles in such event, and the expected present value of annuities payable on death or disability less the net best estimate, with a floor equal to zero, relating to non-life activities

G23	Capital at risk for all life (re)insurance obligations – life activities	This is the capital at risk, being the sum over all contracts that give rise to life insurance or reinsurance obligations of the highest amounts that the insurance or reinsurance undertaking would pay in the event of the death or disability of the persons insured under the contract after deduction of the amounts recoverable from reinsurance contracts and special purpose vehicles in such event, and the expected present value of annuities payable on death or disability less the net best estimate, with a floor equal to zero, relating to life activities
A24	Linear MCR	This is calculated in accordance Solvency II requirements.
A25	SCR	This is the latest SCR to be calculated, either the annual one or a more recent one in case the SCR has been recalculated (e.g. due to a change in risk profile) since the last value of the SCR was reported, including capital add on. Undertakings using internal models to calculate the SCR should refer to IM SCR, except where under L1 Article 129(3) the national supervisor requires standard formula reference.
A26	MCR cap	This is calculated as 45% of the SCR including any capital add-on in accordance with Art 129(3) of the Solvency II Directive
A27	MCR floor	This is calculated as 25% of the SCR including any capital add-on in accordance with Art 129(3) of the Solvency II Directive
A28	Combined MCR	This is calculated in accordance with Solvency 2 requirements
A29	Absolute floor of the MCR	This is as defined in Art 129(1)d of the Solvency II Directive
A30	MCR	This is calculated in accordance with Solvency 2 requirements

Technical Annex II: List of quantitative reporting items

S.32.01.g

Undertakings in the scope of the group

	ITEM	INSTRUCTIONS
A1	Country	Country in which the registered head office of each undertaking within the group is located
B1	Identification code	<p>Identification code:</p> <ul style="list-style-type: none"> - Legal Entity Identifier (LEI); - Interim entity identifier (Pre-LEI); - Specific code <p>(by this order of priority)</p> <p>Specific code:</p> <ul style="list-style-type: none"> - For EEA (re) insurance undertakings within the group: identification code used in the local market, attributed by the undertaking's supervisory authority - For non-EEA undertakings and non-regulated undertakings within the group, identification code provided will be provided by the group. When allocating an identification code to each non-EEA or non-regulated undertaking, it should comply with the following format in a consistent manner: identification code of the parent undertaking + ISO 3166-1 alpha-2 code of the country of the undertaking + 5 digits
V1	Type of code	<p>Identification of the code used in B1:</p> <ul style="list-style-type: none"> - LEI - Pre-LEI - Specific code
C1	Legal name of the undertaking	Legal name of the undertaking
D1	Type of undertaking	<p>Type of undertaking should give information on the type of activity of the undertaking. The closed list is the following:</p> <ol style="list-style-type: none"> 1. Life insurance undertaking 2. Non life insurance undertaking 3. Composite undertaking 4. Insurance holding company as defined in Art. 212§ (f) of Directive 2009/138/EC 5. Mixed-activity insurance holding company as defined in Art. 212§1 (g) of Directive 2009/138/EC 6. Mixed financial holding company as defined in Art. 212§1(h) of Directive 2009/138/EC 7. Credit institution, investment firm and financial institution 8. Institution for occupational retirement provision 9. Ancillary services undertaking as defined in Art. 1bis (23) of Level 2 10. Non-regulated undertaking carrying out financial activities as defined in Art. 1bis (33) of Level 2 11. Special purpose vehicle authorized in accordance with Art. 211 of Directive 2009/138/EC 12. Special purpose vehicle other special purpose vehicle authorized in accordance with Art. 211 of Directive 2009/138/EC
E1	Legal form	Form of the undertaking consistent with Annex III of Directive 2009/138/EC
F1	Category of the undertaking	<p>High level information on the legal form, i.e. whether the undertaking is a mutual or not</p> <p>The closed list is the following:</p> <ol style="list-style-type: none"> 1. Mutual 2. Non-mutual
G1	Supervisory Authority	Name of the Supervisory Authority responsible for the supervision of the individual undertaking
H1a	Total Balance Sheet (for (re)insurance undertakings)	<p>For (re)insurance undertakings, total amount of Solvency II balance sheet as reported in item A30 in BS-C1.</p> <p>The currency used should be the group currency</p>
H1b	Total Balance Sheet (for other regulated undertakings)	<p>For other regulated undertakings, total amount of balance sheet used for prudential purposes.</p> <p>The currency used should be the group currency</p>
H1c	Total Balance Sheet (non-regulated undertakings)	<p>For non-regulated undertakings, total amount of balance sheet used for accounting purposes.</p> <p>The currency used should be the group currency</p>

I1a	Written premium or Turn Over (written premiums net of reinsurance ceded under IFRS or local GAAP for insurance undertakings)	For insurance and reinsurance undertakings: written premiums net of reinsurance ceded under IFRS or local GAAP. The currency used should be the group currency
I1b	Written premium or Turn Over (turn over defined as the gross revenue under IFRS or local GAAP for other types of undertakings or insurance holding companies)	For other types of undertakings : turn over defined as the gross revenue under IFRS or local GAAP For insurance holding companies where appropriate turnover defined as the gross revenue under IFRS or local GAAP will be used as a ranking criteria. The currency used should be the group currency
J1	Underwriting performance if applicable	(Re)insurance undertakings should report their underwriting performance in accordance to financial statements. An absolute amount should be reported. The currency used should be the group currency.
K1	Investment performance	(Re)insurance undertakings should report their investment performance in accordance to financial statements. An absolute amount should be reported. The currency used should be the group currency. This value should not include any value already reported in J1.
L1	Total performance	All the related undertakings within the group should report their total performance. An absolute amount should be reported. The currency used should be the group currency.
M1	Criteria of influence - % capital share	Proportion of the subscribed capital that is held, directly or indirectly, by the participating undertaking in the undertaking (as referred to in article 221 of Directive 2009/138/EC)
N1	Criteria of influence - %used for establishment of statutory (GAAP/IFRS) consolidated accounts	Percentage as defined by the consolidated account directive for the integration of consolidated undertakings into the consolidation which may differ from item M1. For full integration, minority interests should also be reported in this item.
O1	Criteria of influence - %voting rights	Proportion of voting rights that is held, directly or indirectly, by the participating undertaking in the undertaking
P1	Criteria of influence - other criteria	Other criteria useful to assess type of influence exercised by the parent undertaking, e.g centralized risk management
Q1	Criteria of influence - level of influence	Influence can be either dominant or significant, depending on former criteria mentioned; the group is responsible for assessing the level of influence exercised by the parent undertaking over any undertaking but as stated in article 212-2 of Directive 2009/138/EC the group supervisor may have a differing view from the group's assessment and if so the group should take into account any decision made by the group supervisor The closed list is the following: 1. Dominant 2. Significant
R1	Criteria of influence - proportional share retained	Proportional share is the proportion that will be used to calculate the group solvency.
S1	Inclusion in the scope of group supervision - Y/N	Indicates if the undertaking is included or not in the scope of group supervision as referred in article 214 of Directive 2009/138/EC; if an undertaking on which a significant/dominant influence is exercised is not included in the scope of supervision as provided for in article 214, then it should be indicated which of a,b or c of article 214.2 is the reason The closed list is the following: 1. Yes 2. No (art. 214 a) 3. No (art. 214 b) 4. No (art. 214 c)
U1	Group solvency assessment - Method used and, under method 1 treatment of the undertaking	The item gathers information on the method used for group solvency assessment and the treatment of each undertaking. The closed list is the following: 1. Consolidation/full integration 2. Consolidation/proportional integration 3. Consolidation/equity method 4. Deduction and Aggregation- Solvency II 5. Deduction and Aggregation- Other sectoral Rules 6. Deduction and Aggregation- Local rules 7. Deduction of the participation in relation to article 229 of Directive 2009/138/EC 8. No inclusion into the Solvency II consolidated data as defined in Art. 323bis SCG3 of Level 2 9. Other method

Technical Annex II: List of quantitative reporting items

S.33.01.g

Insurance and reinsurance individual requirements

ITEM		INSTRUCTIONS
A1	Legal name of the undertaking	Legal name of each undertaking
A2	Identification code	<p>Identification code:</p> <ul style="list-style-type: none"> - Legal Entity Identifier (LEI); - Interim entity identifier (Pre-LEI); - Specific code <p>(by this order of priority)</p> <p>Specific code:</p> <ul style="list-style-type: none"> - For EEA (re) insurance undertakings within the group: identification code used in the local market, attributed by the undertaking's supervisory authority - For non-EEA undertakings and non-regulated undertakings within the group, identification code provided will be provided by the group. When allocating an identification code to each non-EEA or non-regulated undertaking, it should comply with the following format in a consistent manner: identification code of the parent undertaking + ISO 3166-1 alpha-2 code of the country of the undertaking + 5 digits
Q1	Type of code	<p>Identification of the code used in A2:</p> <ul style="list-style-type: none"> - LEI - Pre-LEI - Specific code
R1	Entity Level/RFF/ Remaining Part	<p>Identify if the information is related to:</p> <ul style="list-style-type: none"> - Entity level - RFF - Remaining part
S1	Fund Number	This number is attributed by the undertaking and must be consistent over time. It should be reported when cell R1 is "RFF"

EEA entities and non EEA entities (using SII rules) included only via D&A

B1	SCR Market Risk	Solo SCR Market Risk for each undertaking
B2	SCR Counterparty Default Risk	Solo SCR Counterparty Default Risk for each undertaking
B3	SCR Life Underwriting Risk	Solo SCR Life Underwriting Risk for each undertaking
B4	SCR Health Underwriting Risk	Solo SCR Health Underwriting Risk for each undertaking
B5	SCR Non-life Underwriting Risk	Solo SCR Non-life Underwriting Risk for each undertaking
B6	SCR Operational Risk	Solo SCR Operational Risk for each undertaking
B7	Solo SCR	Solo SCR for each undertaking
C1	Solo MCR	Solo MCR for each undertaking within EEA
D1	Eligible Solo Own Funds	Eligible Solo Own Funds to cover the SCR. Total own funds are to be reported in this item. No restrictions on availability for the group apply.
F1	If Simplifications used specify where	When an entity used simplifications for calculating solo SCR, report the area(s) for which these simplifications are used.
G1	if Partial Internal Model used specify where	When an entity used a partial internal model(s) for calculating solo SCR, report the area(s) for which this/these are used.
H1	Group or solo internal model	When an entity used a full internal model for calculating solo SCR, it has to be stated whether this regards a solo internal model or group internal model.

Non EEA entities (both using SII rules and not using SII rules) regardless of the method used

N1	Local capital requirement	Local solo capital requirement that triggers first intervention by local supervisor.
O1	Local minimum capital requirement	Local solo minimum capital requirement that triggers final intervention - withdrawal of the authorisation- by local supervisor. This figure is needed to calculate the group SCR floor.
P1	Eligible own funds in accordance with local rules	Eligible Solo Own Funds to cover the local capital requirement, as calculated according to local rules, without applying restrictions on availability for the group.

Technical Annex II: List of quantitative reporting items

S.34.01.g

Other regulated and non-regulated financial undertakings including insurance holding companies individual requirements

ITEM		INSTRUCTIONS
A1	Legal name of the undertaking	Legal name of each undertaking
A2	Identification code	<p>Identification code:</p> <ul style="list-style-type: none"> - Legal Entity Identifier (LEI); - Interim entity identifier (Pre-LEI); - Specific code <p>(by this order of priority)</p> <p>Specific code:</p> <ul style="list-style-type: none"> - For EEA (re) insurance undertakings within the group: identification code used in the local market, attributed by the undertaking's supervisory authority - For non-EEA undertakings and non-regulated undertakings within the group, identification code provided will be provided by the group. When allocating an identification code to each non-EEA or non-regulated undertaking, it should comply with the following format in a consistent manner: identification code of the parent undertaking + ISO 3166-1 alpha-2 code of the country of the undertaking + 5 digits
F1	Type of code	<p>Identification of the code used in A2:</p> <ul style="list-style-type: none"> - LEI - Pre-LEI - Specific code
A3	Aggregated or not (Y/N)	<p>When the entities of other financial sectors form a group with a specific capital requirement, this consolidated capital requirement can be accepted instead of the list of each solo requirement. One of the options in the following closed list</p> <p>If the capital requirement is then provided on aggregated basis under this specific case: Y; Otherwise: N.</p>
B1	Type of capital requirement	<p>One of the options in the following closed list shall be used:</p> <ul style="list-style-type: none"> For Insurance holding company, Mixed financial holding company, and non-regulated undertaking carrying out financial activities the requirement: Notional; For Mixed activity holding company: Non; For credit institution, investment firm and financial institution, institution for occupational retirement provision: Sectoral
C1	Notional SCR or Sectoral capital requirement	The capital requirement, either sectoral or notional, that triggers first intervention by solo supervisor, assuming a so-called intervention ladder.
D1	Notional MCR or Sectoral minimum capital requirement	Minimum capital requirement, either sectoral or notional, that triggers final intervention, assuming a so-called intervention ladder. This figure is needed to calculate the group SCR floor. This item is not reported for entities for which a final trigger level is not set.
E1	Eligible Own Funds	Total own funds to cover the (notional or sectoral) capital requirement. No restrictions on availability for the group apply.

Technical Annex II: List of quantitative reporting items

S.35.01.g

Contribution to group Technical Provisions

ITEM		INSTRUCTIONS
A1	Identification code	<p>Identification code:</p> <ul style="list-style-type: none"> - Legal Entity Identifier (LEI); - Interim entity identifier (Pre-LEI); - Specific code <p>(by this order of priority)</p> <p>Specific code:</p> <ul style="list-style-type: none"> - For EEA (re) insurance undertakings within the group: identification code used in the local market, attributed by the undertaking's supervisory authority - For non-EEA undertakings and non-regulated undertakings within the group, identification code provided will be provided by the group. When allocating an identification code to each non-EEA or non-regulated undertaking, it should comply with the following format in a consistent manner: identification code of the parent undertaking + ISO 3166-1 alpha-2 code of the country of the undertaking + 5 digits
S1	Type of code	<p>Identification of the code used in A1:</p> <ul style="list-style-type: none"> - LEI - Pre-LEI - Specific code
B1	Legal name of the undertaking	Legal name of each undertaking
S1	Method of group solvency calculation	<p>One of the options in the following closed list shall be used:</p> <ul style="list-style-type: none"> Method 1 Method 2
C1, F1, I1, L1, O1	Amount of gross TP	<p>Overall amount of technical provisions (TP calculated as a whole or the sum of the best estimate and the risk margin) of the EEA or non-EEA undertaking calculated according to Solvency II rules. The cell should be filled in gross figures, i. e. gross of IGT and before cession of reinsurance .</p> <p>The currency used should be the group currency.</p> <p>This item is reported for the (re)insurance undertakings under method 1 and method 2, except for the (re)insurance undertakings under method 2 situated in equivalent non-EEA countries.</p>
D1,G1,J1,M1,P1	Amount of net TP	<p>Overall amount of technical provisions (TP calculated as a whole or the sum of the best estimate and the risk margin) of the EEA or non-EEA undertaking calculated according to Solvency II rules. The cell should be filled in net of IGT but gross of reinsurance ceded outside the group. The currency used should be the group currency. This item is reported for the (re)insurance undertakings under method 1 and method 2, except for the (re)insurance undertakings under method 2 situated in equivalent non-EEA countries.</p> <p>See cross-templates checks tab CGS 1 See cross-templates checks tab CGS 2 See cross-templates checks tab CGS 3 See cross-templates checks tab CGS 4 See cross-templates checks tab CGS 5</p>
E1, H1, K1, N1, Q1	Net Contribution to Group TP (%)	<p>The percentage share of TP (TP calculated as a whole or the sum of the best estimate and the risk margin) of the (re) insurance undertaking to the group TP under method 1 net of IGT but gross of reinsurance ceded outside the group , split by respective main categories (Life excluding health and unit linked index-linked, Unit-linked and index linked, Health – SLT and non-SLT, Non-life excluding health)</p> <p>This item is not reported for undertakings under method 2.</p>

R1	Total amount of TP (excluding IGT)	<p>This item equals to the sum of items D1+G1+J1+M1+P1, except for (re)insurance undertakings situated in equivalent non-EEA countries under method 2, because in this case items D1,G1,J1,M1 and P1 are not required to be reported for this type of undertakings, with only item R1 being reported.</p> <p>When method 1 as defined under Article 230 of the Solvency II Directive is used for the (re)insurance undertaking, the total amount of technical provisions in cell R1 accounts for its contribution net of reinsurance ceded within the group to the group technical provisions. The total amount of technical provisions in cell R1 for all (re)insurance undertakings under method 1 can be reconciled with the amount of group technical provisions in the group balance sheet (sum of the cells L1+L4+L6B+L7+L10)</p> <p>When method 2 is used for the (re)insurance undertaking, the total amount of technical provisions in cell R1 cannot be reconciled with the amount of group technical provisions in the group balance sheet.</p>
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Technical Annex III: Lines of business

This Annex contains the lines of business to be used when submitting information by Line of Business.

Line of Business	Description
A. Non-life insurance obligations	
1. Medical expense insurance	Medical expense insurance obligations where the underlying business is not pursued on a similar technical basis to that of life insurance, other than obligations included in the line of business 3.
2. Income protection insurance	Income protection insurance obligations where the underlying business is not pursued on a similar technical basis to that of life insurance, other than obligations included in the line of business 3.
3. Workers' compensation insurance	Health insurance obligations which relate to accidents at work, industrial injury and occupational diseases and where the underlying business is not pursued on a similar technical basis to that of life insurance.
4. Motor vehicle liability insurance	Insurance obligations which cover all liabilities arising out of the use of motor vehicles operating on land (including carrier's liability).
5. Other motor insurance	Insurance obligations which cover all damage to or loss of land vehicles (including railway rolling stock).
6. Marine, aviation and transport insurance	Insurance obligations which cover all damage or loss to sea, lake, river and canal vessels, aircraft, and damage to or loss of goods in transit or baggage irrespective of the form of transport. Insurance obligations which cover liabilities arising out of the use of aircraft, ships, vessels or boats on the sea, lakes, rivers or canals (including carrier's liability).
7. Fire and other damage to property insurance	Insurance obligations which cover all damage to or loss of property other than those included in the lines of business 5 and 6 due to fire, explosion, natural forces including storm, hail or frost, nuclear energy, land subsidence and any event such as theft.
8. General liability insurance	Insurance obligations which cover all liabilities other than those in the lines of business 4 and 6.
9. Credit and suretyship insurance	Insurance obligations which cover insolvency, export credit, instalment credit, mortgages, agricultural credit and direct and indirect suretyship.
10. Legal expenses insurance	Insurance obligations which cover legal expenses and cost of litigation.
11. Assistance	Insurance obligations which cover assistance for persons who get into difficulties while travelling, while away from home or while away from their habitual residence.
12. Miscellaneous financial loss	Insurance obligations which cover employment risk, insufficiency of income, bad weather, loss of benefit, continuing general expenses, unforeseen trading expenses, loss of market value, loss of rent or revenue, indirect trading losses other than those mentioned above, other financial loss (non-trading) as well as any other risk of non-life insurance not covered by the lines of business 1 to 11.
The lines of business 13 to 24 shall include proportional reinsurance obligations which relate to the obligations included in lines of business 1 to 12 respectively.	
B. Proportional non-life reinsurance obligations	
C. Non-proportional non-life reinsurance obligations	
25. Non-proportional health reinsurance	Non-proportional reinsurance obligations relating to insurance obligations included in lines of business 1 to 3.
26. Non-proportional casualty reinsurance	Non-proportional reinsurance obligations relating to insurance obligations included in lines of business 4 and 8.
27. Non-proportional marine, aviation and transport reinsurance	Non-proportional reinsurance obligations relating to insurance obligations included in line of business 6.
28. Non-proportional property reinsurance	Non-proportional reinsurance obligations relating to insurance obligations included in lines of business 5, 7 and 9 to 12.
D. Life insurance obligations	
29. Health insurance	Health insurance obligations where the underlying business is pursued on a similar technical basis to that of life insurance, other than those included in line of business 33.
30. Insurance with profit participation	Insurance obligations with profit participation other than obligations included in line of business 33 and 34.
31. Index-linked and unit-linked insurance	Insurance obligations with index-linked and unit-linked benefits other than those included in lines of business 33 and 34.
32. Other life insurance	Other life insurance obligations other than obligations included in lines of business 29 to 31, 33 and 34.
33. Annuities stemming from non-life insurance contracts and relating to health insurance obligations	
34. Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	
E. Life reinsurance obligations	
35. Health reinsurance	Reinsurance obligations which relate to the obligations included in lines of business 29 and 33.
36. Life reinsurance	Reinsurance obligations which relate to the obligations included in lines of business 30 to 32 and 34.

Technical Annex IV: Complementary Identification Code (CIC) Categories

This Annex contains the Complementary Identification Code Categories to be used when submitting the assets and derivatives information.

Category		Definition
1	Government bonds	Bonds issued by public authorities, whether by central governments supra-national government institutions, regional governments or municipal governments
2	Corporate bonds	Bonds issued by corporations
3	Equity	Shares and other securities equivalent to shares representing corporations' capital, i.e., representing ownership in a corporation
4	Investment funds	Undertakings the sole purpose of which is the collective investment in transferrable securities and/or in other financial assets
5	Structured notes	Hybrid securities, combining a fixed income instrument with a series of derivative components. Excluded from this category are fixed income securities that are issued by sovereign governments. Concerns securities that have embedded one or a combination of categories of derivatives, including Credit Default Swaps (CDS), Constant Maturity Swaps (CMS), Credit Default Options (CDOp). Assets under this category are not subject to unbundling
6	Collateralised securities	Securities whose value and payments are derived from a portfolio of underlying assets. Includes Asset Backed Securities (ABS), Mortgage Backed securities (MBS), Commercial Mortgage Backed securities (CMBS), Collateralised Debt Obligations (CDO), Collateralised Loan Obligations (CLO), Collateralised Mortgage Obligations (CMO). Assets under this category are not subject to unbundling
7	Cash and deposits	Money in the physical form, bank deposits and other money deposits
8	Mortgages and loans	Financial assets created when creditors lend funds to debtors, with collateral or not, including cash pools.
9	Property	Buildings, land, other constructions that are immovable and equipment
A	Futures	Standardised contract between two parties to buy or sell a specified asset of standardised quantity and quality at a specified future date at a price agreed today
B	Call Options	Contract between two parties concerning the buying of an asset at a reference price during a specified time frame, where the buyer of the call option gains the right, but not the obligation, to buy the underlying asset
C	Put Options	Contract between two parties concerning the selling of an asset at a reference price during a specified time frame, where the buyer of the put option gains the right, but not the obligation, to sell the underlying asset
D	Swaps	Contract in which counterparties exchange certain benefits of one party's financial instrument for those of the other party's financial instrument, and the benefits in question depend on the type of financial instruments involved
E	Forwards	Non-standardised contract between two parties to buy or sell an asset at a specified future time at a price agreed today
F	Credit derivatives	Derivative whose value is derived from the credit risk on an underlying bond, loan or any other financial asset

Technical Annex V: Complementary Identification Code (CIC) Table

This Annex contains the Complementary Identification Code Table to be used when submitting the assets and derivatives information.

First 2 positions	Asset listed in	ISO 3166-1-alpha-2 country code or XL (for not listed) or XT (for not exchange tradable)															
Third position	Category	1	2	3	4	5	6	7	8	9	A	B	C	D	E	F	
Fourth position	Sub-category or main risk	Government bonds	Corporate bonds	Equity	Investment funds	Structured notes	Collateralised securities	Cash and deposits	Mortgages and loans	Property	Futures	Call Options	Put Options	Swaps	Forwards	Credit derivatives	
		1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
		Central Government bonds	Corporate bonds	Common equity	Equity funds	Equity risk	Equity risk	Cash	Uncollateralized loans made	Property (office and commercial)	Equity and index futures	Equity and index options	Equity and index options	Interest rate swaps	Forward interest rate agreement	Credit default swap	
		2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
		Supra-national bonds	Convertible bonds	Equity of real estate related corporation	Debt funds	Interest rate risk	Interest rate risk	Transferable deposits (cash equivalents)	Loans made collateralized with securities	Property (residential)	Interest rate futures	Bond options	Bond options	Currency swaps	Forward exchange rate agreement	Credit spread option	
		3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
		Regional government bonds	Commercial paper	Equity rights	Money market funds	Currency risk	Currency risk	Other deposits short term (less than one year)		Property (for own use)	Currency futures	Currency options	Currency options	Interest rate and currency swaps		Credit spread swap	
		4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4
		Municipal government bonds	Money market instruments	Preferred equity	Asset allocation funds	Credit risk	Credit risk	Other deposits with term longer than one year	Mortgages	Property (under construction)		Warrants	Warrants			Total return swap	
		5	5		5	5	5	5	5	5	5	5	5	5	5		
		Treasury bonds	Hybrid bonds		Real estate funds	Real estate risk	Real estate risk	Deposits to cedants	Other collateralized loans made	Plant and equipment (for own use)	Commodity futures	Commodity options	Commodity options	Security swaps			
		6	6		6	6	6	6	6	6	6	6	6	6	6	6	6
		Covered bond	Common covered bonds		Alternative funds	Commodity risk	Commodity risk		Loans on policies				Swaptions	Swaptions			
			7		7	7	7				7	7	7	7	7	7	7
	Covered bonds subject to specific law		Private equity funds	Catastrophe and Weather risk	Catastrophe and Weather risk				Catastrophe and Weather risk	Catastrophe and Weather risk	Catastrophe and Weather risk	Catastrophe and Weather risk	Catastrophe and Weather risk	Catastrophe and Weather risk			
	8		8	8	8				8	8	8	8	8	8	8		
	Subordinated bonds		Infrastructure funds	Mortality risk	Mortality risk				Mortality risk	Mortality risk	Mortality risk	Mortality risk	Mortality risk	Mortality risk			
9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9		
Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other	Other		

Technical Annex V: Complementary Identification Code (CIC) Table

Definition of CIC

Assets listed in		Definition
Country	ISO 3166-1-alpha-2 country code	Identify the country ISO code where the asset is listed in. An asset is considered as being listed if it is negotiated on a regulated market or on a multilateral trading facility, as defined by Directive 2004/39/EC. If the asset is listed in more than one country, the country should be the one used as the reference for valuation purposes
XL	Assets that are not listed in a stock exchange	Identify assets that are not negotiated on a regulated market or on a multilateral trading facility, as defined by Directive 2004/39/EC
XT	Assets that are not exchange tradable	Identify assets that by their nature are not subject to negotiation on a regulated market or on a multilateral trading facility, as defined by Directive 2004/39/CE. This applies to asset categories 7, 8 and 9
Category		Definition
1	Government bonds	Bonds issued by public authorities, whether by central governments supra-national government institutions, regional governments or municipal governments
11	Central Government bonds	Bonds issued by central governments
12	Supra-national bonds	Bonds issued by public institutions established by a commitment between national states, e.g. issued by a multilateral development bank as listed in Annex VI, Part 1, Number 4 of the Capital Requirements Directive (2006/48/EC) or issued by an international organisation listed in Annex VI, Part 1, Number 5 of the Capital Requirements Directive (2006/48/EC)
13	Regional government bonds	Regional government or autonomous communities debt instruments offered to the public in a public offering on the capital market
14	Municipal government bonds	Bonds issued by municipalities, including cities, provinces, districts and other municipal authorities
15	Treasury bonds	Short term government bonds, issued by central governments (issued with a maturity term up to 1 year)
16	Covered bonds	Government bonds which have a pool of assets that secures or "covers" the bond. Those assets remain on the issuer balance sheet.
19	Other	Other government bonds, not classified under the above categories
2	Corporate bonds	Bonds issued by corporations
21	Corporate bonds	Bonds issued by corporations, with simple characteristics, usually covering the ones referred to as "plain vanilla", and that don't have any special feature described in the categories 22 to 28
22	Convertible bonds	Corporate bonds that the holder can convert into shares of common stock in the issuing company or cash of equal value, having debt and equity-like features
23	Commercial paper	Unsecured, short-term debt instrument issued by a corporation, typically for the financing of accounts receivable, inventories and meeting short-term liabilities, usually with original maturity lesser than 270 days.
24	Money market instruments	Very short term debt securities (usually with maturities ranging from 1 day up to 1 year), consisting mainly of negotiable certificates of deposit (CDs), bankers acceptances, repurchase agreements (repos) and other highly liquid instruments. Commercial Paper is excluded from this category
25	Hybrid bonds	Corporate bonds that have debt and equity-like features, but are not convertible.
26	Common covered bonds	Corporate bonds which have a pool of assets that secures or "covers" the bond. Those assets remain on the issuer balance sheet. Covered bonds subject to specific law are excluded from this category

Technical Annex V: Complementary Identification Code (CIC) Table

Definition of CIC

Assets listed in		Definition
27	Covered bonds subject to specific law	Corporate bonds which have a pool of assets that secures or "covers" the bond if the originator becomes insolvent and are subject by law to special public supervision designed to protect bond-holders, as defined in Article 22(4) of Directive 85/611/EEC. An example of this category is Pfandbrief: "Covered bonds which are issued on the basis of the Pfandbrief Act. They are used to refinance loans for which collateral is furnished in the form of loans secured by real estate liens (Mortgage Pfandbriefe), public-sector loans (Public Pfandbriefe), ship mortgages (Ship Pfandbriefe) or aircraft mortgages (Aircraft Pfandbriefe). Thus, the distinction made between these Pfandbrief types refers to the cover pool created for each type of Pfandbrief."
28	Subordinated bonds	Corporate bonds which have a lower priority than other bonds of the issuer in case of liquidation.
29	Other	Other corporate bonds, with other characteristics than the ones identified in the above categories
3	Equity	Shares and other securities equivalent to shares representing corporations' capital, i.e., representing ownership in a corporation
31	Common equity	Equity that represents basic property rights on corporations
32	Equity of real estate related corporation	Equity representing capital from real estate related corporations
33	Equity rights	Rights to subscribe to additional shares of equity at a set price
34	Preferred equity	Equity security that is senior to common equity, having a higher claim on the assets and earnings than common equity, but is subordinate to bonds
39	Other	Other equity, not classified under the above categories
4	Investment funds	Undertakings the sole purpose of which is the collective investment in transferrable securities and/or in other financial assets
41	Equity funds	Investment funds mainly invested in equity
42	Debt funds	Investment funds mainly invested in bonds
43	Money market funds	Investment funds mainly invested in money market instruments
44	Asset allocation funds	Fund which invests its assets pursuing a specific asset allocation objective, e.g. primarily investing in the securities of companies in countries with nascent stock markets or small economies, specific sectors or group of sectors, specific countries or other specific investment objective
45	Real estate funds	Investment funds mainly invested in real estate
46	Alternative funds	Funds whose investment strategies include such as hedging, event driven, fixed income directional and relative value, managed futures, commodities etc.
47	Private equity funds	Investment funds used for making investments in equity securities following strategies associated with private equity.
48	Infrastructure funds	Funds that invest in utilities such as toll roads, bridges, tunnels, ports and airports, oil and gas distribution, electricity distribution and social infrastructure such as healthcare and educational facilities
49	Other	Other investment funds, not classified under the above categories
5	Structured notes	Hybrid securities, combining a fixed income instrument with a series of derivative components. Excluded from this category are fixed income securities that are issued by sovereign governments. Concerns securities that have embedded one or a combination of categories of derivatives, including Credit Default Swaps (CDS), Constant Maturity Swaps (CMS), Credit Default Options (CDOp). Assets under this category are not subject to unbundling

Technical Annex V: Complementary Identification Code (CIC) Table

Definition of CIC

Assets listed in		Definition
51	Equity risk	Structured notes mainly exposed to equity risk
52	Interest rate risk	Structured notes mainly exposed to interest rate risk
53	Currency risk	Structured notes mainly exposed to currency risk
54	Credit risk	Structured notes mainly exposed to credit risk
55	Real estate risk	Structured notes mainly exposed to real estate risk
56	Commodity risk	Structured notes mainly exposed to commodity risk
57	Catastrophe and Weather risk	Structured notes mainly exposed to catastrophe or weather risk
58	Mortality risk	Structured notes mainly exposed to mortality risk
59	Other	Other structured notes, not classified under the above categories
6	Collateralised securities	Securities whose value and payments are derived from a portfolio of underlying assets. Includes Asset Backed Securities (ABS), Mortgage Backed securities (MBS), Commercial Mortgage Backed securities (CMBS), Collateralised Debt Obligations (CDO), Collateralised Loan Obligations (CLO) , Collateralised Mortgage Obligations (CMO). Assets under this category are not subject to unbundling
61	Equity risk	Collateralised securities mainly exposed to equity risk
62	Interest rate risk	Collateralised securities mainly exposed to interest rate risk
63	Currency risk	Collateralised securities mainly exposed to currency risk
64	Credit risk	Collateralised securities mainly exposed to credit risk
65	Real estate risk	Collateralised securities mainly exposed to real estate risk
66	Commodity risk	Collateralised securities mainly exposed to commodity risk
67	Catastrophe and Weather risk	Collateralised securities mainly exposed to catastrophe or weather risk
68	Mortality risk	Collateralised securities mainly exposed to mortality risk
69	Other	Other collateralised securities, not classified under the above categories
7	Cash and deposits	Money in the physical form, bank deposits and other money deposits
71	Cash	Notes and coins in circulation that are commonly used to make payments
72	Transferable deposits (cash equivalents)	Deposits exchangeable for currency on demand at par and which are directly usable for making payments by cheque, draft, giro order, direct debit/credit, or other direct payment facility, without penalty or restriction
73	Other deposits short term (less than one year)	Deposits other than transferable deposits, with remaining maturity inferior to 1 year, that cannot be used to make payments at any time and that are not exchangeable for currency or transferable deposits without any kind of significant restriction or penalty
74	Other deposits with term longer than one year	Deposits other than transferable deposits, with remaining maturity superior to 1 year, that cannot be used to make payments at any time and that are not exchangeable for currency or transferable deposits without any kind of significant restriction or penalty
75	Deposits to cedants	Deposits relating to reinsurance accepted
79	Other	Other cash and equivalents, not classified under the above categories
8	Mortgages and loans	Financial assets created when creditors lend funds to debtors, with collateral or not, including cash pools.

Technical Annex V: Complementary Identification Code (CIC) Table

Definition of CIC

Assets listed in		Definition
81	Uncollateralized loans made	Loans made without collateral
82	Loans made collateralized with securities	Loans made with collateral in the form of financial securities
84	Mortgages	Loans made with collateral in the form of real estate
85	Other collateralized loans made	Loans made with collateral in any other form
86	Loans on policies	Loans made with insurance policies as collateral
89	Other	Other mortgages and loans, not classified under the above categories
9	Property	Buildings, land, other constructions that are immovable and equipment
91	Property (office and commercial)	Office and commercial building used for investment
92	Property (residential)	Residential buildings used for investment
93	Property (for own use)	Real estate for the own use of the undertaking
94	Property (under construction)	Real estate that is under construction, for future own usage or future usage as investment
95	Plant and equipment (for own use)	Plant and equipment for the own use of the undertaking
99	Other	Other real estate, not classified under the above categories
A	Futures	Standardised contract between two parties to buy or sell a specified asset of standardised quantity and quality at a specified future date at a price agreed today
A1	Equity and index futures	Futures with equity or stock exchange indices as underlying
A2	Interest rate futures	Futures with bonds or other interest rate dependent security as underlying
A3	Currency futures	Futures with currencies or other currencies dependent security as underlying
A5	Commodity futures	Futures with commodities or other commodities dependent security as underlying
A7	Catastrophe and Weather risk	Futures mainly exposed to catastrophe or weather risk
A8	Mortality risk	Futures mainly exposed to mortality risk
A9	Other	Other futures, not classified under the above categories
B	Call Options	Contract between two parties concerning the buying of an asset at a reference price during a specified time frame, where the buyer of the call option gains the right, but not the obligation, to buy the underlying asset
B1	Equity and index options	Call options with equity or stock exchange indices as underlying
B2	Bond options	Call options with bonds or other interest rate dependent security as underlying
B3	Currency options	Call options with currencies or other currencies dependent security as underlying
B4	Warrants	Call options that entitles the holder to buy stock of the issuing company at a specified price
B5	Commodity options	Call options with commodities or other commodities dependent security as underlying
B6	Swaptions	Call options granting its owner the right but not the obligation to enter into a long position in an underlying swap, i.e., enter into a swap where the owner pays the fixed leg and receive the floating leg
B7	Catastrophe and Weather risk	Call options mainly exposed to catastrophe or weather risk
B8	Mortality risk	Call options mainly exposed to mortality risk

Technical Annex V: Complementary Identification Code (CIC) Table

Definition of CIC

Assets listed in		Definition
B9	Other	Other call options, not classified under the above categories
C	Put Options	Contract between two parties concerning the selling of an asset at a reference price during a specified time frame, where the buyer of the put option gains the right, but not the obligation, to sell the underlying asset
C1	Equity and index options	Put options with equity or stock exchange indices as underlying
C2	Bond options	Put options with bonds or other interest rate dependent security as underlying
C3	Currency options	Put options with currencies or other currencies dependent security as underlying
C4	Warrants	Put options that entitles the holder to sell stock of the issuing company at a specified price
C5	Commodity options	Put options with commodities or other commodities dependent security as underlying
C6	Swaptions	Put options granting its owner the right but not the obligation to enter into a short position in an underlying swap, i.e., enter into a swap in which the owner will receive the fixed leg, and pay the floating leg
C7	Catastrophe and Weather risk	Put options mainly exposed to catastrophe or weather risk
C8	Mortality risk	Put options mainly exposed to mortality risk
C9	Other	Other put options, not classified under the above categories
D	Swaps	Contract in which counterparties exchange certain benefits of one party's financial instrument for those of the other party's financial instrument, and the benefits in question depend on the type of financial instruments involved
D1	Interest rate swaps	Swap that exchange interest flows
D2	Currency swaps	Swap that exchange currency
D3	Interest rate and currency swaps	Swap that exchange interest and currency flows
D5	Security swaps	Swap that exchange securities
D7	Catastrophe and Weather risk	Swaps mainly exposed to catastrophe or weather risk
D8	Mortality risk	Swaps mainly exposed to mortality risk
D9	Other	Other swaps, not classified under the above categories
E	Forwards	Non-standardised contract between two parties to buy or sell an asset at a specified future time at a price agreed today
E1	Forward interest rate agreement	Forward contract in which typically one party pays a fixed interest rate, and receives a variable interest rate usually based on an underlying index rate, at the predefined forward date
E2	Forward exchange rate agreement	Forward contract in which one party pays an amount in one currency, and receives an equivalent amount in a different currency resulting from the conversion using the contractual exchange rate, at the predefined forward date
E7	Catastrophe and Weather risk	Forwards mainly exposed to catastrophe or weather risk
E8	Mortality risk	Forwards mainly exposed to mortality risk
E9	Other	Other forwards, not classified under the above categories
F	Credit derivatives	Derivative whose value is derived from the credit risk on an underlying bond, loan or any other financial asset
F1	Credit default swap	Credit derivative transaction in which two parties enter into an agreement whereby one party pays the other a fixed periodic coupon for the specified life on the agreement and the other party makes no payments unless a credit event relating to a predetermined reference asset occurs

Technical Annex V: Complementary Identification Code (CIC) Table

Definition of CIC

Assets listed in		Definition
F2	Credit spread option	Credit derivative that will generate cash flows if a given credit spread between two specific assets or benchmarks changes from its current level
F3	Credit spread swap	A swap in which one party makes a fixed payment to the other on the swap's settlement date and the second party pays the first an amount based on the actual credit spread
F4	Total return swap	A swap in which the non-floating rate side is based on the total return of an equity or fixed income instrument with the life longer than the swap
F9	Other	Other credit derivatives, not classified under the above categories

Technical Annex VI: Data checks

This Annex contains the checks that data received should comply with.

Cross-templates Checks Annual SOLO (CAS)

N° of Check Annual Solo (CAS)	Templates	Assertion
CAS 1	S.02.01.b-S.02.02.b	$S.02.01.b.A30 = \text{sum}(S.02.02.b.A7A[\text{CUR}])$
CAS 2	S.02.01.b-S.02.02.b	$S.02.01.b.L25A = \text{sum}(S.02.02.b.A15[\text{CUR}])$
CAS 3	S.02.01.b-S.02.02.b	$S.02.01.b.A4 = \text{sum}(S.02.02.b.A3[\text{CUR}])$
CAS 4	S.02.01.b-S.02.02.b	$S.02.01.b.A3+S.02.01.b.A27 + S.02.01.b.A14A + S.02.01.b.A14B + S.02.01.b.A14BC = \text{sum}(S.02.02.b.A4[\text{CUR}])$
CAS 5	S.02.01.b-S.02.02.b	$S.02.01.b.A12 = \text{sum}(S.02.02.b.A5[\text{CUR}])$
CAS 6	S.02.01.b-S.02.02.b	$S.02.01.b.A16 = \text{sum}(S.02.02.b.A5A[\text{CUR}])$
CAS 7	S.02.01.b-S.02.02.b	$S.02.01.b.A13+S.02.01.b.A21+S.02.01.b.A20 = \text{sum}(S.02.02.b.A6[\text{CUR}])$
CAS 8	S.02.01.b-S.02.02.b	$S.02.01.b.A2+S.02.01.b.A26+S.02.01.b.A25B+S.02.01.b.A23+S.02.01.b.A29 + S.02.01.b.A28A + S.02.01.b.A28B = \text{sum}(S.02.02.b.A7[\text{CUR}])$
CAS 9	S.02.01.b-S.02.02.b	$S.02.01.b.L1+S.02.01.b.L4+S.02.01.b.L6B+S.02.01.b.L7 = \text{sum}(S.02.02.b.A8[\text{CUR}])$
CAS 10	S.02.01.b-S.02.02.b	$S.02.01.b.L10 = \text{sum}(S.02.02.b.A9[\text{CUR}])$
CAS 11	S.02.01.b-S.02.02.b	$S.02.01.b.L13+S.02.01.b.L15A+S.02.01.b.L15B = \text{sum}(S.02.02.b.A10[\text{CUR}])$
CAS 12	S.02.01.b-S.02.02.b	$S.02.01.b.L16 = \text{sum}(S.02.02.b.A11[\text{CUR}])$
CAS 13	S.02.01.b-S.02.02.b	$S.02.01.b.L19+S.02.01.b.L20 = \text{sum}(S.02.02.b.A12[\text{CUR}])$
CAS 14	S.02.01.b-S.02.02.b	$S.02.01.b.L23 = \text{sum}(S.02.02.b.A13[\text{CUR}])$
CAS 15	S.02.01.b-S.02.02.b	$S.02.01.b.L18+S.02.01.b.L22+S.02.01.b.L17+S.02.01.b.L15C+S.02.01.b.L25+S.02.01.b.L26+S.02.01.b.L15D = \text{sum}(S.02.02.b.A14[\text{CUR}])$
CAS 16	S.02.01.b - S.17.01.b	$S.02.01.b.A17 = S.17.01.b.D27+S.17.01.b.E27+S.17.01.b.F27+S.17.01.b.G27+S.17.01.b.H27 + S.17.01.b.I27+S.17.01.b.J27+S.17.01.b.K27+S.17.01.b.L27+S.17.01.b.N27+S.17.01.b.O27+S.17.01.b.P27$
CAS 17	S.02.01.b - S.17.01.b	$S.02.01.b.A18 = S.17.01.b.A27+S.17.01.b.B27+S.17.01.b.C27+S.17.01.b.M27$
CAS 18	S.02.01.b - S.12.01.b	$S.02.01.b.A18A = \text{sum}(S.12.01.b.C10...C13)$
CAS 19	S.02.01.b - S.12.01.b	$S.02.01.b.A19 = S.12.01.b.C1+S.12.01.b.C4+S.12.01.b.C5+S.12.01.b.C6+S.12.01.b.C7$
CAS 20	S.02.01.b - S.12.01.b	$S.02.01.b.A19A = S.12.01.b.C2 + S.12.01.b.C3$
CAS 21	S.02.01.b - S.17.01.b	$S.02.01.b.L1A = S.17.01.b.D1+S.17.01.b.E1+S.17.01.b.F1+S.17.01.b.G1+S.17.01.b.H1+S.17.01.b.I1+S.17.01.b.J1+S.17.01.b.K1+S.17.01.b.L1+S.17.01.b.N1+S.17.01.b.O1+S.17.01.b.P1$
CAS 22	S.02.01.b - S.17.01.b	$S.02.01.b.L2 = S.17.01.b.D23+S.17.01.b.E23+S.17.01.b.F23+S.17.01.b.G23+S.17.01.b.H23 + S.17.01.b.I23+S.17.01.b.J23+S.17.01.b.K23+S.17.01.b.L23+S.17.01.b.N23+S.17.01.b.O23+S.17.01.b.P23$

This Annex contains the checks that data received should comply with.

Cross-templates Checks Annual SOLO (CAS)

N° of Check Annual Solo (CAS)	Templates	Assertion
CAS 23	S.02.01.b - S.17.01.b	S.02.01.b.L3 = S.17.01.b.D25+S.17.01.b.E25+S.17.01.b.F25+S.17.01.b.G25+S.17.01.b.H25 +S.17.01.b.I25+S.17.01.b.J25+S.17.01.b.K25+S.17.01.b.L25+S.17.01.b.N25+ S.17.01.b.O25+S.17.01.b.P25
CAS 24	S.02.01.b - S.17.01.b	S.02.01.b.L4A = S.17.01.b.A1+S.17.01.b.B1+S.17.01.b.C1+S.17.01.b.M1
CAS 25	S.02.01.b - S.17.01.b	S.02.01.b.L5 = S.17.01.b.A23+S.17.01.b.B23+S.17.01.b.C23+S.17.01.b.M23
CAS 26	S.02.01.b - S.17.01.b	S.02.01.b.L6 = S.17.01.b.A25+S.17.01.b.B25+S.17.01.b.C25+S.17.01.b.M25
CAS 27	S.02.01.b - S.12.01.b	S.02.01.b.L6C = sum(S.12.01.b.A10...A13)
CAS 28	S.02.01.b - S.12.01.b	S.02.01.b.L6D = sum(S.12.01.b.B10...B13)
CAS 29	S.02.01.b - S.12.01.b	S.02.01.b.L6E = sum(S.12.01.b.E10...E13)
CAS 30	S.02.01.b - S.12.01.b	S.02.01.b.L7A = S.12.01.b.A1+S.12.01.b.A5+S.12.01.b.A6+S.12.01.b.A7
CAS 31	S.02.01.b - S.12.01.b	S.02.01.b.L8 = S.12.01.b.B1+S.12.01.b.B4+S.12.01.b.B5+S.12.01.b.B6+S.12.01.b.B7
CAS 32	S.02.01.b - S.12.01.b	S.02.01.b.L9 = S.12.01.b.E1+S.12.01.b.E4+S.12.01.b.E6+S.12.01.b.E7
CAS 33	S.02.01.b - S.12.01.b	S.02.01.b.L11 = S.12.01.b.B3 + S.12.01.b.B2
CAS 34	S.02.01.b-S.12.01.b	S.02.01.b.L6B+S.02.01.b.L7+S.02.01.b.L10 = S.12.01.b.A1[LOB:LB29] + S.12.01.b.B1[LOB:LB29] [CBK:CB02] + S.12.01.b.B1[LOB:LB29] [CBK:CB03] + S.12.01.b.E1[LOB:LB29] + S.12.01.b.A1[LOB:LB33] + S.12.01.b.B1[LOB:LB33] + S.12.01.b.E1[LOB:LB33]+S.12.01.b.A1[LOB:LB35] + S.12.01.b.B1[LOB:LB35] + S.12.01.b.E1[LOB:LB35] + S.12.01.b.A1[LOB:LB30] + S.12.01.b.B1[LOB:LB30] + S.12.01.b.E1[LOB:LB30] + S.12.01.b.A1[LOB:LB31] + S.12.01.b.B1[LOB:LB31] [CBK:CB02] + S.12.01.b.B1[LOB:LB31] [CBK:CB03] + S.12.01.b.E1[LOB:LB31] + S.12.01.b.A1[LOB:LB32] + S.12.01.b.B1[LOB:LB32] [CBK:CB02] + S.12.01.b.B1[LOB:LB32] [CBK:CB03] + S.12.01.b.E1[LOB:LB32] + S.12.01.b.A1[LOB:LB34] + S.12.01.b.B1[LOB:LB34] + S.12.01.b.E1[LOB:LB34] + S.12.01.b.A1[LOB:LB36] + S.12.01.b.B1[LOB:LB36] + S.12.01.b.E1[LOB:LB36]
CAS 35	S.02.01.b-S.12.01.b	S.02.01.b.L6C+S.02.01.b.L7A+S.02.01.b.L10A = S.12.01.b.A1[LOB:LB29]+S.12.01.b.A1[LOB:LB33]+S.12.01.b.A1[LOB:LB35]+ S.12.01.b.A1[LOB:LB30]+S.12.01.b.A1[LOB:LB31]+S.12.01.b.A1[LOB:LB32]+ S.12.01.b.A1[LOB:LB34]+S.12.01.b.A1[LOB:LB36]
CAS 36	S.02.01.b-S.12.01.b	S.02.01.b.L6D+S.02.01.b.L8+S.02.01.b.L11 = S.12.01.b.B1[LOB:LB29] [CBK:CB02] + S.12.01.b.B1[LOB:LB29] [CBK:CB03] +S.12.01.b.B1[LOB:LB33]+S.12.01.b.B1[LOB:LB35]+S.12.01.b.B1[LOB:LB30] +S.12.01.b.B1[LOB:LB31][CBK:CB02]+S.12.01.b.B1[LOB:LB31][CBK:CB03] + S.12.01.b.B1[LOB:LB32][CBK:CB02] + S.12.01.b.B1[LOB:LB32][CBK:CB03] + S.12.01.b.B1[LOB:LB34]+S.12.01.b.B1[LOB:LB36]

This Annex contains the checks that data received should comply with.

Cross-templates Checks Annual SOLO (CAS)

N° of Check Annual Solo (CAS)	Templates	Assertion
CAS 37	S.02.01.b-S.12.01.b	S.02.01.b.L6E+S.02.01.b.L9+S.02.01.b.L12 = S.12.01.b.E1[LOB:LB29]+S.12.01.b.E1[LOB:LB33]+S.12.01.b.E1[LOB:LB35]+S.12.01.b.E1[LOB:LB30]+S.12.01.b.E1[LOB:LB31]+S.12.01.b.E1[LOB:LB32]+S.12.01.b.E1[LOB:LB34]+S.12.01.b.E1[LOB:LB36]
CAS 38	S.02.01.b-S.12.01.b & S.17.01.b	S.02.01.b.A16 = S.12.01.b.C1[LOB:LB29] [CBK:CB02] + S.12.01.b.C1[LOB:LB29] [CBK:CB03] +S.12.01.b.C1[LOB:LB33]+S.12.01.b.C1[LOB:LB35]+S.12.01.b.C1[LOB:LB30] + S.12.01.b.C1[LOB:LB31] [CBK:CB02]+ S.12.01.b.C1[LOB:LB31] [CBK:CB03] + S.12.01.b.C1[LOB:LB32] [CBK:CB02] + S.12.01.b.C1[LOB:LB32] [CBK:CB03] + S.12.01.b.C1[LOB:LB34]+S.12.01.b.C1[LOB:LB36] + S.17.01.b.Q27
CAS 39	S.02.01.b-S.17.01.b	S.02.01.b.L1+ S.02.01.b.L4 = S.17.01.b.Q26
CAS 40	S.28.02.b-S.17.01.b	S.17.01.b.A24 <= S.28.02.b.D2 + S.28.02.b.F2
CAS 41	S.28.02.b-S.17.01.b	S.17.01.b.B24 <= S.28.02.b.D3 + S.28.02.b.F3
CAS 42	S.28.02.b-S.17.01.b	S.17.01.b.C24 <= S.28.02.b.D4 + S.28.02.b.F4
CAS 43	S.28.02.b-S.17.01.b	S.17.01.b.D24 <= S.28.02.b.D5 + S.28.02.b.F5
CAS 44	S.28.02.b-S.17.01.b	S.28.02.b.D6 + S.28.02.b.F6 >= S.17.01.b.E24
CAS 45	S.28.02.b-S.17.01.b	S.28.02.b.D7 + S.28.02.b.F7 >= S.17.01.b.F24
CAS 46	S.28.02.b-S.17.01.b	S.28.02.b.D8 + S.28.02.b.F8 >= S.17.01.b.G24
CAS 47	S.28.02.b-S.17.01.b	S.28.02.b.D9 + S.28.02.b.F9 >= S.17.01.b.H24
CAS 48	S.28.02.b-S.17.01.b	S.28.02.b.D10 + S.28.02.b.F10 >= S.17.01.b.I24
CAS 49	S.28.02.b-S.17.01.b	S.28.02.b.D11 + S.28.02.b.F11 >= S.17.01.b.J24
CAS 50	S.28.02.b-S.17.01.b	S.28.02.b.D12 + S.28.02.b.F12 >= S.17.01.b.K24
CAS 51	S.28.02.b-S.17.01.b	S.28.02.b.D13 + S.28.02.b.F13 >= S.17.01.b.L24
CAS 52	S.28.02.b-S.17.01.b	S.28.02.b.D14 + S.28.02.b.F14 >= S.17.01.b.N24
CAS 53	S.28.02.b-S.17.01.b	S.28.02.b.D17 + S.28.02.b.F17 >= S.17.01.b.M24
CAS 54	S.28.02.b-S.17.01.b	S.28.02.b.D16 + S.28.02.b.F16 >= S.17.01.b.O24
CAS 55	S.28.02.b-S.17.01.b	S.28.02.b.D15 + S.28.02.b.F15 >= S.17.01.b.P24
CAS 56	S.28.02.b-S.12.01.b	S.28.02.b.D19 + S.28.02.b.F19 + S.28.02.b.D20 + S.28.02.b.F20 >= (S.12.01.b.B1 [LOB:LB30] - S.12.01.b.C1 [LOB:LB30])
CAS 57	S.28.02.b-S.12.01.b	S.28.02.b.D21 + S.28.02.b.F21 >= (S.12.01.b.B1[LOB:LB31][CBK:CB02] - S.12.01.b.C1[LOB:LB31][CBK:CB02]) + (S.12.01.b.B1[LOB:LB31][CBK:CB03] - S.12.01.b.C1[LOB:LB31][CBK:CB03])
CAS 58	S.28.02.b-S.12.01.b	S.28.02.b.D22 + S.28.02.b.F22 >= (S.12.01.b.B1[LOB:LB33] - S.12.01.b.C1[LOB:LB33]) + (S.12.01.b.B1[LOB:LB36] - S.12.01.b.C1[LOB:LB36]) + (S.12.01.b.B1[LOB:LB29][CBK:CB02] - S.12.01.b.C1[LOB:LB29][CBK:CB02]) + (S.12.01.b.B1[LOB:LB29][CBK:CB03] - S.12.01.b.C1[LOB:LB29][CBK:CB03]) + (S.12.01.b.B1[LOB:LB34] - S.12.01.b.C1 [LOB:LB34]) + (S.12.01.b.B1[LOB:LB35] - S.12.01.b.C1[LOB:LB35])

This Annex contains the checks that data received should comply with.

Cross-templates Checks Annual SOLO (CAS)

N° of Check Annual Solo (CAS)	Templates	Assertion
CAS 59	S.28.01.b-S.17.01.b	S.28.01.b.B2 >= S.17.01.b.A24
CAS 60	S.28.01.b-S.17.01.b	S.28.01.b.B3 >= S.17.01.b.B24
CAS 61	S.28.01.b-S.17.01.b	S.28.01.b.B4 >= S.17.01.b.C24
CAS 62	S.28.01.b-S.17.01.b	S.28.01.b.B5 >= S.17.01.b.D24
CAS 63	S.28.01.b-S.17.01.b	S.28.01.b.B6 >= S.17.01.b.E24
CAS 64	S.28.01.b-S.17.01.b	S.28.01.b.B7 >= S.17.01.b.F24
CAS 65	S.28.01.b-S.17.01.b	S.28.01.b.B8 >= S.17.01.b.G24
CAS 66	S.28.01.b-S.17.01.b	S.28.01.b.B9 >= S.17.01.b.H24
CAS 67	S.28.01.b-S.17.01.b	S.28.01.b.B10 >= S.17.01.b.I24
CAS 68	S.28.01.b-S.17.01.b	S.28.01.b.B11 >= S.17.01.b.J24
CAS 69	S.28.01.b-S.17.01.b	S.28.01.b.B12 >= S.17.01.b.K24
CAS 70	S.28.01.b-S.17.01.b	S.28.01.b.B13 >= S.17.01.b.L24
CAS 71	S.28.01.b-S.17.01.b	S.28.01.b.B14 >= S.17.01.b.N24
CAS 72	S.28.01.b-S.17.01.b	S.28.01.b.B17 >= S.17.01.b.M24
CAS 73	S.28.01.b-S.17.01.b	S.28.01.b.B16 >= S.17.01.b.P24
CAS 74	S.28.01.b-S.17.01.b	S.28.01.b.B15 >= S.17.01.b.O24
CAS 75	S.28.01.b-S.12.01.b	S.28.01.b.B19 + S.28.01.b.B20 >= (S.12.01.b.B1 [LOB:LB30] - S.12.01.b.C1 [LOB:LB30])
CAS 76	S.28.01.b-S.12.01.b	S.28.01.b.B21 >= (S.12.01.b.B1[LOB:LB31][CBK:CB02] - S.12.01.b.C1[LOB:LB31][CBK:CB02]) + (S.12.01.b.B1[LOB:LB31][CBK:CB03] - S.12.01.b.C1[LOB:LB31][CBK:CB03])
CAS 77	S.28.01.b-S.12.01.b	S.28.01.b.B22 >= (S.12.01.b.B1[LOB:LB33] - S.12.01.b.C1[LOB:LB33]) + (S.12.01.b.B1[LOB:LB36] - S.12.01.b.C1[LOB:LB36]) + (S.12.01.b.B1[LOB:LB29][CBK:CB02] - S.12.01.b.C1[LOB:LB29][CBK:CB02]) + (S.12.01.b.B1[LOB:LB29][CBK:CB03] - S.12.01.b.C1[LOB:LB29][CBK:CB03]) + (S.12.01.b.B1[LOB:LB34] - S.12.01.b.C1 [LOB:LB34]) + (S.12.01.b.B1[LOB:LB35] - S.12.01.b.C1[LOB:LB35])
CAS 78	S.02.01.b-S.23.01.b	S.23.01.b.A20 = S.02.01.b.L27-S.23.01.b.B24-S.23.01.b.B25-S.23.01.b.B26-S.23.01.b.B27-S.23.01.b.B502-S.23.01.b.A503+ S.02.01.b.L26

Technical Annex VI: Data checks

This Annex contains the checks that data received should comply with.

Cross-templates Checks Quarterly SOLO (CQS)

N° of Check Quarterly Solo (CQS)	Templates	Assertion
CQS 1	S.02.01.a-S.23.01.a	S.23.01.a.A20 = S.02.01.a.L27-OF_B1.B24-S.23.01.a.B25-S.23.01.a.B27-S.23.01.a.B502-S.23.01.a.A503+ S.02.01.a.L26
CQS 2	S.02.01.a - S.17.01.a	S.02.01.a.A17 = S.17.01.a.D27+S.17.01.a.E27+S.17.01.a.F27+S.17.01.a.G27+S.17.01.a.H27+S.17.01.a.I27+S.17.01.a.J27+S.17.01.a.K27+S.17.01.a.L27+S.17.01.a.N27+S.17.01.a.O27+S.17.01.a.P27
CQS 3	S.02.01.a - S.17.01.a	S.02.01.a.A18 = S.17.01.a.A27+S.17.01.a.B27+S.17.01.a.C27+S.17.01.a.M27
CQS 4	S.02.01.a - S.12.01.a	S.02.01.a.A18A = sum(S.12.01.a.C10...C13)
CQS 5	S.02.01.a - S.12.01.a	S.02.01.a.A19 = S.12.01.a.C1+S.12.01.a.C4+S.12.01.a.C5+S.12.01.a.C6+S.12.01.a.C7
CQS 6	S.02.01.a - S.12.01.a	S.02.01.a.A19A = S.12.01.a.C2 + S.12.01.a.C3
CQS 7	S.02.01.a - S.17.01.a	S.02.01.a.L1A = S.17.01.a.D1+S.17.01.a.E1+S.17.01.a.F1+S.17.01.a.G1+S.17.01.a.H1+S.17.01.a.I1+S.17.01.a.J1+S.17.01.a.K1+S.17.01.a.L1+S.17.01.a.N1+S.17.01.a.O1+S.17.01.a.P1
CQS 8	S.02.01.a - S.17.01.a	S.02.01.a.L2 = S.17.01.a.D23+S.17.01.a.E23+S.17.01.a.F23+S.17.01.a.G23+S.17.01.a.H23+S.17.01.a.I23+S.17.01.a.J23+S.17.01.a.K23+S.17.01.a.L23+S.17.01.a.N23+S.17.01.a.O23+S.17.01.a.P23
CQS 9	S.02.01.a - S.17.01.a	S.02.01.a.L3 = S.17.01.a.D25+S.17.01.a.E25+S.17.01.a.F25+S.17.01.a.G25+S.17.01.a.H25+S.17.01.a.I25+S.17.01.a.J25+S.17.01.a.K25+S.17.01.a.L25+S.17.01.a.N25+S.17.01.a.O25+S.17.01.a.P25
CQS 10	S.02.01.a - S.17.01.a	S.02.01.a.L4A = S.17.01.a.A1+S.17.01.a.B1+S.17.01.a.C1+S.17.01.a.M1
CQS 11	S.02.01.a - S.17.01.a	S.02.01.a.L5 = S.17.01.a.A23+S.17.01.a.B23+S.17.01.a.C23+S.17.01.a.M23
CQS 12	S.02.01.a - S.17.01.a	S.02.01.a.L6 = S.17.01.a.A25+S.17.01.a.B25+S.17.01.a.C25+S.17.01.a.M25
CQS 13	S.02.01.a - S.12.01.a	S.02.01.a.L6C = sum(S.12.01.a.A10...A13)
CQS 14	S.02.01.a - S.12.01.a	S.02.01.a.L6D = sum(S.12.01.a.B10...B13)
CQS 15	S.02.01.a - S.12.01.a	S.02.01.a.L6E = sum(S.12.01.a.E10...E13)
CQS 16	S.02.01.a - S.12.01.a	S.02.01.a.L7A = S.12.01.a.A1+S.12.01.a.A5+S.12.01.a.A6+S.12.01.a.A7
CQS 17	S.02.01.a - S.12.01.a	S.02.01.a.L8 = S.12.01.a.B1+S.12.01.a.B4+S.12.01.a.B5+S.12.01.a.B6+S.12.01.a.B7
CQS 18	S.02.01.a - S.12.01.a	S.02.01.a.L9 = S.12.01.a.E1+S.12.01.a.E4+S.12.01.a.E6+S.12.01.a.E7
CQS 19	S.02.01.a - S.12.01.a	S.02.01.a.L11 = S.12.01.a.B3 + S.12.01.a.B2

This Annex contains the checks that data received should comply with.

Cross-templates Checks Quarterly SOLO (CQS)

N° of Check Quarterly Solo (CQS)	Templates	Assertion
CQS 20	S.02.01.a-S.12.01.a	S.02.01.a.L6B+S.02.01.a.L7+S.02.01.a.L10 = S.12.01.a.A1[LOB:LB29] + S.12.01.a.B1[LOB:LB29] [CBK:CB02] + S.12.01.a.B1[LOB:LB29] [CBK:CB03] + S.12.01.a.E1[LOB:LB29] + S.12.01.a.A1[LOB:LB33] + S.12.01.a.B1[LOB:LB33] + S.12.01.a.E1[LOB:LB33]+ S.12.01.a.A1[LOB:LB35] + S.12.01.a.B1[LOB:LB35] + S.12.01.a.E1[LOB:LB35] + S.12.01.a.A1[LOB:LB30] + S.12.01.a.B1[LOB:LB30] + S.12.01.a.E1[LOB:LB30] + S.12.01.a.A1[LOB:LB31] + S.12.01.a.B1[LOB:LB31] [CBK:CB02] + S.12.01.a.B1[LOB:LB31] [CBK:CB03] + S.12.01.a.E1[LOB:LB31] + S.12.01.a.A1[LOB:LB32] + S.12.01.a.B1[LOB:LB32] [CBK:CB02] + S.12.01.a.B1[LOB:LB32] [CBK:CB03] + S.12.01.a.E1[LOB:LB32] + S.12.01.a.A1[LOB:LB34] + S.12.01.a.B1[LOB:LB34] + S.12.01.a.E1[LOB:LB34] + S.12.01.a.A1[LOB:LB36] + S.12.01.a.B1[LOB:LB36] + S.12.01.a.E1[LOB:LB36]
CQS 21	S.02.01.a-S.12.01.a	S.02.01.a.L6C+S.02.01.a.L7A+S.02.01.a.L10A = S.12.01.a.A1[LOB:LB29]+S.12.01.a.A1[LOB:LB33]+S.12.01.a.A1[LOB:LB35]+S.12.01.a.A1[LOB:LB30]+S.12.01.a.A1[LOB:LB31]+S.12.01.a.A1[LOB:LB32]+S.12.01.a.A1[LOB:LB34]+S.12.01.a.A1[LOB:LB36]
CQS 22	S.02.01.a-S.12.01.a	S.02.01.a.L6D+S.02.01.a.L8+S.02.01.a.L11 = S.12.01.a.B1[LOB:LB29] [CBK:CB02] + S.12.01.a.B1[LOB:LB29] [CBK:CB03] +S.12.01.a.B1[LOB:LB33]+S.12.01.a.B1[LOB:LB35]+S.12.01.a.B1[LOB:LB30]+ S.12.01.a.B1[LOB:LB31][CBK:CB02]+S.12.01.a.B1[LOB:LB31][CBK:CB03] + S.12.01.a.B1[LOB:LB32][CBK:CB02] + S.12.01.a.B1[LOB:LB32][CBK:CB03] + S.12.01.a.B1[LOB:LB34]+S.12.01.a.B1[LOB:LB36]
CQS 23	S.02.01.a-S.12.01.a	S.02.01.a.L6E+S.02.01.a.L9+S.02.01.a.L12 = S.12.01.a.E1[LOB:LB29]+S.12.01.a.E1[LOB:LB33]+S.12.01.a.E1[LOB:LB35]+S.12.01.a.E1[LOB:LB30]+S.12.01.a.E1[LOB:LB31]+S.12.01.a.E1[LOB:LB32]+S.12.01.a.E1[LOB:LB34]+S.12.01.a.E1[LOB:LB36]
CQS 24	S.02.01.a-S.12.01.a & S.17.01.a	S.02.01.a.A16 = S.12.01.a.C1[LOB:LB29] [CBK:CB02] + S.12.01.a.C1[LOB:LB29] [CBK:CB03] +S.12.01.a.C1[LOB:LB33]+S.12.01.a.C1[LOB:LB35]+S.12.01.a.C1[LOB:LB30]+ S.12.01.a.C1[LOB:LB31] [CBK:CB02]+ S.12.01.a.C1[LOB:LB31] [CBK:CB03] + S.12.01.a.C1[LOB:LB32] [CBK:CB02] + S.12.01.a.C1[LOB:LB32] [CBK:CB03] + S.12.01.a.C1[LOB:LB34]+S.12.01.a.C1[LOB:LB36] + S.17.01.a.Q27
CQS 25	S.02.01.a-S.17.01.a	S.02.01.a.L1+ S.02.01.a.L4 = S.17.01.a.Q26
CQS 26	S.28.02.a-S.17.01.a	S.17.01.a.A24 <= S.28.02.a.D2 + S.28.02.a.F2
CQS 27	S.28.02.a-S.17.01.a	S.17.01.a.B24 <= S.28.02.a.D3 + S.28.02.a.F3
CQS 28	S.28.02.a-S.17.01.a	S.17.01.a.C24 <= S.28.02.a.D4 + S.28.02.a.F4
CQS 29	S.28.02.a-S.17.01.a	S.17.01.a.D24 <= S.28.02.a.D5 + S.28.02.a.F5
CQS 30	S.28.02.a-S.17.01.a	S.28.02.a.D6 + S.28.02.a.F6 >= S.17.01.a.E24
CQS 31	S.28.02.a-S.17.01.a	S.28.02.a.D7 + S.28.02.a.F7 >= S.17.01.a.F24
CQS 32	S.28.02.a-S.17.01.a	S.28.02.a.D8 + S.28.02.a.F8 >= S.17.01.a.G24
CQS 33	S.28.02.a-S.17.01.a	S.28.02.a.D9 + S.28.02.a.F9 >= S.17.01.a.H24
CQS 34	S.28.02.a-S.17.01.a	S.28.02.a.D10 + S.28.02.a.F10 >= S.17.01.a.I24
CQS 35	S.28.02.a-S.17.01.a	S.28.02.a.D11 + S.28.02.a.F11 >= S.17.01.a.J24

This Annex contains the checks that data received should comply with.

Cross-templates Checks Quarterly SOLO (CQS)

N° of Check Quarterly Solo (CQS)	Templates	Assertion
CQS 36	S.28.02.a-S.17.01.a	S.28.02.a.D12 + S.28.02.a.F12 >= S.17.01.a.K24
CQS 37	S.28.02.a-S.17.01.a	S.28.02.a.D13 + S.28.02.a.F13 >= S.17.01.a.L24
CQS 38	S.28.02.a-S.17.01.a	S.28.02.a.D14 + S.28.02.a.F14 >= S.17.01.a.N24
CQS 39	S.28.02.a-S.17.01.a	S.28.02.a.D17 + S.28.02.a.F17 >= S.17.01.a.M24
CQS 40	S.28.02.a-S.17.01.a	S.28.02.a.D16 + S.28.02.a.F16 >= S.17.01.a.O24
CQS 41	S.28.02.a-S.17.01.a	S.28.02.a.D15 + S.28.02.a.F15 >= S.17.01.a.P24
CQS 42	S.28.02.a-S.12.01.a	S.28.02.a.D19 + S.28.02.a.F19 + S.28.02.a.D20 + S.28.02.a.F20 >= (S.12.01.a.B1 [LOB:LB30] - S.12.01.a.C1 [LOB:LB30])
CQS 43	S.28.02.a-S.12.01.a	S.28.02.a.D21 + S.28.02.a.F21 >= (S.12.01.a.B1[LOB:LB31][CBK:CB02] - S.12.01.a.C1[LOB:LB31][CBK:CB02]) + (S.12.01.a.B1[LOB:LB31][CBK:CB03] - S.12.01.a.C1[LOB:LB31][CBK:CB03])
CQS 44	S.28.02.a-S.12.01.a	S.28.02.a.D22 + S.28.02.a.F22 >= (S.12.01.a.B1[LOB:LB33] - S.12.01.a.C1[LOB:LB33]) + (S.12.01.a.B1[LOB:LB36] - S.12.01.a.C1[LOB:LB36]) + (S.12.01.a.B1[LOB:LB29][CBK:CB02] - S.12.01.a.C1[LOB:LB29][CBK:CB02]) + (S.12.01.a.B1[LOB:LB29][CBK:CB03] - S.12.01.a.C1[LOB:LB29][CBK:CB03]) + (S.12.01.a.B1[LOB:LB34] - S.12.01.a.C1 [LOB:LB34]) + (S.12.01.a.B1[LOB:LB35] - S.12.01.a.C1[LOB:LB35])
CQS 45	S.28.01.a-S.17.01.a	S.28.01.a.B2 >= S.17.01.a.A24
CQS 46	S.28.01.a-S.17.01.a	S.28.01.a.B3 >= S.17.01.a.B24
CQS 47	S.28.01.a-S.17.01.a	S.28.01.a.B4 >= S.17.01.a.C24
CQS 48	S.28.01.a-S.17.01.a	S.28.01.a.B5 >= S.17.01.a.D24
CQS 49	S.28.01.a-S.17.01.a	S.28.01.a.B6 >= S.17.01.a.E24
CQS 50	S.28.01.a-S.17.01.a	S.28.01.a.B7 >= S.17.01.a.F24
CQS 51	S.28.01.a-S.17.01.a	S.28.01.a.B8 >= S.17.01.a.G24
CQS 52	S.28.01.a-S.17.01.a	S.28.01.a.B9 >= S.17.01.a.H24
CQS 53	S.28.01.a-S.17.01.a	S.28.01.a.B10 >= S.17.01.a.I24
CQS 54	S.28.01.a-S.17.01.a	S.28.01.a.B11 >= S.17.01.a.J24
CQS 55	S.28.01.a-S.17.01.a	S.28.01.a.B12 >= S.17.01.a.K24
CQS 56	S.28.01.a-S.17.01.a	S.28.01.a.B13 >= S.17.01.a.L24
CQS 57	S.28.01.a-S.17.01.a	S.28.01.a.B14 >= S.17.01.a.N24
CQS 58	S.28.01.a-S.17.01.a	S.28.01.a.B17 >= S.17.01.a.M24
CQS 59	S.28.01.a-S.17.01.a	S.28.01.a.B16 >= S.17.01.a.P24
CQS 60	S.28.01.a-S.17.01.a	S.28.01.a.B15 >= S.17.01.a.O24
CQS 61	S.28.01.a-S.12.01.a	S.28.01.a.B19 + S.28.01.a.B20 >= (S.12.01.a.B1 [LOB:LB30] - S.12.01.a.C1 [LOB:LB30])
CQS 62	S.28.01.a-S.12.01.a	S.28.01.a.B21 >= (S.12.01.a.B1[LOB:LB31][CBK:CB02] - S.12.01.a.C1[LOB:LB31][CBK:CB02]) + (S.12.01.a.B1[LOB:LB31][CBK:CB03] - S.12.01.a.C1[LOB:LB31][CBK:CB03])

This Annex contains the checks that data received should comply with.

Cross-templates Checks Quarterly SOLO (CQS)

N° of Check Quarterly Solo (CQS)	Templates	Assertion
CQS 63	S.28.01.a-S.12.01.a	$S.28.01.a.B22 \geq (S.12.01.a.B1[LOB:LB33] - S.12.01.a.C1[LOB:LB33]) + (S.12.01.a.B1[LOB:LB36] - S.12.01.a.C1[LOB:LB36]) + (S.12.01.a.B1[LOB:LB29][CBK:CB02] - S.12.01.a.C1[LOB:LB29][CBK:CB02]) + (S.12.01.a.B1[LOB:LB29][CBK:CB03] - S.12.01.a.C1[LOB:LB29][CBK:CB03]) + (S.12.01.a.B1[LOB:LB34] - S.12.01.a.C1 [LOB:LB34]) + (S.12.01.a.B1[LOB:LB35] - S.12.01.a.C1[LOB:LB35])$

Technical Annex VI: Data checks

This Annex contains the checks that data received should comply with.

Cross-templates Checks Group Specific (CGS)

N° of Check Group Specific (CGS)	Templates	Assertion
CGS 1	S.02.01.g-S.35.01.g	$S.02.01.g.L1 = \text{sum}(S.35.01.g.D1[EID])$
CGS 2	S.02.01.g-S.35.01.g	$S.02.01.g.L4 = \text{sum}(S.35.01.g.G1[EID])$
CGS 3	S.02.01.g-S.35.01.g	$S.02.01.g.L6B = \text{sum}(S.35.01.g.J1[EID])$
CGS 4	S.02.01.g-S.35.01.g	$S.02.01.g.L7 = \text{sum}(S.35.01.g.M1[EID])$
CGS 5	S.02.01.g-S.35.01.g	$S.02.01.g.L10 = \text{sum}(S.35.01.g.P1[EID])$
CGS 6	S.02.01.g-S.23.01.g	$S.23.01.g.A21 = S.02.01.g.L27 - S.23.01.g.B24 - S.23.01.g.B25 - S.23.01.g.B26 - S.23.01.g.B27 - S.23.01.g.B28 - S.23.01.g.B502 - S.23.01.g.A607 + S.02.01.g.L26$

Technical Annex VI: Data checks

This Annex contains the checks that data received should comply with.

Cross-templates Quarterly Checks Group Specific (QCGS)

N° of Quarterly Check Group Specific (QCGS)	Templates	Assertion
QCGS 1	S.02.01.h-S.23.01.f	S.23.01.f.A21 = S.02.01.h.L27-S.23.01.f.B24-S.23.01.f.B25-S.23.01.f.B26-S.23.01.f.B27-S.23.01.f.B28-S.23.01.f.B502-S.23.01.f.A607+ S.02.01.h.L26

Technical Annex VI: Data checks

This Annex contains the checks that data received should comply with.

Item	Description
N° of Check	The code of the data check. This code is inserted in the relevant reporting items as a link to the data checks listed in this annex. For example, data item A2 in Annex II - BS LOG - S.02.01 has included the following: "See cross-templates checks tab CAS 8"
Templates	Indicates the source of the data items on which the data check is performed. For example, N° of Check CAS1 refers to a data check that involves data items submitted under S.02.01.b and S.02.02.b ("S.02.01.b-S.02.02.b")
Assertion	The description of the data check being performed. For example, N° of Check CAS1 is "S.02.01.b.A30 = sum(S.02.02.b.A7A[CUR])". This means that item code A30 ("Total assets") in S.02.01b should be equal to the value of item A7A ("Total assets"), by currency, in S.02.02b.

GlobalFilters Codes	Description
[CUR]	Checks available for all currencies
[LOB:LB29]; [LOB:LB33]; [LOB:LB35]	Lines of business for SLT health
[LOB:LB30]	Lines of business for insurance with profit participation (life obligations)
[LOB:LB31]	Lines of business for Index-linked and unit-linked insurance (life obligations)
[LOB:LB32]	Lines of business for Other life insurance
[LOB:LB36]	Lines of business for Accepted Reinsurance (life obligations)
[LOB:LB33]	Lines of business for Annuities stemming from non-life contracts
[LOB:LB29]	Lines of business for Direct business, SLT health
[LOB:LB35]	Lines of business for Reinsurance accepted, SLT health
[CBK:CB02]	Contracts break-down (Contracts without options)
[CBK:CB03]	Contracts break-down (Contracts with options and guarantees)
[LOB:LB34]	Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations in S.12.01.a
[EID]	Entity identification
[LOB:LB30]; [LOB:LB31]; [LOB:LB32]; [LOB:LB34]; [LOB:LB36]	Lines of business for life obligations

Appendix I: Quantitative reporting templates

Content of the submission

S.01.01.a

Template Code	Template name	
S.01.02.a	Basic Information	A1
S.02.01.a	Balance Sheet	A2
S.06.02.a	List of assets	A4
S.08.01.a	Open derivatives	A5
S.14.01.a	Life and Health SLT Technical Provisions	A6
S.17.01.a	Non-Life Technical Provisions	A7
S.23.01.a	Own funds	A8
S.28.01.a	Minimum Capital Requirement	A19
S.28.02.a	Minimum Capital Requirement - Composite	A20

Appendix I: Quantitative reporting templates

Content of the submission

S.01.01.b

Template Code	Template name	
S.01.02.b	Basic Information	A1
S.02.01.b	Balance Sheet	A2
S.02.02.b	Assets and liabilities by currency	A3
S.06.02.b	List of assets	A4
S.08.01.b	Open derivatives	A5
S.14.01.b	Life and Health SLT Technical Provisions	A6
S.17.01.b	Non-Life Technical Provisions	A7
S.23.01.b	Own funds	A8
S.25.01.b	Solvency Capital Requirement - SF	A9
S.25.02.b	Solvency Capital Requirement - PIM	A10
S.25.03.b	Solvency Capital Requirement - IM	A11
S.26.01.b	Solvency Capital Requirement - Market risk	A12
S.26.02.b	Solvency Capital Requirement - Counterparty default risk	A13
S.26.03.b	Solvency Capital Requirement - Life underwriting risk	A14
S.26.04.b	Solvency Capital Requirement - Health underwriting risk	A15
S.26.05.b	Solvency Capital Requirement - Non-Life underwriting risk	A16
S.26.06.b	Solvency Capital Requirement - Operational risk	A17
S.27.01.b	Solvency Capital Requirement - Non-Life Catastrophe risk	A18
S.28.01.b	Minimum Capital Requirement	A19
S.28.02.b	Minimum Capital Requirement - Composite	A20

Appendix I: Quantitative reporting templates

Content of the submission

S.01.01.f

Template Code	Template name
S.01.02.f	Basic Information
S.02.01.f	Balance Sheet
S.06.02.f	List of assets
S.08.01.f	Open derivatives
S.23.01.f	Own funds

A1
A2
A4
A5
A8

Appendix I: Quantitative reporting templates

Content of the submission

S.01.01.g

Template Code	Template name	
S.01.02.g	Basic Information	A1
S.02.01.g	Balance Sheet	A2
S.06.02.g	List of assets	A4
S.08.01.g	Open derivatives	A5
S.23.01.g	Own funds	A8
S.25.01.g	Solvency Capital Requirement - SF	A9
S.25.02.g	Solvency Capital Requirement - PIM	A10
S.25.03.g	Solvency Capital Requirement - IM	A11
S.26.01.g	Solvency Capital Requirement - Market risk	A12
S.26.02.g	Solvency Capital Requirement - Counterparty default risk	A13
S.26.03.g	Solvency Capital Requirement - Life underwriting risk	A14
S.26.04.g	Solvency Capital Requirement - Health underwriting risk	A15
S.26.05.g	Solvency Capital Requirement - Non-Life underwriting risk	A16
S.26.06.g	Solvency Capital Requirement - Operational risk	A17
S.27.01.g	Solvency Capital Requirement - Non-Life Catastrophe risk	A18
S.32.01.g	Entities in the scope of the group	A21
S.33.01.g	(Re)insurance Solo requirements	A22
S.34.01.g	Non-(re)insurance Solo requirements	A23
S.35.01.g	Group - contribution of TP	A24

Appendix I: Quantitative reporting templates

S.01.02.a

Basic information

General information

Identification code

Type of code

Reporting date

Reference date

Currency used for reporting

Accounting standard

Type of internal model

Composite undertaking? (Y/N)

RFF? (Y/N)

A1
A11
A2
A3
A4
A5
A6
A7
A8

Appendix I: Quantitative reporting templates

S.01.02.b

Basic information

General information

Identification code

Type of code

Reporting date

Reference date

Currency used for reporting

Accounting standard

Type of internal model

Composite undertaking? (Y/N)

RFF? (Y/N)

A1
A11
A2
A3
A4
A5
A6
A7
A8

Appendix I: Quantitative reporting templates

S.01.02.f

Basic information

General information

Group identification code

Type of code

Reporting date

Reference date

Currency used for reporting

Accounting standard

Type of internal model

Composite undertaking? (Y/N)

RFF? (Y/N)

Consolidation method 1 or a combination of methods is used for calculating group solvency of at least one undertaking in the scope? (Y/N)

A9
A11
A2
A3
A4
A5
A6
A7
A8
A10

Appendix I: Quantitative reporting templates

S.01.02.g

Basic information

General information

Group identification code

Type of code

Reporting date

Reference date

Currency used for reporting

Accounting standard

Type of internal model

Composite undertaking? (Y/N)

RFF? (Y/N)

Consolidation method 1 or a combination of methods is used for calculating group solvency of at least one undertaking in the scope? (Y/N)

A9
A11
A2
A3
A4
A5
A6
A7
A8
A10

Appendix I: Quantitative reporting templates

S.02.01.a

Balance sheet

Fund number

Assets

Goodwill	
Deferred acquisition costs	
Intangible assets	A2
Deferred tax assets	A26
Pension benefit surplus	A25B
Property, plant & equipment held for own use	A3
Investments (other than assets held for index-linked and unit-linked funds)	A4
Property (other than for own use)	A5
Participations	A6
Equities	A7B
Equities - listed	A7
Equities - unlisted	A7A
Bonds	A8E
Government Bonds	A8
Corporate Bonds	A8A
Structured notes	A8C
Collateralised securities	A8D
Investment funds	A9
Derivatives	A10A
Deposits other than cash equivalents	A10B
Other investments	A11
Assets held for index-linked and unit-linked funds	A12
Loans & mortgages	A14
Loans & mortgages to individuals	A14B
Other loans & mortgages	A14C
Loans on policies	A14A
Reinsurance recoverables from:	A16
Non-life and health similar to non-life	A17A
Non-life excluding health	A17
Health similar to non-life	A18
Life and health similar to life, excluding health and index-linked and unit-linked	A19B
Health similar to life	A18A
Life excluding health and index-linked and unit-linked	A19
Life index-linked and unit-linked	A19A
Deposits to cedants	A13
Insurance & intermediaries receivables	A21
Reinsurance receivables	A20
Receivables (trade, not insurance)	A23
Own shares	A28A
Amounts due in respect of own fund items or initial fund called up but not yet paid in	A28B
Cash and cash equivalents	A27
Any other assets, not elsewhere shown	A29
Total assets	A30

A0
Solvency II value
A2
A26
A25B
A3
A4
A5
A6
A7B
A7
A7A
A8E
A8
A8A
A8C
A8D
A9
A10A
A10B
A11
A12
A14
A14B
A14C
A14A
A16
A17A
A17
A18
A19B
A18A
A19
A19A
A13
A21
A20
A23
A28A
A28B
A27
A29
A30

Liabilities	Solvency II value
Technical provisions – non-life	
Technical provisions – non-life (excluding health)	L1
TP calculated as a whole	L1A
Best Estimate	L2
Risk margin	L3
Technical provisions - health (similar to non-life)	L4
TP calculated as a whole	L4A
Best Estimate	L5
Risk margin	L6
Technical provisions - life (excluding index-linked and unit-linked)	
Technical provisions - health (similar to life)	L6B
TP calculated as a whole	L6C
Best Estimate	L6D
Risk margin	L6E
Technical provisions – life (excluding health and index-linked and unit-linked)	L7
TP calculated as a whole	L7A
Best Estimate	L8
Risk margin	L9
Technical provisions – index-linked and unit-linked	L10
TP calculated as a whole	L10A
Best Estimate	L11
Risk margin	L12
Other technical provisions	
Contingent liabilities	L23
Provisions other than technical provisions	L18
Pension benefit obligations	L22
Deposits from reinsurers	L13
Deferred tax liabilities	L17
Derivatives	L16
Debts owed to credit institutions	L19
Financial liabilities other than debts owed to credit institutions	L20
Insurance & intermediaries payables	L15A
Reinsurance payables	L15B
Payables (trade, not insurance)	L15C
Subordinated liabilities	L15E
Subordinated liabilities not in BOF	L15D
Subordinated liabilities in BOF	L26
Any other liabilities, not elsewhere shown	L25
Total liabilities	L25A
Excess of assets over liabilities	L27

Appendix I: Quantitative reporting templates
S.02.01.b
Balance sheet

Fund number

Assets

Goodwill
Deferred acquisition costs
Intangible assets
Deferred tax assets
Pension benefit surplus
Property, plant & equipment held for own use
Investments (other than assets held for index-linked and unit-linked funds)
Property (other than for own use)
Participations
Equities
Equities - listed
Equities - unlisted
Bonds
Government Bonds
Corporate Bonds
Structured notes
Collateralised securities
Investment funds
Derivatives
Deposits other than cash equivalents
Other investments
Assets held for index-linked and unit-linked funds
Loans & mortgages
Loans & mortgages to individuals
Other loans & mortgages
Loans on policies
Reinsurance recoverables from:
Non-life and health similar to non-life
Non-life excluding health
Health similar to non-life
Life and health similar to life, excluding health and index-linked and unit-linked
Health similar to life
Life excluding health and index-linked and unit-linked
Life index-linked and unit-linked
Deposits to cedants
Insurance & intermediaries receivables
Reinsurance receivables
Receivables (trade, not insurance)
Own shares
Amounts due in respect of own fund items or initial fund called up but not yet paid in
Cash and cash equivalents
Any other assets, not elsewhere shown
Total assets

A0	
Solvency II value	Statutory accounts value
	AS1
	AS24
A2	A2
A26	A26
A25B	A25B
A3	A3
A4	A4
A5	A5
A6	A6
A7B	A7B
A7	A7
A7A	A7A
A8E	A8E
A8	A8
A8A	A8A
A8C	A8C
A8D	A8D
A9	A9
A10A	A10A
A10B	A10B
A11	A11
A12	A12
A14	A14
A14B	
A14C	
A14A	A14A
A16	A16
A17A	A17A
A17	A17
A18	A18
A19B	A19B
A18A	A18A
A19	A19
A19A	A19A
A13	A13
A21	A21
A20	A20
A23	A23
A28A	A28A
A28B	A28B
A27	A27
A29	A29
A30	A30

Liabilities

Technical provisions – non-life
Technical provisions – non-life (excluding health)
TP calculated as a whole
Best Estimate
Risk margin
Technical provisions - health (similar to non-life)
TP calculated as a whole
Best Estimate
Risk margin
Technical provisions - life (excluding index-linked and unit-linked)
Technical provisions - health (similar to life)
TP calculated as a whole

Solvency II value	Statutory accounts value
	LS0
L1	L1
L1A	
L2	
L3	
L4	L4
L4A	
L5	
L6	
L6B	LS6F
L6C	L6B

Best Estimate	L6D	
Risk margin	L6E	
Technical provisions – life (excluding health and index-linked and unit-linked)		
TP calculated as a whole	L7	L7
Best Estimate	L7A	
Risk margin	L8	
	L9	
Technical provisions – index-linked and unit-linked	L10	L10
TP calculated as a whole	L10A	
Best Estimate	L11	
Risk margin	L12	
Other technical provisions		LS14
Contingent liabilities	L23	
Provisions other than technical provisions	L18	L18
Pension benefit obligations	L22	L22
Deposits from reinsurers	L13	L13
Deferred tax liabilities	L17	L17
Derivatives	L16	L16
Debts owed to credit institutions	L19	L19
Financial liabilities other than debts owed to credit institutions	L20	L20
Insurance & intermediaries payables	L15A	L15A
Reinsurance payables	L15B	L15B
Payables (trade, not insurance)	L15C	L15C
Subordinated liabilities	L15E	L15E
Subordinated liabilities not in BOF	L15D	L15D
Subordinated liabilities in BOF	L26	L26
Any other liabilities, not elsewhere shown	L25	L25
Total liabilities	L25A	L25A
Excess of assets over liabilities	L27	L27

Appendix I: Quantitative reporting templates

S.02.01.f

Balance sheet

Fund number

Assets

Goodwill	
Deferred acquisition costs	
Intangible assets	A2
Deferred tax assets	A26
Pension benefit surplus	A25B
Property, plant & equipment held for own use	A3
Investments (other than assets held for index-linked and unit-linked funds)	A4
Property (other than for own use)	A5
Participations	A6
Equities	A7B
Equities - listed	A7
Equities - unlisted	A7A
Bonds	A8E
Government Bonds	A8
Corporate Bonds	A8A
Structured notes	A8C
Collateralised securities	A8D
Investment funds	A9
Derivatives	A10A
Deposits other than cash equivalents	A10B
Other investments	A11
Assets held for index-linked and unit-linked funds	A12
Loans & mortgages	A14
Loans & mortgages to individuals	A14B
Other loans & mortgages	A14C
Loans on policies	A14A
Reinsurance recoverables from:	A16
Non-life and health similar to non-life	A17A
Non-life excluding health	A17
Health similar to non-life	A18
Life and health similar to life, excluding health and index-linked and unit-linked	A19B
Health similar to life	A18A
Life excluding health and index-linked and unit-linked	A19
Life index-linked and unit-linked	A19A
Deposits to cedants	A13
Insurance & intermediaries receivables	A21
Reinsurance receivables	A20
Receivables (trade, not insurance)	A23
Own shares	A28A
Amounts due in respect of own fund items or initial fund called up but not yet paid in	A28B
Cash and cash equivalents	A27
Any other assets, not elsewhere shown	A29
Total assets	A30

A0
Solvency II value
A2
A26
A25B
A3
A4
A5
A6
A7B
A7
A7A
A8E
A8
A8A
A8C
A8D
A9
A10A
A10B
A11
A12
A14
A14B
A14C
A14A
A16
A17A
A17
A18
A19B
A18A
A19
A19A
A13
A21
A20
A23
A28A
A28B
A27
A29
A30

Liabilities

Technical provisions – non-life	
Technical provisions – non-life (excluding health)	L1
TP calculated as a whole	L1A
Best Estimate	L2
Risk margin	L3
Technical provisions - health (similar to non-life)	L4
TP calculated as a whole	L4A
Best Estimate	L5
Risk margin	L6
Technical provisions - life (excluding index-linked and unit-linked)	
Technical provisions - health (similar to life)	L6B
TP calculated as a whole	L6C
Best Estimate	L6D
Risk margin	L6E
Technical provisions – life (excluding health and index-linked and unit-linked)	L7
TP calculated as a whole	L7A
Best Estimate	L8
Risk margin	L9
Technical provisions – index-linked and unit-linked	L10
TP calculated as a whole	L10A
Best Estimate	L11
Risk margin	L12
Other technical provisions	
Contingent liabilities	L23
Provisions other than technical provisions	L18
Pension benefit obligations	L22
Deposits from reinsurers	L13
Deferred tax liabilities	L17
Derivatives	L16
Debts owed to credit institutions	L19
Financial liabilities other than debts owed to credit institutions	L20
Insurance & intermediaries payables	L15A
Reinsurance payables	L15B
Payables (trade, not insurance)	L15C
Subordinated liabilities	L15E
Subordinated liabilities not in BOF	L15D
Subordinated liabilities in BOF	L26
Any other liabilities, not elsewhere shown	L25
Total liabilities	L25A
Excess of assets over liabilities	L27

Solvency II value
L1
L1A
L2
L3
L4
L4A
L5
L6
L6B
L6C
L6D
L6E
L7
L7A
L8
L9
L10
L10A
L11
L12
L23
L18
L22
L13
L17
L16
L19
L20
L15A
L15B
L15C
L15E
L15D
L26
L25
L25A
L27

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Balance sheet

Fund number

Assets

Goodwill
Deferred acquisition costs
Intangible assets
Deferred tax assets
Pension benefit surplus
Property, plant & equipment held for own use
Investments (other than assets held for index-linked and unit-linked funds)
Property (other than for own use)
Participations
Equities
Equities - listed
Equities - unlisted
Bonds
Government Bonds
Corporate Bonds
Structured notes
Collateralised securities
Investment funds
Derivatives
Deposits other than cash equivalents
Other investments
Assets held for index-linked and unit-linked funds
Loans & mortgages
Loans & mortgages to individuals
Other loans & mortgages
Loans on policies
Reinsurance recoverables from:
Non-life and health similar to non-life
Non-life excluding health
Health similar to non-life
Life and health similar to life, excluding health and index-linked and unit-linked
Health similar to life
Life excluding health and index-linked and unit-linked
Life index-linked and unit-linked
Deposits to cedants
Insurance & intermediaries receivables
Reinsurance receivables
Receivables (trade, not insurance)
Own shares
Amounts due in respect of own fund items or initial fund called up but not yet paid in
Cash and cash equivalents
Any other assets, not elsewhere shown
Total assets

A0	
Solvency II value	Statutory accounts value
	AS1
	AS24
A2	A2
A26	A26
A25B	A25B
A3	A3
A4	A4
A5	A5
A6	A6
A7B	A7B
A7	A7
A7A	A7A
A8E	A8E
A8	A8
A8A	A8A
A8C	A8C
A8D	A8D
A9	A9
A10A	A10A
A10B	A10B
A11	A11
A12	A12
A14	A14
A14B	
A14C	
A14A	A14A
A16	A16
A17A	A17A
A17	A17
A18	A18
A19B	A19B
A18A	A18A
A19	A19
A19A	A19A
A13	A13
A21	A21
A20	A20
A23	A23
A28A	A28A
A28B	A28B
A27	A27
A29	A29
A30	A30

Liabilities

Technical provisions – non-life
Technical provisions – non-life (excluding health)
TP calculated as a whole
Best Estimate
Risk margin
Technical provisions - health (similar to non-life)
TP calculated as a whole
Best Estimate
Risk margin
Technical provisions - life (excluding index-linked and unit-linked)
Technical provisions - health (similar to life)
TP calculated as a whole

Solvency II value	Statutory accounts value
	LS0
L1	L1
L1A	
L2	
L3	
L4	L4
L4A	
L5	
L6	
L6B	LS6F
L6C	L6B

Best Estimate	L6D	
Risk margin	L6E	
Technical provisions – life (excluding health and index-linked and unit-linked)		
TP calculated as a whole	L7	L7
Best Estimate	L7A	
Risk margin	L8	
	L9	
Technical provisions – index-linked and unit-linked	L10	L10
TP calculated as a whole	L10A	
Best Estimate	L11	
Risk margin	L12	
Other technical provisions		LS14
Contingent liabilities	L23	
Provisions other than technical provisions	L18	L18
Pension benefit obligations	L22	L22
Deposits from reinsurers	L13	L13
Deferred tax liabilities	L17	L17
Derivatives	L16	L16
Debts owed to credit institutions	L19	L19
Financial liabilities other than debts owed to credit institutions	L20	L20
Insurance & intermediaries payables	L15A	L15A
Reinsurance payables	L15B	L15B
Payables (trade, not insurance)	L15C	L15C
Subordinated liabilities	L15E	L15E
Subordinated liabilities not in BOF	L15D	L15D
Subordinated liabilities in BOF	L26	L26
Any other liabilities, not elsewhere shown	L25	L25
Total liabilities	L25A	L25A
Excess of assets over liabilities	L27	L27

Appendix I: Quantitative reporting templates

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Assets and liabilities by currency

Currency code

Assets

- Investments (other than assets held for index-linked and unit-linked funds)
- Other assets within scope of Assets-D1 (other than index-linked and unit-linked funds)
- Assets held for index-linked and unit-linked funds
- Reinsurance recoverables
- Deposits to cedants, insurance and intermediaries receivables and reinsurance receivables
- Any other assets
- Total assets

Liabilities

- Technical provisions (excluding index-linked and unit-linked funds)
- Technical provisions - index-linked and unit-linked funds
- Deposits from reinsurers and insurance, intermediaries and reinsurance payables
- Derivatives
- Financial liabilities
- Contingent liabilities
- Any other liabilities
- Total liabilities

Reporting currency	Currencies	Other	Total
A1	B1		

A3			
A4			
A5			
A5A			
A6			
A7			
A7A			

A8			
A9			
A10			
A11			
A12			
A13			
A14			
A15			

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 List of assets

Portfolio	Fund number	Asset held in unit linked and index linked funds (V/M)	ID Code	ID Code type	Asset pledged as collateral	Item Title	Issuer Name	Issuer Code	Type of code	Issuer Sector	Issuer Group	Issuer Group Code	Type of code	Issuer Country	Country of custody	Currency (ISO code)	CIC	Participation	External rating	Rating agency	Duration	Quantity	Unit SII price	Valuation method SII	Acquisition price	Total SII amount	Maturity date	Accrued interest
A1	A2	A3	A4	A5	A6	A7	A8	A31	A33	A9	A10	A32	A33	A11	A12	A13	A15	A16	A17	A18	A20	A22	A23	A24	A25	A26	A28	A30

Appendix I: Quantitative reporting templates
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List of assets

Portfolio	Fund number	Asset held in unit linked and index linked funds (Y/N)	ID Code	ID Code type	Asset pledged as collateral	Item Title	Issuer Name	Issuer Code	Type of code	Issuer Sector	Issuer Group	Issuer Group Code	Type of code	Issuer Country	Country of custody	Currency (ISO code)	CIC	Participation	External rating	Rating agency	Duration	Quantity	Unit SII price	Valuation method SII	Acquisition price	Total SII amount	Maturity date	Accrued interest
A1	A2	A3	A4	A5	A6	A7	A8	A31	A33	A9	A10	A32	A33	A11	A12	A13	A15	A16	A17	A18	A20	A22	A23	A24	A25	A26	A28	A30

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List of assets

Legal name of the undertaking	Portfolio	Fund number	Asset held in unit linked and index linked funds (Y/N)	ID Code	ID Code type	Asset pledged as collateral	Item Title	Issuer Name	Issuer Code	Type of code	Issuer Sector	Issuer Group	Issuer Group Code	Type of code	Issuer Country	Country of custody	Currency (ISO code)	CIC	Participation	External rating	Rating agency	Duration	Quantity	Unit SII price	Valuation method SII	Acquisition price	Total SII amount	Maturity date	Accrued interest
A50	A1	A2	A3	A4	A5	A6	A7	A8	A31	A33	A9	A10	A32	A33	A11	A12	A13	A15	A16	A17	A18	A20	A22	A23	A24	A25	A26	A28	A30

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List of assets

Legal name of the undertaking	Portfolio	Fund number	Asset held in unit linked and index linked funds (Y/N)	ID Code	ID Code type	Asset pledged as collateral	Item Title	Issuer Name	Issuer Code	Type of code	Issuer Sector	Issuer Group	Issuer Group Code	Type of code	Issuer Country	Country of custody	Currency (ISO code)	CIC	Participation	External rating	Rating agency	Duration	Quantity	Unit SII price	Valuation method SII	Acquisition price	Total SII amount	Maturity date	Accrued interest
A50	A1	A2	A3	A4	A5	A6	A7	A8	A31	A33	A9	A10	A32	A33	A11	A12	A13	A15	A16	A17	A18	A20	A22	A23	A24	A25	A26	A28	A30

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 Open derivatives

Portfolio	Fund number	Derivatives held in unit linked and index linked funds (Y/N)	ID Code	ID Code type	Counterparty Name	Counterparty Code	Type of code	External rating	Rating agency	Counterparty Group	Counterparty group Code	Type of code	Contract name	Asset or liability underlying the derivative	Currency (ISO code)	CIC	Use of derivative	Delta	Notional amount	Long or short position	Premium paid/received to date	Number of contracts	Contract dimension	Trigger value	Unwind trigger of contract	Maximum loss under unwinding event	Swap outflow amount	Swap inflow amount	Swap delivered currency	Swap received currency	Trade date	Maturity date	Duration	SI	Valuation method	SI
A1	A2	A3	A4	A5	A6	A36	A38	A34	A35	A7	A37	A38	A8	A9	A10	A11	A13	A14	A15	A16	A17	A19	A20	A21	A31	A32	A22	A23	A24	A25	A26	A27	A33	A28	A29	

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 S.08.01.b
 Open derivatives

Portfolio	Fund number	Derivatives held in unit linked and index linked funds (Y/N)	ID Code	ID Code type	Counterparty Name	Counterparty Code	Type of code	External rating	Rating agency	Counterparty Group	Counterparty group Code	Type of code	Contract name	Asset or liability underlying the derivative	Currency (ISO code)	CIC	Use of derivative	Delta	Notional amount	Long or short position	Premium paid/received to date	Number of contracts	Contract dimension	Trigger value	Unwind trigger of contract	Maximum loss under unwinding event	Swap outflow amount	Swap inflow amount	Swap delivered currency	Swap received currency	Trade date	Maturity date	Duration	SI value	Valuation method SI
A1	A2	A3	A4	A5	A6	A36	A38	A34	A35	A7	A37	A38	A8	A9	A10	A11	A13	A14	A15	A16	A17	A19	A20	A21	A31	A32	A22	A23	A24	A25	A26	A27	A33	A28	A29

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S.08.01.f
Open derivatives

Legal name of the undertaking	Portfolio	Fund number	Derivatives held in unit linked and index linked funds (Y/N)	ID Code	ID Code type	Counterparty Name	Counterparty Code	Type of code	External rating	Rating agency	Counterparty Group	Counterparty group Code	Type of code	Contract name	Asset or liability underlying the derivative	Currency (ISO code)	CIC	Use of derivative	Delta	Notional amount	Long or short position	Premium paid/received to date	Number of contracts	Contract dimension	Trigger value	Unwind trigger of contract	Maximum loss under unwinding event	Swap outflow amount	Swap inflow amount	Swap delivered currency	Swap received currency	Trade date	Maturity date	Duration	SII value	Valuation method SII
A50	A1	A2	A3	A4	A5	A6	A36	A38	A34	A35	A7	A37	A38	A8	A9	A10	A11	A13	A14	A15	A16	A17	A19	A20	A21	A31	A32	A22	A23	A24	A25	A26	A27	A33	A28	A29

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S.08.01.a
Open derivatives

Legal name of the undertaking	Portfolio	Fund number	Derivatives held in unit linked and index linked funds (Y/N)	ID Code	ID Code type	Counterparty Name	Counterparty Code	Type of code	External rating	Rating agency	Counterparty Group	Counterparty group Code	Type of code	Contract name	Asset or liability underlying the derivative	Currency (ISO code)	CIC	Use of derivative	Delta	Notional amount	Long or short position	Premium paid/received to date	Number of contracts	Contract dimension	Trigger value	Unwind trigger of contract	Maximum loss under unwinding event	Swap outflow amount	Swap inflow amount	Swap delivered currency	Swap received currency	Trade date	Maturity date	Duration	SII value	Valuation method SII
A50	A1	A2	A3	A4	A5	A6	A36	A38	A34	A35	A7	A37	A38	A8	A9	A10	A11	A13	A14	A15	A16	A17	A19	A20	A21	A31	A32	A22	A23	A24	A25	A26	A27	A33	A28	A29

Appendix I: Quantitative reporting templates
S.12.01.a
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 reinsurance			Total (Life other than health insurance, incl. Unit-Linked)	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 and guarantees	Contracts without options and guarantees	Contracts with options and guarantees		Of which WP (Insurance with profit participation on Accepted reinsurance (Gross))	Of which UL (Index-linked and unit-linked insurance on Accepted reinsurance (Gross))	Of which OL (Other life insurance on Accepted reinsurance (Gross))		Contracts without options and guarantees	Contracts with options and guarantees				
Technical provisions calculated as a whole (Replicable portfolio)	A1	A3	A5		A6	A7	A7A	A7B	A7C	A9	A10		A12	A13	A14
Technical provisions calculated as a sum of BE and RM (Non-Replicable portfolio)															
Best Estimate Gross	B1	B2	B3	B4	B5	B6	B7			B9	B10	B11	B12	B13	B14
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	C1	C2	C3	C4	C5	C6	C7			C9	C10	C11	C12	C13	C14
Risk Margin	E1	E2		E4		E5	E7			E9	E10		E12	E13	E14
Technical provisions - total	F1	F2		F4		F6	F7			F9	F10		F12	F13	F14

Appendix I: Quantitative reporting templates
S.12.01.b
Life and Health SLT Technical Provisions - Best Estimate by country

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 reinsurance			Total (Life other than health insurance, incl. Unit-Linked)	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 and guarantees	Contracts without options and guarantees	Contracts with options and guarantees		Of which WP (Insurance with profit participation on Accepted reinsurance (Gross))	Of which UL (Index-linked and unit-linked insurance on Accepted reinsurance (Gross))	Of which OL (Other life insurance on Accepted reinsurance (Gross))		Contracts without options and guarantees	Contracts with options and guarantees				
A1	A3		A5		A6	A7	A7A	A7B	A7C	A9	A10		A12	A13	A14
Technical provisions calculated as a whole (Replicable portfolio)															
Technical provisions calculated as a sum of BE and RM (Non-Replicable portfolio)															
Best Estimate															
Gross															
Total recoverables from reinsurance and SPV <u>before</u> the adjustment for expected losses due to counterparty default															
Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses															
Recoverables from SPV before adjustment for expected losses															
Recoverables from Finite Reinsurance before adjustment for expected losses															
Total Recoverables from reinsurance and SPV <u>after</u> the adjustment for expected losses due to counterparty default															
Best estimate minus recoverables from reinsurance and SPV - total															
Risk Margin															
Technical provisions - total															
Technical provisions minus recoverables from reinsurance and SPV - total															
Best Estimate of products with a surrender option															
ADDITIONAL INFORMATION															
Gross BE for different countries															
Home country															
For countries in the materiality threshold (one line for each country in the materiality threshold)															
For EEA countries outside the materiality threshold															
For non-EEA countries outside the materiality threshold															
Gross BE for Cash flow															
Cash out-flows															
Future guaranteed benefits															
Future discretionary benefits															
Future expenses and other cash out-flows															
Cash in-flows															
Future premiums															
Other cash in-flows															
Percentage of gross TP calculated using simplified methods															
Surrender value															
Additional information in case of use of discount rates other than risk free rates															

Appendix I: Quantitative reporting templates
S.17.01.a
Non-life Technical Provisions

Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Direct business and accepted proportional reinsurance								Accepted non-proportional reinsurance				Total Non-Life obligation
				Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	
A1	B1	C1	D1	E1	F1	G1	H1	I1	J1	K1	L1	M1	N1	O1	P1	Q1

Technical provisions calculated as a whole (REPL)

Technical provisions calculated as a sum of BE and RM (NON-REPL)

Best estimate

Premium provisions

Gross

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

Net Best Estimate of Premium Provisions

A5	B5	C5	D5	E5	F5	G5	H5	I5	J5	K5	L5	M5	N5	O5	P5	Q5
A12	B12	C12	D12	E12	F12	G12	H12	I12	J12	K12	L12	M12	N12	O12	P12	Q12
A13	B13	C13	D13	E13	F13	G13	H13	I13	J13	K13	L13	M13	N13	O13	P13	Q13

Claims provisions

Gross

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

Net Best Estimate of Claims Provisions

A14	B14	C14	D14	E14	F14	G14	H14	I14	J14	K14	L14	M14	N14	O14	P14	Q14
A21	B21	C21	D21	E21	F21	G21	H21	I21	J21	K21	L21	M21	N21	O21	P21	Q21
A22	B22	C22	D22	E22	F22	G22	H22	I22	J22	K22	L22	M22	N22	O22	P22	Q22

Total Best estimate - gross

Total Best estimate - net

A23	B23	C23	D23	E23	F23	G23	H23	I23	J23	K23	L23	M23	N23	O23	P23	Q23
A24	B24	C24	D24	E24	F24	G24	H24	I24	J24	K24	L24	M24	N24	O24	P24	Q24

Risk margin

A25	B25	C25	D25	E25	F25	G25	H25	I25	J25	K25	L25	M25	N25	O25	P25	Q25
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Technical provisions - total

Technical provisions - total

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

Technical provisions minus recoverables from reinsurance and SPV - total

A26	B26	C26	D26	E26	F26	G26	H26	I26	J26	K26	L26	M26	N26	O26	P26	Q26
A27	B27	C27	D27	E27	F27	G27	H27	I27	J27	K27	L27	M27	N27	O27	P27	Q27
A28	B28	C28	D28	E28	F28	G28	H28	I28	J28	K28	L28	M28	N28	O28	P28	Q28

Appendix I: Quantitative reporting templates
S.17.01.b
Non-life Technical Provisions - Best Estimate by country

	Direct business and accepted proportional reinsurance											Accepted non-proportional reinsurance				Total Non-Life obligation	
	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	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance		Non-proportional property reinsurance
Technical provisions calculated as a whole (REPL.)	A1	B1	C1	D1	E1	F1	G1	H1	I1	J1	K1	L1	M1	N1	O1	P1	Q1
Direct business	A2	B2	C2	D2	E2	F2	G2	H2	I2	J2	K2	L2					Q2
Accepted proportional reinsurance business	A3	B3	C3	D3	E3	F3	G3	H3	I3	J3	K3	L3					Q3
Accepted non-proportional reinsurance													M4	N4	O4	P4	Q4

Technical provisions calculated as a sum of BE and RM (NON-REPL.)

Best estimate

Premium provisions

	A5A	B5A	C5A	D5A	E5A	F5A	G5A	H5A	I5A	J5A	K5A	L5A	M5A	N5A	O5A	P5A	Q5A
Gross - Total	A5	B5	C5	D5	E5	F5	G5	H5	I5	J5	K5	L5					Q5
Gross - direct business	A6	B6	C6	D6	E6	F6	G6	H6	I6	J6	K6	L6					Q6
Gross - accepted proportional reinsurance business													M7	N7	O7	P7	Q7
Gross - accepted non-proportional reinsurance business																	Q8
Total recoverable from reinsurance/SPV before the adjustment for expected losses due to counterparty default	A8	B8	C8	D8	E8	F8	G8	H8	I8	J8	K8	L8	M8	N8	O8	P8	Q8
Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	A9	B9	C9	D9	E9	F9	G9	H9	I9	J9	K9	L9	M9	N9	O9	P9	Q9
Recoverables from SPV before adjustment for expected losses	A10	B10	C10	D10	E10	F10	G10	H10	I10	J10	K10	L10	M10	N10	O10	P10	Q10
Recoverables from Finite Reinsurance before adjustment for expected losses	A11	B11	C11	D11	E11	F11	G11	H11	I11	J11	K11	L11	M11	N11	O11	P11	Q11
Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default	A12	B12	C12	D12	E12	F12	G12	H12	I12	J12	K12	L12	M12	N12	O12	P12	Q12
Net Best Estimate of Premium Provisions	A13	B13	C13	D13	E13	F13	G13	H13	I13	J13	K13	L13	M13	N13	O13	P13	Q13

Claims provisions

	A14A	B14A	C14A	D14A	E14A	F14A	G14A	H14A	I14A	J14A	K14A	L14A	M14A	N14A	O14A	P14A	Q14A
Gross - Total	A14	B14	C14	D14	E14	F14	G14	H14	I14	J14	K14	L14					Q14
Gross - direct business	A15	B15	C15	D15	E15	F15	G15	H15	I15	J15	K15	L15					Q15
Gross - accepted proportional reinsurance business													M16	N16	O16	P16	Q16
Gross - accepted non-proportional reinsurance business																	Q17
Total recoverable from reinsurance/SPV before the adjustment for expected losses due to counterparty default	A17	B17	C17	D17	E17	F17	G17	H17	I17	J17	K17	L17	M17	N17	O17	P17	Q17
Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	A18	B18	C18	D18	E18	F18	G18	H18	I18	J18	K18	L18	M18	N18	O18	P18	Q18
Recoverables from SPV before adjustment for expected losses	A19	B19	C19	D19	E19	F19	G19	H19	I19	J19	K19	L19	M19	N19	O19	P19	Q19
Recoverables from Finite Reinsurance before adjustment for expected losses	A20	B20	C20	D20	E20	F20	G20	H20	I20	J20	K20	L20	M20	N20	O20	P20	Q20
Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default	A21	B21	C21	D21	E21	F21	G21	H21	I21	J21	K21	L21	M21	N21	O21	P21	Q21
Net Best Estimate of Claims Provisions	A22	B22	C22	D22	E22	F22	G22	H22	I22	J22	K22	L22	M22	N22	O22	P22	Q22
Total Best estimate - gross	A23	B23	C23	D23	E23	F23	G23	H23	I23	J23	K23	L23	M23	N23	O23	P23	Q23
Total Best estimate - net	A24	B24	C24	D24	E24	F24	G24	H24	I24	J24	K24	L24	M24	N24	O24	P24	Q24
Risk margin	A25	B25	C25	D25	E25	F25	G25	H25	I25	J25	K25	L25	M25	N25	O25	P25	Q25

Technical provisions - total

	A26	B26	C26	D26	E26	F26	G26	H26	I26	J26	K26	L26	M26	N26	O26	P26	Q26
Technical provisions - total	A26	B26	C26	D26	E26	F26	G26	H26	I26	J26	K26	L26	M26	N26	O26	P26	Q26
Recoverable from reinsurance contract/SPV after the adjustment for expected losses due to counterparty default - total	A27	B27	C27	D27	E27	F27	G27	H27	I27	J27	K27	L27	M27	N27	O27	P27	Q27
Technical provisions minus recoverables from reinsurance and SPV - total	A28	B28	C28	D28	E28	F28	G28	H28	I28	J28	K28	L28	M28	N28	O28	P28	Q28

ADDITIONAL INFORMATION:

Additional information in case of use of discount rates other than risk-free rates

	A29	B29	C29	D29	E29	F29	G29	H29	I29	J29	K29	L29	M29	N29	O29	P29	Q29
	A29	B29	C29	D29	E29	F29	G29	H29	I29	J29	K29	L29	M29	N29	O29	P29	Q29

Line of Business (LoB): further segmentation (Homogeneous Risk Groups - HRG)

a) Premium provisions

	A30	B30	C30	D30	E30	F30	G30	H30	I30	J30	K30	L30	M30	N30	O30	P30	Q30
further segmentation into homogeneous risk groups (Y/N)	A30	B30	C30	D30	E30	F30	G30	H30	I30	J30	K30	L30	M30	N30	O30	P30	Q30
If yes, specify total number of homogenous risk groups (HRGs)	A31	B31	C31	D31	E31	F31	G31	H31	I31	J31	K31	L31	M31	N31	O31	P31	Q31

b) Claims provisions

	A32	B32	C32	D32	E32	F32	G32	H32	I32	J32	K32	L32	M32	N32	O32	P32	Q32
further segmentation into homogeneous risk groups (Y/N)	A32	B32	C32	D32	E32	F32	G32	H32	I32	J32	K32	L32	M32	N32	O32	P32	Q32
If yes, specify total number of homogenous risk groups (HRGs)	A33	B33	C33	D33	E33	F33	G33	H33	I33	J33	K33	L33	M33	N33	O33	P33	Q33

Best estimate of Premium Provisions (Gross)

	A34	B34	C34	D34	E34	F34	G34	H34	I34	J34	K34	L34	M34	N34	O34	P34	Q34
Cash out-flows	A34	B34	C34	D34	E34	F34	G34	H34	I34	J34	K34	L34	M34	N34	O34	P34	Q34
Future benefits and claims	A35	B35	C35	D35	E35	F35	G35	H35	I35	J35	K35	L35	M35	N35	O35	P35	Q35
Future expenses and other cash-out flows	A36	B36	C36	D36	E36	F36	G36	H36	I36	J36	K36	L36	M36	N36	O36	P36	Q36
Cash in-flows	A37	B37	C37	D37	E37	F37	G37	H37	I37	J37	K37	L37	M37	N37	O37	P37	Q37
Future premiums																	
Other cash-in flows (incl. Recoverable from salvages and subrogations)																	

Best estimate of Claims Provisions (Gross)

	A38	B38	C38	D38	E38	F38	G38	H38	I38	J38	K38	L38	M38	N38	O38	P38	Q38
Cash out-flows	A38	B38	C38	D38	E38	F38	G38	H38	I38	J38	K38	L38	M38	N38	O38	P38	Q38
Future benefits and claims	A39	B39	C39	D39	E39	F39	G39	H39	I39	J39	K39	L39	M39	N39	O39	P39	Q39
Future expenses and other cash-out flows	A40	B40	C40	D40	E40	F40	G40	H40	I40	J40	K40	L40	M40	N40	O40	P40	Q40
Cash in-flows	A41	B41	C41	D41	E41	F41	G41	H41	I41	J41	K41	L41	M41	N41	O41	P41	Q41
Future premiums																	
Other cash-in flows (incl. Recoverable from salvages and subrogations)																	

Use of simplified methods and techniques to calculate technical provisions

Percentage of gross TP calculated using simplified methods

	A42	B42	C42	D42	E42	F42	G42	H42	I42	J42	K42	L42	M42	N42	O42	P42	Q42
	A42	B42	C42	D42	E42	F42	G42	H42	I42	J42	K42	L42	M42	N42	O42	P42	Q42

Gross Best estimate for different countries

Home country

	A43	B43	C43	D43	E43	F43	G43	H43	I43	J43	K43	L43	M43	N43	O43	P43	Q43
For countries in the materiality threshold [one line for each country in the materiality threshold]	A43	B43	C43	D43	E43	F43	G43	H43	I43	J43	K43	L43	M43	N43	O43	P43	Q43
For EEA countries outside the materiality threshold	A44	B44	C44	D44	E44	F44	G44	H44	I44	J44	K44	L44					Q44
For non-EEA countries outside the materiality threshold	A45	B45	C45	D45	E45	F45	G45	H45	I45	J45	K45	L45					Q45
	A46	B46	C46	D46	E46	F46	G46	H46	I46	J46	K46	L46					Q46

Appendix I: Quantitative reporting templates

S.23.01.a

Own funds

Basic own funds

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

Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
A1	B1		C1	
A2	B2		C2	
A3	B3		C3	
A4		B4	C4	D4
A6	B6			
A8		B8	C8	D8
A9		B9	C9	D9
A12	B12			
A13		B13	C13	D13
A15				D15
A16	B16	B16A	C16	D16

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

B502				
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Deductions not included in the reconciliation reserve

Deductions for participations in financial and credit institutions

A503	B503	C503	D503	
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Total basic own funds after adjustments

A20	B20	B20A	C20	D20
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Ancillary own funds

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

			Tier 2	Tier 3
A33			C33	
A34			C34	
A35			C35	D35
A36			C36	D36
A37			C37	
A38			C38	D38
A39			C39	
A40			C40	D40
A42			C42	D42
A43			C43	D43

Total available own funds to meet the SCR

A46	B46	C46	D46	E46
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Total available own funds to meet the MCR	A47	B47	C47	D47	
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Total eligible own funds to meet the SCR	A50	B50	C50	D50	E50
Total eligible own funds to meet the MCR	A51	B51	C51	D51	

SCR	A52
MCR	A53
Ratio of Eligible own funds to SCR	A54
Ratio of Eligible own funds to MCR	A55

Reconciliation reserve	
Excess of assets over liabilities	B23
Own shares (included as assets on the balance sheet)	B24
Forseeable dividends and distributions	B25
Other basic own fund items	B26
Restricted own fund items due to ring fencing	B27
Reconciliation reserve	B29

Expected profits included in future premiums (EPIFP) - Life business	A30
Expected profits included in future premiums (EPIFP) - Non- life business	A31
Total EPIFP	A32

Appendix I: Quantitative reporting templates
S.23.01.b
Own funds

Basic own funds

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

Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
A1	B1		C1	
A2	B2		C2	
A3	B3		C3	
A4		B4	C4	D4
A6	B6			
A8		B8	C8	D8
A9		B9	C9	D9
A12	B12			
A13		B13	C13	D13
A15				D15
A16	B16	B16A	C16	D16

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

B502				
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Deductions not included in the reconciliation reserve

Deductions for participations in financial and credit institutions

A503	B503	C503	D503	
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Total basic own funds after adjustments

A20	B20	B20A	C20	D20
-----	-----	------	-----	-----

Ancillary own funds

Unpaid and uncalled ordinary share capital callable on demand

Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand

Unpaid and uncalled preference shares callable on demand

A legally binding commitment to subscribe and pay for subordinated liabilities on demand

Letters of credit and guarantees under Article 96(2) of the Framework Directive

Letters of credit and guarantees other than under Article 96(2) of the Framework Directive

Supplementary members calls under Article 96(3) of the Framework Directive

Supplementary members calls - other than under Article 96(3) of the Framework Directive

Other ancillary own funds

Total ancillary own funds

			Tier 2	Tier 3
A33			C33	
A34			C34	
A35			C35	D35
A36			C36	D36
A37			C37	
A38			C38	D38
A39			C39	
A40			C40	D40
A42			C42	D42
A43			C43	D43

Total available own funds to meet the SCR

Total available own funds to meet the MCR

A46	B46	C46	D46	E46
A47	B47	C47	D47	

Total eligible own funds to meet the SCR	A50	B50	C50	D50	E50
Total eligible own funds to meet the MCR	A51	B51	C51	D51	

SCR	A52
MCR	A53
Ratio of Eligible own funds to SCR	A54
Ratio of Eligible own funds to MCR	A55

Reconciliation reserve

Excess of assets over liabilities	B23
Own shares (included as assets on the balance sheet)	B24
Forseeable dividends and distributions	B25
Other basic own fund items	B26
Restricted own fund items due to ring fencing	B27
Reconciliation reserve	B29

Expected profits included in future premiums (EPIFP) - Life business	A30
Expected profits included in future premiums (EPIFP) - Non- life business	A31
Total EPIFP	A32

Ordinary share capital

	Total	Tier 1	Tier 2	Tier 3
Paid in	A56	B56		
Called up but not yet paid in	A57		C57	
Own shares held	A58	B58		
Total ordinary share capital	A59	B59	C59	

The initial fund members' contributions or the equivalent basic own - fund item for mutual and mutual - type undertakings

	Total	Tier 1	Tier 2	Tier 3
Paid in	A67	B67		
Called up but not yet paid in	A68		C68	
Total initial fund	A69	B69	C69	

Subordinated mutual members accounts (MMA)

	Total	Tier 1	Of which counted under transitionals	Tier 2	Of which counted under transitionals	Tier 3
Dated subordinated MMA	A73	B73	C73	D73	E73	F73
Undated subordinated MMA with a call option	A74	B74	C74	D74	E74	F74
Undated subordinated MMA with no contractual opportunity to redeem	A75	B75	C75	D75	E75	F75
Total subordinated MMA	A76	B76	C76	D76	E76	F76

Preference shares

	Total	Tier 1	Of which counted under transitionals	Tier 2	Of which counted under transitionals	Tier 3
Dated preference shares	A79	B79	C79	D79	E79	F79
Undated preference shares with a call option	A80	B80	C80	D80	E80	F80
Undated preference shares with no contractual opportunity to redeem	A81	B81	C81	D81	E81	F81
Total preference shares	A82	B82	C82	D82	E82	F82

Subordinated liabilities

	Total	Tier 1	Of which counted under transitionals	Tier 2	Of which counted under transitionals	Tier 3
Dated subordinated liabilities	A92	B92	C92	D92	E92	F92
Undated subordinated liabilities with a contractual opportunity to redeem	A93	B93	C93	D93	E93	F93
Undated subordinated liabilities with no contractual opportunity to redeem	A94	B94	C94	D94	E94	F94
Total subordinated liabilities	A95	B95	C95	D95	E95	F95

Ancillary own funds

	Tier 2		Tier 3	
	Initial amounts approved	Current amounts	Initial amounts approved	Current amounts
Items for which an amount was approved	A108	B108	C108	D108
Items for which a method was approved		B109		D109

Excess of assets over liabilities - attribution of valuation differences

References to BS-C1, refer to the balance sheet template

	S2 Value - Statutory accounts	Explanation
Difference in the valuation of assets	Q1	
Difference in the valuation of technical provisions	Q2	
Difference in the valuation of other liabilities	Q3	
Total of reserves and retained earnings from financial statements	Q4	
<i>Other, please explain why you need to use this line.</i>	Q5	
Reserves from financial statements adjusted for Solvency II valuation differences	Q6	
Excess of assets over liabilities attributable to basic own fund items (excluding the reconciliation reserve)	Q7	
Excess of assets over liabilities	Q8	

Appendix I: Quantitative reporting templates

S.23.01.f

Own funds

Basic own funds

Ordinary share capital (gross of own shares)
 Non-available called but not paid in ordinary share capital at group level
 Share premium account related to ordinary share capital
 Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings
 Subordinated mutual member accounts
 Non-available subordinated mutual member accounts at group level
 Surplus funds
 Non-available surplus funds at group level
 Preference shares
 Non-available preference shares at group level
 Share premium account related to preference shares
 Non-available share premium account related to preference shares at group level
 Reconciliation reserve (group)
 Subordinated liabilities
 Non-available subordinated liabilities at group level
 An amount equal to the value of net deferred tax assets
 The amount equal to the value of net deferred tax assets not available at the group level
 Other items approved by supervisory authority as basic own funds not specified above
 Non-available own funds related to non-EEA entities, due to local restrictions: regulatory or otherwise, at group level
 Minority interests (if not reported as part of another own fund item)
 Non-available minority interests at group level

Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
A1	B1		C1	
A1A			C1A	
A2	B2		C2	
A3	B3		C3	
A4		B4	C4	D4
A5		B5	C5	D5
A6	B6			
A7	B7			
A8		B8	C8	D8
A10		B10	C10	D10
A9		B9	C9	D9
A11		B11	C11	D11
A12A	B12A			
A13		B13	C13	D13
A14		B14	C14	D14
A15				D15
A15A				D15A
A16	B16	B16A	C16	D16
A17	B17	B17A	C17	D17
A18	B18	B18A	C18	D18
A19	B19	B19A	C19	D19

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

B502

Deductions not included in the reconciliation reserve

Deductions for participations related credit institutions, investment firms and financial institutions (Level I Article 228)
 Deductions for participations where there is non-availability of information (Article 229)
 Deduction for participations included by using D&A when a combination of methods is used
 Total of non-available own fund items
 Total deductions

A603	B603	C603	D603	
A604	B604	C604	D604	E604
A605	B605	C605	D605	E605
A606	B606	C606	D606	E606
A607	B607	C607	D607	E607

Total basic own funds after adjustments (group)

A21	B21	B21A	C21	D21
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Ancillary own funds

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

A33			C33	
A34			C34	
A35			C35	D35
A36			C36	D36
A37			C37	
A38			C38	D38
A39			C39	
A40			C40	D40
A41			C41	D41
A42			C42	D42
A44			C44	D44

Investment firms and financial institutions	A45				
Institutions for occupational retirement provision	A45A				
Non regulated entities carrying out financial activities	A45B				
Total own funds of other financial sectors	A45C				
Own funds aggregated when using the D&A and combination of method - Net	A45D	B45D	C45D	D45D	E45D
Own funds aggregated when using the D&A and a combination of method net of IGT	A45E	B45E	C45E	D45E	E45E
Total available own funds to meet the SCR (group) (excluding other financial sector's own funds)	A48	B48	C48	D48	E48
Total available own funds to meet the minimum group SCR (group)	A49	B49	C49	D49	
Total eligible own funds to meet the SCR	A50A	B50A	C50A	D50A	E50A
Total-eligible own funds to meet the minimum group SCR (group)	A51A	B51A	C51A	D51A	
Consolidated Group SCR	A52A				
Minimum consolidated Group SCR (Article 230)	A53A				
Ratio of Eligible own funds to SCR (excluding other financial sectors)	A54A				
Ratio of Eligible own funds to Minimum Group SCR	A55A				
SCR for entities included with D&A method	A53B				
Ratio of Eligible own funds to SCR including other financial sectors' own funds and capital requirements	A56B				
Reconciliation reserve					
Excess of assets over liabilities	B23				
Own shares (included as assets on the balance sheet)	B24				
Forseeable dividends and distributions	B25				
Other basic own fund items	B26				
Adjustment for restricted own fund items in respect of ring fenced funds	B27				
Other non available own funds	B28				
Reconciliation reserve (total group)	B29A				
Expected profits included in future premiums (EPIFP) - Life business	A30				
Expected profits included in future premiums (EPIFP) - Non- life business	A31				
Total EPIFP	A32				

Appendix I: Quantitative reporting templates

S.23.01.g

Own funds

Basic own funds

Ordinary share capital (gross of own shares)
 Non-available called but not paid in ordinary share capital at group level
 Share premium account related to ordinary share capital
 Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings
 Subordinated mutual member accounts
 Non-available subordinated mutual member accounts at group level
 Surplus funds
 Non-available surplus funds at group level
 Preference shares
 Non-available preference shares at group level
 Share premium account related to preference shares
 Non-available share premium account related to preference shares at group level
 Reconciliation reserve (group)
 Subordinated liabilities
 Non-available subordinated liabilities at group level
 An amount equal to the value of net deferred tax assets
 The amount equal to the value of net deferred tax assets not available at the group level
 Other items approved by supervisory authority as basic own funds not specified above
 Non-available own funds related to non-EEA entities, due to local restrictions: regulatory or otherwise, at group level
 Minority interests (if not reported as part of another own fund item)
 Non-available minority interests at group level

Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
A1	B1		C1	
A1A			C1A	
A2	B2		C2	
A3	B3		C3	
A4		B4	C4	D4
A5		B5	C5	D5
A6	B6			
A7	B7			
A8		B8	C8	D8
A10		B10	C10	D10
A9		B9	C9	D9
A11		B11	C11	D11
A12A	B12A			
A13		B13	C13	D13
A14		B14	C14	D14
A15				D15
A15A				D15A
A16	B16	B16A	C16	D16
A17	B17	B17A	C17	D17
A18	B18	B18A	C18	D18
A19	B19	B19A	C19	D19

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

B502

Deductions not included in the reconciliation reserve

Deductions for participations related credit institutions, investment firms and financial institutions (Level I Article 228)
 Deductions for participations where there is non-availability of information (Article 229)
 Deduction for participations included by using D&A when a combination of methods is used
 Total of non-available own fund items
 Total deductions

A603	B603	C603	D603	
A604	B604	C604	D604	E604
A605	B605	C605	D605	E605
A606	B606	C606	D606	E606
A607	B607	C607	D607	E607

Total basic own funds after adjustments (group)

A21	B21	B21A	C21	D21
-----	-----	------	-----	-----

Ancillary own funds

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

A33			C33	
A34			C34	
A35			C35	D35
A36			C36	D36
A37			C37	
A38			C38	D38
A39			C39	
A40			C40	D40
A41			C41	D41
A42			C42	D42
A44			C44	D44

Investment firms and financial institutions
 Institutions for occupational retirement provision
 Non regulated entities carrying out financial activities
 Total own funds of other financial sectors

A45				
A45A				
A45B				
A45C				

Own funds aggregated when using the D&A and combination of method - Net
 Own funds aggregated when using the D&A and a combination of method net of IGT

A45D	B45D	C45D	D45D	E45D
A45E	B45E	C45E	D45E	E45E

Total available own funds to meet the SCR (group) (excluding other financial sector's own funds)
Total available own funds to meet the minimum group SCR (group)

A48	B48	C48	D48	E48
A49	B49	C49	D49	

Total eligible own funds to meet the SCR
Total-eligible own funds to meet the minimum group SCR (group)

A50A	B50A	C50A	D50A	E50A
A51A	B51A	C51A	D51A	

Consolidated Group SCR
Minimum consolidated Group SCR (Article 230)
Ratio of Eligible own funds to SCR (excluding other financial sectors)

A52A
A53A
A54A
A55A
A53B

Ratio of Eligible own funds to Minimum Group SCR
SCR for entities included with D&A method

Ratio of Eligible own funds to SCR including other financial sectors' own funds and capital requirements

A55B

Reconciliation reserve

Excess of assets over liabilities
 Own shares (included as assets on the balance sheet)
 Forseeable dividends and distributions
 Other basic own fund items
 Adjustment for restricted own fund items in respect of ring fenced funds
 Other non available own funds

B23
B24
B25
B26
B27
B28
B29A

Reconciliation reserve (total group)

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

A30
A31
A32

Total EPIFP

Ordinary share capital

Paid in

 Called up but not yet paid in
 Own shares held
Total ordinary share capital

Total	Tier 1	Tier 2	Tier 3
A56	B56		
A57		C57	
A58	B58		
A59	B59	C59	

The initial fund members' contributions or the equivalent basic own - fund item for mutual and mutual - type undertakings

Paid in
 Called up but not yet paid in
Total initial fund

Total	Tier 1	Tier 2	Tier 3
A67	B67		
A68		C68	
A69	B69	C69	

Subordinated mutual members accounts (MMA)

Dated subordinated MMA
 Undated subordinated MMA with a call option
 Undated subordinated MMA with no contractual opportunity to redeem
 Total subordinated MMA

Total	Tier 1	Of which counted under transitionals	Tier 2	Of which counted under transitionals	Tier 3
A73	B73	C73	D73	E73	F73
A74	B74	C74	D74	E74	F74
A75	B75	C75	D75	E75	F75
A76	B76	C76	D76	E76	F76

Preference shares

Dated preference shares
 Undated preference shares with a call option
 Undated preference shares with no contractual opportunity to redeem

Total	Tier 1	Of which counted under transitionals	Tier 2	Of which counted under transitionals	Tier 3
A79	B79	C79	D79	E79	F79
A80	B80	C80	D80	E80	F80
A81	B81	C81	D81	E81	F81

Total preference shares

A82	B82	C82	D82	E82	F82
-----	-----	-----	-----	-----	-----

Subordinated liabilities

Dated subordinated liabilities
 Undated subordinated liabilities with a contractual opportunity to redeem
 Undated subordinated liabilities with no contractual opportunity to redeem
 Total subordinated liabilities

	Total	Tier 1	Of which counted under transitionals	Tier 2	Of which counted under transitionals	Tier 3
Dated subordinated liabilities	A92	B92	C92	D92	E92	F92
Undated subordinated liabilities with a contractual opportunity to redeem	A93	B93	C93	D93	E93	F93
Undated subordinated liabilities with no contractual opportunity to redeem	A94	B94	C94	D94	E94	F94
Total subordinated liabilities	A95	B95	C95	D95	E95	F95

Ancillary own funds

Items for which an amount was approved
 Items for which a method was approved

	Tier 2		Tier 3	
	Initial amounts approved	Current amounts	Initial amounts approved	Current amounts
Items for which an amount was approved	A108	B108	C108	D108
Items for which a method was approved		B109		D109

Excess of assets over liabilities - attribution of valuation differences

References to BS-C1, refer to the balance sheet remplate

Difference in the valuation of assets

S2 Value - Statutory accounts

Q1

Difference in the valuation of technical provisions

Q2

Difference in the valuation of other liabilities

Q3

Total of reserves and retained earnings from financial statements

Q4

Other, please explain why you need to use this line.

	Explanation
Q5	

Appendix I: Quantitative reporting templates

S.25.01.b

Solvency Capital Requirement - for undertakings on Standard Formula or Partial Internal Models

Article 112? (Y/N)	A001
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Solvency Capital Requirement calculated using standard formula

	Net solvency capital requirement (including the loss-absorbing capacity of technical provisions)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions)	Elements of the risks covered by partial internal model (Y/N)
Market risk	A1	B1	AA01
Counterparty default risk	A2	B2	AA02
Life underwriting risk	A3	B3	AA03
Health underwriting risk	A4	B4	AA04
Non-life underwriting risk	A5	B5	AA05
Diversification	A6	B6	
Intangible asset risk	A7	B7	AA07
Basic Solvency Capital Requirement	A10	B10	
Operational risk	A13		AA013
Loss-absorbing capacity of technical provisions	A11		
Loss-absorbing capacity of deferred taxes	A12		
Diversification between ring fenced funds and between ring fenced funds and remaining part	A14A		

Net Solvency Capital Requirements calculated using standard formula

A14C

Remaining part of the Solvency Capital Requirement calculated using partial internal model

Net solvency capital requirement (including the loss absorbing capacity of technical provisions and/or deferred taxes when applicable)	A8
Diversification (between Standard Formula and Partial Internal Model components)	A9
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional)	A17

Solvency capital requirement (excluding capital add-on)

Capital add-ons already set	A18
Solvency capital requirement	A19
	A20

For information only:

Total amount of Notional Solvency Capital Requirements for ring fenced funds (other than those related to business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional))	A14B
Total amount of Notional Solvency Capital Requirements for remaining part	A14

Gross future discretionary benefits	A11A
Net future discretionary benefits	A11B

Appendix I: Quantitative reporting templates

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Solvency Capital Requirement - for undertakings on Standard Formula or Partial Internal Models

Ring fenced fund? (Y/N))	A30
Fund number	A0

Solvency Capital Requirement calculated using standard formula

	Net solvency capital requirement (including the loss-absorbing capacity of technical provisions)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions)	Elements of the risks covered by partial internal model (Y/N)
Market risk	A1	B1	AA01
Counterparty default risk	A2	B2	AA02
Life underwriting risk	A3	B3	AA03
Health underwriting risk	A4	B4	AA04
Non-life underwriting risk	A5	B5	AA05
Diversification	A6	B6	
Intangible asset risk	A7	B7	AA07
Basic Solvency Capital Requirement	A10	B10	
Operational risk	A13		AA013
Loss-absorbing capacity of technical provisions	A11		
Loss-absorbing capacity of deferred taxes	A12		
Individual Notional Solvency Capital Requirement for the ring fenced fund/remaining part	A31		

Appendix I: Quantitative reporting templates

S.25.01.g

Solvency Capital Requirement - for undertakings on Standard Formula or Partial Internal Models

Article 112? (Y/N)	A001		
Solvency Capital Requirement calculated using standard formula			
	Net solvency capital requirement (including the loss-absorbing capacity of technical provisions)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions)	Elements of the risks covered by partial internal model (Y/N)
Market risk	A1	B1	AA01
Counterparty default risk	A2	B2	AA02
Life underwriting risk	A3	B3	AA03
Health underwriting risk	A4	B4	AA04
Non-life underwriting risk	A5	B5	AA05
Diversification	A6	B6	
Intangible asset risk	A7	B7	AA07
Basic Solvency Capital Requirement	A10	B10	
Operational risk	A13		AA013
Loss-absorbing capacity of technical provisions	A11		
Loss-absorbing capacity of deferred taxes	A12		
Diversification between ring fenced funds and between ring fenced funds and remaining part	A14A		
Net Solvency Capital Requirements calculated using standard formula	A14C		
Remaining part of the Solvency Capital Requirement calculated using partial internal model			
Net solvency capital requirement (including the loss absorbing capacity of technical provisions and/or deferred taxes when applicable)	A8		
Diversification (between Standard Formula and Partial Internal Model components)	A9		
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional)	A17		
For groups only			
Capital requirements of other financial sectors (Non-insurance capital requirements) (groups only):	A15		
Credit institution & investment firms and financial institutions	A15A		
Institutions for occupational retirement provision	A15B		
Non regulated entities carrying out financial activities	A15C		
Non-controlled participation requirements (groups only)	A16		
Solvency capital requirement (excluding capital add-on)	A18		
Capital add-ons already set	A19		
Solvency capital requirement	A20		
Minimum consolidated group solvency capital requirement (groups only)	A21		
For information only:			
Total amount of Notional Solvency Capital Requirements for ring fenced funds (other than those related to business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional))	A14B		
Total amount of Notional Solvency Capital Requirements for remaining part	A14		
Gross future discretionary benefits	A11A		
Net future discretionary benefits	A11B		

Appendix I: Quantitative reporting templates

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Solvency Capital Requirement - for undertakings on Standard Formula or Partial Internal Models

Ring fenced fund? (Y/N))

A30

Fund number

A0

Solvency Capital Requirement calculated using standard formula

	Net solvency capital requirement (including the loss-absorbing capacity of technical provisions)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions)	Elements of the risks covered by partial internal model (Y/N)
Market risk	A1	B1	AA01
Counterparty default risk	A2	B2	AA02
Life underwriting risk	A3	B3	AA03
Health underwriting risk	A4	B4	AA04
Non-life underwriting risk	A5	B5	AA05
Diversification	A6	B6	
Intangible asset risk	A7	B7	AA07
Basic Solvency Capital Requirement	A10	B10	
Operational risk	A13		AA013
Loss-absorbing capacity of technical provisions	A11		
Loss-absorbing capacity of deferred taxes	A12		
Individual Notional Solvency Capital Requirement for the ring fenced fund/remaining part	A31		

Appendix I: Quantitative reporting templates
S.25.02.b

Solvency Capital Requirement - for undertakings on Partial Internal Models

Components in descending order of size	Unique number of component	Modelling approach to calculation of loss absorbing capacity of technical provisions	Modelling approach to calculation of loss absorbing capacity of deferred taxes	Net solvency capital requirement (including the loss absorbing capacity of technical provisions and/or deferred taxes when applicable)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions and/or deferred taxes when applicable)
A1	A1A	A1B	A1C	B1	C1
Total undiversified components				B2	C2
Diversification				B3	C3
Solvency capital requirement calculated using partial internal model including/excluding adjustments for loss absorbing capacity of technical provisions and/or deferred taxes,if modelled within components				B4	C4
Loss-absorbing capacity of technical provisions if not modelled within components				B5	
Loss absorbing capacity for deferred taxes if not modelled within components				B6	
Solvency capital requirement calculated using partial internal model				B7	
For information only:					
Estimate of loss-absorbing capacity of technical provisions if modelled within components				C5	
Estimate of loss-absorbing capacity of deferred tax if modelled within components				C6	
Total amount of Notional Solvency Capital Requirements for ring fenced funds-(other than those related to business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional))				B8	
Total amount of Notional Solvency Capital Requirements for remaining part				B8AA	
Diversification between ring fenced funds and between ring fenced funds and remaining part				B8A	
Gross future discretionary benefits				A11A	
Net future discretionary benefits				A11B	
Date of formal approval of partial internal model				B9	

Appendix I: Quantitative reporting templates
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Solvency Capital Requirement - for undertakings on Partial Internal Models

Components in descending order of size	Unique number of component	Modelling approach to calculation of loss absorbing capacity of technical provisions	Modelling approach to calculation of loss absorbing capacity of deferred taxes	Net solvency capital requirement (including the loss absorbing capacity of technical provisions and/or deferred taxes when applicable)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions and/or deferred taxes when applicable)
A1	A1A	A1B	A1C	B1	C1
Total undiversified components				B2	C2
Diversification				B3	C3
Solvency capital requirement calculated using partial internal model including/excluding adjustments for loss absorbing capacity of technical provisions and/or deferred taxes,if modelled within components				B4	C4
Loss-absorbing capacity of technical provisions if not modelled within components				B5	
Loss absorbing capacity for deferred taxes if not modelled within components				B6	
Solvency capital requirement calculated using partial internal model				B7	
For information only:					
Estimate of loss-absorbing capacity of technical provisions if modelled within components				C5	
Estimate of loss-absorbing capacity of deferred tax if modelled within components				C6	
Total amount of Notional Solvency Capital Requirements for ring fenced funds-(other than those related to business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional)				B8	
Total amount of Notional Solvency Capital Requirements for remaining part				B8AA	
Diversification between ring fenced funds and between ring fenced funds and remaining part				B8A	
Gross future discretionary benefits				A11A	
Net future discretionary benefits				A11B	
Date of formal approval of partial internal model				B9	

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Solvency Capital Requirement - for undertakings on Full Internal Models

Components in descending order of size	Unique number of component	Modelling approach to calculation of loss absorbing capacity of technical provisions	Modelling approach to calculation of loss absorbing capacity of deferred taxes	Net solvency capital requirement (including the loss absorbing capacity of technical provisions and/or deferred taxes when applicable)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions and/or deferred taxes when applicable)
		A1B	A1C	B1 B2	C1 C2
Total undiversified components	A1	A1A	A1C	B1 B2	C1 C2
Diversification				B3	C3
Solvency capital requirement calculated using full internal model including/excluding adjustments for loss absorbing capacity of technical provisions and /or deferred taxes-if modelled within components				B4	C4
Loss-absorbing capacity of technical provisions if not modelled within components				B5	
Loss absorbing capacity for deferred taxes if not modelled within components				B6	
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional)				B9	
Solvency capital requirement calculated using full internal model, excluding capital add - on				B10	
Capital add-ons				B11	
Solvency capital requirement calculated using full internal model				B12	
For information only: Estimate of loss-absorbing capacity of technical provisions if modelled within components				C5	
Estimate of loss-absorbing capacity of deferred tax if modelled within components				C6	
Total amount of Notional Solvency Capital Requirements for ring fenced funds (other than those related to business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional)				B14	
Total amount of Notional Solvency Capital Requirements for remaining part				B14AA	
Diversification between ring fenced funds and between ring fenced funds and remaining part				B14A	
Gross future discretionary benefits				A11A	
Net future discretionary benefits				A11B	
Date of formal approval of internal model				B15	

Appendix I: Quantitative reporting templates
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Solvency Capital Requirement - for undertakings on Full Internal Models

Components in descending order of size	Unique number of component	Modelling approach to calculation of loss absorbing capacity of technical provisions	Modelling approach to calculation of loss absorbing capacity of deferred taxes	Net solvency capital requirement (including the loss absorbing capacity of technical provisions and/or deferred taxes when applicable)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions and/or deferred taxes when applicable)
		A1	A1A	A1B	A1C
Total undiversified components				B2	C2
Diversification				B3	C3
Solvency capital requirement calculated using full internal model including/excluding adjustments for loss absorbing capacity of technical provisions and /or deferred taxes-if modelled within components				B4	C4
Loss-absorbing capacity of technical provisions if not modelled within components				B5	
Loss absorbing capacity for deferred taxes if not modelled within components				B6	
Capital requirements of other financial sectors (Non-insurance capital requirements) (groups only):				B7	
Credit institution & investment firms and financial institutions				B7A	
Institutions for occupational retirement provision				B7B	
Non regulated entities carrying out financial activities				B7C	
Non-controlled participations requirements (groups only):				B8	
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional)				B9	
Solvency capital requirement calculated using full internal model, excluding capital add - on				B10	
Capital add-ons				B11	
Solvency capital requirement calculated using full internal model				B12	
Minimum consolidated group solvency capital requirement (groups only)				B13	
For information only: Estimate of loss-absorbing capacity of technical provisions if modelled within components				C5	
Estimate of loss-absorbing capacity of deferred tax if modelled within components				C6	
Total amount of Notional Solvency Capital Requirements for ring fenced funds (other than those related to business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional))				B14	
Total amount of Notional Solvency Capital Requirements for remaining part				B14AA	
Diversification between ring fenced funds and between ring fenced funds and remaining part				B14A	
Gross future discretionary benefits				A11A	
Net future discretionary benefits				A11B	
Date of formal approval of internal model				B15	

Appendix I: Quantitative reporting templates
S.26.01.b
Solvency Capital Requirement - Market risk

Simplifications - spread risk - bonds and loans ? (Y/N)
 Captives simplifications - interest rate risk ?(Y/N)
 Captives simplifications - spread risk ?(Y/N)
 Captives simplifications - market concentration risk ?(Y/N)

Simplifications used
AA0
AA01
AA02
AA03

Market risk - basic information

	Initial absolute values before shock		Absolute values after shock				
	Assets	Liabilities	Assets	Liabilities (including the loss absorbing capacity of technical provisions)	Net solvency capital requirement (including the loss-absorbing capacity of technical provisions)	Liabilities (excluding the loss-absorbing capacity of technical provisions)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions)
Interest rate risk					C0		D0
<i>interest rate down shock</i>	A1	A1A	B1	B1A	C1	B1B	D1
<i>interest rate up shock</i>	A2	A2A	B2	B2A	C2	B2B	D2
Equity risk					C3		D3
type 1 equities	A4	A4A	B4	B4A	C4	B4B	D4
type 1 equity	A5		B5				
strategic participations (type 1 equities)	A6		B6				
duration-based (type 1 equities)	A7		B7				
type 2 equities	A8	A8A	B8	B8A	C8	B8B	D8
type 2 equity	A9		B9				
strategic participations (type 2 equities)	A10		B10				
duration-based (type 2 equities)	A11		B11				
Property risk	A12	A12A	B12	B12A	C12	B12B	D12
Spread risk					C13		D13
bonds and loans	A14	A14A	B14	B14A	C14	B14B	D14
credit derivatives					C15		D15
downward shock on credit derivatives	A16	A16A	B16	B16A	C16	B16B	D16
upward shock on credit derivatives	A17	A17A	B17	B17A	C17	B17B	D17
tradable securities or other financial instruments based on repackaged loans	A18	A18A	B18	B18A	C18	B18B	D18
Market risk concentrations	A19	A19A			C19		D19
Currency risk	A20	A20A			C20		D20
Counter-cyclical premium risk	A21	A21A	B21	B21A	C21	B21B	D21
Diversification within market risk module					C22		D22
Total capital requirement for market risk					C23		D23

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Solvency Capital Requirement - Market risk

Simplifications - spread risk - bonds and loans ? (Y/N)
 Captives simplifications - interest rate risk ?(Y/N)
 Captives simplifications -spread risk ?(Y/N)
 Captives simplifications - market concentration risk ?(Y/N)

Ring fenced fund? (Y/N)
 Fund number

Simplifications used

AA0
AA01
AA02
AA03
A30
A0

Market risk - basic information

	Initial absolute values before shock		Absolute values after shock				
	Assets	Liabilities	Assets	Liabilities (including the loss absorbing capacity of technical provisions)	Net solvency capital requirement (including the loss-absorbing capacity of technical provisions)	Liabilities (excluding the loss-absorbing capacity of technical provisions)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions)
Interest rate risk					C0		D0
<i>interest rate down shock</i>	A1	A1A	B1	B1A	C1	B1B	D1
<i>interest rate up shock</i>	A2	A2A	B2	B2A	C2	B2B	D2
Equity risk					C3		D3
type 1 equities	A4	A4A	B4	B4A	C4	B4B	D4
type 1 equity	A5		B5				
strategic participations (type 1 equities)	A6		B6				
duration-based (type 1 equities)	A7		B7				
type 2 equities	A8	A8A	B8	B8A	C8	B8B	D8
type 2 equity	A9		B9				
strategic participations (type 2 equities)	A10		B10				
duration-based (type 2 equities)	A11		B11				
Property risk	A12	A12A	B12	B12A	C12	B12B	D12
Spread risk					C13		D13
bonds and loans	A14	A14A	B14	B14A	C14	B14B	D14
credit derivatives					C15		D15
downward shock on credit derivatives	A16	A16A	B16	B16A	C16	B16B	D16
upward shock on credit derivatives	A17	A17A	B17	B17A	C17	B17B	D17
tradable securities or other financial instruments based on repackaged loans	A18	A18A	B18	B18A	C18	B18B	D18
Market risk concentrations	A19	A19A			C19		D19
Currency risk	A20	A20A			C20		D20
Counter-cyclical premium risk	A21	A21A	B21	B21A	C21	B21B	D21
Diversification within market risk module					C22		D22
Total capital requirement for market risk					C23		D23

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Solvency Capital Requirement - Market risk

Simplifications - spread risk - bonds and loans ? (Y/N)
 Captives simplifications - interest rate risk ?(Y/N)
 Captives simplifications -spread risk ?(Y/N)
 Captives simplifications - market concentration risk ?(Y/N)

Simplifications used

A00
AA01
AA02
AA03

Market risk - basic information

Interest rate risk
interest rate down shock

interest rate up shock

Equity risk

type 1 equities

type 1 equity

strategic participations (type 1 equities)

duration-based (type 1 equities)

type 2 equities

type 2 equity

strategic participations (type 2 equities)

duration-based (type 2 equities)

Property risk

Spread risk

bonds and loans

credit derivatives

downward shock on credit derivatives

upward shock on credit derivatives

tradable securities or other financial instruments

based on repackaged loans

Market risk concentrations

Currency risk

Counter-cyclical premium risk

Diversification within market risk module

Total capital requirement for market risk

Initial absolute values before		Absolute values after shock				
Assets	Liabilities	Assets	Liabilities (including the loss absorbing capacity of technical provisions)	Net solvency capital requirement (including the loss-absorbing capacity of technical provisions)	Liabilities (excluding the loss-absorbing capacity of technical provisions)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions)
				C0		D0
A1	A1A	B1	B1A	C1	B1B	D1
A2	A2A	B2	B2A	C2	B2B	D2
				C3		D3
A4	A4A	B4	B4A	C4	B4B	D4
A5		B5				
A6		B6				
A7		B7				
A8	A8A	B8	B8A	C8	B8B	D8
A9		B9				
A10		B10				
A11		B11				
A12	A12A	B12	B12A	C12	B12B	D12
				C13		D13
A14	A14A	B14	B14A	C14	B14B	D14
				C15		D15
A16	A16A	B16	B16A	C16	B16B	D16
A17	A17A	B17	B17A	C17	B17B	D17
A18	A18A	B18	B18A	C18	B18B	D18
A19	A19A			C19		D19
A20	A20A			C20		D20
A21	A21A	B21	B21A	C21	B21B	D21
				C22		D22
				C23		D23

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Solvency Capital Requirement - Market risk

Simplifications - spread risk - bonds and loans ? (Y/N)
 Captives simplifications - interest rate risk ?(Y/N)
 Captives simplifications -spread risk ?(Y/N)
 Captives simplifications - market concentration risk ?(Y/N)
 Ring fenced fund? (Y/N)
 Fund number

Simplifications used	
A00	
AA01	
AA02	
AA03	
A30	
A0	

Market risk - basic information

	Initial absolute values before shock		Absolute values after shock				
	Assets	Liabilities	Assets	Liabilities (including the loss absorbing capacity of technical provisions)	Net solvency capital requirement (including the loss-absorbing capacity of technical provisions)	Liabilities (excluding the loss-absorbing capacity of technical provisions)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions)
Interest rate risk					C0		D0
<i>interest rate down shock</i>	A1	A1A	B1	B1A	C1	B1B	D1
<i>interest rate up shock</i>	A2	A2A	B2	B2A	C2	B2B	D2
Equity risk					C3		D3
type 1 equities	A4	A4A	B4	B4A	C4	B4B	D4
type 1 equity	A5		B5				
strategic participations (type 1 equities)	A6		B6				
duration-based (type 1 equities)	A7		B7				
type 2 equities	A8	A8A	B8	B8A	C8	B8B	D8
type 2 equity	A9		B9				
strategic participations (type 2 equities)	A10		B10				
duration-based (type 2 equities)	A11		B11				
Property risk	A12	A12A	B12	B12A	C12	B12B	D12
Spread risk					C13		D13
bonds and loans	A14	A14A	B14	B14A	C14	B14B	D14
credit derivatives					C15		D15
downward shock on credit derivatives	A16	A16A	B16	B16A	C16	B16B	D16
upward shock on credit derivatives	A17	A17A	B17	B17A	C17	B17B	D17
tradable securities or other financial instruments based on repackaged loans	A18	A18A	B18	B18A	C18	B18B	D18
Market risk concentrations	A19	A19A			C19		D19
Currency risk	A20	A20A			C20		D20
Counter-cyclical premium risk	A21	A21A	B21	B21A	C21	B21B	D21
Diversification within market risk module					C22		D22
Total capital requirement for market risk					C23		D23

Appendix I: Quantitative reporting templates
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Solvency Capital Requirement - Counterparty default risk

Simplifications? (Y/N)
 Captives simplifications? (Y/N)

Simplifications used
A00
A001

Counterparty default risk - basic information

Type 1 exposures

- Single name exposure 1
- Single name exposure 2
- Single name exposure 3
- Single name exposure 4
- Single name exposure 5
- Single name exposure 6
- Single name exposure 7
- Single name exposure 8
- Single name exposure 9
- Single name exposure 10

- Type 2 exposures**
 Receivables from Intermediaries due for more than 3 months
 All type 2 exposures other than receivables from Intermediaries due for more than 3 months

Diversification within counterparty default risk module

Total capital requirement for counterparty default risk

Name of single name exposure	Code of single name exposure	Type of code	Loss Given Default	Probability of Default	Net solvency capital requirement (including the loss-absorbing capacity of technical provisions)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions)
						C0
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
						C1
			A2			
			A3			
						C3
					D4	C4

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Solvency Capital Requirement - Counterparty default risk

Simplifications used

Simplifications? (Y/N)
 Captives simplifications? (Y/N)
 Ring fenced fund? (Y/N)
 Fund number

A00
A001
A30
A0

Counterparty default risk - basic information

Type 1 exposures

Single name exposure 1
 Single name exposure 2
 Single name exposure 3
 Single name exposure 4
 Single name exposure 5
 Single name exposure 6
 Single name exposure 7
 Single name exposure 8
 Single name exposure 9
 Single name exposure 10

Type 2 exposures

Receivables from Intermediaries due for more than 3 months
 All type 2 exposures other than receivables from Intermediaries due for more than 3 months

Diversification within counterparty default risk module

Total capital requirement for counterparty default risk

Name of single name exposure	Code of single name exposure	Type of code	Loss Given Default	Probability of Default	Net solvency capital requirement (including the loss-absorbing capacity of technical provisions)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions)
						C0
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
						C1
			A2			
			A3			
						C3
					D4	C4

Appendix I: Quantitative reporting templates
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Solvency Capital Requirement - Counterparty default risk

Simplifications? (Y/N)
 Captives simplifications? (Y/N)

Simplifications used	
A00	
A001	

Counterparty default risk - basic information

Type 1 exposures

- Single name exposure 1
- Single name exposure 2
- Single name exposure 3
- Single name exposure 4
- Single name exposure 5
- Single name exposure 6
- Single name exposure 7
- Single name exposure 8
- Single name exposure 9
- Single name exposure 10

Type 2 exposures

Receivables from Intermediaries due for more than 3 months
 All type 2 exposures other than receivables from Intermediaries due for more than 3 months

Diversification within counterparty default risk module

Total capital requirement for counterparty default risk

Name of single name exposure	Code of single name exposure	Type of code	Loss Given Default	Probability of Default	Net solvency capital requirement (including the loss-absorbing capacity of technical provisions)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions)
						C0
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
						C1
			A2			
			A3			
						C3
					D4	C4

Appendix I: Quantitative reporting templates
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Solvency Capital Requirement - Counterparty default risk

Simplifications used

Simifications? (Y/N)
 Captives simifications? (Y/N)
 Ring fenced fund? (Y/N)
 Fund number

A00
A001
A30
A0

Counterparty default risk - basic information

Type 1 exposures

Single name exposure 1
 Single name exposure 2
 Single name exposure 3
 Single name exposure 4
 Single name exposure 5
 Single name exposure 6
 Single name exposure 7
 Single name exposure 8
 Single name exposure 9
 Single name exposure 10

Type 2 exposures

Receivables from Intermediaries due for more than 3 months
 All type 2 exposures other than receivables from Intermediaries due for more than 3 months

Diversification within counterparty default risk module

Total capital requirement for counterparty default risk

Name of single name exposure	Code of single name exposure	Type of code	Loss Given Default	Probability of Default	Net solvency capital requirement (including the loss-absorbing capacity of technical provisions)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions)
						C0
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
A10	AA10	AB10	A1	B1		
						C1
			A2			
			A3			
						C3
					D4	C4

Appendix I: Quantitative reporting templates
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Solvency Capital Requirement - Life underwriting risk

	Simplifications used
Simplifications - mortality risk ? (Y/N)	A01
Simplifications- longevity risk? (Y/N)	A02
Simplifications - disability-morbidity risk? (Y/N)	A03
Simplifications - lapse risk? (Y/N)	A04
Simplifications - life expense risk ? (Y/N)	A05
Simplifications - life catastrophe risk? (Y/N)	A06
Captives simplifications (Y/N)	A001

Life underwriting risk - basic information

	Initial absolute values before shock		Absolute values after shock				
	Assets	Liabilities	Assets	Liabilities (including the loss absorbing capacity of technical provisions)	Net solvency capital requirement (including the loss-absorbing capacity of technical provisions)	Liabilities (excluding the loss-absorbing capacity of technical provisions)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions)
Mortality risk	A1	A1A	B1	B1A	C1	B1B	D1
Longevity risk	A2	A2A	B2	B2A	C2	B2B	D2
Disability-morbidity risk	A3	A3A	B3	B3A	C3	B3B	D3
Lapse risk					C04		D04
<i>risk of increase in lapse rates</i>	A4	A4A	B4	B4A	C4	B4B	D4
<i>risk of decrease in lapse rates</i>	A5	A5A	B5	B5A	C5	B5B	D5
<i>mass lapse risk</i>	A6	A6A	B6	B6A	C6	B6B	D6
Life expense risk	A7	A7A	B7	B7A	C7	B7B	D7
Revision risk	A8	A8A	B8	B8A	C8	B8B	D8
Life catastrophe risk	A9	A9A	B9	B9A	C9	B9B	D9
Diversification within life underwriting risk module					C10		D10
Total capital requirement for life underwriting risk					C11		D11
Further details on revision risk		USP					
Factor applied for the revision shock		A12					

Appendix I: Quantitative reporting templates
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Solvency Capital Requirement - Life underwriting risk

	Simplifications used
Simplifications - mortality risk? (Y/N)	A01
Simplifications- longevity risk? (Y/N)	A02
Simplifications - disability-morbidity risk? (Y/N)	A03
Simplifications - lapse risk? (Y/N)	A04
Simplifications - life expense risk? (Y/N)	A05
Simplifications - life catastrophe risk? (Y/N)	A06
Captives simplifications (Y/N)	A001
Ring fenced fund? (Y/N)	A30
Fund number	A0

Life underwriting risk - basic information

	Initial absolute values before shock		Absolute values after shock				
	Assets	Liabilities	Assets	Liabilities (including the loss absorbing capacity of technical provisions)	Net solvency capital requirement (including the loss-absorbing capacity of technical provisions)	Liabilities (excluding the loss-absorbing capacity of technical provisions)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions)
Mortality risk	A1	A1A	B1	B1A	C1	B1B	D1
Longevity risk	A2	A2A	B2	B2A	C2	B2B	D2
Disability-morbidity risk	A3	A3A	B3	B3A	C3	B3B	D3
Lapse risk					C04		D04
<i>risk of increase in lapse rates</i>	A4	A4A	B4	B4A	C4	B4B	D4
<i>risk of decrease in lapse rates</i>	A5	A5A	B5	B5A	C5	B5B	D5
<i>mass lapse risk</i>	A6	A6A	B6	B6A	C6	B6B	D6
Life expense risk	A7	A7A	B7	B7A	C7	B7B	D7
Revision risk	A8	A8A	B8	B8A	C8	B8B	D8
Life catastrophe risk	A9	A9A	B9	B9A	C9	B9B	D9
Diversification within life underwriting risk module					C10		D10
Total capital requirement for life underwriting risk					C11		D11
Further details on revision risk		USP					
Factor applied for the revision shock		A12					

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Solvency Capital Requirement - Life underwriting risk

Life underwriting risk - basic information	Initial absolute values before shock		Absolute values after shock				
	Assets	Liabilities	Assets	Liabilities (including the loss absorbing capacity of technical provisions)	Net solvency capital requirement (including the loss-absorbing capacity of technical provisions)	Liabilities (excluding the loss-absorbing capacity of technical provisions)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions)
Mortality risk	A1	A1A	B1	B1A	C1	B1B	D1
Longevity risk	A2	A2A	B2	B2A	C2	B2B	D2
Disability-morbidity risk	A3	A3A	B3	B3A	C3	B3B	D3
Lapse risk					C04		D04
<i>risk of increase in lapse rates</i>	A4	A4A	B4	B4A	C4	B4B	D4
<i>risk of decrease in lapse rates</i>	A5	A5A	B5	B5A	C5	B5B	D5
<i>mass lapse risk</i>	A6	A6A	B6	B6A	C6	B6B	D6
Life expense risk	A7	A7A	B7	B7A	C7	B7B	D7
Revision risk	A8	A8A	B8	B8A	C8	B8B	D8
Life catastrophe risk	A9	A9A	B9	B9A	C9	B9B	D9
Diversification within life underwriting risk module					C10		D10
Total capital requirement for life underwriting risk					C11		D11
Further details on revision risk		USP					
Factor applied for the revision shock		A12					

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Solvency Capital Requirement - Life underwriting risk

	Simplifications used
Simplifications - mortality risk ? (Y/N)	A01
Simplifications- longevity risk? (Y/N)	A02
Simplifications - disability-morbidity risk? (Y/N)	A03
Simplifications - lapse risk? (Y/N)	A04
Simplifications - life expense risk ? (Y/N)	A05
Simplifications - life catastrophe risk? (Y/N)	A06
Captives simplifications (Y/N)	A001
Ring fenced fund? (Y/N)	A30
Fund number	A0

Life underwriting risk - basic information

	Initial absolute values before shock		Absolute values after shock				
	Assets	Liabilities	Assets	Liabilities (including the loss absorbing capacity of technical provisions)	Net solvency capital requirement (including the loss-absorbing capacity of technical provisions)	Liabilities (excluding the loss-absorbing capacity of technical provisions)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions)
Mortality risk	A1	A1A	B1	B1A	C1	B1B	D1
Longevity risk	A2	A2A	B2	B2A	C2	B2B	D2
Disability-morbidity risk	A3	A3A	B3	B3A	C3	B3B	D3
Lapse risk					C04		D04
<i>risk of increase in lapse rates</i>	A4	A4A	B4	B4A	C4	B4B	D4
<i>risk of decrease in lapse rates</i>	A5	A5A	B5	B5A	C5	B5B	D5
<i>mass lapse risk</i>	A6	A6A	B6	B6A	C6	B6B	D6
Life expense risk	A7	A7A	B7	B7A	C7	B7B	D7
Revision risk	A8	A8A	B8	B8A	C8	B8B	D8
Life catastrophe risk	A9	A9A	B9	B9A	C9	B9B	D9
Diversification within life underwriting risk module					C10		D10
Total capital requirement for life underwriting risk					C11		D11
Further details on revision risk		USP					
Factor applied for the revision shock		A12					

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Solvency Capital Requirement - Health underwriting risk

Simplifications -health mortality risk ? (Y/N)
Simplifications- health longevity risk? (Y/N)
Simplifications - health disability-morbidity risk? (Y/N)
Simplifications -SLT lapse risk? (Y/N)
Simplifications -health expense risk ? (Y/N)
Captives simplifications (Y/N)

Simplifications used

A01
A02
A03
A04
A05
A001

SLT health underwriting risk - basic information

Initial absolute values before shock		Absolute values after shock				
Assets	Liabilities	Assets	Liabilities (including the loss absorbing capacity of technical provisions)	Net solvency capital requirement (including the loss-absorbing capacity of technical provisions)	Liabilities (excluding the loss-absorbing capacity of technical provisions)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions)
A1	A1A	B1	B1A	C1	B1B	D1
A2	A2A	B2	B2A	C2	B2B	D2
A3	A3A	B3	B3A	C3	B3B	D3
A4	A4A	B4	B4A	C4	B4B	D4
A5	A5A	B5	B5A	C5	B5B	D5
A6	A6A	B6	B6A	C6	B6B	D6
A7	A7A	B7	B7A	C7	B7B	D7
A8	A8A	B8	B8A	C8	B8B	D8
Diversification within SLT health underwriting risk				C9		D9
Total capital requirement for SLT health underwriting risk				C10		D10

Further details on revision risk
Factor applied for the revision shock

USP
A11

NSLT Health premium and reserve risk - basic information

Standard deviation for premium risk		Standard deviation for reserve risk	Volume measure for premium and reserve risk			
USP Standard Deviation	USP Adjustment factor for non-proportional reinsurance	USP	V _{prem}	V _{res}	Geographical Diversification	V
A12	A12A	B12	C12	D12	E12	F12
A13	A13A	B13	C13	D13	E13	F13
A14	A14A	B14	C14	D14	E14	F14
A15	A15A	B15	C15	D15	E15	F15
Total Volume measure						F16
Combined standard deviation						
A16						
Total NSLT health premium and reserve risk						
A17						

Medical expenses insurance and proportional reinsurance
Income protection insurance and proportional reinsurance
Worker's compensation insurance and proportional reinsurance
Non-proportional health reinsurance

Combined standard deviation

Total NSLT health premium and reserve risk

Initial absolute values before shock		Absolute values after shock		
Assets	Liabilities	Assets	Liabilities (excluding the loss absorbing capacity of technical provisions)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions)

NSLT health lapse risk

A18	A18A	B18	B18B	D18
Diversification within NSLT health underwriting risk				D19
Total NSLT health underwriting risk				D20

Health catastrophe risk - basic information

Net capital requirement (including the loss-absorbing capacity of technical provisions)	Gross capital requirement (excluding the loss-absorbing capacity of technical provisions)
B21	A21
B22	A22
B23	A23
Diversification within health catastrophe risk	
B24	A24
Total capital requirement for health catastrophe risk	
B25	A25
Diversification within health underwriting risk module	
B26	A26
Total capital requirement for health underwriting risk	
B27	A27

Mass accident risk
Accident concentration risk
Pandemic risk

Diversification within health catastrophe risk

Total capital requirement for health catastrophe risk

Diversification within health underwriting risk module

Total capital requirement for health underwriting risk

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Solvency Capital Requirement - Health underwriting risk

Simplifications used

Simplifications - health mortality risk? (Y/N)
Simplifications - health longevity risk? (Y/N)
Simplifications - health disability-morbidity risk? (Y/N)
Simplifications - SLT lapse risk? (Y/N)
Simplifications - health expense risk? (Y/N)
Captives simplifications (Y/N)

A01
A02
A03
A04
A05
A001

Ring fenced fund? (Y/N)
Fund number

A30
A0

SLT health underwriting risk - basic information

Initial absolute values before shock		Absolute values after shock				
Assets	Liabilities	Assets	Liabilities (including the loss absorbing capacity of technical provisions)	Net solvency capital requirement (including the loss-absorbing capacity of technical provisions)	Liabilities (excluding the loss-absorbing capacity of technical provisions)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions)
A1	A1A	B1	B1A	C1	B1B	D1
A2	A2A	B2	B2A	C2	B2B	D2
A3	A3A	B3	B3A	C3	B3B	D3
A4	A4A	B4	B4A	C4	B4B	D4
A5	A5A	B5	B5A	C5	B5B	D5
A6	A6A	B6	B6A	C6	B6B	D6
A7	A7A	B7	B7A	C7	B7B	D7
A8	A8A	B8	B8A	C8	B8B	D8
Diversification within SLT health underwriting risk				C9		D9
Total capital requirement for SLT health underwriting risk				C10		D10

Further details on revision risk
Factor applied for the revision shock

USP
A11

NSLT Health premium and reserve risk - basic information

Standard deviation for premium risk		Standard deviation for reserve risk	Volume measure for premium and reserve risk			
USP Standard Deviation	USP Adjustment factor for non-proportional reinsurance	USP	V _{prem}	V _{res}	Geographical Diversification	V
A12	A12A	B12	C12	D12	E12	F12
A13	A13A	B13	C13	D13	E13	F13
A14	A14A	B14	C14	D14	E14	F14
A15	A15A	B15	C15	D15	E15	F15
Total Volume measure						F16
Combined standard deviation						
A16						
A17						

Total NSLT health premium and reserve risk

NSLT health lapse risk

Initial absolute values before shock		Absolute values after shock		
Assets	Liabilities	Assets	Liabilities (excluding the loss absorbing capacity of technical provisions)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions)
A18	A18A	B18	B18B	D18
Diversification within NSLT health underwriting risk				
D19				
Total NSLT health underwriting risk				
D20				

Health catastrophe risk - basic information

Net capital requirement (including the loss-absorbing capacity of technical provisions)
Gross capital requirement (excluding the loss-absorbing capacity of technical provisions)

Mass accident risk
Accident concentration risk
Pandemic risk

B21	A21
B22	A22
B23	A23

Diversification within health catastrophe risk

B24	A24
-----	-----

Total capital requirement for health catastrophe risk

B25	A25
-----	-----

Diversification within health underwriting risk module

B26	A26
-----	-----

Total capital requirement for health underwriting risk

B27	A27
-----	-----

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Solvency Capital Requirement - Health underwriting risk

Simplifications -health mortality risk ? (Y/N)
Simplifications- health longevity risk? (Y/N)
Simplifications - health disability-morbidity risk? (Y/N)
Simplifications -SLT lapse risk? (Y/N)
Simplifications -health expense risk ? (Y/N)
Captives simplifications (Y/N)

Simplifications used

A01
A02
A03
A04
A05
A001

SLT health underwriting risk - basic information

Health mortality risk

Health longevity risk

Health disability-morbidity risk

SLT health lapse risk

risk of increase in lapse rates
risk of decrease in lapse rates
mass lapse risk

Health expense risk

Health revision risk

Diversification within SLT health underwriting risk

Total capital requirement for SLT health underwriting risk

Initial absolute values before		Absolute values after shock				
Assets	Liabilities	Assets	Liabilities (including the loss absorbing capacity of technical provisions)	Net solvency capital requirement (including the loss-absorbing capacity of technical provisions)	Liabilities (excluding the loss-absorbing capacity of technical provisions)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions)
A1	A1A	B1	B1A	C1	B1B	D1
A2	A2A	B2	B2A	C2	B2B	D2
A3	A3A	B3	B3A	C3	B3B	D3
A4	A4A	B4	B4A	C4	B4B	D4
A5	A5A	B5	B5A	C5	B5B	D5
A6	A6A	B6	B6A	C6	B6B	D6
A7	A7A	B7	B7A	C7	B7B	D7
A8	A8A	B8	B8A	C8	B8B	D8
				C9	B9B	D9
				C10	B10B	D10

Further details on revision risk

Factor applied for the revision shock

USP
A11

NSLT Health premium and reserve risk - basic information

Medical expenses insurance and proportional reinsurance
Income protection insurance and proportional reinsurance
Worker's compensation insurance and proportional reinsurance
Non-proportional health reinsurance

Combined standard deviation

Total NSLT health premium and reserve risk

Standard deviation for premium risk		Standard deviation for reserve risk	Volume measure for premium and reserve risk			
USP Standard Deviation	USP Adjustment factor for non-proportional reinsurance	USP	V _{prem}	V _{res}	Geographical Diversification	V
A12	A12A	B12	C12	D12	E12	F12
A13	A13A	B13	C13	D13	E13	F13
A14	A14A	B14	C14	D14	E14	F14
A15	A15A	B15	C15	D15	E15	F15
Total Volume measure						F16
A16						
A17						

NSLT health lapse risk

Diversification within NSLT health underwriting risk

Total NSLT health underwriting risk

Initial absolute values before			Absolute values after shock	
Assets	Liabilities	Assets	Liabilities (excluding the loss absorbing capacity of technical provisions)	Gross solvency capital requirement (excluding the loss absorbing capacity of technical provisions)
A18	A18A	B18	B18B	D18
D19				
D20				

Health catastrophe risk - basic information

Mass accident risk
Accident concentration risk
Pandemic risk

Diversification within health catastrophe risk

Total capital requirement for health catastrophe risk

Diversification within health underwriting risk module

Total capital requirement for health underwriting risk

Net capital requirement (including the loss-absorbing capacity of technical provisions)	Gross capital requirement (excluding the loss-absorbing capacity of technical provisions)
B21	A21
B22	A22
B23	A23
B24	
A24	
B25	
A25	
B26	
A26	
B27	
A27	

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Solvency Capital Requirement - Health underwriting risk

Simplifications -health mortality risk ? (Y/N)
 Simplifications- health longevity risk? (Y/N)
 Simplifications - health disability-morbidity risk? (Y/N)
 Simplifications -SLT lapse risk? (Y/N)
 Simplifications -health expense risk ? (Y/N)
 Captives simplifications (Y/N)

Ring fenced fund? (Y/N)
 Fund number

Simplifications used

A01
A02
A03
A04
A05
A001
A30
A0

SLT health underwriting risk - basic information

	Initial absolute values before shock		Absolute values after shock				
	Assets	Liabilities	Assets	Liabilities (including the loss absorbing capacity of technical provisions)	Net solvency capital requirement (including the loss-absorbing capacity of technical provisions)	Liabilities (excluding the loss-absorbing capacity of technical provisions)	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions)
Health mortality risk	A1	A1A	B1	B1A	C1	B1B	D1
Health longevity risk	A2	A2A	B2	B2A	C2	B2B	D2
Health disability-morbidity risk	A3	A3A	B3	B3A	C3	B3B	D3
SLT health lapse risk					C04		D04
<i>risk of increase in lapse rates</i>	A4	A4A	B4	B4A	C4	B4B	D4
<i>risk of decrease in lapse rates</i>	A5	A5A	B5	B5A	C5	B5B	D5
<i>mass lapse risk</i>	A6	A6A	B6	B6A	C6	B6B	D6
Health expense risk	A7	A7A	B7	B7A	C7	B7B	D7
Health revision risk	A8	A8A	B8	B8A	C8	B8B	D8
Diversification within SLT health underwriting risk					C9		D9
Total capital requirement for SLT health underwriting risk					C10		D10

Further details on revision risk

Factor applied for the revision shock

USP
A11

NSLT Health premium and reserve risk - basic information

Medical expenses insurance and proportional reinsurance
 Income protection insurance and proportional reinsurance
 Worker's compensation insurance and proportional reinsurance
 Non-proportional health reinsurance

Standard deviation for premium risk		Standard deviation for reserve risk	Volume measure for premium and reserve risk			
USP Standard Deviation	USP Adjustment factor for non-proportional reinsurance	USP	V _{prem}	V _{res}	Geographical Diversification	V
A12	A12A	B12	C12	D12	E12	F12
A13	A13A	B13	C13	D13	E13	F13
A14	A14A	B14	C14	D14	E14	F14
A15	A15A	B15	C15	D15	E15	F15
Total Volume measure						F16

Combined standard deviation

A16

Total NSLT health premium and reserve risk

A17

NSLT health lapse risk

Diversification within NSLT health underwriting risk

	Initial absolute values before shock		Absolute values after shock	
	Assets	Liabilities	Assets	Liabilities (excluding the loss absorbing capacity of technical provisions)
NSLT health lapse risk	A18	A18A	B18	B18B
Diversification within NSLT health underwriting risk				D19
Total NSLT health underwriting risk				D20

Health catastrophe risk - basic information

Mass accident risk
 Accident concentration risk
 Pandemic risk

Diversification within health catastrophe risk

	Net capital requirement (including the loss-absorbing capacity of technical provisions)	Gross capital requirement (excluding the loss-absorbing capacity of technical provisions)
Mass accident risk	B21	A21
Accident concentration risk	B22	A22
Pandemic risk	B23	A23
Diversification within health catastrophe risk	B24	A24
Total capital requirement for health catastrophe risk	B25	A25
Diversification within health underwriting risk module	B26	A26
Total capital requirement for health underwriting risk	B27	A27

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Solvency Capital Requirement - Non-life underwriting risk

Captives simplifications - premium and reserve risk (Y/N)

Simplifications used
A001

Non-life underwriting risk

Premium and reserve Risk - Basic information

- Motor vehicle liability
- Motor, other classes
- Marine, aviation, transport (MAT)
- Fire and other property damage
- Third-party liability
- Credit and suretyship
- Legal expenses
- Assistance
- Miscellaneous
- Non-proportional reinsurance - property
- Non-proportional reinsurance - casualty
- Non-proportional reinsurance - MAT

Standard deviation for premium risk		Standard deviation for reserve risk	Volume measure for premium and reserve risk			
USP Standard Deviation	USP Adjustment factor for non-	USP	V _{prem}	V _{res}	Geographical Diversification	V
A1	A1A	B1	C1	D1	E1	F1
A2	A2A	B2	C2	D2	E2	F2
A3	A3A	B3	C3	D3	E3	F3
A4	A4A	B4	C4	D4	E4	F4
A5	A5A	B5	C5	D5	E5	F5
A6	A6A	B6	C6	D6	E6	F6
A7	A7A	B7	C7	D7	E7	F7
A8	A8A	B8	C8	D8	E8	F8
A9	A9A	B9	C9	D9	E9	F9
A10	A10A	B10	C10	D10	E10	F10
A11	A11A	B11	C11	D11	E11	F11
A12	A12A	B12	C12	D12	E12	F12
Total Volume measure						F13

Combined standard deviation

A13

Total capital requirement for non-life premium and reserve risk

A14

Non-Life lapse risk

Initial absolute values before		Absolute values after shock		
Assets	Liabilities	Assets	Liabilities	Solvency capital

Non-life lapse risk

A15 A15A B15 B15A C15

Capital requirement for non-life catastrophe risk

A16

Diversification within non - life underwriting risk module

A17

risk

A18

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Solvency Capital Requirement - Non-life underwriting risk

Simplifications used

Captives simplifications - premium and reserve risk (Y/N)
 Ring fenced fund? (Y/N or N/A)
 Fund number

A001
A30
A0

Non-life underwriting risk

Premium and reserve Risk - Basic information

Motor vehicle liability
 Motor, other classes
 Marine, aviation, transport (MAT)
 Fire and other property damage
 Third-party liability
 Credit and suretyship
 Legal expenses
 Assistance
 Miscellaneous
 Non-proportional reinsurance - property
 Non-proportional reinsurance - casualty
 Non-proportional reinsurance - MAT

Standard deviation for premium risk		Standard deviation for reserve risk	Volume measure for premium and reserve risk			
USP Standard Deviation	USP Adjustment factor for non-proportional reinsurance	USP	V _{prem}	V _{res}	Geographical Diversification	V
A1	A1A	B1	C1	D1	E1	F1
A2	A2A	B2	C2	D2	E2	F2
A3	A3A	B3	C3	D3	E3	F3
A4	A4A	B4	C4	D4	E4	F4
A5	A5A	B5	C5	D5	E5	F5
A6	A6A	B6	C6	D6	E6	F6
A7	A7A	B7	C7	D7	E7	F7
A8	A8A	B8	C8	D8	E8	F8
A9	A9A	B9	C9	D9	E9	F9
A10	A10A	B10	C10	D10	E10	F10
A11	A11A	B11	C11	D11	E11	F11
A12	A12A	B12	C12	D12	E12	F12
Total Volume measure						F13

Combined standard deviation

A13

Total capital requirement for non-life premium and reserve risk

A14

Non-Life lapse risk

Initial absolute values before shock		Absolute values after shock		
Assets	Liabilities	Assets	Liabilities	Solvency capital requirement
A15	A15A	B15	B15A	C15

Non-life lapse risk

Capital requirement for non-life catastrophe risk

A16

Diversification within non - life underwriting risk module

A17

Total capital requirement for non-life underwriting risk

A18

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Solvency Capital Requirement - Non-life underwriting risk

Captives simplifications - premium and reserve risk (Y/N)

Non-life underwriting risk

Premium and reserve Risk - Basic information

Motor vehicle liability

Motor, other classes
 Marine, aviation, transport (MAT)
 Fire and other property damage
 Third-party liability
 Credit and suretyship
 Legal expenses
 Assistance
 Miscellaneous
 Non-proportional reinsurance - property
 Non-proportional reinsurance - casualty
 Non-proportional reinsurance - MAT

Combined standard deviation

Total capital requirement for non-life premium and reserve risk

Non-Life lapse risk

Non-life lapse risk

Capital requirement for non-life catastrophe risk

Diversification within non - life underwriting risk module

Total capital requirement for non-life underwriting

Simplifications used
 A001

Standard deviation for premium risk			Standard deviation for reserve risk		Volume measure for premium and reserve risk		
USP Standard Deviation	USP Adjustment factor for non-proportional reinsurance	USP	V _{prem}	V _{res}	Geographical Diversification	V	
A1	A1A	B1	C1	D1	E1	F1	
A2	A2A	B2	C2	D2	E2	F2	
A3	A3A	B3	C3	D3	E3	F3	
A4	A4A	B4	C4	D4	E4	F4	
A5	A5A	B5	C5	D5	E5	F5	
A6	A6A	B6	C6	D6	E6	F6	
A7	A7A	B7	C7	D7	E7	F7	
A8	A8A	B8	C8	D8	E8	F8	
A9	A9A	B9	C9	D9	E9	F9	
A10	A10A	B10	C10	D10	E10	F10	
A11	A11A	B11	C11	D11	E11	F11	
A12	A12A	B12	C12	D12	E12	F12	
					Total Volume measure	F13	

A13

A14

Initial absolute values before		Absolute values after shock		
Assets	Liabilities	Assets	Liabilities	Solvency capital requirement

A15 A15A B15 B15A C15

A16

A17

A18

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Solvency Capital Requirement - Non-life underwriting risk

Simplifications used

Captives simplifications - premium and reserve risk (Y/N)
 Ring fenced fund? (Y/N or N/A)
 Fund number

A001
A30
A0

Non-life underwriting risk

Premium and reserve Risk - Basic information

Motor vehicle liability
 Motor, other classes
 Marine, aviation, transport (MAT)
 Fire and other property damage
 Third-party liability
 Credit and suretyship
 Legal expenses
 Assistance
 Miscellaneous
 Non-proportional reinsurance - property
 Non-proportional reinsurance - casualty
 Non-proportional reinsurance - MAT

Standard deviation for premium risk		Standard deviation for reserve risk	Volume measure for premium and reserve risk			
USP Standard Deviation	USP Adjustment factor for non-proportional reinsurance	USP	V _{prem}	V _{res}	Geographical Diversification	V
A1	A1A	B1	C1	D1	E1	F1
A2	A2A	B2	C2	D2	E2	F2
A3	A3A	B3	C3	D3	E3	F3
A4	A4A	B4	C4	D4	E4	F4
A5	A5A	B5	C5	D5	E5	F5
A6	A6A	B6	C6	D6	E6	F6
A7	A7A	B7	C7	D7	E7	F7
A8	A8A	B8	C8	D8	E8	F8
A9	A9A	B9	C9	D9	E9	F9
A10	A10A	B10	C10	D10	E10	F10
A11	A11A	B11	C11	D11	E11	F11
A12	A12A	B12	C12	D12	E12	F12
Total Volume measure						F13

Combined standard deviation

A13

Total capital requirement for non-life premium and reserve risk

A14

Non-Life lapse risk

Initial absolute values before shock		Absolute values after shock		
Assets	Liabilities	Assets	Liabilities	Solvency capital requirement
A15	A15A	B15	B15A	C15

Non-life lapse risk

Capital requirement for non-life catastrophe risk

A16

Diversification within non - life underwriting risk module

A17

Total capital requirement for non-life underwriting risk

A18

Appendix I: Quantitative reporting templates

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Solvency Capital Requirement - Operational risk

Operational risk - basic information

Life gross technical provisions (excluding risk margin)
 Life gross technical provisions unit-linked (excluding risk margin)
 Non-life gross technical provisions (excluding risk margin)

Capital requirement

Capital requirement for operational risk based on technical provisions

Earned life gross premiums (previous 12 months)
 Earned life gross premiums unit-linked (previous 12 months)

Earned non-life gross premiums (previous 12 months)
 Earned life gross premiums (12 months prior to the previous 12 months)
 Earned life gross premiums unit-linked (12 months prior to the previous 12 months)
 Earned non-life gross premiums (12 months prior to the previous 12 months)

Capital requirement for operational risk based on earned premiums

Capital requirement for operational risk charge before capping

Percentage of Basic Solvency Capital Requirement
 Capital requirement for operational risk charge after capping

Expenses incurred in respect of unit linked business (previous 12 months)

Total capital requirement for operational risk

A1
A2
A3
A4
A5
A6
A7
A8
A9
A10
A11
A12
A13
A14
A15
A16

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Solvency Capital Requirement - Operational risk

Ring fenced fund? (Y/N)
Fund number

A30
A0

Operational risk - basic information

Life gross technical provisions (excluding risk margin)
Life gross technical provisions unit-linked (excluding risk margin)
Non-life gross technical provisions (excluding risk margin)

Capital requirement

A1
A2
A3
A4

Capital requirement for operational risk based on technical provisions

Earned life gross premiums (previous 12 months)
Earned life gross premiums unit-linked (previous 12 months)

A5
A6

Earned non-life gross premiums (previous 12 months)
Earned life gross premiums (12 months prior to the previous 12 months)
Earned life gross premiums unit-linked (12 months prior to the previous 12 months)
Earned non-life gross premiums (12 months prior to the previous 12 months)

A7
A8
A9
A10
A11

Capital requirement for operational risk based on earned premiums

Capital requirement for operational risk charge before capping
Percentage of Basic Solvency Capital Requirement
Capital requirement for operational risk charge after capping

A12
A13
A14

Expenses incurred in respect of unit linked business (previous 12 months)

A15
A16

Total capital requirement for operational risk

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Solvency Capital Requirement - Operational risk

Operational risk - basic information

Life gross technical provisions (excluding risk margin)
 Life gross technical provisions unit-linked (excluding risk margin)
 Non-life gross technical provisions (excluding risk margin)

Capital requirement

A1
A2
A3
A4

Capital requirement for operational risk based on technical provisions

Earned life gross premiums (previous 12 months)
 Earned life gross premiums unit-linked (previous 12 months)

A5
A6

Earned non-life gross premiums (previous 12 months)
 Earned life gross premiums (12 months prior to the previous 12 months)
 Earned life gross premiums unit-linked (12 months prior to the previous 12 months)
 Earned non-life gross premiums (12 months prior to the previous 12 months)

A7
A8
A9
A10
A11

Capital requirement for operational risk based on earned premiums

Capital requirement for operational risk charge before capping

A12

Percentage of Basic Solvency Capital Requirement
 Capital requirement for operational risk charge after capping

A13
A14

Expenses incurred in respect of unit linked business (previous 12 months)

A15

Total capital requirement for operational risk

A16

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Solvency Capital Requirement - Operational risk

Ring fenced fund? (Y/N)
Fund number

A30
A0

Operational risk - basic information

Life gross technical provisions (excluding risk margin)
Life gross technical provisions unit-linked (excluding risk margin)
Non-life gross technical provisions (excluding risk margin)

Capital requirement

A1
A2
A3
A4

Capital requirement for operational risk based on technical provisions

Earned life gross premiums (previous 12 months)
Earned life gross premiums unit-linked (previous 12 months)

A5
A6

Earned non-life gross premiums (previous 12 months)
Earned life gross premiums (12 months prior to the previous 12 months)
Earned life gross premiums unit-linked (12 months prior to the previous 12 months)
Earned non-life gross premiums (12 months prior to the previous 12 months)

A7
A8
A9
A10
A11

Capital requirement for operational risk based on earned premiums

Capital requirement for operational risk charge before capping
Percentage of Basic Solvency Capital Requirement
Capital requirement for operational risk charge after capping

A12
A13
A14

Expenses incurred in respect of unit linked business (previous 12 months)

A15
A16

Total capital requirement for operational risk

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Solvency Capital Requirement - Non-life catastrophe risk

Non-life catastrophe risk - Summary	Gross SCR	Total risk mitigation	Net SCR
Natural catastrophe risk	A1	B1	C1
Windstorm	A2	B2	C2
Earthquake	A3	B3	C3
Flood	A4	B4	C4
Hail	A5	B5	C5
Subsidence	A6	B6	C6
Diversification between perils	A7	B7	C7
Catastrophe risk non-proportional property reinsurance	A8	B8	C8
Man-made catastrophe risk	A9	B9	C9
Motor vehicle liability	A10	B10	C10
Marine	A11	B11	C11
Aviation	A12	B12	C12
Fire	A13	B13	C13
Liability	A14	B14	C14
Credit & Suretyship	A15	B15	C15
Diversification between perils	A16	B16	C16
Other non-life catastrophe risk	A17	B17	C17
Diversification between perils	A18	B18	C18
Total Non-life catastrophe risk before diversification	A19	B19	C19
Diversification between sub-modules	A20	B20	C20
Total Non-life catastrophe risk after diversification	A21	B21	C21
Health catastrophe risk - Summary	Gross SCR	Total risk mitigation	Net SCR
Health catastrophe risk	A22	B22	C22
Mass accident	A23	B23	C23
Accident concentration	A24	B24	C24
Pandemic	A25	B25	C25
Diversification between sub-modules	A26	B26	C26

Natural Catastrophe risk - Windstorm	Estimation of the gross premiums to be earned	Exposure	Specified Gross Loss	Gross Cat Risk Charge Factor	Scenario A or B	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
EEA Region 1	AA1	AB1	AC1	AD1	AE1	AF1	AG1	AH1	AI1
EEA Region 2	AA2	AB2	AC2	AD2	AE2	AF2	AG2	AH2	AI2
EEA Region 3	AA3	AB3	AC3	AD3	AE3	AF3	AG3	AH3	AI3
EEA Region 4	AA4	AB4	AC4	AD4	AE4	AF4	AG4	AH4	AI4
EEA Region 5	AA5	AB5	AC5	AD5	AE5	AF5	AG5	AH5	AI5
EEA Region 6	AA6	AB6	AC6	AD6	AE6	AF6	AG6	AH6	AI6
EEA Region 7	AA7	AB7	AC7	AD7	AE7	AF7	AG7	AH7	AI7
EEA Region 8	AA8	AB8	AC8	AD8	AE8	AF8	AG8	AH8	AI8
EEA Region 9	AA9	AB9	AC9	AD9	AE9	AF9	AG9	AH9	AI9
EEA Region 10	AA10	AB10	AC10	AD10	AE10	AF10	AG10	AH10	AI10
EEA Region 11	AA11	AB11	AC11	AD11	AE11	AF11	AG11	AH11	AI11
EEA Region 12	AA12	AB12	AC12	AD12	AE12	AF12	AG12	AH12	AI12
EEA Region 13	AA13	AB13	AC13	AD13	AE13	AF13	AG13	AH13	AI13
EEA Region 14	AA14	AB14	AC14	AD14	AE14	AF14	AG14	AH14	AI14
EEA Region 15	AA15	AB15	AC15	AD15	AE15	AF15	AG15	AH15	AI15
EEA Region 16	AA16	AB16	AC16	AD16	AE16	AF16	AG16	AH16	AI16
EEA Region 17	AA17	AB17	AC17	AD17	AE17	AF17	AG17	AH17	AI17
EEA Region 18	AA18	AB18	AC18	AD18	AE18	AF18	AG18	AH18	AI18
EEA Region 19	AA19	AB19	AC19	AD19	AE19	AF19	AG19	AH19	AI19
EEA Region 20	AA20	AB20	AC20	AD20	AE20	AF20	AG20	AH20	AI20
Total Windstorm EEA Regions before diversification	AA21	AB21	AC21	AD21		AF21	AG21	AH21	AI21
Other Regions 1	AA22	AB22							
Other Regions 2	AA23	AB23							
Other Regions 3	AA24	AB24							
Other Regions 4	AA25	AB25							
Other Regions 5	AA26	AB26							
Other Regions 6	AA27	AB27							
Other Regions 7	AA28	AB28							
Other Regions 8	AA29	AB29							
Other Regions 9	AA30	AB30							
Other Regions 10	AA31	AB31							
Other Regions 11	AA32	AB32							
Other Regions 12	AA33	AB33							
Other Regions 13	AA34	AB34							
Other Regions 14	AA35	AB35							
Total Windstorm Other Regions before diversifications	AA36	AB36				AF36	AG36	AH36	AI36
Total Windstorm all Regions before diversification	AA37	AB37				AF37	AG37	AH37	AI37
Diversification effect between regions						AF38			AI38
Total Windstorm after diversification						AF39			AI39

Natural Catastrophe risk - Earthquake	Estimation of the gross premiums to be earned	Exposure	Specified Gross Loss	Gross Cat Risk Charge Factor	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
EEA Region 1	BA1	BB1	BC1	BD1	BE1	BF1	BG1	BH1
EEA Region 2	BA2	BB2	BC2	BD2	BE2	BF2	BG2	BH2
EEA Region 3	BA3	BB3	BC3	BD3	BE3	BF3	BG3	BH3
EEA Region 4	BA4	BB4	BC4	BD4	BE4	BF4	BG4	BH4
EEA Region 5	BA5	BB5	BC5	BD5	BE5	BF5	BG5	BH5
EEA Region 6	BA6	BB6	BC6	BD6	BE6	BF6	BG6	BH6
EEA Region 7	BA7	BB7	BC7	BD7	BE7	BF7	BG7	BH7

EEA Region 8	BA8	BB8	BC8	BD8	BE8	BF8	BG8	BH8
EEA Region 9	BA9	BB9	BC9	BD9	BE9	BF9	BG9	BH9
EEA Region 10	BA10	BB10	BC10	BD10	BE10	BF10	BG10	BH10
EEA Region 11	BA11	BB11	BC11	BD11	BE11	BF11	BG11	BH11
EEA Region 12	BA12	BB12	BC12	BD12	BE12	BF12	BG12	BH12
EEA Region 13	BA13	BB13	BC13	BD13	BE13	BF13	BG13	BH13
EEA Region 14	BA14	BB14	BC14	BD14	BE14	BF14	BG14	BH14
EEA Region 15	BA15	BB15	BC15	BD15	BE15	BF15	BG15	BH15
EEA Region 16	BA16	BB16	BC16	BD16	BE16	BF16	BG16	BH16
EEA Region 17	BA17	BB17	BC17	BD17	BE17	BF17	BG17	BH17
EEA Region 18	BA18	BB18	BC18	BD18	BE18	BF18	BG18	BH18
EEA Region 19	BA19	BB19	BC19	BD19	BE19	BF19	BG19	BH19
EEA Region 20	BA20	BB20	BC20	BD20	BE20	BF20	BG20	BH20
Total Earthquake EEA Regions before diversification	BA21	BB21	BC21	BD21	BE21	BF21	BG21	BH21
Other Regions 1	BA22	BB22						
Other Regions 2	BA23	BB23						
Other Regions 3	BA24	BB24						
Other Regions 4	BA25	BB25						
Other Regions 5	BA26	BB26						
Other Regions 6	BA27	BB27						
Other Regions 7	BA28	BB28						
Other Regions 8	BA29	BB29						
Other Regions 9	BA30	BB30						
Other Regions 10	BA31	BB31						
Other Regions 11	BA32	BB32						
Other Regions 12	BA33	BB33						
Other Regions 13	BA34	BB34						
Other Regions 14	BA35	BB35						
Total Earthquake Other Regions before diversifications	BA36	BB36			BE36	BF36	BG36	BH36
Total Earthquake all Regions before diversification	BA37	BB37			BE37	BF37	BG37	BH37
Diversification effect between regions					BE38			BH38
Total Earthquake after diversification					BE39			BH39

	Estimation of the gross premiums to be earned		Specified Gross Loss	Gross Cat Risk Charge Factor	Scenario A or B	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
Natural Catastrophe risk - Flood	Exposure								
EEA Region 1	CA1	CB1	CC1	CD1	CE1	CF1	CG1	CH1	CI1
EEA Region 2	CA2	CB2	CC2	CD2	CE2	CF2	CG2	CH2	CI2
EEA Region 3	CA3	CB3	CC3	CD3	CE3	CF3	CG3	CH3	CI3
EEA Region 4	CA4	CB4	CC4	CD4	CE4	CF4	CG4	CH4	CI4
EEA Region 5	CA5	CB5	CC5	CD5	CE5	CF5	CG5	CH5	CI5
EEA Region 6	CA6	CB6	CC6	CD6	CE6	CF6	CG6	CH6	CI6
EEA Region 7	CA7	CB7	CC7	CD7	CE7	CF7	CG7	CH7	CI7
EEA Region 8	CA8	CB8	CC8	CD8	CE8	CF8	CG8	CH8	CI8
EEA Region 9	CA9	CB9	CC9	CD9	CE9	CF9	CG9	CH9	CI9
EEA Region 10	CA10	CB10	CC10	CD10	CE10	CF10	CG10	CH10	CI10
EEA Region 11	CA11	CB11	CC11	CD11	CE11	CF11	CG11	CH11	CI11
EEA Region 12	CA12	CB12	CC12	CD12	CE12	CF12	CG12	CH12	CI12
EEA Region 13	CA13	CB13	CC13	CD13	CE13	CF13	CG13	CH13	CI13
EEA Region 14	CA14	CB14	CC14	CD14	CE14	CF14	CG14	CH14	CI14
Total Flood EEA Regions before diversification	CA15	CB15	CC15	CD15		CF15	CG15	CH15	CI15
Other Regions 1	CA16	CB16							
Other Regions 2	CA17	CB17							
Other Regions 3	CA18	CB18							
Other Regions 4	CA19	CB19							
Other Regions 5	CA20	CB20							
Other Regions 6	CA21	CB21							
Other Regions 7	CA22	CB22							
Other Regions 8	CA23	CB23							
Other Regions 9	CA24	CB24							
Other Regions 10	CA25	CB25							
Other Regions 11	CA26	CB26							
Other Regions 12	CA27	CB27							
Other Regions 13	CA28	CB28							
Other Regions 14	CA29	CB29							
Total Flood Other Regions before diversifications	CA30	CB30				CF30	CG30	CH30	CI30
Total Flood all Regions before diversification	CA31	CB31				CF31	CG31	CH31	CI31
Diversification effect between regions						CF32			CI32
Total Flood after diversification						CF33			CI33

	Estimation of the gross premiums to be earned		Specified Gross Loss	Gross Cat Risk Charge Factor	Scenario A or B	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
Natural Catastrophe risk - Hail	Exposure								
EEA Region 1	DA1	DB1	DC1	DD1	DE1	DF1	DG1	DH1	DI1
EEA Region 2	DA2	DB2	DC2	DD2	DE2	DF2	DG2	DH2	DI2
EEA Region 3	DA3	DB3	DC3	DD3	DE3	DF3	DG3	DH3	DI3
EEA Region 4	DA4	DB4	DC4	DD4	DE4	DF4	DG4	DH4	DI4
EEA Region 5	DA5	DB5	DC5	DD5	DE5	DF5	DG5	DH5	DI5
EEA Region 6	DA6	DB6	DC6	DD6	DE6	DF6	DG6	DH6	DI6
EEA Region 7	DA7	DB7	DC7	DD7	DE7	DF7	DG7	DH7	DI7
EEA Region 8	DA8	DB8	DC8	DD8	DE8	DF8	DG8	DH8	DI8
EEA Region 9	DA9	DB9	DC9	DD9	DE9	DF9	DG9	DH9	DI9
Total Hail EEA Regions before diversification	DA10	DB10	DC10	DD10		DF10	DG10	DH10	DI10
Other Regions 1	DA11	DB11							

Other Regions 2	DA12	DB12							
Other Regions 3	DA13	DB13							
Other Regions 4	DA14	DB14							
Other Regions 5	DA15	DB15							
Other Regions 6	DA16	DB16							
Other Regions 7	DA17	DB17							
Other Regions 8	DA18	DB18							
Other Regions 9	DA19	DB19							
Other Regions 10	DA20	DB20							
Other Regions 11	DA21	DB21							
Other Regions 12	DA22	DB22							
Other Regions 13	DA23	DB23							
Other Regions 14	DA24	DB24							
Total Hail Other Regions before diversifications	DA25	DB25				DF25	DG25	DH25	DI25
Total Hail all Regions before diversification	DA26	DB26				DF26	DG26	DH26	DI26
Diversification effect between regions						DF27			DI27
Total Hail after diversification						DF28			DI28

	Estimation of the gross premiums to be earned	Exposure	Specified Gross Loss	Gross Cat Risk Charge Factor	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
Natural Catastrophe risk -Subsidence								
Total Subsidence before diversification	EA1	EB1	EC1	ED1	EE1	EF1	EG1	EH1
Diversification effect between zones					EE2			EH2
Total Subsidence after diversification					EE3			EH3

	Estimation of the premiums to be earned	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
Natural Catastrophe risk - Non-proportional property reinsurance					
Non-proportional property reinsurance	FA1	FB1	FC1	FD1	FE1

Man made catastrophe risk - Motor Vehicle Liability					
	Number of vehicles policy limit below or equal to 24MC	Gross Cat Risk Charge Motor Vehicle Liability	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Motor Vehicle Liability
GA1	GA2	GA3	GA4	GA5	GA6

	Gross Cat Risk Charge Share marine hull in tanker t	Gross Cat Risk Charge Share marine liability in tanker t	Gross Cat Risk Charge Share marine oil pollution	Gross Cat Risk Charge Marine Tanker Collision	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Marine Tanker Collision	Name vessel
Man made catastrophe risk - Marine Tanker Collision								
Marine Tanker Collision	HA1	HB1	HC1	HD1	HE1	HF1	HG1	HH1

	Gross Cat Risk Charge Property damage	Gross Cat Risk Charge Removal of wreckage	Gross Cat Risk Charge Loss of production income	Gross Cat Risk Charge Capping of the well or making the well secure	Gross Cat Risk Charge Liability insurance and reinsurance obligations	Gross Cat Risk Charge Marine Platform Explosion	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Marine Platform Explosion	Name platform
Man made catastrophe risk - Marine Platform Explosion										
Marine Platform Explosion	HA2	HB2	HC2	HD2	HE2	HF2	HG2	HH2	HI2	HJ2

Man made catastrophe risk - Marine			
	Gross Cat Risk Charge Marine	Estimated Total Risk Mitigation	Net Cat Risk Charge Marine
Total before diversification	HA3	HA4	HA5
Diversification between type of event	HB3	HB4	HB5
Total after diversification	HC3	HC4	HC5

	Gross Cat risk Charge Aviation hull	Gross Cat risk Charge Aviation liability	Gross Cat Risk Charge Aviation	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Aviation
Man made catastrophe risk - Aviation						
Gross Cat Risk Charge Aviation	IA1	IB1	IC1	ID1	IE1	IF1

Man made catastrophe risk - Fire			
	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Fire
Gross Cat Risk Charge Fire	JA2	JA3	JA4
JA1			

Man made catastrophe risk - Liability	Earned premium last 12 months	Largest liability limit provided	Number of claims	Gross Cat Risk Charge Liability	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Liability
Professional malpractice liability	KA1	KA2	KA3	KA4	KA5	KA6	KA7
Employers liability	KB1	KB2	KB3	KB4	KB5	KB6	KB7
Directors and officers liability	KC1	KC2	KC3	KC4	KC5	KC6	KC7
Other liability	KD1	KD2	KD3	KD4	KD5	KD6	KD7
Non-proportional reinsurance	KE1	KE2	KE3	KE4	KE5	KE6	KE7
Total	KF1			KF4	KF5	KF6	KF7

Man made catastrophe risk - Liability			
	Gross Cat Risk Charge Liability	Estimated Total Risk Mitigation	Net Cat Risk Charge Liability
Total before diversification	KA8	KA9	KA10
Diversification between type of cover	KB8	KB9	KB10
Total after diversification	KC8	KC9	KC10

Man made catastrophe risk - Credit & Suretyship - Large Credit Default						
	Exposure (individual or group)	Proportion of damage caused by scenario	Gross Cat Risk Charge Credit & Surety - Large Credit Default	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Credit & Surety - Large Credit Default
Largest exposure 1	LA1	LA2	LA3	LA4	LA5	LA6
Largest exposure 2	LB1	LB2	LB3	LB4	LB5	LB6
Total	LC1	LC2	LC3	LC4	LC5	LC6

Man made catastrophe risk - Credit & Suretyship - Recession Risk					
	Earned premium last 12 months	Gross Cat Risk Charge Credit & Suretyship - Recession Risk	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Credit & Suretyship - Recession Risk
Total	LA7	LA8	LA9	LA10	LA11

Man made catastrophe risk - Credit & Suretyship			
	Gross Cat Risk Charge Credit & Suretyship	Estimated Total Risk Mitigation	Net Cat Risk Charge Credit & Suretyship
Total before diversification	LA12	LA13	LA14
Diversification between type of event	LB12	LB13	LB14
Total after diversification	LC12	LC13	LC14

Man made catastrophe risk - Other non-life catastrophe risk				
	Estimation of the gross premiums to be earned	Gross Cat Risk Charge Other non-life catastrophe risk	Estimated Total Risk Mitigation	Net Cat Risk Charge Other non-life catastrophe risk
MAT other than Marine and Aviation	MA1	MA2		
Non-proportional MAT reinsurance other than Marine and Aviation	MB1	MB2		
Miscellaneous financial loss	MC1	MC2		
Non-proportional Casualty reinsurance other than General liability	MD1	MD2		
Non-proportional Credit & Surety reinsurance	ME1	ME2		
Total before diversification		MF2	MF3	MF4
Diversification between groups of obligations		MG2	MG3	MG4
Total after diversification		MH2	MH3	MH4

Health Catastrophe risk - Mass accident	Accidental death		Permanent disability		Disability 10 years		Disability 12 months		Medical treatment		Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
	# Policyholders	Total value of benefits payable	# Policyholders	Total value of benefits payable	# Policyholders	Total value of benefits payable	# Policyholders	Total value of benefits payable	# Policyholders	Total value of benefits payable				
Country 1	NA1	NB1	NC1	ND1	NE1	NF1	NG1	NH1	NI1	NJ1	NK1	NL1	NM1	NN1
Country 2	NA2	NB2	NC2	ND2	NE2	NF2	NG2	NH2	NI2	NJ2	NK2	NL2	NM2	NN2
Country 3	NA3	NB3	NC3	ND3	NE3	NF3	NG3	NH3	NI3	NJ3	NK3	NL3	NM3	NN3
Country 4	NA4	NB4	NC4	ND4	NE4	NF4	NG4	NH4	NI4	NJ4	NK4	NL4	NM4	NN4
Country 5	NA5	NB5	NC5	ND5	NE5	NF5	NG5	NH5	NI5	NJ5	NK5	NL5	NM5	NN5
Country 6	NA6	NB6	NC6	ND6	NE6	NF6	NG6	NH6	NI6	NJ6	NK6	NL6	NM6	NN6
Country 7	NA7	NB7	NC7	ND7	NE7	NF7	NG7	NH7	NI7	NJ7	NK7	NL7	NM7	NN7
Country 8	NA8	NB8	NC8	ND8	NE8	NF8	NG8	NH8	NI8	NJ8	NK8	NL8	NM8	NN8
Country 9	NA9	NB9	NC9	ND9	NE9	NF9	NG9	NH9	NI9	NJ9	NK9	NL9	NM9	NN9
Country 10	NA10	NB10	NC10	ND10	NE10	NF10	NG10	NH10	NI10	NJ10	NK10	NL10	NM10	NN10
Country 11	NA11	NB11	NC11	ND11	NE11	NF11	NG11	NH11	NI11	NJ11	NK11	NL11	NM11	NN11
Country 12	NA12	NB12	NC12	ND12	NE12	NF12	NG12	NH12	NI12	NJ12	NK12	NL12	NM12	NN12
Country 13	NA13	NB13	NC13	ND13	NE13	NF13	NG13	NH13	NI13	NJ13	NK13	NL13	NM13	NN13
Country 14	NA14	NB14	NC14	ND14	NE14	NF14	NG14	NH14	NI14	NJ14	NK14	NL14	NM14	NN14
Country 15	NA15	NB15	NC15	ND15	NE15	NF15	NG15	NH15	NI15	NJ15	NK15	NL15	NM15	NN15
Country 16	NA16	NB16	NC16	ND16	NE16	NF16	NG16	NH16	NI16	NJ16	NK16	NL16	NM16	NN16
Country 17	NA17	NB17	NC17	ND17	NE17	NF17	NG17	NH17	NI17	NJ17	NK17	NL17	NM17	NN17
Country 18	NA18	NB18	NC18	ND18	NE18	NF18	NG18	NH18	NI18	NJ18	NK18	NL18	NM18	NN18
Country 19	NA19	NB19	NC19	ND19	NE19	NF19	NG19	NH19	NI19	NJ19	NK19	NL19	NM19	NN19
Country 20	NA20	NB20	NC20	ND20	NE20	NF20	NG20	NH20	NI20	NJ20	NK20	NL20	NM20	NN20

Country 21	NA21	NB21	NC21	ND21	NE21	NF21	NG21	NH21	NI21	NJ21	NK21	NL21	NM21	NN21
Country 22	NA22	NB22	NC22	ND22	NE22	NF22	NG22	NH22	NI22	NJ22	NK22	NL22	NM22	NN22
Country 23	NA23	NB23	NC23	ND23	NE23	NF23	NG23	NH23	NI23	NJ23	NK23	NL23	NM23	NN23
Country 24	NA24	NB24	NC24	ND24	NE24	NF24	NG24	NH24	NI24	NJ24	NK24	NL24	NM24	NN24
Country 25	NA25	NB25	NC25	ND25	NE25	NF25	NG25	NH25	NI25	NJ25	NK25	NL25	NM25	NN25
Country 26	NA26	NB26	NC26	ND26	NE26	NF26	NG26	NH26	NI26	NJ26	NK26	NL26	NM26	NN26
Country 27	NA27	NB27	NC27	ND27	NE27	NF27	NG27	NH27	NI27	NJ27	NK27	NL27	NM27	NN27
Country 28	NA28	NB28	NC28	ND28	NE28	NF28	NG28	NH28	NI28	NJ28	NK28	NL28	NM28	NN28
Country 29	NA29	NB29	NC29	ND29	NE29	NF29	NG29	NH29	NI29	NJ29	NK29	NL29	NM29	NN29
Country 30	NA30	NB30	NC30	ND30	NE30	NF30	NG30	NH30	NI30	NJ30	NK30	NL30	NM30	NN30
Country 31	NA31	NB31	NC31	ND31	NE31	NF31	NG31	NH31	NI31	NJ31	NK31	NL31	NM31	NN31
Total Mass accident all countries before diversification														
Diversification effect between countries														
Total Mass accident all countries after diversification														

Health Catastrophe risk - Concentration accident	Largest known accident risk concentration	Accidental death	Permanent disability	Disability 10 years	Disability 12 months	Medical treatment	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
		Average sum insured	Average sum insured	Average sum insured	Average sum insured	Average sum insured				
Country 1	OA1	OB1	OC1	OD1	OE1	OF1	OG1	OH1	OI1	OJ1
Country 2	OA2	OB2	OC2	OD2	OE2	OF2	OG2	OH2	OI2	OJ2
Country 3	OA3	OB3	OC3	OD3	OE3	OF3	OG3	OH3	OI3	OJ3
Country 4	OA4	OB4	OC4	OD4	OE4	OF4	OG4	OH4	OI4	OJ4
Country 5	OA5	OB5	OC5	OD5	OE5	OF5	OG5	OH5	OI5	OJ5
Country 6	OA6	OB6	OC6	OD6	OE6	OF6	OG6	OH6	OI6	OJ6
Country 7	OA7	OB7	OC7	OD7	OE7	OF7	OG7	OH7	OI7	OJ7
Country 8	OA8	OB8	OC8	OD8	OE8	OF8	OG8	OH8	OI8	OJ8
Country 9	OA9	OB9	OC9	OD9	OE9	OF9	OG9	OH9	OI9	OJ9
Country 10	OA10	OB10	OC10	OD10	OE10	OF10	OG10	OH10	OI10	OJ10
Country 11	OA11	OB11	OC11	OD11	OE11	OF11	OG11	OH11	OI11	OJ11
Country 12	OA12	OB12	OC12	OD12	OE12	OF12	OG12	OH12	OI12	OJ12
Country 13	OA13	OB13	OC13	OD13	OE13	OF13	OG13	OH13	OI13	OJ13
Country 14	OA14	OB14	OC14	OD14	OE14	OF14	OG14	OH14	OI14	OJ14
Country 15	OA15	OB15	OC15	OD15	OE15	OF15	OG15	OH15	OI15	OJ15
Country 16	OA16	OB16	OC16	OD16	OE16	OF16	OG16	OH16	OI16	OJ16
Country 17	OA17	OB17	OC17	OD17	OE17	OF17	OG17	OH17	OI17	OJ17
Country 18	OA18	OB18	OC18	OD18	OE18	OF18	OG18	OH18	OI18	OJ18
Country 19	OA19	OB19	OC19	OD19	OE19	OF19	OG19	OH19	OI19	OJ19
Country 20	OA20	OB20	OC20	OD20	OE20	OF20	OG20	OH20	OI20	OJ20
Country 21	OA21	OB21	OC21	OD21	OE21	OF21	OG21	OH21	OI21	OJ21
Country 22	OA22	OB22	OC22	OD22	OE22	OF22	OG22	OH22	OI22	OJ22
Country 23	OA23	OB23	OC23	OD23	OE23	OF23	OG23	OH23	OI23	OJ23
Country 24	OA24	OB24	OC24	OD24	OE24	OF24	OG24	OH24	OI24	OJ24
Country 25	OA25	OB25	OC25	OD25	OE25	OF25	OG25	OH25	OI25	OJ25
Country 26	OA26	OB26	OC26	OD26	OE26	OF26	OG26	OH26	OI26	OJ26
Country 27	OA27	OB27	OC27	OD27	OE27	OF27	OG27	OH27	OI27	OJ27
Country 28	OA28	OB28	OC28	OD28	OE28	OF28	OG28	OH28	OI28	OJ28
Country 29	OA29	OB29	OC29	OD29	OE29	OF29	OG29	OH29	OI29	OJ29
Country 30	OA30	OB30	OC30	OD30	OE30	OF30	OG30	OH30	OI30	OJ30
Country 31	OA31	OB31	OC31	OD31	OE31	OF31	OG31	OH31	OI31	OJ31
Total Concentration accident all countries before diversification										
Diversification effect between countries										
Total Concentration accident all countries after diversification										

Health Catastrophe risk - Pandemic	Income protection		Medical expense						Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
	Number of insured people	Total pandemic exposure	Number of insured people	Unit claim cost hospitalisation	Expected number of uses hospitalisation	Unit claim cost medical practitioner	Expected number of uses medical practitioner	Unit claim cost no formal medical care				
Country 1			PC1	PD1	PE1	PF1	PG1	PH1	PI1			
Country 2			PC2	PD2	PE2	PF2	PG2	PH2	PI2			
Country 3			PC3	PD3	PE3	PF3	PG3	PH3	PI3			
Country 4			PC4	PD4	PE4	PF4	PG4	PH4	PI4			
Country 5			PC5	PD5	PE5	PF5	PG5	PH5	PI5			
Country 6			PC6	PD6	PE6	PF6	PG6	PH6	PI6			
Country 7			PC7	PD7	PE7	PF7	PG7	PH7	PI7			
Country 8			PC8	PD8	PE8	PF8	PG8	PH8	PI8			
Country 9			PC9	PD9	PE9	PF9	PG9	PH9	PI9			
Country 10			PC10	PD10	PE10	PF10	PG10	PH10	PI10			
Country 11			PC11	PD11	PE11	PF11	PG11	PH11	PI11			
Country 12			PC12	PD12	PE12	PF12	PG12	PH12	PI12			
Country 13			PC13	PD13	PE13	PF13	PG13	PH13	PI13			
Country 14			PC14	PD14	PE14	PF14	PG14	PH14	PI14			
Country 15			PC15	PD15	PE15	PF15	PG15	PH15	PI15			
Country 16			PC16	PD16	PE16	PF16	PG16	PH16	PI16			
Country 17			PC17	PD17	PE17	PF17	PG17	PH17	PI17			
Country 18			PC18	PD18	PE18	PF18	PG18	PH18	PI18			
Country 19			PC19	PD19	PE19	PF19	PG19	PH19	PI19			
Country 20			PC20	PD20	PE20	PF20	PG20	PH20	PI20			
Country 21			PC21	PD21	PE21	PF21	PG21	PH21	PI21			
Country 22			PC22	PD22	PE22	PF22	PG22	PH22	PI22			
Country 23			PC23	PD23	PE23	PF23	PG23	PH23	PI23			
Country 24			PC24	PD24	PE24	PF24	PG24	PH24	PI24			
Country 25			PC25	PD25	PE25	PF25	PG25	PH25	PI25			
Country 26			PC26	PD26	PE26	PF26	PG26	PH26	PI26			
Country 27			PC27	PD27	PE27	PF27	PG27	PH27	PI27			
Country 28			PC28	PD28	PE28	PF28	PG28	PH28	PI28			
Country 29			PC29	PD29	PE29	PF29	PG29	PH29	PI29			

Country 30			PC30	PD30	PE30	PF30	PG30	PH30	PI30	PJ30			
Country 31			PC31	PD31	PE31	PF31	PG31	PH31	PI31	PJ31			
Total Income Protections all countries	PA32	PB32								PJ32			

Appendix I: Quantitative reporting templates
S.27.01.1
Solvency Capital Requirement - Non-life catastrophe risk

Ring fenced fund? (Y/N)
Fund number

A30
A0

Non-life catastrophe risk - Summary	Gross SCR	Total risk mitigation	Net SCR
Natural catastrophe risk	A1	B1	C1
Windstorm	A2	B2	C2
Earthquake	A3	B3	C3
Flood	A4	B4	C4
Hail	A5	B5	C5
Subsidence	A6	B6	C6
Diversification between perils	A7	B7	C7
Catastrophe risk non-proportional property reinsurance	A8	B8	C8
Man-made catastrophe risk	A9	B9	C9
Motor vehicle liability	A10	B10	C10
Marine	A11	B11	C11
Aviation	A12	B12	C12
Fire	A13	B13	C13
Liability	A14	B14	C14
Credit & Suretyship	A15	B15	C15
Diversification between perils	A16	B16	C16
Other non-life catastrophe risk	A17	B17	C17
Diversification between perils	A18	B18	C18
Total Non-life catastrophe risk before diversification	A19	B19	C19
Diversification between sub-modules	A20	B20	C20
Total Non-life catastrophe risk after diversification	A21	B21	C21
Health catastrophe risk - Summary	Gross SCR	Total risk mitigation	Net SCR
Health catastrophe risk	A22	B22	C22
Mass accident	A23	B23	C23
Accident concentration	A24	B24	C24
Pandemic	A25	B25	C25
Diversification between sub-modules	A26	B26	C26

	Estimation of the gross premiums to be earned	Exposure	Specified Gross Loss	Gross Cat Risk Charge Factor	Scenario A or B	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
Natural Catastrophe risk - Windstorm									
EEA Region 1	AA1	AB1	AC1	AD1	AE1	AF1	AG1	AH1	AI1
EEA Region 2	AA2	AB2	AC2	AD2	AE2	AF2	AG2	AH2	AI2
EEA Region 3	AA3	AB3	AC3	AD3	AE3	AF3	AG3	AH3	AI3
EEA Region 4	AA4	AB4	AC4	AD4	AE4	AF4	AG4	AH4	AI4
EEA Region 5	AA5	AB5	AC5	AD5	AE5	AF5	AG5	AH5	AI5
EEA Region 6	AA6	AB6	AC6	AD6	AE6	AF6	AG6	AH6	AI6
EEA Region 7	AA7	AB7	AC7	AD7	AE7	AF7	AG7	AH7	AI7
EEA Region 8	AA8	AB8	AC8	AD8	AE8	AF8	AG8	AH8	AI8
EEA Region 9	AA9	AB9	AC9	AD9	AE9	AF9	AG9	AH9	AI9
EEA Region 10	AA10	AB10	AC10	AD10	AE10	AF10	AG10	AH10	AI10
EEA Region 11	AA11	AB11	AC11	AD11	AE11	AF11	AG11	AH11	AI11
EEA Region 12	AA12	AB12	AC12	AD12	AE12	AF12	AG12	AH12	AI12
EEA Region 13	AA13	AB13	AC13	AD13	AE13	AF13	AG13	AH13	AI13
EEA Region 14	AA14	AB14	AC14	AD14	AE14	AF14	AG14	AH14	AI14
EEA Region 15	AA15	AB15	AC15	AD15	AE15	AF15	AG15	AH15	AI15
EEA Region 16	AA16	AB16	AC16	AD16	AE16	AF16	AG16	AH16	AI16
EEA Region 17	AA17	AB17	AC17	AD17	AE17	AF17	AG17	AH17	AI17
EEA Region 18	AA18	AB18	AC18	AD18	AE18	AF18	AG18	AH18	AI18
EEA Region 19	AA19	AB19	AC19	AD19	AE19	AF19	AG19	AH19	AI19
EEA Region 20	AA20	AB20	AC20	AD20	AE20	AF20	AG20	AH20	AI20
Total Windstorm EEA Regions before diversification	AA21	AB21	AC21	AD21		AF21	AG21	AH21	AI21
Other Regions 1	AA22	AB22							
Other Regions 2	AA23	AB23							
Other Regions 3	AA24	AB24							
Other Regions 4	AA25	AB25							
Other Regions 5	AA26	AB26							
Other Regions 6	AA27	AB27							
Other Regions 7	AA28	AB28							
Other Regions 8	AA29	AB29							
Other Regions 9	AA30	AB30							
Other Regions 10	AA31	AB31							
Other Regions 11	AA32	AB32							
Other Regions 12	AA33	AB33							
Other Regions 13	AA34	AB34							
Other Regions 14	AA35	AB35							
Total Windstorm Other Regions before diversifications	AA36	AB36				AF36	AG36	AH36	AI36
Total Windstorm all Regions before diversification	AA37	AB37				AF37	AG37	AH37	AI37
Diversification effect between regions						AF38			AI38
Total Windstorm after diversification						AF39			AI39

	Estimation of the gross premiums to be earned	Exposure	Specified Gross Loss	Gross Cat Risk Charge Factor	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
Natural Catastrophe risk - Earthquake								
EEA Region 1	BA1	BB1	BC1	BD1	BE1	BF1	BG1	BH1
EEA Region 2	BA2	BB2	BC2	BD2	BE2	BF2	BG2	BH2

EEA Region 3	BA3	BB3	BC3	BD3	BE3	BF3	BG3	BH3
EEA Region 4	BA4	BB4	BC4	BD4	BE4	BF4	BG4	BH4
EEA Region 5	BA5	BB5	BC5	BD5	BE5	BF5	BG5	BH5
EEA Region 6	BA6	BB6	BC6	BD6	BE6	BF6	BG6	BH6
EEA Region 7	BA7	BB7	BC7	BD7	BE7	BF7	BG7	BH7
EEA Region 8	BA8	BB8	BC8	BD8	BE8	BF8	BG8	BH8
EEA Region 9	BA9	BB9	BC9	BD9	BE9	BF9	BG9	BH9
EEA Region 10	BA10	BB10	BC10	BD10	BE10	BF10	BG10	BH10
EEA Region 11	BA11	BB11	BC11	BD11	BE11	BF11	BG11	BH11
EEA Region 12	BA12	BB12	BC12	BD12	BE12	BF12	BG12	BH12
EEA Region 13	BA13	BB13	BC13	BD13	BE13	BF13	BG13	BH13
EEA Region 14	BA14	BB14	BC14	BD14	BE14	BF14	BG14	BH14
EEA Region 15	BA15	BB15	BC15	BD15	BE15	BF15	BG15	BH15
EEA Region 16	BA16	BB16	BC16	BD16	BE16	BF16	BG16	BH16
EEA Region 17	BA17	BB17	BC17	BD17	BE17	BF17	BG17	BH17
EEA Region 18	BA18	BB18	BC18	BD18	BE18	BF18	BG18	BH18
EEA Region 19	BA19	BB19	BC19	BD19	BE19	BF19	BG19	BH19
EEA Region 20	BA20	BB20	BC20	BD20	BE20	BF20	BG20	BH20
Total Earthquake EEA Regions before diversification	BA21	BB21	BC21	BD21	BE21	BF21	BG21	BH21
Other Regions 1	BA22	BB22						
Other Regions 2	BA23	BB23						
Other Regions 3	BA24	BB24						
Other Regions 4	BA25	BB25						
Other Regions 5	BA26	BB26						
Other Regions 6	BA27	BB27						
Other Regions 7	BA28	BB28						
Other Regions 8	BA29	BB29						
Other Regions 9	BA30	BB30						
Other Regions 10	BA31	BB31						
Other Regions 11	BA32	BB32						
Other Regions 12	BA33	BB33						
Other Regions 13	BA34	BB34						
Other Regions 14	BA35	BB35						
Total Earthquake Other Regions before diversifications	BA36	BB36			BE36	BF36	BG36	BH36
Total Earthquake all Regions before diversification	BA37	BB37			BE37	BF37	BG37	BH37
Diversification effect between regions					BE38			BH38
Total Earthquake after diversification					BE39			BH39

	Estimation of the gross premiums to be earned	Exposure	Specified Gross Loss	Gross Cat Risk Charge Factor	Scenario A or B	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
Natural Catastrophe risk - Flood									
EEA Region 1	CA1	CB1	CC1	CD1	CE1	CF1	CG1	CH1	CI1
EEA Region 2	CA2	CB2	CC2	CD2	CE2	CF2	CG2	CH2	CI2
EEA Region 3	CA3	CB3	CC3	CD3	CE3	CF3	CG3	CH3	CI3
EEA Region 4	CA4	CB4	CC4	CD4	CE4	CF4	CG4	CH4	CI4
EEA Region 5	CA5	CB5	CC5	CD5	CE5	CF5	CG5	CH5	CI5
EEA Region 6	CA6	CB6	CC6	CD6	CE6	CF6	CG6	CH6	CI6
EEA Region 7	CA7	CB7	CC7	CD7	CE7	CF7	CG7	CH7	CI7
EEA Region 8	CA8	CB8	CC8	CD8	CE8	CF8	CG8	CH8	CI8
EEA Region 9	CA9	CB9	CC9	CD9	CE9	CF9	CG9	CH9	CI9
EEA Region 10	CA10	CB10	CC10	CD10	CE10	CF10	CG10	CH10	CI10
EEA Region 11	CA11	CB11	CC11	CD11	CE11	CF11	CG11	CH11	CI11
EEA Region 12	CA12	CB12	CC12	CD12	CE12	CF12	CG12	CH12	CI12
EEA Region 13	CA13	CB13	CC13	CD13	CE13	CF13	CG13	CH13	CI13
EEA Region 14	CA14	CB14	CC14	CD14	CE14	CF14	CG14	CH14	CI14
Total Flood EEA Regions before diversification	CA15	CB15	CC15	CD15		CF15	CG15	CH15	CI15
Other Regions 1	CA16	CB16							
Other Regions 2	CA17	CB17							
Other Regions 3	CA18	CB18							
Other Regions 4	CA19	CB19							
Other Regions 5	CA20	CB20							
Other Regions 6	CA21	CB21							
Other Regions 7	CA22	CB22							
Other Regions 8	CA23	CB23							
Other Regions 9	CA24	CB24							
Other Regions 10	CA25	CB25							
Other Regions 11	CA26	CB26							
Other Regions 12	CA27	CB27							
Other Regions 13	CA28	CB28							
Other Regions 14	CA29	CB29							
Total Flood Other Regions before diversifications	CA30	CB30				CF30	CG30	CH30	CI30
Total Flood all Regions before diversification	CA31	CB31				CF31	CG31	CH31	CI31
Diversification effect between regions						CF32			CI32
Total Flood after diversification						CF33			CI33

	Estimation of the gross premiums to be earned	Exposure	Specified Gross Loss	Gross Cat Risk Charge Factor	Scenario A or B	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
Natural Catastrophe risk - Hail									
EEA Region 1	DA1	DB1	DC1	DD1	DE1	DF1	DG1	DH1	DI1
EEA Region 2	DA2	DB2	DC2	DD2	DE2	DF2	DG2	DH2	DI2
EEA Region 3	DA3	DB3	DC3	DD3	DE3	DF3	DG3	DH3	DI3
EEA Region 4	DA4	DB4	DC4	DD4	DE4	DF4	DG4	DH4	DI4
EEA Region 5	DA5	DB5	DC5	DD5	DE5	DF5	DG5	DH5	DI5
EEA Region 6	DA6	DB6	DC6	DD6	DE6	DF6	DG6	DH6	DI6

EEA Region 7	DA7	DB7	DC7	DD7	DE7	DF7	DG7	DH7	DI7
EEA Region 8	DA8	DB8	DC8	DD8	DE8	DF8	DG8	DH8	DI8
EEA Region 9	DA9	DB9	DC9	DD9	DE9	DF9	DG9	DH9	DI9
Total Hail EEA Regions before diversification	DA10	DB10	DC10	DD10		DF10	DG10	DH10	DI10
Other Regions 1	DA11	DB11							
Other Regions 2	DA12	DB12							
Other Regions 3	DA13	DB13							
Other Regions 4	DA14	DB14							
Other Regions 5	DA15	DB15							
Other Regions 6	DA16	DB16							
Other Regions 7	DA17	DB17							
Other Regions 8	DA18	DB18							
Other Regions 9	DA19	DB19							
Other Regions 10	DA20	DB20							
Other Regions 11	DA21	DB21							
Other Regions 12	DA22	DB22							
Other Regions 13	DA23	DB23							
Other Regions 14	DA24	DB24							
Total Hail Other Regions before diversifications	DA25	DB25				DF25	DG25	DH25	DI25
Total Hail all Regions before diversification	DA26	DB26				DF26	DG26	DH26	DI26
Diversification effect between regions						DF27			DI27
Total Hail after diversification						DF28			DI28

	Estimation of the gross premiums to be earned	Exposure	Specified Gross Loss	Gross Cat Risk Charge Factor	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
Natural Catastrophe risk -Subsidence								
Total Subsidence before diversification	EA1	EB1	EC1	ED1	EE1	EF1	EG1	EH1
Diversification effect between zones					EE2			EH2
Total Subsidence after diversification					EE3			EH3

	Estimation of the premiums to be earned	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
Natural Catastrophe risk - Non-proportional property reinsurance					
Non-proportional property reinsurance	FA1	FB1	FC1	FD1	FE1

Man made catastrophe risk - Motor Vehicle Liability					
	Number of vehicles policy limit below or equal to 24MC	Gross Cat Risk Charge Motor Vehicle Liability	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Motor Vehicle Liability
GA1	GA2	GA3	GA4	GA5	GA6

	Gross Cat Risk Charge Share marine hull in tanker t	Gross Cat Risk Charge Share marine liability in tanker t	Gross Cat Risk Charge Share marine oil pollution liability in tanker t	Gross Cat Risk Charge Marine Tanker Collision	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Marine Tanker Collision	Name vessel
Man made catastrophe risk - Marine Tanker Collision								
Marine Tanker Collision	HA1	HB1	HC1	HD1	HE1	HF1	HG1	HH1

	Gross Cat Risk Charge Property damage	Gross Cat Risk Charge Removal of wreckage	Gross Cat Risk Charge Loss of production income	Gross Cat Risk Charge Capping of the well or making the well secure	Gross Cat Risk Charge Liability insurance and reinsurance obligations	Gross Cat Risk Charge Marine Platform Explosion	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Marine Platform Explosion	Name platform
Man made catastrophe risk - Marine Platform Explosion										
Marine Platform Explosion	HA2	HB2	HC2	HD2	HE2	HF2	HG2	HH2	HI2	HJ2

Man made catastrophe risk - Marine			
	Gross Cat Risk Charge Marine	Estimated Total Risk Mitigation	Net Cat Risk Charge Marine
Total before diversification	HA3	HA4	HA5
Diversification between type of event	HB3	HB4	HB5
Total after diversification	HC3	HC4	HC5

	Gross Cat risk Charge Aviation hull	Gross Cat risk Charge Aviation liability	Gross Cat Risk Charge Aviation	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Aviation
Man made catastrophe risk - Aviation						
Gross Cat Risk Charge Aviation	IA1	IB1	IC1	ID1	IE1	IF1

Man made catastrophe risk - Fire			
	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Fire
Gross Cat Risk Charge Fire	JA1	JA2	JA3
	JA4		

Man made catastrophe risk - Liability	Earned premium last 12 months	Largest liability limit provided	Number of claims	Gross Cat Risk Charge Liability	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Liability
Professional malpractice liability	KA1	KA2	KA3	KA4	KA5	KA6	KA7
Employers liability	KB1	KB2	KB3	KB4	KB5	KB6	KB7
Directors and officers liability	KC1	KC2	KC3	KC4	KC5	KC6	KC7
Other liability	KD1	KD2	KD3	KD4	KD5	KD6	KD7
Non-proportional reinsurance	KE1	KE2	KE3	KE4	KE5	KE6	KE7
Total	KF1	KF2	KF3	KF4	KF5	KF6	KF7

Man made catastrophe risk - Liability			
	Gross Cat Risk Charge Liability	Estimated Total Risk Mitigation	Net Cat Risk Charge Liability
Total before diversification	KA8	KA9	KA10
Diversification between type of cover	KB8	KB9	KB10
Total after diversification	KC8	KC9	KC10

Man made catastrophe risk - Credit & Suretyship - Large Credit Default						
	Exposure (individual or group)	Proportion of damage caused by scenario	Gross Cat Risk Charge Credit & Surety - Large Credit Default	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Credit & Surety - Large Credit Default
Largest exposure 1	LA1	LA2	LA3	LA4	LA5	LA6
Largest exposure 2	LB1	LB2	LB3	LB4	LB5	LB6
Total	LC1	LC2	LC3	LC4	LC5	LC6

Man made catastrophe risk - Credit & Suretyship - Recession Risk					
	Earned premium last 12 months	Gross Cat Risk Charge Credit & Suretyship - Recession Risk	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Credit & Suretyship - Recession Risk
Total	LA7	LA8	LA9	LA10	LA11

Man made catastrophe risk - Credit & Suretyship			
	Gross Cat Risk Charge Credit & Suretyship	Estimated Total Risk Mitigation	Net Cat Risk Charge Credit & Suretyship
Total before diversification	LA12	LA13	LA14
Diversification between type of event	LB12	LB13	LB14
Total after diversification	LC12	LC13	LC14

Man made catastrophe risk - Other non-life catastrophe risk				
	Estimation of the gross premiums to be earned	Gross Cat Risk Charge Other non-life catastrophe risk	Estimated Total Risk Mitigation	Net Cat Risk Charge Other non-life catastrophe risk
MAT other than Marine and Aviation	MA1	MA2		
Non-proportional MAT reinsurance other than Marine and Aviation	MB1	MB2		
Miscellaneous financial loss	MC1	MC2		
Non-proportional Casualty reinsurance other than General liability	MD1	MD2		
Non-proportional Credit & Surety reinsurance	ME1	ME2		
Total before diversification		MF2	MF3	MF4
Diversification between groups of obligations		MG2	MG3	MG4
Total after diversification		MH2	MH3	MH4

Health Catastrophe risk - Mass accident	Accidental death		Permanent disability		Disability 10 years		Disability 12 months		Medical treatment		Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
	# Policyholders	Total value of benefits payable	# Policyholders	Total value of benefits payable	# Policyholders	Total value of benefits payable	# Policyholders	Total value of benefits payable	# Policyholders	Total value of benefits payable				
Country 1	NA1	NB1	NC1	ND1	NE1	NF1	NG1	NH1	NI1	NJ1	NK1	NL1	NM1	NN1
Country 2	NA2	NB2	NC2	ND2	NE2	NF2	NG2	NH2	NI2	NJ2	NK2	NL2	NM2	NN2
Country 3	NA3	NB3	NC3	ND3	NE3	NF3	NG3	NH3	NI3	NJ3	NK3	NL3	NM3	NN3
Country 4	NA4	NB4	NC4	ND4	NE4	NF4	NG4	NH4	NI4	NJ4	NK4	NL4	NM4	NN4
Country 5	NA5	NB5	NC5	ND5	NE5	NF5	NG5	NH5	NI5	NJ5	NK5	NL5	NM5	NN5
Country 6	NA6	NB6	NC6	ND6	NE6	NF6	NG6	NH6	NI6	NJ6	NK6	NL6	NM6	NN6
Country 7	NA7	NB7	NC7	ND7	NE7	NF7	NG7	NH7	NI7	NJ7	NK7	NL7	NM7	NN7
Country 8	NA8	NB8	NC8	ND8	NE8	NF8	NG8	NH8	NI8	NJ8	NK8	NL8	NM8	NN8
Country 9	NA9	NB9	NC9	ND9	NE9	NF9	NG9	NH9	NI9	NJ9	NK9	NL9	NM9	NN9
Country 10	NA10	NB10	NC10	ND10	NE10	NF10	NG10	NH10	NI10	NJ10	NK10	NL10	NM10	NN10
Country 11	NA11	NB11	NC11	ND11	NE11	NF11	NG11	NH11	NI11	NJ11	NK11	NL11	NM11	NN11
Country 12	NA12	NB12	NC12	ND12	NE12	NF12	NG12	NH12	NI12	NJ12	NK12	NL12	NM12	NN12
Country 13	NA13	NB13	NC13	ND13	NE13	NF13	NG13	NH13	NI13	NJ13	NK13	NL13	NM13	NN13
Country 14	NA14	NB14	NC14	ND14	NE14	NF14	NG14	NH14	NI14	NJ14	NK14	NL14	NM14	NN14
Country 15	NA15	NB15	NC15	ND15	NE15	NF15	NG15	NH15	NI15	NJ15	NK15	NL15	NM15	NN15
Country 16	NA16	NB16	NC16	ND16	NE16	NF16	NG16	NH16	NI16	NJ16	NK16	NL16	NM16	NN16
Country 17	NA17	NB17	NC17	ND17	NE17	NF17	NG17	NH17	NI17	NJ17	NK17	NL17	NM17	NN17

Country 28			PC28	PD28	PE28	PF28	PG28	PH28	PI28	PJ28			
Country 29			PC29	PD29	PE29	PF29	PG29	PH29	PI29	PJ29			
Country 30			PC30	PD30	PE30	PF30	PG30	PH30	PI30	PJ30			
Country 31			PC31	PD31	PE31	PF31	PG31	PH31	PI31	PJ31			
Total Income Protections all countries	PA32	PB32								PJ32			
Total Pandemic all countries										PJ33	PK33	PL33	PM33

Appendix I: Quantitative reporting templates
S.27.01.g
Solvency Capital Requirement - Non-life catastrophe risk

Non-life catastrophe risk - Summary	Gross SCR	Total risk mitigation	Net SCR
Natural catastrophe risk	A1	B1	C1
Windstorm	A2	B2	C2
Earthquake	A3	B3	C3
Flood	A4	B4	C4
Hail	A5	B5	C5
Subsidence	A6	B6	C6
Diversification between perils	A7	B7	C7
Catastrophe risk non-proportional property reinsurance	A8	B8	C8
Man-made catastrophe risk	A9	B9	C9
Motor vehicle liability	A10	B10	C10
Marine	A11	B11	C11
Aviation	A12	B12	C12
Fire	A13	B13	C13
Liability	A14	B14	C14
Credit & Suretyship	A15	B15	C15
Diversification between perils	A16	B16	C16
Other non-life catastrophe risk	A17	B17	C17
Diversification between perils	A18	B18	C18
Total Non-life catastrophe risk before diversification	A19	B19	C19
Diversification between sub-modules	A20	B20	C20
Total Non-life catastrophe risk after diversification	A21	B21	C21
Health catastrophe risk - Summary	Gross SCR	Total risk mitigation	Net SCR
Health catastrophe risk	A22	B22	C22
Mass accident	A23	B23	C23
Accident concentration	A24	B24	C24
Pandemic	A25	B25	C25
Diversification between sub-modules	A26	B26	C26

	Estimation of the gross premiums to be earned	Exposure	Specified Gross Loss	Gross Cat Risk Charge Factor	Scenario A or B	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
Natural Catastrophe risk - Windstorm									
EEA Region 1	AA1	AB1	AC1	AD1	AE1	AF1	AG1	AH1	AI1
EEA Region 2	AA2	AB2	AC2	AD2	AE2	AF2	AG2	AH2	AI2
EEA Region 3	AA3	AB3	AC3	AD3	AE3	AF3	AG3	AH3	AI3
EEA Region 4	AA4	AB4	AC4	AD4	AE4	AF4	AG4	AH4	AI4
EEA Region 5	AA5	AB5	AC5	AD5	AE5	AF5	AG5	AH5	AI5
EEA Region 6	AA6	AB6	AC6	AD6	AE6	AF6	AG6	AH6	AI6
EEA Region 7	AA7	AB7	AC7	AD7	AE7	AF7	AG7	AH7	AI7
EEA Region 8	AA8	AB8	AC8	AD8	AE8	AF8	AG8	AH8	AI8
EEA Region 9	AA9	AB9	AC9	AD9	AE9	AF9	AG9	AH9	AI9
EEA Region 10	AA10	AB10	AC10	AD10	AE10	AF10	AG10	AH10	AI10
EEA Region 11	AA11	AB11	AC11	AD11	AE11	AF11	AG11	AH11	AI11
EEA Region 12	AA12	AB12	AC12	AD12	AE12	AF12	AG12	AH12	AI12
EEA Region 13	AA13	AB13	AC13	AD13	AE13	AF13	AG13	AH13	AI13
EEA Region 14	AA14	AB14	AC14	AD14	AE14	AF14	AG14	AH14	AI14
EEA Region 15	AA15	AB15	AC15	AD15	AE15	AF15	AG15	AH15	AI15
EEA Region 16	AA16	AB16	AC16	AD16	AE16	AF16	AG16	AH16	AI16
EEA Region 17	AA17	AB17	AC17	AD17	AE17	AF17	AG17	AH17	AI17
EEA Region 18	AA18	AB18	AC18	AD18	AE18	AF18	AG18	AH18	AI18
EEA Region 19	AA19	AB19	AC19	AD19	AE19	AF19	AG19	AH19	AI19
EEA Region 20	AA20	AB20	AC20	AD20	AE20	AF20	AG20	AH20	AI20
Total Windstorm EEA Regions before diversification	AA21	AB21	AC21	AD21		AF21	AG21	AH21	AI21
Other Regions 1	AA22	AB22							
Other Regions 2	AA23	AB23							
Other Regions 3	AA24	AB24							
Other Regions 4	AA25	AB25							
Other Regions 5	AA26	AB26							
Other Regions 6	AA27	AB27							
Other Regions 7	AA28	AB28							
Other Regions 8	AA29	AB29							
Other Regions 9	AA30	AB30							
Other Regions 10	AA31	AB31							
Other Regions 11	AA32	AB32							
Other Regions 12	AA33	AB33							
Other Regions 13	AA34	AB34							
Other Regions 14	AA35	AB35							
Total Windstorm Other Regions before diversifications	AA36	AB36				AF36	AG36	AH36	AI36
Total Windstorm all Regions before diversification	AA37	AB37				AF37	AG37	AH37	AI37
Diversification effect between regions						AF38			AI38
Total Windstorm after diversification						AF39			AI39

	Estimation of the gross premiums to be earned	Exposure	Specified Gross Loss	Gross Cat Risk Charge Factor	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
Natural Catastrophe risk - Earthquake								
EEA Region 1	BA1	BB1	BC1	BD1	BE1	BF1	BG1	BH1
EEA Region 2	BA2	BB2	BC2	BD2	BE2	BF2	BG2	BH2
EEA Region 3	BA3	BB3	BC3	BD3	BE3	BF3	BG3	BH3
EEA Region 4	BA4	BB4	BC4	BD4	BE4	BF4	BG4	BH4
EEA Region 5	BA5	BB5	BC5	BD5	BE5	BF5	BG5	BH5
EEA Region 6	BA6	BB6	BC6	BD6	BE6	BF6	BG6	BH6
EEA Region 7	BA7	BB7	BC7	BD7	BE7	BF7	BG7	BH7

EEA Region 8	BA8	BB8	BC8	BD8	BE8	BF8	BG8	BH8
EEA Region 9	BA9	BB9	BC9	BD9	BE9	BF9	BG9	BH9
EEA Region 10	BA10	BB10	BC10	BD10	BE10	BF10	BG10	BH10
EEA Region 11	BA11	BB11	BC11	BD11	BE11	BF11	BG11	BH11
EEA Region 12	BA12	BB12	BC12	BD12	BE12	BF12	BG12	BH12
EEA Region 13	BA13	BB13	BC13	BD13	BE13	BF13	BG13	BH13
EEA Region 14	BA14	BB14	BC14	BD14	BE14	BF14	BG14	BH14
EEA Region 15	BA15	BB15	BC15	BD15	BE15	BF15	BG15	BH15
EEA Region 16	BA16	BB16	BC16	BD16	BE16	BF16	BG16	BH16
EEA Region 17	BA17	BB17	BC17	BD17	BE17	BF17	BG17	BH17
EEA Region 18	BA18	BB18	BC18	BD18	BE18	BF18	BG18	BH18
EEA Region 19	BA19	BB19	BC19	BD19	BE19	BF19	BG19	BH19
EEA Region 20	BA20	BB20	BC20	BD20	BE20	BF20	BG20	BH20
Total Earthquake EEA Regions before diversification	BA21	BB21	BC21	BD21	BE21	BF21	BG21	BH21
Other Regions 1	BA22	BB22						
Other Regions 2	BA23	BB23						
Other Regions 3	BA24	BB24						
Other Regions 4	BA25	BB25						
Other Regions 5	BA26	BB26						
Other Regions 6	BA27	BB27						
Other Regions 7	BA28	BB28						
Other Regions 8	BA29	BB29						
Other Regions 9	BA30	BB30						
Other Regions 10	BA31	BB31						
Other Regions 11	BA32	BB32						
Other Regions 12	BA33	BB33						
Other Regions 13	BA34	BB34						
Other Regions 14	BA35	BB35						
Total Earthquake Other Regions before diversifications	BA36	BB36			BE36	BF36	BG36	BH36
Total Earthquake all Regions before diversification	BA37	BB37			BE37	BF37	BG37	BH37
Diversification effect between regions					BE38			BH38
Total Earthquake after diversification					BE39			BH39

	Estimation of the gross premiums to be earned		Specified Gross Loss	Gross Cat Risk Charge Factor	Scenario A or B	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
Natural Catastrophe risk - Flood	Exposure								
EEA Region 1	CA1	CB1	CC1	CD1	CE1	CF1	CG1	CH1	CI1
EEA Region 2	CA2	CB2	CC2	CD2	CE2	CF2	CG2	CH2	CI2
EEA Region 3	CA3	CB3	CC3	CD3	CE3	CF3	CG3	CH3	CI3
EEA Region 4	CA4	CB4	CC4	CD4	CE4	CF4	CG4	CH4	CI4
EEA Region 5	CA5	CB5	CC5	CD5	CE5	CF5	CG5	CH5	CI5
EEA Region 6	CA6	CB6	CC6	CD6	CE6	CF6	CG6	CH6	CI6
EEA Region 7	CA7	CB7	CC7	CD7	CE7	CF7	CG7	CH7	CI7
EEA Region 8	CA8	CB8	CC8	CD8	CE8	CF8	CG8	CH8	CI8
EEA Region 9	CA9	CB9	CC9	CD9	CE9	CF9	CG9	CH9	CI9
EEA Region 10	CA10	CB10	CC10	CD10	CE10	CF10	CG10	CH10	CI10
EEA Region 11	CA11	CB11	CC11	CD11	CE11	CF11	CG11	CH11	CI11
EEA Region 12	CA12	CB12	CC12	CD12	CE12	CF12	CG12	CH12	CI12
EEA Region 13	CA13	CB13	CC13	CD13	CE13	CF13	CG13	CH13	CI13
EEA Region 14	CA14	CB14	CC14	CD14	CE14	CF14	CG14	CH14	CI14
Total Flood EEA Regions before diversification	CA15	CB15	CC15	CD15		CF15	CG15	CH15	CI15
Other Regions 1	CA16	CB16							
Other Regions 2	CA17	CB17							
Other Regions 3	CA18	CB18							
Other Regions 4	CA19	CB19							
Other Regions 5	CA20	CB20							
Other Regions 6	CA21	CB21							
Other Regions 7	CA22	CB22							
Other Regions 8	CA23	CB23							
Other Regions 9	CA24	CB24							
Other Regions 10	CA25	CB25							
Other Regions 11	CA26	CB26							
Other Regions 12	CA27	CB27							
Other Regions 13	CA28	CB28							
Other Regions 14	CA29	CB29							
Total Flood Other Regions before diversifications	CA30	CB30				CF30	CG30	CH30	CI30
Total Flood all Regions before diversification	CA31	CB31				CF31	CG31	CH31	CI31
Diversification effect between regions						CF32			CI32
Total Flood after diversification						CF33			CI33

	Estimation of the gross premiums to be earned		Specified Gross Loss	Gross Cat Risk Charge Factor	Scenario A or B	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
Natural Catastrophe risk - Hail	Exposure								
EEA Region 1	DA1	DB1	DC1	DD1	DE1	DF1	DG1	DH1	DI1
EEA Region 2	DA2	DB2	DC2	DD2	DE2	DF2	DG2	DH2	DI2
EEA Region 3	DA3	DB3	DC3	DD3	DE3	DF3	DG3	DH3	DI3
EEA Region 4	DA4	DB4	DC4	DD4	DE4	DF4	DG4	DH4	DI4
EEA Region 5	DA5	DB5	DC5	DD5	DE5	DF5	DG5	DH5	DI5
EEA Region 6	DA6	DB6	DC6	DD6	DE6	DF6	DG6	DH6	DI6
EEA Region 7	DA7	DB7	DC7	DD7	DE7	DF7	DG7	DH7	DI7
EEA Region 8	DA8	DB8	DC8	DD8	DE8	DF8	DG8	DH8	DI8
EEA Region 9	DA9	DB9	DC9	DD9	DE9	DF9	DG9	DH9	DI9
Total Hail EEA Regions before diversification	DA10	DB10	DC10	DD10		DF10	DG10	DH10	DI10
Other Regions 1	DA11	DB11							

Other Regions 2	DA12	DB12							
Other Regions 3	DA13	DB13							
Other Regions 4	DA14	DB14							
Other Regions 5	DA15	DB15							
Other Regions 6	DA16	DB16							
Other Regions 7	DA17	DB17							
Other Regions 8	DA18	DB18							
Other Regions 9	DA19	DB19							
Other Regions 10	DA20	DB20							
Other Regions 11	DA21	DB21							
Other Regions 12	DA22	DB22							
Other Regions 13	DA23	DB23							
Other Regions 14	DA24	DB24							
Total Hail Other Regions before diversifications	DA25	DB25				DF25	DG25	DH25	DI25
Total Hail all Regions before diversification	DA26	DB26				DF26	DG26	DH26	DI26
Diversification effect between regions						DF27			DI27
Total Hail after diversification						DF28			DI28

	Estimation of the gross premiums to be earned	Exposure	Specified Gross Loss	Gross Cat Risk Charge Factor	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
Natural Catastrophe risk -Subsidence								
Total Subsidence before diversification	EA1	EB1	EC1	ED1	EE1	EF1	EG1	EH1
Diversification effect between zones					EE2			EH2
Total Subsidence after diversification					EE3			EH3

	Estimation of the premiums	Gross Catastrophe	Estimated Risk Mitigation	Estimated Reinstatement	Net Catastrophe
Natural Catastrophe risk - Non-proportional property reinsurance					
Non-proportional property reinsurance	FA1	FB1	FC1	FD1	FE1

Man made catastrophe risk - Motor Vehicle Liability					
	Number of vehicles policy limit below or equal to 24MC	Gross Cat Risk Charge Motor Vehicle Liability	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Motor Vehicle Liability
GA1	GA2	GA3	GA4	GA5	GA6

	Gross Cat Risk Charge Share marine hull in tanker t	Gross Cat Risk Charge Share marine liability in tanker t	Gross Cat Risk Charge Share marine oil pollution liability in tanker t	Gross Cat Risk Charge Marine Tanker Collision	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Marine Tanker Collision	Name vessel
Man made catastrophe risk - Marine Tanker Collision								
Marine Tanker Collision	HA1	HB1	HC1	HD1	HE1	HF1	HG1	HH1

	Gross Cat Risk Charge Property	Gross Cat Risk Charge Removal of	Gross Cat Risk Charge Loss of production	Gross Cat Risk Charge Capping of the well or	Gross Cat Risk Charge Liability	Gross Cat Risk Charge Marine Platform	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Marine Platform	Name platform
Man made catastrophe risk - Marine Platform Explosion										
Marine Platform Explosion	HA2	HB2	HC2	HD2	HE2	HF2	HG2	HH2	HI2	HJ2

Man made catastrophe risk - Marine			
	Gross Cat Risk Charge Marine	Estimated Total Risk Mitigation	Net Cat Risk Charge Marine
Total before diversification	HA3	HA4	HA5
Diversification between type of event	HB3	HB4	HB5
Total after diversification	HC3	HC4	HC5

	Gross Cat risk Charge Aviation hull	Gross Cat risk Charge Aviation liability	Gross Cat Risk Charge Aviation	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Aviation
Man made catastrophe risk - Aviation						
Gross Cat Risk Charge Aviation	IA1	IB1	IC1	ID1	IE1	IF1

Man made catastrophe risk - Fire			
	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Fire
Gross Cat Risk Charge Fire	JA2	JA3	JA4

	Earned premium last 12 months	Largest liability limit provided	Number of claims	Gross Cat Risk Charge Liability	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Liability
Man made catastrophe risk - Liability							

Professional malpractice liability	KA1	KA2	KA3	KA4	KA5	KA6	KA7
Employers liability	KB1	KB2	KB3	KB4	KB5	KB6	KB7
Directors and officers liability	KC1	KC2	KC3	KC4	KC5	KC6	KC7
Other liability	KD1	KD2	KD3	KD4	KD5	KD6	KD7
Non-proportional reinsurance	KE1	KE2	KE3	KE4	KE5	KE6	KE7
Total	KF1	KE2	KE3	KF4	KF5	KF6	KF7

Man made catastrophe risk - Liability			
	Gross Cat Risk Charge Liability	Estimated Total Risk Mitigation	Net Cat Risk Charge Liability
Total before diversification	KA8	KA9	KA10
Diversification between type of cover	KB8	KB9	KB10
Total after diversification	KC8	KC9	KC10

Man made catastrophe risk - Credit & Suretyship - Large Credit Default						
	Exposure (individual or group)	Proportion of damage caused by scenario	Gross Cat Risk Charge Credit & Surety - Large Credit Default	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Credit & Surety - Large Credit Default
Largest exposure 1	LA1	LA2	LA3	LA4	LA5	LA6
Largest exposure 2	LB1	LB2	LB3	LB4	LB5	LB6
Total	LC1	LC2	LC3	LC4	LC5	LC6

Man made catastrophe risk - Credit & Suretyship - Recession Risk					
	Earned premium last 12 months	Gross Cat Risk Charge Credit & Suretyship - Recession Risk	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Credit & Suretyship - Recession Risk
Total	LA7	LA8	LA9	LA10	LA11

Man made catastrophe risk - Credit & Suretyship			
	Gross Cat Risk Charge Credit & Suretyship	Estimated Total Risk Mitigation	Net Cat Risk Charge Credit & Suretyship
Total before diversification	LA12	LA13	LA14
Diversification between type of event	LB12	LB13	LB14
Total after diversification	LC12	LC13	LC14

Man made catastrophe risk - Other non-life catastrophe risk				
	Estimation of the gross premiums to be earned	Gross Cat Risk Charge Other non-life catastrophe risk	Estimated Total Risk Mitigation	Net Cat Risk Charge Other non-life catastrophe risk
MAT other than Marine and Aviation	MA1	MA2		
Non-proportional MAT reinsurance other than Marine and Aviation	MB1	MB2		
Miscellaneous financial loss	MC1	MC2		
Non-proportional Casualty reinsurance other than General liability	MD1	MD2		
Non-proportional Credit & Surety reinsurance	ME1	ME2		
Total before diversification		MF2	MF3	MF4
Diversification between groups of obligations		MG2	MG3	MG4
Total after diversification		MH2	MH3	MH4

Health Catastrophe risk - Mass accident	Accidental death		Permanent disability		Disability 10 years		Disability 12 months		Medical treatment		Gross Catastrophe	Estimated Risk Mitigation	Estimated Reinstatement	Net Catastrophe Risk Charge
	# Policyholders	Total value of	# Policyholders	Total value of	# Policyholders	Total value of	# Policyholders	Total value of	# Policyholders	Total value of				
Country 1	NA1	NB1	NC1	ND1	NE1	NF1	NG1	NH1	NI1	NJ1	NK1	NL1	NM1	NN1
Country 2	NA2	NB2	NC2	ND2	NE2	NF2	NG2	NH2	NI2	NJ2	NK2	NL2	NM2	NN2
Country 3	NA3	NB3	NC3	ND3	NE3	NF3	NG3	NH3	NI3	NJ3	NK3	NL3	NM3	NN3
Country 4	NA4	NB4	NC4	ND4	NE4	NF4	NG4	NH4	NI4	NJ4	NK4	NL4	NM4	NN4
Country 5	NA5	NB5	NC5	ND5	NE5	NF5	NG5	NH5	NI5	NJ5	NK5	NL5	NM5	NN5
Country 6	NA6	NB6	NC6	ND6	NE6	NF6	NG6	NH6	NI6	NJ6	NK6	NL6	NM6	NN6
Country 7	NA7	NB7	NC7	ND7	NE7	NF7	NG7	NH7	NI7	NJ7	NK7	NL7	NM7	NN7
Country 8	NA8	NB8	NC8	ND8	NE8	NF8	NG8	NH8	NI8	NJ8	NK8	NL8	NM8	NN8
Country 9	NA9	NB9	NC9	ND9	NE9	NF9	NG9	NH9	NI9	NJ9	NK9	NL9	NM9	NN9
Country 10	NA10	NB10	NC10	ND10	NE10	NF10	NG10	NH10	NI10	NJ10	NK10	NL10	NM10	NN10
Country 11	NA11	NB11	NC11	ND11	NE11	NF11	NG11	NH11	NI11	NJ11	NK11	NL11	NM11	NN11
Country 12	NA12	NB12	NC12	ND12	NE12	NF12	NG12	NH12	NI12	NJ12	NK12	NL12	NM12	NN12
Country 13	NA13	NB13	NC13	ND13	NE13	NF13	NG13	NH13	NI13	NJ13	NK13	NL13	NM13	NN13
Country 14	NA14	NB14	NC14	ND14	NE14	NF14	NG14	NH14	NI14	NJ14	NK14	NL14	NM14	NN14
Country 15	NA15	NB15	NC15	ND15	NE15	NF15	NG15	NH15	NI15	NJ15	NK15	NL15	NM15	NN15
Country 16	NA16	NB16	NC16	ND16	NE16	NF16	NG16	NH16	NI16	NJ16	NK16	NL16	NM16	NN16
Country 17	NA17	NB17	NC17	ND17	NE17	NF17	NG17	NH17	NI17	NJ17	NK17	NL17	NM17	NN17
Country 18	NA18	NB18	NC18	ND18	NE18	NF18	NG18	NH18	NI18	NJ18	NK18	NL18	NM18	NN18
Country 19	NA19	NB19	NC19	ND19	NE19	NF19	NG19	NH19	NI19	NJ19	NK19	NL19	NM19	NN19
Country 20	NA20	NB20	NC20	ND20	NE20	NF20	NG20	NH20	NI20	NJ20	NK20	NL20	NM20	NN20
Country 21	NA21	NB21	NC21	ND21	NE21	NF21	NG21	NH21	NI21	NJ21	NK21	NL21	NM21	NN21
Country 22	NA22	NB22	NC22	ND22	NE22	NF22	NG22	NH22	NI22	NJ22	NK22	NL22	NM22	NN22
Country 23	NA23	NB23	NC23	ND23	NE23	NF23	NG23	NH23	NI23	NJ23	NK23	NL23	NM23	NN23
Country 24	NA24	NB24	NC24	ND24	NE24	NF24	NG24	NH24	NI24	NJ24	NK24	NL24	NM24	NN24
Country 25	NA25	NB25	NC25	ND25	NE25	NF25	NG25	NH25	NI25	NJ25	NK25	NL25	NM25	NN25

Country 26	NA26	NB26	NC26	ND26	NE26	NF26	NG26	NH26	NI26	NJ26	NK26	NL26	NM26	NN26
Country 27	NA27	NB27	NC27	ND27	NE27	NF27	NG27	NH27	NI27	NJ27	NK27	NL27	NM27	NN27
Country 28	NA28	NB28	NC28	ND28	NE28	NF28	NG28	NH28	NI28	NJ28	NK28	NL28	NM28	NN28
Country 29	NA29	NB29	NC29	ND29	NE29	NF29	NG29	NH29	NI29	NJ29	NK29	NL29	NM29	NN29
Country 30	NA30	NB30	NC30	ND30	NE30	NF30	NG30	NH30	NI30	NJ30	NK30	NL30	NM30	NN30
Country 31	NA31	NB31	NC31	ND31	NE31	NF31	NG31	NH31	NI31	NJ31	NK31	NL31	NM31	NN31
Total Mass accident all countries before diversification														
Diversification effect between countries											NK32	NL32	NM32	NN32
Total Mass accident all countries after diversification											NK33			NN33
											NK34			NN34

Health Catastrophe risk - Concentration accident	Largest known accident risk concentration	Accidental death	Permanent disability	Disability 10 years	Disability 12 months	Medical treatment	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
		average sum insured	average sum insured	average sum insured	average sum insured	average sum insured				
Country 1	OA1	OB1	OC1	OD1	OE1	OF1	OG1	OH1	OI1	OJ1
Country 2	OA2	OB2	OC2	OD2	OE2	OF2	OG2	OH2	OI2	OJ2
Country 3	OA3	OB3	OC3	OD3	OE3	OF3	OG3	OH3	OI3	OJ3
Country 4	OA4	OB4	OC4	OD4	OE4	OF4	OG4	OH4	OI4	OJ4
Country 5	OA5	OB5	OC5	OD5	OE5	OF5	OG5	OH5	OI5	OJ5
Country 6	OA6	OB6	OC6	OD6	OE6	OF6	OG6	OH6	OI6	OJ6
Country 7	OA7	OB7	OC7	OD7	OE7	OF7	OG7	OH7	OI7	OJ7
Country 8	OA8	OB8	OC8	OD8	OE8	OF8	OG8	OH8	OI8	OJ8
Country 9	OA9	OB9	OC9	OD9	OE9	OF9	OG9	OH9	OI9	OJ9
Country 10	OA10	OB10	OC10	OD10	OE10	OF10	OG10	OH10	OI10	OJ10
Country 11	OA11	OB11	OC11	OD11	OE11	OF11	OG11	OH11	OI11	OJ11
Country 12	OA12	OB12	OC12	OD12	OE12	OF12	OG12	OH12	OI12	OJ12
Country 13	OA13	OB13	OC13	OD13	OE13	OF13	OG13	OH13	OI13	OJ13
Country 14	OA14	OB14	OC14	OD14	OE14	OF14	OG14	OH14	OI14	OJ14
Country 15	OA15	OB15	OC15	OD15	OE15	OF15	OG15	OH15	OI15	OJ15
Country 16	OA16	OB16	OC16	OD16	OE16	OF16	OG16	OH16	OI16	OJ16
Country 17	OA17	OB17	OC17	OD17	OE17	OF17	OG17	OH17	OI17	OJ17
Country 18	OA18	OB18	OC18	OD18	OE18	OF18	OG18	OH18	OI18	OJ18
Country 19	OA19	OB19	OC19	OD19	OE19	OF19	OG19	OH19	OI19	OJ19
Country 20	OA20	OB20	OC20	OD20	OE20	OF20	OG20	OH20	OI20	OJ20
Country 21	OA21	OB21	OC21	OD21	OE21	OF21	OG21	OH21	OI21	OJ21
Country 22	OA22	OB22	OC22	OD22	OE22	OF22	OG22	OH22	OI22	OJ22
Country 23	OA23	OB23	OC23	OD23	OE23	OF23	OG23	OH23	OI23	OJ23
Country 24	OA24	OB24	OC24	OD24	OE24	OF24	OG24	OH24	OI24	OJ24
Country 25	OA25	OB25	OC25	OD25	OE25	OF25	OG25	OH25	OI25	OJ25
Country 26	OA26	OB26	OC26	OD26	OE26	OF26	OG26	OH26	OI26	OJ26
Country 27	OA27	OB27	OC27	OD27	OE27	OF27	OG27	OH27	OI27	OJ27
Country 28	OA28	OB28	OC28	OD28	OE28	OF28	OG28	OH28	OI28	OJ28
Country 29	OA29	OB29	OC29	OD29	OE29	OF29	OG29	OH29	OI29	OJ29
Country 30	OA30	OB30	OC30	OD30	OE30	OF30	OG30	OH30	OI30	OJ30
Country 31	OA31	OB31	OC31	OD31	OE31	OF31	OG31	OH31	OI31	OJ31
Total Concentration accident all countries before diversification							OG32	OH32	OI32	OJ32
Diversification effect between countries							OG33			OJ33
Total Concentration accident all countries after diversification							OG34			OJ34

Health Catastrophe risk - Pandemic	Income protection		Medical expense						Gross	Estimated Risk	Estimated	Net Catastrophe	
	Number of	Total pandemic	Number of	Unit claim cost	Expected	Unit claim cost	Expected	Unit claim cost					Expected
Country 1			PC1	PD1	PE1	PF1	PG1	PH1	PI1	PJ1			
Country 2			PC2	PD2	PE2	PF2	PG2	PH2	PI2	PJ2			
Country 3			PC3	PD3	PE3	PF3	PG3	PH3	PI3	PJ3			
Country 4			PC4	PD4	PE4	PF4	PG4	PH4	PI4	PJ4			
Country 5			PC5	PD5	PE5	PF5	PG5	PH5	PI5	PJ5			
Country 6			PC6	PD6	PE6	PF6	PG6	PH6	PI6	PJ6			
Country 7			PC7	PD7	PE7	PF7	PG7	PH7	PI7	PJ7			
Country 8			PC8	PD8	PE8	PF8	PG8	PH8	PI8	PJ8			
Country 9			PC9	PD9	PE9	PF9	PG9	PH9	PI9	PJ9			
Country 10			PC10	PD10	PE10	PF10	PG10	PH10	PI10	PJ10			
Country 11			PC11	PD11	PE11	PF11	PG11	PH11	PI11	PJ11			
Country 12			PC12	PD12	PE12	PF12	PG12	PH12	PI12	PJ12			
Country 13			PC13	PD13	PE13	PF13	PG13	PH13	PI13	PJ13			
Country 14			PC14	PD14	PE14	PF14	PG14	PH14	PI14	PJ14			
Country 15			PC15	PD15	PE15	PF15	PG15	PH15	PI15	PJ15			
Country 16			PC16	PD16	PE16	PF16	PG16	PH16	PI16	PJ16			
Country 17			PC17	PD17	PE17	PF17	PG17	PH17	PI17	PJ17			
Country 18			PC18	PD18	PE18	PF18	PG18	PH18	PI18	PJ18			
Country 19			PC19	PD19	PE19	PF19	PG19	PH19	PI19	PJ19			
Country 20			PC20	PD20	PE20	PF20	PG20	PH20	PI20	PJ20			
Country 21			PC21	PD21	PE21	PF21	PG21	PH21	PI21	PJ21			
Country 22			PC22	PD22	PE22	PF22	PG22	PH22	PI22	PJ22			
Country 23			PC23	PD23	PE23	PF23	PG23	PH23	PI23	PJ23			
Country 24			PC24	PD24	PE24	PF24	PG24	PH24	PI24	PJ24			
Country 25			PC25	PD25	PE25	PF25	PG25	PH25	PI25	PJ25			
Country 26			PC26	PD26	PE26	PF26	PG26	PH26	PI26	PJ26			
Country 27			PC27	PD27	PE27	PF27	PG27	PH27	PI27	PJ27			
Country 28			PC28	PD28	PE28	PF28	PG28	PH28	PI28	PJ28			
Country 29			PC29	PD29	PE29	PF29	PG29	PH29	PI29	PJ29			
Country 30			PC30	PD30	PE30	PF30	PG30	PH30	PI30	PJ30			
Country 31			PC31	PD31	PE31	PF31	PG31	PH31	PI31	PJ31			
Total Income Protections all countries	PA32	PB32								PJ32			
Total Pandemic all countries										PJ33	PK33	PL33	PM33

Appendix I: Quantitative reporting templates
S.27.01.n
Solvency Capital Requirement - Non-life catastrophe risk

Ring fenced fund? (Y/N)
Fund number

A30
A0

Non-life catastrophe risk - Summary	Gross SCR	Total risk mitigation	Net SCR
Natural catastrophe risk	A1	B1	C1
Windstorm	A2	B2	C2
Earthquake	A3	B3	C3
Flood	A4	B4	C4
Hail	A5	B5	C5
Subsidence	A6	B6	C6
Diversification between perils	A7	B7	C7
Catastrophe risk non-proportional property reinsurance	A8	B8	C8
Man-made catastrophe risk	A9	B9	C9
Motor vehicle liability	A10	B10	C10
Marine	A11	B11	C11
Aviation	A12	B12	C12
Fire	A13	B13	C13
Liability	A14	B14	C14
Credit & Suretyship	A15	B15	C15
Diversification between perils	A16	B16	C16
Other non-life catastrophe risk	A17	B17	C17
Diversification between perils	A18	B18	C18
Total Non-life catastrophe risk before diversification	A19	B19	C19
Diversification between sub-modules	A20	B20	C20
Total Non-life catastrophe risk after diversification	A21	B21	C21
Health catastrophe risk - Summary	Gross SCR	Total risk mitigation	Net SCR
Health catastrophe risk	A22	B22	C22
Mass accident	A23	B23	C23
Accident concentration	A24	B24	C24
Pandemic	A25	B25	C25
Diversification between sub-modules	A26	B26	C26

Natural Catastrophe risk - Windstorm	Estimation of the gross premiums to be earned	Exposure	Specified Gross Loss	Gross Cat Risk Charge Factor	Scenario A or B	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
EEA Region 1	AA1	AB1	AC1	AD1	AE1	AF1	AG1	AH1	AI1
EEA Region 2	AA2	AB2	AC2	AD2	AE2	AF2	AG2	AH2	AI2
EEA Region 3	AA3	AB3	AC3	AD3	AE3	AF3	AG3	AH3	AI3
EEA Region 4	AA4	AB4	AC4	AD4	AE4	AF4	AG4	AH4	AI4
EEA Region 5	AA5	AB5	AC5	AD5	AE5	AF5	AG5	AH5	AI5
EEA Region 6	AA6	AB6	AC6	AD6	AE6	AF6	AG6	AH6	AI6
EEA Region 7	AA7	AB7	AC7	AD7	AE7	AF7	AG7	AH7	AI7
EEA Region 8	AA8	AB8	AC8	AD8	AE8	AF8	AG8	AH8	AI8
EEA Region 9	AA9	AB9	AC9	AD9	AE9	AF9	AG9	AH9	AI9
EEA Region 10	AA10	AB10	AC10	AD10	AE10	AF10	AG10	AH10	AI10
EEA Region 11	AA11	AB11	AC11	AD11	AE11	AF11	AG11	AH11	AI11
EEA Region 12	AA12	AB12	AC12	AD12	AE12	AF12	AG12	AH12	AI12
EEA Region 13	AA13	AB13	AC13	AD13	AE13	AF13	AG13	AH13	AI13
EEA Region 14	AA14	AB14	AC14	AD14	AE14	AF14	AG14	AH14	AI14
EEA Region 15	AA15	AB15	AC15	AD15	AE15	AF15	AG15	AH15	AI15
EEA Region 16	AA16	AB16	AC16	AD16	AE16	AF16	AG16	AH16	AI16
EEA Region 17	AA17	AB17	AC17	AD17	AE17	AF17	AG17	AH17	AI17
EEA Region 18	AA18	AB18	AC18	AD18	AE18	AF18	AG18	AH18	AI18
EEA Region 19	AA19	AB19	AC19	AD19	AE19	AF19	AG19	AH19	AI19
EEA Region 20	AA20	AB20	AC20	AD20	AE20	AF20	AG20	AH20	AI20
Total Windstorm EEA Regions before diversification	AA21	AB21	AC21	AD21		AF21	AG21	AH21	AI21
Other Regions 1	AA22	AB22							
Other Regions 2	AA23	AB23							
Other Regions 3	AA24	AB24							
Other Regions 4	AA25	AB25							
Other Regions 5	AA26	AB26							
Other Regions 6	AA27	AB27							
Other Regions 7	AA28	AB28							
Other Regions 8	AA29	AB29							
Other Regions 9	AA30	AB30							
Other Regions 10	AA31	AB31							
Other Regions 11	AA32	AB32							
Other Regions 12	AA33	AB33							
Other Regions 13	AA34	AB34							
Other Regions 14	AA35	AB35							
Total Windstorm Other Regions before diversifications	AA36	AB36				AF36	AG36	AH36	AI36
Total Windstorm all Regions before diversification	AA37	AB37				AF37	AG37	AH37	AI37
Diversification effect between regions						AF38			AI38
Total Windstorm after diversification						AF39			AI39

Natural Catastrophe risk - Earthquake	Estimation of the gross premiums to be earned	Exposure	Specified Gross Loss	Gross Cat Risk Charge Factor	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
EEA Region 1	BA1	BB1	BC1	BD1	BE1	BF1	BG1	BH1
EEA Region 2	BA2	BB2	BC2	BD2	BE2	BF2	BG2	BH2

EEA Region 3	BA3	BB3	BC3	BD3	BE3	BF3	BG3	BH3
EEA Region 4	BA4	BB4	BC4	BD4	BE4	BF4	BG4	BH4
EEA Region 5	BA5	BB5	BC5	BD5	BE5	BF5	BG5	BH5
EEA Region 6	BA6	BB6	BC6	BD6	BE6	BF6	BG6	BH6
EEA Region 7	BA7	BB7	BC7	BD7	BE7	BF7	BG7	BH7
EEA Region 8	BA8	BB8	BC8	BD8	BE8	BF8	BG8	BH8
EEA Region 9	BA9	BB9	BC9	BD9	BE9	BF9	BG9	BH9
EEA Region 10	BA10	BB10	BC10	BD10	BE10	BF10	BG10	BH10
EEA Region 11	BA11	BB11	BC11	BD11	BE11	BF11	BG11	BH11
EEA Region 12	BA12	BB12	BC12	BD12	BE12	BF12	BG12	BH12
EEA Region 13	BA13	BB13	BC13	BD13	BE13	BF13	BG13	BH13
EEA Region 14	BA14	BB14	BC14	BD14	BE14	BF14	BG14	BH14
EEA Region 15	BA15	BB15	BC15	BD15	BE15	BF15	BG15	BH15
EEA Region 16	BA16	BB16	BC16	BD16	BE16	BF16	BG16	BH16
EEA Region 17	BA17	BB17	BC17	BD17	BE17	BF17	BG17	BH17
EEA Region 18	BA18	BB18	BC18	BD18	BE18	BF18	BG18	BH18
EEA Region 19	BA19	BB19	BC19	BD19	BE19	BF19	BG19	BH19
EEA Region 20	BA20	BB20	BC20	BD20	BE20	BF20	BG20	BH20
Total Earthquake EEA Regions before diversification	BA21	BB21	BC21	BD21	BE21	BF21	BG21	BH21
Other Regions 1	BA22	BB22						
Other Regions 2	BA23	BB23						
Other Regions 3	BA24	BB24						
Other Regions 4	BA25	BB25						
Other Regions 5	BA26	BB26						
Other Regions 6	BA27	BB27						
Other Regions 7	BA28	BB28						
Other Regions 8	BA29	BB29						
Other Regions 9	BA30	BB30						
Other Regions 10	BA31	BB31						
Other Regions 11	BA32	BB32						
Other Regions 12	BA33	BB33						
Other Regions 13	BA34	BB34						
Other Regions 14	BA35	BB35						
Total Earthquake Other Regions before diversifications	BA36	BB36			BE36	BF36	BG36	BH36
Total Earthquake all Regions before diversification	BA37	BB37			BE37	BF37	BG37	BH37
Diversification effect between regions					BE38			BH38
Total Earthquake after diversification					BE39			BH39

	Estimation of the gross premiums to be earned	Exposure	Specified Gross Loss	Gross Cat Risk Charge Factor	Scenario A or B	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
Natural Catastrophe risk - Flood									
EEA Region 1	CA1	CB1	CC1	CD1	CE1	CF1	CG1	CH1	CI1
EEA Region 2	CA2	CB2	CC2	CD2	CE2	CF2	CG2	CH2	CI2
EEA Region 3	CA3	CB3	CC3	CD3	CE3	CF3	CG3	CH3	CI3
EEA Region 4	CA4	CB4	CC4	CD4	CE4	CF4	CG4	CH4	CI4
EEA Region 5	CA5	CB5	CC5	CD5	CE5	CF5	CG5	CH5	CI5
EEA Region 6	CA6	CB6	CC6	CD6	CE6	CF6	CG6	CH6	CI6
EEA Region 7	CA7	CB7	CC7	CD7	CE7	CF7	CG7	CH7	CI7
EEA Region 8	CA8	CB8	CC8	CD8	CE8	CF8	CG8	CH8	CI8
EEA Region 9	CA9	CB9	CC9	CD9	CE9	CF9	CG9	CH9	CI9
EEA Region 10	CA10	CB10	CC10	CD10	CE10	CF10	CG10	CH10	CI10
EEA Region 11	CA11	CB11	CC11	CD11	CE11	CF11	CG11	CH11	CI11
EEA Region 12	CA12	CB12	CC12	CD12	CE12	CF12	CG12	CH12	CI12
EEA Region 13	CA13	CB13	CC13	CD13	CE13	CF13	CG13	CH13	CI13
EEA Region 14	CA14	CB14	CC14	CD14	CE14	CF14	CG14	CH14	CI14
Total Flood EEA Regions before diversification	CA15	CB15	CC15	CD15		CF15	CG15	CH15	CI15
Other Regions 1	CA16	CB16							
Other Regions 2	CA17	CB17							
Other Regions 3	CA18	CB18							
Other Regions 4	CA19	CB19							
Other Regions 5	CA20	CB20							
Other Regions 6	CA21	CB21							
Other Regions 7	CA22	CB22							
Other Regions 8	CA23	CB23							
Other Regions 9	CA24	CB24							
Other Regions 10	CA25	CB25							
Other Regions 11	CA26	CB26							
Other Regions 12	CA27	CB27							
Other Regions 13	CA28	CB28							
Other Regions 14	CA29	CB29							
Total Flood Other Regions before diversifications	CA30	CB30				CF30	CG30	CH30	CI30
Total Flood all Regions before diversification	CA31	CB31				CF31	CG31	CH31	CI31
Diversification effect between regions						CF32			CI32
Total Flood after diversification						CF33			CI33

	Estimation of the gross premiums to be earned	Exposure	Specified Gross Loss	Gross Cat Risk Charge Factor	Scenario A or B	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
Natural Catastrophe risk - Hail									
EEA Region 1	DA1	DB1	DC1	DD1	DE1	DF1	DG1	DH1	DI1
EEA Region 2	DA2	DB2	DC2	DD2	DE2	DF2	DG2	DH2	DI2
EEA Region 3	DA3	DB3	DC3	DD3	DE3	DF3	DG3	DH3	DI3
EEA Region 4	DA4	DB4	DC4	DD4	DE4	DF4	DG4	DH4	DI4
EEA Region 5	DA5	DB5	DC5	DD5	DE5	DF5	DG5	DH5	DI5
EEA Region 6	DA6	DB6	DC6	DD6	DE6	DF6	DG6	DH6	DI6

EEA Region 7	DA7	DB7	DC7	DD7	DE7	DF7	DG7	DH7	DI7
EEA Region 8	DA8	DB8	DC8	DD8	DE8	DF8	DG8	DH8	DI8
EEA Region 9	DA9	DB9	DC9	DD9	DE9	DF9	DG9	DH9	DI9
Total Hail EEA Regions before diversification	DA10	DB10	DC10	DD10		DF10	DG10	DH10	DI10
Other Regions 1	DA11	DB11							
Other Regions 2	DA12	DB12							
Other Regions 3	DA13	DB13							
Other Regions 4	DA14	DB14							
Other Regions 5	DA15	DB15							
Other Regions 6	DA16	DB16							
Other Regions 7	DA17	DB17							
Other Regions 8	DA18	DB18							
Other Regions 9	DA19	DB19							
Other Regions 10	DA20	DB20							
Other Regions 11	DA21	DB21							
Other Regions 12	DA22	DB22							
Other Regions 13	DA23	DB23							
Other Regions 14	DA24	DB24							
Total Hail Other Regions before diversifications	DA25	DB25				DF25	DG25	DH25	DI25
Total Hail all Regions before diversification	DA26	DB26				DF26	DG26	DH26	DI26
Diversification effect between regions						DF27			DI27
Total Hail after diversification						DF28			DI28

	Estimation of the gross premiums to be earned	Exposure	Specified Gross Loss	Gross Cat Risk Charge Factor	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
Natural Catastrophe risk -Subsidence								
Total Subsidence before diversification	EA1	EB1	EC1	ED1	EE1	EF1	EG1	EH1
Diversification effect between zones					EE2			EH2
Total Subsidence after diversification					EE3			EH3

	Estimation of the premiums to be earned	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
Natural Catastrophe risk - Non-proportional property reinsurance					
Non-proportional property reinsurance	FA1	FB1	FC1	FD1	FE1

Man made catastrophe risk - Motor Vehicle Liability					
	Number of vehicles policy limit below or equal to 24MC	Gross Cat Risk Charge Motor Vehicle Liability	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Motor Vehicle Liability
GA1	GA2	GA3	GA4	GA5	GA6

	Gross Cat Risk Charge Share marine hull in tanker t	Gross Cat Risk Charge Share marine liability in tanker t	Gross Cat Risk Charge Share marine oil pollution liability in tanker t	Gross Cat Risk Charge Marine Tanker Collision	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Marine Tanker Collision	Name vessel
Man made catastrophe risk - Marine Tanker Collision								
Marine Tanker Collision	HA1	HB1	HC1	HD1	HE1	HF1	HG1	HH1

	Gross Cat Risk Charge Property damage	Gross Cat Risk Charge Removal of wreckage	Gross Cat Risk Charge Loss of production income	Gross Cat Risk Charge Capping of the well or making the well secure	Gross Cat Risk Charge Liability insurance and reinsurance obligations	Gross Cat Risk Charge Marine Platform Explosion	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Marine Platform Explosion	Name platform
Man made catastrophe risk - Marine Platform Explosion										
Marine Platform Explosion	HA2	HB2	HC2	HD2	HE2	HF2	HG2	HH2	HI2	HJ2

Man made catastrophe risk - Marine			
	Gross Cat Risk Charge Marine	Estimated Total Risk Mitigation	Net Cat Risk Charge Marine
Total before diversification	HA3	HA4	HA5
Diversification between type of event	HB3	HB4	HB5
Total after diversification	HC3	HC4	HC5

	Gross Cat risk Charge Aviation hull	Gross Cat risk Charge Aviation liability	Gross Cat Risk Charge Aviation	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Aviation
Man made catastrophe risk - Aviation						
Gross Cat Risk Charge Aviation	IA1	IB1	IC1	ID1	IE1	IF1

Man made catastrophe risk - Fire			
	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Fire
Gross Cat Risk Charge Fire	JA1	JA2	JA3
	JA4		

Man made catastrophe risk - Liability	Earned premium last 12 months	Largest liability limit provided	Number of claims	Gross Cat Risk Charge Liability	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Liability
Professional malpractice liability	KA1	KA2	KA3	KA4	KA5	KA6	KA7
Employers liability	KB1	KB2	KB3	KB4	KB5	KB6	KB7
Directors and officers liability	KC1	KC2	KC3	KC4	KC5	KC6	KC7
Other liability	KD1	KD2	KD3	KD4	KD5	KD6	KD7
Non-proportional reinsurance	KE1	KE2	KE3	KE4	KE5	KE6	KE7
Total	KF1	KF2	KF3	KF4	KF5	KF6	KF7

Man made catastrophe risk - Liability			
	Gross Cat Risk Charge Liability	Estimated Total Risk Mitigation	Net Cat Risk Charge Liability
Total before diversification	KA8	KA9	KA10
Diversification between type of cover	KB8	KB9	KB10
Total after diversification	KC8	KC9	KC10

Man made catastrophe risk - Credit & Suretyship - Large Credit Default						
	Exposure (individual or group)	Proportion of damage caused by scenario	Gross Cat Risk Charge Credit & Surety - Large Credit Default	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Credit & Surety - Large Credit Default
Largest exposure 1	LA1	LA2	LA3	LA4	LA5	LA6
Largest exposure 2	LB1	LB2	LB3	LB4	LB5	LB6
Total	LC1	LC2	LC3	LC4	LC5	LC6

Man made catastrophe risk - Credit & Suretyship - Recession Risk					
	Earned premium last 12 months	Gross Cat Risk Charge Credit & Suretyship - Recession Risk	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Cat Risk Charge Credit & Suretyship - Recession Risk
Total	LA7	LA8	LA9	LA10	LA11

Man made catastrophe risk - Credit & Suretyship			
	Gross Cat Risk Charge Credit & Suretyship	Estimated Total Risk Mitigation	Net Cat Risk Charge Credit & Suretyship
Total before diversification	LA12	LA13	LA14
Diversification between type of event	LB12	LB13	LB14
Total after diversification	LC12	LC13	LC14

Man made catastrophe risk - Other non-life catastrophe risk				
	Estimation of the gross premiums to be earned	Gross Cat Risk Charge Other non-life catastrophe risk	Estimated Total Risk Mitigation	Net Cat Risk Charge Other non-life catastrophe risk
MAT other than Marine and Aviation	MA1	MA2		
Non-proportional MAT reinsurance other than Marine and Aviation	MB1	MB2		
Miscellaneous financial loss	MC1	MC2		
Non-proportional Casualty reinsurance other than General liability	MD1	MD2		
Non-proportional Credit & Surety reinsurance	ME1	ME2		
Total before diversification		MF2	MF3	MF4
Diversification between groups of obligations		MG2	MG3	MG4
Total after diversification		MH2	MH3	MH4

Health Catastrophe risk - Mass accident	Accidental death		Permanent disability		Disability 10 years		Disability 12 months		Medical treatment		Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
	# Policyholders	Total value of benefits payable	# Policyholders	Total value of benefits payable	# Policyholders	Total value of benefits payable	# Policyholders	Total value of benefits payable	# Policyholders	Total value of benefits payable				
Country 1	NA1	NB1	NC1	ND1	NE1	NF1	NG1	NH1	NI1	NJ1	NK1	NL1	NM1	NN1
Country 2	NA2	NB2	NC2	ND2	NE2	NF2	NG2	NH2	NI2	NJ2	NK2	NL2	NM2	NN2
Country 3	NA3	NB3	NC3	ND3	NE3	NF3	NG3	NH3	NI3	NJ3	NK3	NL3	NM3	NN3
Country 4	NA4	NB4	NC4	ND4	NE4	NF4	NG4	NH4	NI4	NJ4	NK4	NL4	NM4	NN4
Country 5	NA5	NB5	NC5	ND5	NE5	NF5	NG5	NH5	NI5	NJ5	NK5	NL5	NM5	NN5
Country 6	NA6	NB6	NC6	ND6	NE6	NF6	NG6	NH6	NI6	NJ6	NK6	NL6	NM6	NN6
Country 7	NA7	NB7	NC7	ND7	NE7	NF7	NG7	NH7	NI7	NJ7	NK7	NL7	NM7	NN7
Country 8	NA8	NB8	NC8	ND8	NE8	NF8	NG8	NH8	NI8	NJ8	NK8	NL8	NM8	NN8
Country 9	NA9	NB9	NC9	ND9	NE9	NF9	NG9	NH9	NI9	NJ9	NK9	NL9	NM9	NN9
Country 10	NA10	NB10	NC10	ND10	NE10	NF10	NG10	NH10	NI10	NJ10	NK10	NL10	NM10	NN10
Country 11	NA11	NB11	NC11	ND11	NE11	NF11	NG11	NH11	NI11	NJ11	NK11	NL11	NM11	NN11
Country 12	NA12	NB12	NC12	ND12	NE12	NF12	NG12	NH12	NI12	NJ12	NK12	NL12	NM12	NN12
Country 13	NA13	NB13	NC13	ND13	NE13	NF13	NG13	NH13	NI13	NJ13	NK13	NL13	NM13	NN13
Country 14	NA14	NB14	NC14	ND14	NE14	NF14	NG14	NH14	NI14	NJ14	NK14	NL14	NM14	NN14
Country 15	NA15	NB15	NC15	ND15	NE15	NF15	NG15	NH15	NI15	NJ15	NK15	NL15	NM15	NN15
Country 16	NA16	NB16	NC16	ND16	NE16	NF16	NG16	NH16	NI16	NJ16	NK16	NL16	NM16	NN16
Country 17	NA17	NB17	NC17	ND17	NE17	NF17	NG17	NH17	NI17	NJ17	NK17	NL17	NM17	NN17

Country 18	NA18	NB18	NC18	ND18	NE18	NF18	NG18	NH18	NI18	NJ18	NK18	NL18	NM18	NN18
Country 19	NA19	NB19	NC19	ND19	NE19	NF19	NG19	NH19	NI19	NJ19	NK19	NL19	NM19	NN19
Country 20	NA20	NB20	NC20	ND20	NE20	NF20	NG20	NH20	NI20	NJ20	NK20	NL20	NM20	NN20
Country 21	NA21	NB21	NC21	ND21	NE21	NF21	NG21	NH21	NI21	NJ21	NK21	NL21	NM21	NN21
Country 22	NA22	NB22	NC22	ND22	NE22	NF22	NG22	NH22	NI22	NJ22	NK22	NL22	NM22	NN22
Country 23	NA23	NB23	NC23	ND23	NE23	NF23	NG23	NH23	NI23	NJ23	NK23	NL23	NM23	NN23
Country 24	NA24	NB24	NC24	ND24	NE24	NF24	NG24	NH24	NI24	NJ24	NK24	NL24	NM24	NN24
Country 25	NA25	NB25	NC25	ND25	NE25	NF25	NG25	NH25	NI25	NJ25	NK25	NL25	NM25	NN25
Country 26	NA26	NB26	NC26	ND26	NE26	NF26	NG26	NH26	NI26	NJ26	NK26	NL26	NM26	NN26
Country 27	NA27	NB27	NC27	ND27	NE27	NF27	NG27	NH27	NI27	NJ27	NK27	NL27	NM27	NN27
Country 28	NA28	NB28	NC28	ND28	NE28	NF28	NG28	NH28	NI28	NJ28	NK28	NL28	NM28	NN28
Country 29	NA29	NB29	NC29	ND29	NE29	NF29	NG29	NH29	NI29	NJ29	NK29	NL29	NM29	NN29
Country 30	NA30	NB30	NC30	ND30	NE30	NF30	NG30	NH30	NI30	NJ30	NK30	NL30	NM30	NN30
Country 31	NA31	NB31	NC31	ND31	NE31	NF31	NG31	NH31	NI31	NJ31	NK31	NL31	NM31	NN31
Total Mass accident all countries before diversification														
Diversification effect between countries														
Total Mass accident all countries after diversification														
											NK33			NN33
											NK34			NN34

Health Catastrophe risk - Concentration accident	Largest known accident risk concentration	Accidental death	Permanent disability	Disability 10 years	Disability 12 months	Medical treatment	Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
Country 1	OA1	OB1	OC1	OD1	OE1	OF1	OG1	OH1	OI1	OJ1
Country 2	OA2	OB2	OC2	OD2	OE2	OF2	OG2	OH2	OI2	OJ2
Country 3	OA3	OB3	OC3	OD3	OE3	OF3	OG3	OH3	OI3	OJ3
Country 4	OA4	OB4	OC4	OD4	OE4	OF4	OG4	OH4	OI4	OJ4
Country 5	OA5	OB5	OC5	OD5	OE5	OF5	OG5	OH5	OI5	OJ5
Country 6	OA6	OB6	OC6	OD6	OE6	OF6	OG6	OH6	OI6	OJ6
Country 7	OA7	OB7	OC7	OD7	OE7	OF7	OG7	OH7	OI7	OJ7
Country 8	OA8	OB8	OC8	OD8	OE8	OF8	OG8	OH8	OI8	OJ8
Country 9	OA9	OB9	OC9	OD9	OE9	OF9	OG9	OH9	OI9	OJ9
Country 10	OA10	OB10	OC10	OD10	OE10	OF10	OG10	OH10	OI10	OJ10
Country 11	OA11	OB11	OC11	OD11	OE11	OF11	OG11	OH11	OI11	OJ11
Country 12	OA12	OB12	OC12	OD12	OE12	OF12	OG12	OH12	OI12	OJ12
Country 13	OA13	OB13	OC13	OD13	OE13	OF13	OG13	OH13	OI13	OJ13
Country 14	OA14	OB14	OC14	OD14	OE14	OF14	OG14	OH14	OI14	OJ14
Country 15	OA15	OB15	OC15	OD15	OE15	OF15	OG15	OH15	OI15	OJ15
Country 16	OA16	OB16	OC16	OD16	OE16	OF16	OG16	OH16	OI16	OJ16
Country 17	OA17	OB17	OC17	OD17	OE17	OF17	OG17	OH17	OI17	OJ17
Country 18	OA18	OB18	OC18	OD18	OE18	OF18	OG18	OH18	OI18	OJ18
Country 19	OA19	OB19	OC19	OD19	OE19	OF19	OG19	OH19	OI19	OJ19
Country 20	OA20	OB20	OC20	OD20	OE20	OF20	OG20	OH20	OI20	OJ20
Country 21	OA21	OB21	OC21	OD21	OE21	OF21	OG21	OH21	OI21	OJ21
Country 22	OA22	OB22	OC22	OD22	OE22	OF22	OG22	OH22	OI22	OJ22
Country 23	OA23	OB23	OC23	OD23	OE23	OF23	OG23	OH23	OI23	OJ23
Country 24	OA24	OB24	OC24	OD24	OE24	OF24	OG24	OH24	OI24	OJ24
Country 25	OA25	OB25	OC25	OD25	OE25	OF25	OG25	OH25	OI25	OJ25
Country 26	OA26	OB26	OC26	OD26	OE26	OF26	OG26	OH26	OI26	OJ26
Country 27	OA27	OB27	OC27	OD27	OE27	OF27	OG27	OH27	OI27	OJ27
Country 28	OA28	OB28	OC28	OD28	OE28	OF28	OG28	OH28	OI28	OJ28
Country 29	OA29	OB29	OC29	OD29	OE29	OF29	OG29	OH29	OI29	OJ29
Country 30	OA30	OB30	OC30	OD30	OE30	OF30	OG30	OH30	OI30	OJ30
Country 31	OA31	OB31	OC31	OD31	OE31	OF31	OG31	OH31	OI31	OJ31
Total Concentration accident all countries before diversification										
Diversification effect between countries										
Total Concentration accident all countries after diversification										
										OJ32
										OJ33
										OJ34

Health Catastrophe risk - Pandemic	Income protection		Medical expense							Gross Catastrophe Risk Charge	Estimated Risk Mitigation	Estimated Reinstatement Premiums	Net Catastrophe Risk Charge
	Number of insured people	Total pandemic exposure	Number of insured people	Unit claim cost hospitalisation	Expected number of uses hospitalisation	Unit claim cost medical practitioner	Expected number of uses medical practitioner	Unit claim cost no formal medical care	Expected number of uses no formal medical care				
Country 1			PC1	PD1	PE1	PF1	PG1	PH1	PI1	PJ1			
Country 2			PC2	PD2	PE2	PF2	PG2	PH2	PI2	PJ2			
Country 3			PC3	PD3	PE3	PF3	PG3	PH3	PI3	PJ3			
Country 4			PC4	PD4	PE4	PF4	PG4	PH4	PI4	PJ4			
Country 5			PC5	PD5	PE5	PF5	PG5	PH5	PI5	PJ5			
Country 6			PC6	PD6	PE6	PF6	PG6	PH6	PI6	PJ6			
Country 7			PC7	PD7	PE7	PF7	PG7	PH7	PI7	PJ7			
Country 8			PC8	PD8	PE8	PF8	PG8	PH8	PI8	PJ8			
Country 9			PC9	PD9	PE9	PF9	PG9	PH9	PI9	PJ9			
Country 10			PC10	PD10	PE10	PF10	PG10	PH10	PI10	PJ10			
Country 11			PC11	PD11	PE11	PF11	PG11	PH11	PI11	PJ11			
Country 12			PC12	PD12	PE12	PF12	PG12	PH12	PI12	PJ12			
Country 13			PC13	PD13	PE13	PF13	PG13	PH13	PI13	PJ13			
Country 14			PC14	PD14	PE14	PF14	PG14	PH14	PI14	PJ14			
Country 15			PC15	PD15	PE15	PF15	PG15	PH15	PI15	PJ15			
Country 16			PC16	PD16	PE16	PF16	PG16	PH16	PI16	PJ16			
Country 17			PC17	PD17	PE17	PF17	PG17	PH17	PI17	PJ17			
Country 18			PC18	PD18	PE18	PF18	PG18	PH18	PI18	PJ18			
Country 19			PC19	PD19	PE19	PF19	PG19	PH19	PI19	PJ19			
Country 20			PC20	PD20	PE20	PF20	PG20	PH20	PI20	PJ20			
Country 21			PC21	PD21	PE21	PF21	PG21	PH21	PI21	PJ21			
Country 22			PC22	PD22	PE22	PF22	PG22	PH22	PI22	PJ22			
Country 23			PC23	PD23	PE23	PF23	PG23	PH23	PI23	PJ23			
Country 24			PC24	PD24	PE24	PF24	PG24	PH24	PI24	PJ24			
Country 25			PC25	PD25	PE25	PF25	PG25	PH25	PI25	PJ25			
Country 26			PC26	PD26	PE26	PF26	PG26	PH26	PI26	PJ26			
Country 27			PC27	PD27	PE27	PF27	PG27	PH27	PI27	PJ27			

Country 28			PC28	PD28	PE28	PF28	PG28	PH28	PI28	PJ28			
Country 29			PC29	PD29	PE29	PF29	PG29	PH29	PI29	PJ29			
Country 30			PC30	PD30	PE30	PF30	PG30	PH30	PI30	PJ30			
Country 31			PC31	PD31	PE31	PF31	PG31	PH31	PI31	PJ31			
Total Income Protections all countries	PA32	PB32								PJ32			
Total Pandemic all countries										PJ33	PK33	PL33	PM33

Appendix I: Quantitative reporting templates

S.28.01.a

Minimum Capital Requirement (except for composite undertakings)

	MCR components	Background information	
Linear formula component for non-life insurance and reinsurance obligations			
MCR _{NL} Result	A1	Net (of reinsurance) best estimate provisions	Net (of reinsurance) written premiums in the last 12 months
Medical expenses		B2	C2
Income protection insurance		B3	C3
Workers' compensation insurance		B4	C4
Motor vehicle liability insurance and proportional reinsurance		B5	C5
Other motor insurance and proportional reinsurance		B6	C6
Marine, aviation and transport insurance and proportional reinsurance		B7	C7
Fire and other damage to property insurance and proportional reinsurance		B8	C8
General liability insurance and proportional reinsurance		B9	C9
Credit and suretyship insurance and proportional reinsurance		B10	C10
Legal expenses insurance and proportional reinsurance		B11	C11
Assistance and its proportional reinsurance		B12	C12
Miscellaneous financial loss insurance and proportional reinsurance		B13	C13
Non-proportional casualty reinsurance		B14	C14
Non-proportional marine, aviation and transport reinsurance		B15	C15
Non-proportional property reinsurance		B16	C16
Non-proportional health reinsurance		B17	C17
Linear formula component for life insurance and reinsurance obligations			
MCR _L Result	A18	Net (of reinsurance) best estimate provisions	Capital at risk
Obligations with profit participation - guaranteed benefits		B19	
Obligations with profit participation - future discretionary benefits		B20	
Index-linked and unit-linked insurance obligations		B21	
Other life (re)insurance and health obligations		B22	
Capital at risk for all life (re)insurance obligations			C23
Overall MCR calculation			
Linear MCR	A24		
SCR	A25		
MCR cap	A26		
MCR floor	A27		
Combined MCR	A28		
Absolute floor of the MCR	A29		
Minimum Capital Requirement	A30		

Appendix I: Quantitative reporting templates

S.28.01.b

Minimum Capital Requirement (except for composite undertakings)

	MCR components	Background information	
Linear formula component for non-life insurance and reinsurance obligations			
MCR _{NL} Result	A1	Net (of reinsurance) best estimate provisions	Net (of reinsurance) written premiums in the last 12 months
Medical expenses		B2	C2
Income protection insurance		B3	C3
Workers' compensation insurance		B4	C4
Motor vehicle liability insurance and proportional reinsurance		B5	C5
Other motor insurance and proportional reinsurance		B6	C6
Marine, aviation and transport insurance and proportional reinsurance		B7	C7
Fire and other damage to property insurance and proportional reinsurance		B8	C8
General liability insurance and proportional reinsurance		B9	C9
Credit and suretyship insurance and proportional reinsurance		B10	C10
Legal expenses insurance and proportional reinsurance		B11	C11
Assistance and its proportional reinsurance		B12	C12
Miscellaneous financial loss insurance and proportional reinsurance		B13	C13
Non-proportional casualty reinsurance		B14	C14
Non-proportional marine, aviation and transport reinsurance		B15	C15
Non-proportional property reinsurance		B16	C16
Non-proportional health reinsurance		B17	C17
Linear formula component for life insurance and reinsurance obligations			
MCR _L Result	A18	Net (of reinsurance) best estimate provisions	Capital at risk
Obligations with profit participation - guaranteed benefits		B19	
Obligations with profit participation - future discretionary benefits		B20	
Index-linked and unit-linked insurance obligations		B21	
Other life (re)insurance and health obligations		B22	
Capital at risk for all life (re)insurance obligations			C23
Overall MCR calculation			
Linear MCR	A24		
SCR	A25		
MCR cap	A26		
MCR floor	A27		
Combined MCR	A28		
Absolute floor of the MCR	A29		
Minimum Capital Requirement	A30		

Appendix I: Quantitative reporting templates

S.28.02.a

Minimum capital Requirement - Composite undertakings

MCR components	
Non-life activities	Life activities
<small>MCR_(NL,NL) Result</small>	<small>MCR_(LL) Result</small>
B1	C1

Linear formula component for non-life insurance or reinsurance obligations

Medical expense insurance and proportional reinsurance
 Income protection insurance and proportional reinsurance
 Workers' compensation insurance and proportional reinsurance
 Motor vehicle liability insurance and proportional reinsurance
 Other motor insurance and proportional reinsurance
 Marine, aviation and transport insurance and proportional reinsurance
 Fire and other damage to property insurance and proportional reinsurance
 General liability insurance and proportional reinsurance
 Credit and suretyship insurance and proportional reinsurance
 Legal expenses insurance and proportional reinsurance
 Assistance and its proportional reinsurance
 Miscellaneous financial loss insurance and proportional reinsurance
 Non-proportional casualty reinsurance
 Non-proportional property reinsurance
 Non-proportional marine, aviation and transport reinsurance
 Non-proportional health reinsurance

Non-life activities	Life activities
<small>MCR_(NL,NL) Result</small>	<small>MCR_(LL) Result</small>
B18	C18

Linear formula component for life insurance or reinsurance obligations

Obligations with profit participation - guaranteed benefits
 Obligations with profit participation - future discretionary benefits
 Index-linked and unit-linked obligations
 Other life (re)insurance obligations
 Capital at risk for all life (re)insurance obligations

Overall MCR calculation

Linear MCR	A24
SCR	A25
MCR cap	A26
MCR floor	A27
Combined MCR	A28
Absolute floor of the MCR	A29

MCR

A30

Notional non-life and life MCR calculation

Notional linear MCR
 Notional SCR with add-on (annual or latest calculation)
 Notional MCR cap
 Notional MCR floor
 Notional Combined MCR
 Absolute floor of the notional MCR
 Notional MCR

Non-life activities	Life activities
B32	C32
B33	C33
B34	C34
B35	C35
B36	C36
B37	C37
B38	C38

Background information			
Non-life activities		Life activities	
<small>Net (of reinsurance) best estimate provisions</small>	<small>Net (of reinsurance) written premiums in the last 12 months</small>	<small>Net (of reinsurance) best estimate provisions</small>	<small>Net (of reinsurance) written premiums in the last 12 months</small>
D2	E2	F2	G2
D3	E3	F3	G3
D4	E4	F4	G4
D5	E5	F5	G5
D6	E6	F6	G6
D7	E7	F7	G7
D8	E8	F8	G8
D9	E9	F9	G9
D10	E10	F10	G10
D11	E11	F11	G11
D12	E12	F12	G12
D13	E13	F13	G13
D14	E14	F14	G14
D15	E15	F15	G15
D16	E16	F16	G16
D17	E17	F17	G17

Non-life activities		Life activities	
<small>Net (of reinsurance) best estimate provisions</small>	<small>Net (of reinsurance) capital at risk</small>	<small>Net (of reinsurance) best estimate provisions</small>	<small>Net (of reinsurance) capital at risk</small>
D19		F19	
D20		F20	
D21		F21	
D22	E23	F22	G23

Appendix I: Quantitative reporting templates

S.28.02.b

Minimum capital Requirement - Composite undertakings

Linear formula component for non-life insurance or reinsurance obligations

MCR components	
Non-life activities	Life activities
MCR _(NL,NL) Result	MCR _(NL,L) Result
B1	C1

- Medical expense insurance and proportional reinsurance
- Income protection insurance and proportional reinsurance
- Workers' compensation insurance and proportional reinsurance
- Motor vehicle liability insurance and proportional reinsurance
- Other motor insurance and proportional reinsurance
- Marine, aviation and transport insurance and proportional reinsurance
- Fire and other damage to property insurance and proportional reinsurance
- General liability insurance and proportional reinsurance
- Credit and suretyship insurance and proportional reinsurance
- Legal expenses insurance and proportional reinsurance
- Assistance and its proportional reinsurance
- Miscellaneous financial loss insurance and proportional reinsurance
- Non-proportional casualty reinsurance
- Non-proportional property reinsurance
- Non-proportional marine, aviation and transport reinsurance
- Non-proportional health reinsurance

Linear formula component for life insurance or reinsurance obligations

- Obligations with profit participation - guaranteed benefits
- Obligations with profit participation - future discretionary benefits
- Index-linked and unit-linked obligations
- Other life (re)insurance obligations
- Capital at risk for all life (re)insurance obligations

Overall MCR calculation

Linear MCR	A24
SCR	A25
MCR cap	A26
MCR floor	A27
Combined MCR	A28
Absolute floor of the MCR	A29

MCR

A30

Notional non-life and life MCR calculation

- Notional linear MCR
- Notional SCR with add-on (annual or latest calculation)
- Notional MCR cap
- Notional MCR floor
- Notional Combined MCR
- Absolute floor of the notional MCR
- Notional MCR

Non-life activities	Life activities
B32	C32
B33	C33
B34	C34
B35	C35
B36	C36
B37	C37
B38	C38

Background information

Non-life activities		Life activities	
Net (of reinsurance) best estimate provisions	Net (of reinsurance) written premiums in the last 12 months	Net (of reinsurance) best estimate provisions	Net (of reinsurance) written premiums in the last 12 months
D2	E2	F2	G2
D3	E3	F3	G3
D4	E4	F4	G4
D5	E5	F5	G5
D6	E6	F6	G6
D7	E7	F7	G7
D8	E8	F8	G8
D9	E9	F9	G9
D10	E10	F10	G10
D11	E11	F11	G11
D12	E12	F12	G12
D13	E13	F13	G13
D14	E14	F14	G14
D15	E15	F15	G15
D16	E16	F16	G16
D17	E17	F17	G17

Non-life activities		Life activities	
Net (of reinsurance) best estimate provisions	Net (of reinsurance) capital at risk	Net (of reinsurance) best estimate provisions	Net (of reinsurance) capital at risk
D19		F19	
D20		F20	
D21		F21	
D22	E23	F22	G23

Appendix I: Quantitative reporting templates
 5.32.01.g
 Undertakings in the scope of the group

Country	Identification code	Type of code	Legal Name of the undertaking	Type of undertaking	Legal form (Annex III L1)	Category (mutual/non mutual)	Supervisory Authority	Ranking criteria (in the same currency)							Criteria of influence					Inclusion in the scope of Group supervision		Group solvency assessment		
								Total Balance Sheet (for (re)insurance undertakings)	Total Balance Sheet (for other regulated undertakings)	Total Balance Sheet (non-regulated undertakings)	Written premiums net of reinsurance ceded under IFRS or local GAAP for insurance undertakings	Turn over defined as the gross revenue under IFRS or local GAAP for other types of undertakings or insurance holding companies	Underwriting performance	Investment performance	Total performance	% capital share	% used for the establishment of accounting consolidated accounts	% voting rights	Other criteria	Level of influence	Proportional Share retained (art.221)	YES/NO	Date of decision if art. 214 is applied	Method used and under treatment of the undertaking
A1	B1	V1	C1	D1	E1	F1	G1	H1a	H1b	H1c	I1a	I1b	J1	K1	L1	M1	N1	O1	P1	Q1	R1	S1	T1	U1

Appendix I: Quantitative reporting templates
 S.33.01.g
 Insurance and Reinsurance individual requirements

EEA undertakings and non EEA undertakings (using SII rules) included only via D&A																					Non EEA undertakings (both using SII rules and not using SII rules) regardless of the method used				
Legal name of the undertaking	Identification code	Type of code	Entity Level/ RFF/ Remaining Part	Fund Number	SCR Market Risk	SCR Counterparty Default Risk	SCR Life Underwriting Risk	SCR Health Underwriting Risk	SCR Non-life Underwriting Risk	SCR Operational Risk	Solo SCR	Solo MCR	Eligible Solo Own Funds to cover the SCR	Standard Formula used			Group or solo Internal Model Used			Solo Capital Add-On			Local capital requirement	Local minimum capital requirement	Eligible own funds in accordance with local rules
														if undertaking specific parameters used specify where	if Simplifications used specify where	if Partial Internal Model used specify where	Group or solo internal model	Date of initial approval	Date of approval of latest major change	Date of decision	Amount	Reason			
A1	A2	Q1	R1	S1	B1	B2	B3	B4	B5	B6	B7	C1	D1	E1	F1	G1	H1	I1	J1	K1	L1	M1	N1	O1	P1

Appendix I: Quantitative reporting templates**S.34.01.g****Other regulated and non-regulated financial undertakings including insurance holding companies individual requirements**

Legal name of the undertaking	Identification code	Type of code	Aggregated or not Y/N	Type of capital requirement (closed list)	Notional SCR or Sectoral capital requirement	Notional MCR or Sectoral minimum capital requirement	Eligible Own Funds
A1	A2	F1	A3	B1	C1	D1	E1

Appendix I: Quantitative reporting templates
S.34.01.g
Contribution to group Technical Provisions

Identification code	Type of code	Legal Name of the undertaking	Method of group solvency calculation used	Technical Provisions - Non-Life (excluding Health)			Technical Provisions - Health (similar to non-life)			Technical Provisions - Health (similar to life)			Technical Provisions - Life (excluding health and index-linked and unit-)			Technical Provisions - Index-linked and unit-Linked insurance			Total amount of TP (excluding IGT)
				Amount of gross TP (gross of IGT)	Amount of gross TP (net of IGT)	Contribution to Group TP (excluding IGT) (%)	Amount of gross TP (gross of IGT)	Amount of gross TP (net of IGT)	Contribution to Group TP (excluding IGT) (%)	Amount of gross TP (gross of IGT)	Amount of gross TP (net of IGT)	Contribution to Group TP (excluding IGT) (%)	Amount of gross TP (gross of IGT)	Amount of gross TP (net of IGT)	Contribution to Group TP (excluding IGT) (%)	Amount of gross TP (gross of IGT)	Amount of gross TP (net of IGT)	Contribution to Group TP (excluding IGT) (%)	
A1	S1	B1	S1	C1	D1	E1	F1	G1	H1	I1	J1	K1	L1	M1	N1	O1	P1	O1	R1

Technical Annex II: List of quantitative reporting items

This Annex contains the list of items (“L annexes”) to be submitted by the insurance and reinsurance undertakings and groups to the national competent authorities and specific instructions on what to submit.

S.01.01

Content of the submission

ITEM		INSTRUCTIONS
A1	Basic Information	Reported
A2	Balance Sheet	Close list: - Reported; - Not reported (in this case special justification is needed).
A4	List of assets	Close list: - Reported; - Not reported (in this case special justification is needed).
A5	Open derivatives	Close list: - Reported; - Not reported o/a no derivative transactions; - Not reported other reason (in this case special justification is needed).
A6	Life and Health SLT Technical Provisions	Close list: - Reported; - Not reported o/a no life and health SLT business; - Not reported o/a materiality threshold; - Not reported other reason (in this case special justification is needed).
A7	Non-Life Technical Provisions	Close list: - Reported; - Not reported o/a no non-life business; - Not reported o/a materiality threshold; - Not reported other reason (in this case special justification is needed).
A8	Own funds	Close list: - Reported; - Not reported (in this case special justification is needed).
A19	Minimum Capital Requirement	Close list: - Reported; - Not reported o/a composite undertaking; - Not reported other reason (in this case special justification is needed).
A20	Minimum Capital Requirement - Composite	Close list: - Reported; - Not reported o/a non-composite undertaking; - Not reported other reason (in this case special justification is needed).

Technical Annex II: List of quantitative reporting items

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Content of the submission

	ITEM	INSTRUCTIONS
A1	Basic Information	Reported
A2	Balance Sheet	Close list: - Reported; - Not reported (in this case special justification is needed).
A3	Assets and liabilities by currency	Close list: - Reported; - Not reported o/a below threshold (of non-home currency total being <10% of assets and liabilities); - Not reported other reason (in this case special justification is needed).
A4	List of assets	Close list: - Reported; - Not reported (in this case special justification is needed).
A5	Open derivatives	Close list: - Reported; - Not reported o/a no derivative transactions; - Not reported other reason (in this case special justification is needed).
A6	Life and Health SLT Technical Provisions	Close list: - Reported; - Not reported o/a no life and health SLT business; - Not reported o/a materiality threshold; - Not reported other reason (in this case special justification is needed).
A7	Non-Life Technical Provisions	Close list: - Reported; - Not reported o/a no non-life business; - Not reported o/a materiality threshold; - Not reported other reason (in this case special justification is needed).
A8	Own funds	Close list: - Reported; - Not reported (in this case special justification is needed).
A9	Solvency Capital Requirement - SF	Close list: - Reported; - Not reported o/a full internal model; - Not reported other reason (in this case special justification is needed).
A10	Solvency Capital Requirement - PIM	Close list: - Reported; - Not reported o/a use Standard Formula; - Not reported o/a use full internal model; - Not reported other reason (in this case special justification is needed).
A11	Solvency Capital Requirement - IM	Close list: - Reported; - Not reported o/a use Standard Formula; - Not reported o/a use partial internal model; - Not reported other reason (in this case special justification is needed).
A12	Solvency Capital Requirement - Market risk	Close list: - Reported; - Not reported o/a full internal model; - Risk not existent; - Not reported other reason (in this case special justification is needed).
A13	Solvency Capital Requirement - Counterparty default risk	Close list: - Reported; - Not reported o/a full internal model; - Risk not existent; - Not reported other reason (in this case special justification is needed).

A14	Solvency Capital Requirement - Life underwriting risk	Close list: - Reported; - Not reported o/a full internal model; - Risk not existent; - Not reported other reason (in this case special justification is needed).
A15	Solvency Capital Requirement - Health underwriting risk	Close list: : - Reported; - Not reported o/a full internal model; - Risk not existent; - Not reported other reason (in this case special justification is needed).
A16	Solvency Capital Requirement - Non-Life underwriting risk	Close list: - Reported; - Not reported o/a full internal model; - Risk not existent; - Not reported other reason (in this case special justification is needed).
A17	Solvency Capital Requirement - Operational risk	Close list: - Reported; - Not reported o/a full internal model; - Risk not existent; - Not reported other reason (in this case special justification is needed).
A18	Solvency Capital Requirement - Non-Life Catastrophe risk	Close list: - Reported; - Not reported o/a full internal model; - Risk not existent; - Not reported other reason (in this case special justification is needed).
A19	Minimum Capital Requirement	Close list: - Reported; - Not reported o/a composite undertaking; - Not reported other reason (in this case special justification is needed).
A20	Minimum Capital Requirement - Composite	Close list: - Reported; - Not reported o/a non-composite undertaking; - Not reported other reason (in this case special justification is needed).
A21	Undertakings in the scope of the group	Close list: - Reported; - Not reported (in this case special justification is needed).
A22	(Re)insurance individual requirements	Close list: - Reported; - Not reported (in this case special justification is needed).
A23	Non-(re)insurance individual requirements	Close list: - Reported; - Not reported o/a no non-(re)insurance business in the scope of the group; - Not reported other reason (in this case special justification is needed).
A24	Group - contribution of TP	Close list: - Reported; - Not reported (in this case special justification is needed).

Technical Annex II: List of quantitative reporting item
S.01.02
Basic information

ITEM		INSTRUCTIONS
A1	Identification code	Identification code: - Legal Entity Identifier (LEI); - Interim entity identifier (Pre-LEI); - Identification code used in the local market, attributed by group supervisor. (by this order of priority if existent)
A11	Type of code	Identification of the code used in A1/A9: - LEI - Pre-LEI - Local code
A2	Reporting date	Date when the report to the supervisory authority is made
A3	Reference date	Date identifying the last day of the reporting period
A4	Currency used for reporting	ISO 4217 Code of the currency of the monetary amounts used in each report
A5	Accounting standard	Identification of the accounting standard used for reporting items in BS-C1, Statutory account valuation. The following closed list of options shall be used: If the undertaking is using IFRS: IFRS; If the undertaking is not using IFRS: Local GAAP
A6	Type of internal model	When the undertaking uses internal models to calculate SCR, identify the type of internal model. The following closed list of options shall be used: Partial internal model(s): PIM; Full internal model: FIM
A7	Composite undertaking? (Y/N)	Identify if the reporting undertaking is a composite undertaking. The following closed list of options shall be used: Composite undertaking: Y; Non-composite undertaking: N
A8	RFF? (Y/N)	Identify if the reporting undertaking is reporting activity by Ring Fenced Funds. The following closed list of options shall be used: Reporting activity by RFF: Y; Not reporting activity by RFF: N
A9	Group identification code	Identification code: - Legal Entity Identifier (LEI); - Interim entity identifier (Pre-LEI); - Identification code used in the local market, attributed by group supervisor. (by this order of priority if existent) This item is only reported when the report is made at group level
A10	Consolidation method 1 or a combination of methods is used for calculating group solvency of at least one undertaking in the scope? (Y/N)	Identify if at least one undertaking in the scope of consolidation is consolidated by using consolidation method 1. The following closed list of options shall be used: Method 1 used: Y; Method 1 not used: N

Technical Annex II: List of quantitative reporting items

S.02.01

Balance sheet

ITEM		INSTRUCTIONS
A0	Fund number	Not applicable for the purpose of preparatory phase Only for reporting per RFF. Identification of the ring fenced fund. This number must be consistent with the fund number in Assets templates, SCR, OF and TP (L) F3, cell A3
ASSETS		
AS1	Goodwill	Intangible asset that represents the economic value of assets that cannot be individually identified and separately recognised in a business combination.
AS24	Deferred acquisition costs	The part of acquisition costs allocated to future reporting periods
A2	Intangible assets	Intangible assets other than goodwill. An identifiable nonmonetary asset without physical substance. See cross-templates checks tab CAS 8
A26	Deferred tax assets	An asset that may be used to reduce any subsequent period's income tax expense. See cross-templates checks tab CAS 8
A25B	Pension benefit surplus	Net surplus related to staff pension scheme, if applicable according to pension system. See cross-templates checks tab CAS 8
A3	Property, plant & equipment held for own use	Tangible assets which are intended for permanent use and property held by the undertaking for own use. Corresponds to CIC categories 93 and 95 in Assets-D1 See cross-templates checks tab CAS 4
A4	Investments (other than assets held for index-linked and unit-linked funds)	Sum of the investments excluding assets held for index-linked and unit-linked funds. $A4=A5+A6+A7B+A8E+A9+A10A+A10B+A11$ See cross-templates checks tab CAS 3
A5	Property (other than for own use)	Property, excluding property for own use. Includes also property under construction that, when constructed, will be for own use. Corresponds to CIC categories 91, 92, 94 and 99
A6	Participations	Participation as defined in article 13(20) of Directive 2009/138/EC. It includes equity and subordinated liabilities. Corresponds to CIC categories 3# and 28 when item "Participation" of Assets-D1 is not "N" and item "Asset held in unit linked and index linked funds (Y/N)" in Assets-D1 is equal to "N". <u>Participations at group level will include:</u> - holdings in related but not subsidiary insurance or reinsurance undertakings or insurance holding companies as described in Art 323bis 1. (d) - holdings in related undertakings in other financial sectors as described in Art 323bis 1. (e) - other related undertakings as described in Art 323bis 1. (f) - insurance or reinsurance undertakings or insurance holding companies included with the deduction and aggregation method (when combination of methods is used)
A7B	Equities	Sum of equities. For the statutory accounts the split between listed and unlisted may not exist and if this is the case this item need to reflect the sum. $A7B=A7+A7A$
A7	Equities - listed	Shares representing corporations' capital, e.g. representing ownership in a corporation, listed on a public stock exchange. Excludes participations Corresponds to CIC categories 3#, excluding XL3# and XT3# and (3# when item "Participation" of Assets is "N")
A7A	Equities - unlisted	Shares representing corporations' capital, e.g. representing ownership in a corporation, not listed on a public stock exchange. It excludes participations. Corresponds to CIC categories XL3# and XT3#, excluding 3# where item "Participations" of Assets is "N"
A8E	Bonds	Sum of bonds. For the statutory accounts the split of bonds may not exist and if this is the case this item need to reflect the sum. $A8E=A8+A8A+A8C+A8D$
A8	Government Bonds	Bonds issued by public authorities, whether by central governments, supra-national government institutions, regional governments or municipal governments Corresponds to CIC category 1
A8A	Corporate Bonds	Bonds issued by corporations

	ITEM	INSTRUCTIONS
A8C	Structured notes	Hybrid securities, combining a fixed income instrument with a series of derivative components. Excluded from this category are fixed income securities that are issued by sovereign governments. Concerns securities that have embedded all categories of derivatives, including Credit Default Swaps (CDS), Constant Maturity Swaps (CMS), Credit Default Options (CDOp) Corresponds to CIC category 5
A8D	Collateralised securities	Securities whose value and payments are derived from a portfolio of underlying assets. Includes Asset Backed Securities (ABS), Mortgage Backed securities (MBS), Commercial Mortgage Backed securities (CMBS), Collateralised Debt Obligations (CDO), Collateralised Loan Obligations (CLO), Collateralised Mortgage Obligations (CMO) Corresponds to CIC category 6
A9	Investment funds	Undertakings the sole purpose of which is the collective investment in transferrable securities and/or in other financial assets Corresponds to CIC category 4
A10A	Derivatives	Financial instruments that have values, based on the expected future price movements of the assets to which they are linked. SII value, only if positive, of the derivative as of the reporting date is reported here (in case of negative value, see L16). Corresponds to CIC categories A to F
A10B	Deposits other than cash equivalents	Deposits and cash equivalents that cannot be used to make payments at any time and that are not exchangeable for currency or transferable deposits without any kind of significant restriction or penalty. Corresponds to CIC categories 73, 74, 79
A11	Other investments	Other investments not covered by positions of Investments indicated above
A12	Assets held for index-linked and unit-linked funds	Assets held for insurance products where policyholder bears the risk (unit-linked) See cross-templates checks tab CAS 5
A14	Loans & mortgages	Financial assets created when creditors lend funds to debtors, with collateral or not, including cash pools. Corresponds to CIC category 8. A14=A14A+A14B+A14C See cross-templates checks tab CAS 4
A14B	Loans and mortgages to individuals	Financial assets created when creditors lend funds to debtors - individuals, with collateral or not, including cash pools
A14C	Other loans & mortgages	Financial assets created when creditors lend funds to debtors - others, not classifiable in item A14B, with collateral or not, including cash pools
A14A	Loans on policies	Loans made to policyholders, collateralized on policies See cross-templates checks tab CAS 4
A16	Reinsurance recoverables from:	Sum of reinsurance recoverables. Reinsurance recoverables as defined for TP templates. A16=A17A+A19B+A19A See cross-templates checks tab CAS 6 See cross-templates checks tab CQS 24 See cross-templates checks tab CAS 38
A17A	Non-life and health similar to non-life	A17A=A17+A18
A17	Non-life excluding health	Reinsurance recoverables from non-life business, excludes TP health-non SLT See cross-templates checks tab CQS 2 See cross-templates checks tab CAS 16
A18	Health similar to non-life	Reinsurance recoverables from TP health-non SLT See cross-templates checks tab CQS 3 See cross-templates checks tab CAS 17
A19B	Life and health similar to life, excluding health and index-linked and unit-linked	A19B=A18A+A19
A18A	Health similar to life	Reinsurance recoverables from TP health-SLT See cross-templates checks tab CQS 4 See cross-templates checks tab CAS 18
A19	Life excluding health and index-linked and unit-linked	Reinsurance recoverables from Life business, excludes TP health-SLT and TP index-linked and unit-linked See cross-templates checks tab CQS 5 See cross-templates checks tab CAS 19
A19A	Life index-linked and unit-linked	Reinsurance recoverables from life index-linked and unit-linked business See cross-templates checks tab CQS 6 See cross-templates checks tab CAS 20
A13	Deposits to cedants	Deposits relating to reinsurance accepted. Corresponds to CIC category 75 See cross-templates checks tab CAS 7
A21	Insurance & intermediaries receivables	Amounts due by policyholders, other insurers, and linked to insurance business, but that are not included in cash-in flows of technical provisions. Includes also amounts overdue by policyholders and insurance intermediaries (e.g. premiums due but not yet paid) See cross-templates checks tab CAS 7

ITEM		INSTRUCTIONS
A20	Reinsurance receivables	Amounts due by reinsurers and linked to reinsurance business, but that are not reinsurance recoverables. It might include: creditors from reinsurers that relate to settled claims of policyholders or beneficiaries; payments in relation to other than insurance events or settled insurance claims. See cross-templates checks tab CAS 7
A23	Receivables (trade, not insurance)	Includes amounts owed by employees or various business partners (not insurance-related), incl. public entities (no reason to have separate lines for current tax assets) See cross-templates checks tab CAS 8 See cross-templates checks tab CGS 13
A28A	Own shares	Own shares held by the undertakings. See cross-templates checks tab CAS 8 See cross-templates checks tab CGS 13
A28B	Amounts due in respect of own fund items or initial fund called up but not yet paid in	See cross-templates checks tab CAS 8 See cross-templates checks tab CGS 13
A27	Cash and cash equivalents	Notes and coins in circulation that are commonly used to make payments, and deposits exchangeable for currency on demand at par and which are directly usable for making payments by cheque, draft, giro order, direct debit/credit, or other direct payment facility, without penalty or restriction. Consistent with 'Cash' and "Transferable deposits" provided in CIC Category 71 and 72 See cross-templates checks tab CAS 4
A29	Any other assets, not elsewhere shown	This includes any assets not included in the other Balance Sheet items. See cross-templates checks tab CAS 8
A30	Total assets	Sum of the assets For SII column : $A30=A2+A26+A25B+A3+A4+A12+A14+A16+A13+A20+A21+A23+A28A+A28B+A27+A29$ For statutory accounts column : $A30=AS1+AS24+A2+A26+A25B+A3+A4+A12+A14+A16+A13+A20+A21+A23+A28A+A28B+A27+A29$ See cross-templates checks tab CAS 1

LIABILITIES

LS0	Technical provisions – non-life	These cells are dotted lines. Either you can split your technical provisions between life or non-life and their linked health business, either you cannot and you directly fill in cell LS6F with the correct total value.
L1	Technical provisions – non-life (excluding health)	Formula (TP calculated as a whole and sum of BE + RM for TP not calculated as a whole, where BE is gross of reinsurance) $L1=L1A+L2+L3$ See cross-templates checks tab CAS 9 See cross-templates checks tab CGS 1 See cross-templates checks tab CQS 25 See cross-templates checks tab CAS 39
L1A	Technical provisions – non-life - TP calculated as a whole	In case TP are calculated as a whole (replicable / hedgeable portfolio) See cross-templates checks tab CQS 7 See cross-templates checks tab CAS 21
L2	Technical provisions – non-life - Best estimate	This is in case TP are not calculated as a whole => split between BE and RM BE here is gross of reinsurance See cross-templates checks tab CQS 8 See cross-templates checks tab CAS 22
L3	Technical provisions – non-life - Risk margin	This is in case TP are not calculated as a whole => split between BE and RM See cross-templates checks tab CQS 9 See cross-templates checks tab CAS 23
L4	Technical provisions – health (similar to non-life)	Formula $L4=L4A+L5+L6$ See cross-templates checks tab CAS 9 See cross-templates checks tab CGS 2 See cross-templates checks tab CGS 14 See cross-templates checks tab CQS 25 See cross-templates checks tab CAS 39
L4A	Technical provisions – health - TP calculated as a whole	In case TP are calculated as a whole (replicable / hedgeable portfolio) See cross-templates checks tab CQS 10 See cross-templates checks tab CAS 24

	ITEM	INSTRUCTIONS
L5	Technical provisions – health - Best estimate	This is in case TP are not calculated as a whole => split between BE and RM BE here is gross of reinsurance See cross-templates checks tab CQS 11 See cross-templates checks tab CAS 25
L6	Technical provisions – health - Risk margin	This is in case TP are not calculated as a whole => split between BE and RM See cross-templates checks tab CQS 12 See cross-templates checks tab CAS 26
LS6F	Technical provisions - life (excluding index-linked and unit-linked)	These cells are dotted lines. Either you can split your technical provisions between life or non-life and their linked health business, either you cannot and you directly fill in cell LS6F with the correct total value. LS6F=L6B+L7
L6B	Technical provisions – health (similar to life)	Formula L6B=L6C+L6D+L6E See cross-templates checks tab CAS 9 See cross-templates checks tab CGS 3 See cross-templates checks tab CQS 20 See cross-templates checks tab CAS 34
L6C	Technical provisions – health (similar to life) - TP calculated as a whole	In case TP are calculated as a whole (replicable / hedgeable portfolio) See cross-templates checks tab CQS 13 See cross-templates checks tab CQS 21 See cross-templates checks tab CAS 35
L6D	Technical provisions – health (similar to life) - Best estimate	This is in case TP are not calculated as a whole => split between BE and RM BE here is gross of reinsurance See cross-templates checks tab CQS 14 See cross-templates checks tab CQS 22 See cross-templates checks tab CAS 36
L6E	Technical provisions – health (similar to life) - Risk margin	This is in case TP are not calculated as a whole => split between BE and RM See cross-templates checks tab CQS 15 See cross-templates checks tab CQS 23 See cross-templates checks tab CAS 37
L7	Technical provisions – life (excl. health and index-linked and unit-linked)	Formula L7=L7A+L8+L9 See cross-templates checks tab CAS 9 See cross-templates checks tab CGS 4 See cross-templates checks tab CQS 20
L7A	Technical provisions – life (excl. health and index-linked and unit-linked) - TP calculated as a whole	In case TP are calculated as a whole (replicable / hedgeable portfolio) See cross-templates checks tab CQS 16 See cross-templates checks tab CQS 21
L8	Technical provisions – life (excl. health and index-linked and unit-linked) - Best estimate	This is in case TP are not calculated as a whole => split between BE and RM BE here is gross of reinsurance See cross-templates checks tab CQS 17 See cross-templates checks tab CQS 22
L9	Technical provisions – life (excl. health and index-linked and unit-linked) - Risk margin	This is in case TP are not calculated as a whole => split between BE and RM See cross-templates checks tab CQS 18 See cross-templates checks tab CQS 23 See cross-templates checks tab CAS 37
L10	Technical provisions – index-linked and unit-linked	Formula L10=L10A+L11+L12 See cross-templates checks tab CAS 10 See cross-templates checks tab CGS 5 See cross-templates checks tab CQS 20 See cross-templates checks tab CAS 34
L10A	Technical provisions – index-linked and unit-linked - TP calculated as a whole	In case TP are calculated as a whole (replicable / hedgeable portfolio) See cross-templates checks tab CQS 21 See cross-templates checks tab CAS 35
L11	Technical provisions – index-linked and unit-linked - Best estimate	This is in case TP are not calculated as a whole => split between BE and RM BE here is gross of reinsurance See cross-templates checks tab CQS 19 See cross-templates checks tab CAS 33 See cross-templates checks tab CQS 22 See cross-templates checks tab CAS 36
L12	Technical provisions – index-linked and unit-linked - Risk margin	This is in case TP are not calculated as a whole => split between BE and RM See cross-templates checks tab CQS 23 See cross-templates checks tab CAS 37
LS14	Other technical provisions	Other technical provisions resulting from local GAAP.
L23	Contingent liabilities	A potential obligation that may be incurred depending on the outcome of a future event. A contingent liability is one where the outcome of an existing situation is uncertain, and this uncertainty will be resolved by a future event. A contingent liability is generally recognised only if the contingency is probable and the amount of the liability can be estimated. It should be equal to BS-C1B – cell B19. See cross-templates checks tab CAS 14

	ITEM	INSTRUCTIONS
L18	Provisions other than technical provisions	Liabilities of uncertain timing of amount. Eg includes provisions for legal expenses or deferred income reserve See cross-templates checks tab CAS 15
L22	Pension benefit obligations	Net obligations related to staff pension scheme, if applicable according to pension system. See cross-templates checks tab CAS 15
L13	Deposits from reinsurers	Amounts (e.g. cash) received from reinsurer or deducted by the reinsurer according to the reinsurance contract. See cross-templates checks tab CAS 11
L17	Deferred tax liabilities	A tax liability that a company owes and does not pay at that current point, although it will be responsible for paying it at some point in the future. See cross-templates checks tab CAS 15 See cross-templates checks tab CGS 20
L16	Derivatives	Financial instruments that have values, based on the expected future price movements of the assets to which they are linked. SII value, only if negative, of the derivative as of the reporting date is reported here. Corresponds to CIC categories A to F. For the statutory accounts this item does not need to be filled for undertakings which do not value derivatives in their Local GAAP. See cross-templates checks tab CAS 12
L19	Debts owed to credit institutions	Debts, such as mortgage and loans, towards credit institutions (banks, etc.) Excludes bonds being held by credit institutions, since it is not possible for the undertaking to identify all the holders of the bonds it issues. Subordinated liabilities should not be included here. See cross-templates checks tab CAS 13
L20	Financial liabilities other than debts owed to credit institutions	Can include bonds issued by undertaking (whether they are held by credit institutions or not), and mortgage and loans due to other entities than credit institutions (sister insurance company, holding, etc.). Includes structured notes issued by undertaking itself (not by SPV). Subordinated liabilities should not be included here. See cross-templates checks tab CAS 13
L15A	Insurance and intermediaries payables	Amounts due to policyholders, other insurers, and linked to insurance business, but that are not technical provisions. Includes amounts due to (re)insurance intermediaries (e.g. commissions due to intermediaries but not yet paid by the undertaking). Excludes loans & mortgages due to insurance companies, if they are not linked to insurance business but are only related to financing (and are therefore included in financial liabilities). See cross-templates checks tab CAS 11
L15B	Reinsurance payables	Amounts due to reinsurers (esp. current accounts) other than deposits and linked to reinsurance business, but that are not included in reinsurance recoverables. Includes debtors to reinsurers that relate to settled claims of policyholders or beneficiaries. See cross-templates checks tab CAS 11
L15C	Payables (trade, not insurance)	Includes amounts due to employees, suppliers, etc. and not insurance-related, parallel to receivables (trade, not insurance) on asset side; includes public entities See cross-templates checks tab CAS 15
L15E	Subordinated liabilities	$L15E=L15D+L26$
L15D	Subordinated liabilities not in BOF	Subordinated liabilities are debts which rank after other debts when company is liquidated, only subordinated liabilities that are not classified in BOF should be presented here. See cross-templates checks tab CAS 15
L26	Subordinated liabilities in BOF	Subordinated liabilities classified in BOF. Should be equal to cell A13 in OF-B1 See cross-templates checks tab CAS 15 See cross-templates checks tab CQS 1 See cross-templates checks tab CGS 6 See cross-templates checks tab QCGS 1 See cross-templates checks tab CAS 78
L25	Any other liabilities, not elsewhere shown	This includes any liabilities not included in the other Balance Sheet items. See cross-templates checks tab CAS 15
L25A	Total liabilities	Sum of liabilities $L25A=L1+L4+L6B+L7+L10+L23+L18+L22+L13+L17+L16+L19+L20+L15A+L15B+L15C+L15D+L26+L25$ See cross-templates checks tab CAS 2

	ITEM	INSTRUCTIONS
L27	Excess of assets over liabilities	Formula For Statutory accounts – amount of other items complementing the balance between Assets and Liabilities $L27=A30-L25A$ See cross-templates checks tab CQS 1 See cross-templates checks tab CGS 6 See cross-templates checks tab QCGS 1 See cross-templates checks tab CAS 78

Technical Annex II: List of quantitative reporting items

S.02.02

Assets and liabilities by currency

	ITEM	INSTRUCTIONS
	General Comment	The BS items presented here are based on BS-C1 (for SII BS only).
A1	Reporting currency	Currency code of the reporting currency
B1	Currency code	Currency code of other currencies
A3	Investments (other than assets held for index-linked and unit-linked funds)	Same as item A4 in BS-C1, by currency See cross-templates checks tab CAS 3
A4	Other assets within scope of Assets-D1 (other than index-linked and unit-linked funds)	Same as items A3 + A14 + A27 in BS-C1, by currency See cross-templates checks tab CAS 4
A5	Assets held for index-linked and unit-linked funds	Same as item A12 in BS-C1, by currency See cross-templates checks tab CAS 5
A5A	Reinsurance recoverables	Same as item A16 in BS-C1, by currency See cross-templates checks tab CAS 6
A6	Deposits to cedants, insurance and intermediaries receivables and reinsurance receivables	Same as items A13 +A20+ A21 in BS-C1, by currency See cross-templates checks tab CAS 7
A7	Any other assets	Same as items A2+A23+A25B+A26 +A28A+A28B+ A29 in BS-C1, by currency See cross-templates checks tab CAS 8
A7A	Total assets	A7A=sum (A3:A7), by currency See cross-templates checks tab CAS 1
A8	Technical provisions (excl. index-linked and unit-linked)	Same as items L1 + L4 + L6B + L7 in BS-C1 See cross-templates checks tab CAS 9
A9	Technical provisions - index-linked and unit-linked funds	Same as item L10 in BS-C1, by currency See cross-templates checks tab CAS 10
A10	Deposits from reinsurers and insurance, intermediaries and reinsurance payables	Same as items L13 + L15A+L15B in BS-C1, by currency See cross-templates checks tab CAS 11
A11	Derivatives	Same as cell L16 of BS-C1, by currency See cross-templates checks tab CAS 12
A12	Financial liabilities	Same as cells L19+L20 of BS-C1 See cross-templates checks tab CAS 13
A13	Contingent liabilities	Same as item L23 in BS-C1, by currency See cross-templates checks tab CAS 14
A14	Any other liabilities	Same as item L15D+L26+L25+ L22+L18+L17+L15C in BS-C1, by currency See cross-templates checks tab CAS 15
A15	Total liabilities	A15=sum (A8:A14) See cross-templates checks tab CAS 2

Technical Annex II: List of quantitative reporting items

S.06.02

List of assets

ITEM		INSTRUCTIONS
A1	Portfolio	Distinction between life, non-life, stakeholder's funds, general (no split) and ring fenced funds. One of the options in the following closed list shall be used: Life: L Non-life: NL Shareholders' funds: SF General: G Ring fenced funds: RF
A2	Fund Number	Applicable to assets held in ring-fenced or other internal funds (defined according to national markets). This number is attributed by the undertaking and must be consistent over time and with the fund number in TP (L) F3, cell A3
A3	Asset held in unit linked and index linked funds (Y/N)	Identify assets that are part of the fund which determines the benefits of the contract. One of the options in the following closed list shall be used: Yes: Y No : N
A4	ID Code	One of the options in the following list shall be used, by order of preference: ISO 6166 ISIN when available Other "recognized" codes (e.g.: CUSIP, Bloomberg Ticker, Reuters RIC) Code attributed by the undertaking, when the options above are not available, and must be consistent over time
A5	ID Code Type	Type of ID Code used for the "ID Code" item. One of the options in the following closed list shall be used: ISO 6166 ISIN: ISIN Other "recognized" codes: the designation of the code Code attributed by the undertaking: Undertaking
A6	Asset pledged as collateral	Identify assets kept in the undertaking balance-sheet and that are in the scope of reporting in template AS-D6. For partially pledge assets two lines for each asset shall be reported, one for the pledged amount and other for the remaining part. One of the options in the following list shall be used for the pledged part of the asset: Assets in the balance sheet that are collateral pledged: CP Collateral for reinsurance accepted: CR Collateral for securities borrowed: CB Repos: R
A7	Item Title	Identify the reported item by filling the name of the security or the address for property, with detail settled by the undertaking. This item is not applicable for CIC category 8 – Mortgages and Loans (for mortgages and loans on individuals, as those assets are not required to be individualized), and to CIC = 95 – Plant and equipment (for own use)
A8	Issuer Name	Name of the issuer, defined as the entity that offers securities for sale to investors, representing part of its capital, part of its debt, derivatives, etc. This item is not applicable to
A31	Issuer Code	Identification code: - Legal Entity Identifier (LEI) if available; - Interim entity identifier (pre-LEI) if available. If none is available this item should not be reported
A33	Type of code	Identification of the code used in A31: - LEI - Pre-LEI
A9	Issuer Sector	Identify the economic sector of issuer based on the NACE code. The letter reference of the NACE code must be used for identifying sectors (e.g. A: Agriculture, hunting and forestry; Section B: Fishing, etc) except for the NACE relating to Financial intermediation, for which the 4 digits code should be used. For investment funds the NACE code would be 6712 (Security broking and fund management). This item is not applicable for CIC category 8 – Mortgages and Loans (for mortgages and loans on individuals, as those assets are not required to be individualized), and to CIC = 95 – Plant and equipment (for own use)
A10	Issuer Group	Name the ultimate parent undertaking of issuer. For investment funds the group relation is relative to the fund manager This item is not applicable for CIC category 8 – Mortgages and Loans (for mortgages and loans on individuals, as those assets are not required to be individualized), and to CIC = 95 – Plant and equipment (for own use)

	ITEM	INSTRUCTIONS
A32	Issuer Group Code	Identification code: - Legal Entity Identifier (LEI) if available; - Interim entity identifier (pre-LEI) if available. If none is available this item should not be reported
A33	Type of code	Identification of the code used in A31/A32: - LEI - Pre-LEI
A11	Issuer Country	Country of localization of the issuer. For investment funds, the country is relative to the fund manager. One of the options in the following closed list shall be used: ISO 3166-1 alpha-2 code Supranational issuers: XA European Union Institutions: EU This item is not applicable for CIC category 8 – Mortgages and Loans (for mortgages and loans on individuals, as those assets are not required to be individualized), and to CIC = 95 – Plant and equipment (for own use)
A12	Country of custody	ISO 3166-1 alpha-2 code of the country where undertaking assets are held in custody. For identifying international custodians, such as Euroclear, the country of custody will be the one corresponding to the legal establishment where the custody service was contractually defined
A13	Currency	ISO 4217 Code of the currency of the issue
A15	CIC	EIOPA Code used to classify securities, as set out in Annex CIC Table. When classifying an asset using the CIC table, undertakings shall take into consideration the most representative risk to which the asset is exposed to. For reporting at group level, if different CIC codes exist for the same asset, due to reporting regarding different entities in the group (because different stock exchanges), a line must be entered for each different CIC. This situation will only occur when reporting by groups using consolidation method 2, and in practice there will be only one CIC for each asset for the same entity in the scope of the group, also identifiable by item A50
A16	Participation	Identify if a equity and other share or subordinated liability is a participation by using the following criteria: included in group supervision except if deducted under art. 212 and / or strategic. <u>For solo reporting or group reporting where the Deduction and aggregation method is used, the following options shall be used:</u> Not a participation: N Is a participation but not consolidated at group level and not strategic: YNGNS Is a participation not consolidated at group level but strategic: YNGS Is a participation, consolidated at group level and not strategic: YGNS Is consolidated at group level and is strategic: YGS <u>For group reporting and only where accounting consolidation-based or a combination of methods is used, the following options shall be used:</u> Not a participation: N Non-controlled participations under method 1: NCP1 Other Financial Sectors: OFS Subsidiaries under method 2: SM2 Non-controlled participations under method 2: NCP2 Other related undertaking under method 1: ORUT1
A17	External rating	Rating given by external rating agency. Only applicable to CIC categories 1, 2, 5 and 6. Undertakings shall report the external rating which in their perspective is best representative, <u>and used internally for SCR/MCR calculations</u>
A18	Rating Agency	Identify the rating agency giving the external rating used by the undertaking
A20	Duration	Asset duration, defined as the 'residual modified duration'. For assets without fixed maturity the first call date shall be used. The duration shall be calculated based on economic value. Only applies to CIC categories 1, 2, 4 (when applicable, e.g. for investment funds mainly invested in bonds), 5 and 6
A22	Quantity	Number of securities or invested amount measured at par amount, depending on the type of Not applicable for CIC categories 7, 8 and 9
A23	Unit SII price	Amount in currency for asset categories 3 and 4, the percentage of par value (clean price consistent with IFRS definition), for asset categories 1, 2, 5 and 6. Not applicable for CIC categories 7, 8 and 9
A24	Valuation method SII	Identify the valuation method used when valuing assets. One of the options in the following closed list shall be used: Quoted market price in active markets for the same assets: QMP Alternative valuation method: - quoted market price in active markets for similar assets: QMPS - other alternative valuation methods: AVM

	ITEM	INSTRUCTIONS
		Adjusted equity methods (applicable for the valuation of participations): AEM IFRS equity methods (applicable for the valuation of participations): IEM
A25	Acquisition price	Acquisition price of each asset. When there are different acquisition prices due to acquisitions made at different dates, an average acquisition price must be used and consequently only one line is completed for one single asset, independently of having more than one acquisition. Not applicable to CIC categories 7 and 8
A26	Total SII amount	Formula, corresponding to the multiplication of "Quantity" by "Unit SII price" plus accrued interest for bonds and other interest bearing security. For CIC categories 7, 8 and 9, this should indicate the SII value of the line
A28	Maturity date	Only applicable for CIC categories 1, 2, 5, 6 and 8. Corresponds always to the maturity date, even for callable securities. For perpetual securities use "31/12/9999" For CIC category 8, regarding loans and mortgages to individuals, the weighted (based on the loan amount) maturity is to be reported.
A30	Accrued interest	Quantify the amount of accrued interest for interest bearing securities. Note that this value is also part of A26 – Total SII amount

Technical Annex II: List of quantitative reporting items

S.08.01

Open derivatives

	ITEM	INSTRUCTIONS
A1	Portfolio	<p>Distinction between life, non-life, stakeholder's funds, general (no split) and ring fenced funds. One of the options in the following closed list shall be used:</p> <p>Life: L Non-life: NL Shareholders' funds: SF General: G Ring fenced funds: RF</p> <p>Issued by the undertaking (I) Related to the undertakings' liabilities (U)</p> <p>The split is not mandatory, except for identifying ring fenced funds, but should be reported if the undertaking uses it internally. When an undertaking does not apply a split "general" must be used. For derivatives issued by the undertaking as an internal (group) derivative and derivatives related to the undertakings' liabilities, a split is also mandatory.</p>
A2	Fund Number	Applicable to assets held in ring-fenced or other internal funds (defined according to national markets). This number is attributed by the undertaking and must be consistent over time and with the fund number in TP (L) F3, cell A3
A3	Derivatives held in unit linked and index linked funds (Y/N)	Identify assets that are part of the fund which determines the benefits of the contract. One of the options in the following closed list shall be used: Yes: Y No : N
A4	ID Code	<p>One of the options in the following list shall be used, by order of preference:</p> <p>ISO 6166 ISIN when available Other "recognized" codes (e.g.: CUSIP, Bloomberg Ticker, Reuters RIC)</p> <p>Code attributed by the undertaking, when the options above are not available, and must be consistent over time</p>
A5	ID Code Type	Type of ID Code used for the "ID Code" item. One of the options in the following closed list shall be used: ISO 6166 ISIN: ISIN Other "recognized" codes: the designation of the code Code attributed by the undertaking: Undertaking
A6	Counterparty Name	Name of the counterparty of the derivative contract (derivatives exchange or the counterparty for OTC derivatives)
A36	Counterparty Code	<p>Identification code:</p> <ul style="list-style-type: none"> - Legal Entity Identifier (LEI) if available; - Interim entity identifier (pre-LEI) if available. <p>If none is available this item should not be reported</p>
A7	Counterparty group	Name of the ultimate parent undertaking of counterparty
A37	Counterparty group Code	<p>Identification code:</p> <ul style="list-style-type: none"> - Legal Entity Identifier (LEI) if available; - Interim entity identifier (pre-LEI) if available. <p>If none is available this item should not be reported</p>
A38	Type of code	Identification of the code used in A36/A37: - LEI - Pre-LEI
A8	Contract name	Name of the derivative contract
A9	Asset or liability underlying the derivative	ID Code (refer to A4) of the asset or liability underlying the derivative contract. This item is to be provided only for derivatives that have a single underlying instrument in the undertakings' portfolio

A10	Currency	ISO 4217 Code of the currency of the derivative, i.e., currency of the notional amount of the derivative (e.g.: option having as underlying an amount in USD, FX swap expressed in EUR, etc). For derivatives that have more than a pair of currencies, it should be split into the pair components and reported in different lines
A11	CIC	EIOPA Code used to classify securities, as set out in Annex CIC Table. When classifying an asset using the CIC table, undertakings shall take into consideration the most representative risk to which the asset is exposed to
A13	Use of derivative	Describe use of derivative (micro / macro hedge, efficient portfolio management). Micro hedge refers to derivatives covering a single financial instrument, forecasted transaction or liability. Macro hedge refers to derivatives covering a set of financial instruments, forecasted transactions or liabilities. One of the options in the following closed list shall be used: Micro hedge: MI Macro hedge: MA Efficient portfolio management: EPM
A14	Delta	Measures the rate of change of option value with respect to changes in the underlying asset's price. Only applicable to CIC categories B and C (Call and put options), with reference to the reporting date
A15	Notional amount	The amount covered or exposed to the derivative. For futures and options corresponds to contract size multiplied by the number of contracts; and for swaps and forwards corresponds to the contract amount. The nominal amount refers to the amount that is being hedged / invested (when not covering risks). If several trades occur, should be the net amount at the reporting date
A16	Long or short position	Only for futures and options, swaps and credit derivatives contracts (currency, credit and securities swaps). The long and short position for swaps is defined relatively to the notional amount. A holder of a long position owns the security or notional amount at the contract inception, while a holder of a short position will own the security or the nominal amount at the end of the derivatives contract. One of the options in the following closed list shall be used: Long position: L Short position: S For interest rate swaps: Fixed-for-floating: FX-FL Fixed-for-fixed: FX-FX Floating-for-fixed: FL-FX Floating-for-floating: FL-FL
A17	Premium paid/received to date	The payment received (if sold) or paid (if bought), for options and also up-front and periodical amounts paid / received for swaps, since inception
A19	Number of contracts	Number of derivative contracts in the portfolio. It shall be the number of contracts entered into. For OTC, e.g., one swap contract, 1 should be reported, if ten swaps with the same characteristics, 10 should be reported. The number of contracts shall be the ones outstanding at the reporting date
A20	Contract dimension	Number of underlying assets in the contract (e.g. for equity futures it is the Only for futures and options
A21	Trigger value	Reference price for futures, strike price for options, currency exchange rate or interest rate for forwards, etc. (not applicable to Interest rate and currency swaps). In the case of more than one trigger over time, report the trigger that refers to the reporting period. When the derivative has a range of trigger values, report the set separated by semi-columns
A22	Swap outflow amount	Amount delivered under the swap contract, during the reporting period. Corresponds to interest paid for IRS and amounts delivered for currency swaps, credit swaps, total return swaps and other swaps
A23	Swap inflow amount	Amount received under the swap contract, during the reporting period.
A24	Swap delivered currency	Currency of the swap price (only for currency swaps and interest rate and currency swaps)
A25	Swap received currency	Currency of the swap notional amount (only for currency swaps and interest rate and currency swaps)
A26	Trade date	Date of the trade of the derivative contract.

		When various trades occur for the same derivative, report only the first trade date of the derivative and only one line for each derivative (no different lines for each trade)
A27	Maturity date	Contractually defined date of close of the derivative contract, whether at maturity date, expiring date for options (European or American), etc
A28	SII value	SII value of the derivative as of the reporting date. Can be positive, negative or zero
A29	Valuation method SII	Identify the valuation method used when valuing assets. Two possibilities : Mark to market and mark to model
A31	Unwind trigger of contract	Identify the event that causes the unwinding of the contract. One of the options in the following closed list shall be used: Bankruptcy of the underlying or reference entity: B Adverse fall in value of the underlying reference asset: F Adverse change in credit rating of the underlying assets or entity: R Novation, i.e. the act of replacing an obligation under the derivative with a new obligation, or replacing a party of the derivative with a new party: N Multiple events or a combination of events: M Other events: O
A32	Maximum loss under unwinding event	Maximum amount of loss if an unwinding event occurs. Applicable to CIC category F
A33	Duration	Derivative duration, defined as the 'residual modified duration', for derivatives for which a duration measure is applicable. Calculated as the net duration between in and out flows from the derivative, when applicable
A34	External rating	Rating of the counterparty given by external rating agency. Undertakings shall report the external rating that in their perspective is best representative, and used internally for SCR/MCR calculations. Only applicable to OTC or bespoke derivatives
A35	Rating Agency	Identify the rating agency giving the external rating used by the undertaking

The following cells should only be completed for group reporting

A50	Legal name of the undertaking	This item shall be filled in only when it relates to the line-by-line list of derivatives held by subsidiaries under method 2
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Technical Annex II: List of quantitative reporting items

S.12.01.a

Life and Health SLT Technical Provisions

ITEM		INSTRUCTIONS
Technical provisions calculated as a whole		
A1	Technical provisions calculated as a whole - Insurance with profit participation	Amount of Technical provisions calculated as a whole regarding LoB Insurance with profit participation See cross-templates checks tab CQS 16 See cross-templates checks tab CQS 20 See cross-templates checks tab CQS 21
A3	Technical provisions calculated as a whole - Index-linked and unit-linked insurance	Amount of Technical provisions calculated as a whole regarding LoB Index-linked and unit-linked insurance
A5	Technical provisions calculated as a whole - Other life insurance	Amount of Technical provisions calculated as a whole regarding LoB Other life insurance See cross-templates checks tab CQS 16
A6	Technical provisions calculated as a whole - Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Amount of Technical provisions calculated as a whole regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations See cross-templates checks tab CQS 16
A7	Technical provisions calculated as a whole - Accepted reinsurance	Amount of Technical provisions calculated as a whole regarding LoB Life accepted reinsurance $A7=A7A+A7B+A7C$ See cross-templates checks tab CQS 16
A7A	Technical provisions calculated as a whole - Accepted reinsurance, Of which WP (Insurance with profit participation on Accepted reinsurance (Gross))	Amount of Technical provisions calculated as a whole regarding LoB Life Accepted reinsurance, Of which WP (Insurance with profit participation on Accepted reinsurance (Gross))
A7B	Technical provisions calculated as a whole - Accepted reinsurance, Of which UL (Index-linked and unit-linked insurance on Accepted reinsurance (Gross))	Amount of Technical provisions calculated as a whole regarding LoB Life Accepted reinsurance, Of which UL (Index-linked and unit-linked insurance on Accepted reinsurance (Gross))
A7C	Technical provisions calculated as a whole - Accepted reinsurance, Of which OL (Other life insurance on Accepted reinsurance (Gross))	Amount of Technical provisions calculated as a whole regarding LoB Life Accepted reinsurance, Of which OL (Other life insurance on Accepted reinsurance (Gross))
A9	Technical provisions calculated as a whole - Total (Life other than health insurance, incl. Unit-Linked)	$A9=A1+A3+A5+A6+A7$
A10	Technical provisions calculated as a whole - Health insurance (direct business)	Amount of Technical provisions calculated as a whole regarding LoB Health SLT insurance (direct business) See cross-templates checks tab CQS 13
A12	Technical provisions calculated as a whole - Annuities stemming from non-life insurance contracts and relating to health insurance	Amount of Technical provisions calculated as a whole regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations See cross-templates checks tab CQS 13
A13	Technical provisions calculated as a whole - Health reinsurance (reinsurance accepted)	Amount of Technical provisions calculated as a whole regarding LoB Health SLT reinsurance (reinsurance accepted) See cross-templates checks tab CQS 13
A14	Technical provisions calculated as a whole - Total (Health similar to life insurance)	$A14=A10+A12+A13$

Technical provisions calculated as a sum of a best estimate and a risk margin - Best estimate

	ITEM	INSTRUCTIONS
B1	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Insurance with profit participation	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Insurance with profit participation See cross-templates checks tab CQS 17 See cross-templates checks tab CQS 20 See cross-templates checks tab CQS 22 See cross-templates checks tab CQS 42 See cross-templates checks tab CQS 43 See cross-templates checks tab CQS 44 See cross-templates checks tab CQS 61 See cross-templates checks tab CQS 62 See cross-templates checks tab CQS 63
B2	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Index-linked and unit-linked insurance, Contracts without options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Index-linked and unit-linked insurance, Contracts without options and guarantees See cross-templates checks tab CQS 19
B3	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Index-linked and unit-linked insurance, Contracts with options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Index-linked and unit-linked insurance, Contracts with options and guarantees See cross-templates checks tab CQS 19
B4	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Other life insurance, Contracts without options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Other life insurance, Contracts without options and guarantees See cross-templates checks tab CQS 17
B5	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Other life insurance, Contracts with options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Other life insurance, Contracts with options and guarantees See cross-templates checks tab CQS 17
B6	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations See cross-templates checks tab CQS 17
B7	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Accepted reinsurance	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Life Accepted reinsurance See cross-templates checks tab CQS 17
B9	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Total (Life other than health insurance, incl. Unit-Linked)	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1), Total (Life other than health insurance, incl. Unit-Linked) B9=SUM(B1:B7)
B10	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Health insurance (direct business), Contracts without options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Health SLT insurance (direct business), Contracts without options and guarantees See cross-templates checks tab CQS 14
B11	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Health insurance (direct business), Contracts with options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Health SLT insurance (direct business), Contracts with options and guarantees See cross-templates checks tab CQS 14

	ITEM	INSTRUCTIONS
B12	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross - Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations See cross-templates checks tab CQS 14
B13	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross - Health reinsurance (reinsurance accepted)	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Health reinsurance (reinsurance accepted) See cross-templates checks tab CQS 14
B14	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross - Total (Health similar to life insurance)	B14=SUM(B10:B13)
C1	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Insurance with profit participation	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Insurance with profit participation See cross-templates checks tab CQS 5 See cross-templates checks tab CQS 24 See cross-templates checks tab CQS 42 See cross-templates checks tab CQS 43 See cross-templates checks tab CQS 44 See cross-templates checks tab CQS 61 See cross-templates checks tab CQS 62 See cross-templates checks tab CQS 63
C2	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Index-linked and unit-linked insurance, Contracts without options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Index-linked and unit-linked insurance, Contracts without options and guarantees See cross-templates checks tab CQS 6
C3	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Index-linked and unit-linked insurance, Contracts with options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Index-linked and unit-linked insurance, Contracts with options and guarantees See cross-templates checks tab CQS 6
C4	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Other life insurance, Contracts without options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Other life insurance, Contracts without options and guarantees See cross-templates checks tab CQS 5
C5	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Other life insurance, Contracts with options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Other life insurance, Contracts with options and guarantees See cross-templates checks tab CQS 5
C6	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations See cross-templates checks tab CQS 5

	ITEM	INSTRUCTIONS
C7	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Accepted reinsurance	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Life Accepted reinsurance See cross-templates checks tab CQS 5
C9	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Total (Life other than health insurance, incl. Unit-Linked)	Total Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, Total (Life other than health insurance, incl. Unit-Linked) C9=SUM(C1:C7)
C10	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Health insurance (direct business), Contracts without options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Health SLT insurance (direct business), Contracts without options and guarantees See cross-templates checks tab CQS 4
C11	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Health insurance (direct business), Contracts with options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Health SLT insurance (direct business), Contracts with options and guarantees See cross-templates checks tab CQS 4
C12	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations See cross-templates checks tab CQS 4
C13	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Gross - Health reinsurance (reinsurance accepted)	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Health reinsurance (reinsurance accepted) See cross-templates checks tab CQS 4
C14	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Total (Health similar to life insurance)	C14=SUM(C10:C13)
E1	Risk Margin - Insurance with profit participation	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Insurance with profit participation See cross-templates checks tab CQS 18 See cross-templates checks tab CQS 20 See cross-templates checks tab CQS 23
E2	Risk Margin - Index-linked and unit-linked insurance	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Index-linked and unit-linked insurance
E4	Risk Margin - Other life insurance	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Other life insurance See cross-templates checks tab CQS 18
E6	Risk Margin - Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations See cross-templates checks tab CQS 18

ITEM		INSTRUCTIONS
E7	Risk Margin - Accepted reinsurance	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Life accepted reinsurance See cross-templates checks tab CQS 18
E9	Risk Margin - Total (Life other than health insurance, incl. Unit-Linked)	$E9=E1+E2+E4+E6+E7$
E10	Risk Margin - Health insurance (direct business)	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Health SLT insurance (direct business) See cross-templates checks tab CQS 15
E12	Risk Margin - Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations See cross-templates checks tab CQS 15
E13	Risk Margin - Health reinsurance (reinsurance accepted)	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Health SLT reinsurance (reinsurance accepted) See cross-templates checks tab CQS 15
E14	Risk Margin - Total (Health similar to life insurance)	$E14=E10+E12+E13$
Technical provisions - Total		
F1	Technical Provisions - Total - Insurance with profit participation	$F1=A1+B1+E1$
F2	Technical Provisions - Total - Index-linked and unit-linked insurance	$F2=A3+B2+B3+E2$
F4	Technical Provisions - Total - Other life insurance	$F4=A5+B4+B5+E4$
F6	Technical Provisions - Total - Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	$F6=A6+B6+E6$
F7	Technical Provisions - Total - Accepted reinsurance	$F7=A7+B7+E7$
F9	Technical Provisions - Total - Total (Life other than health insurance, incl. Unit-Linked)	$F9=F1+F2+F4+F6+F7$
F10	Technical Provisions - Total - Health insurance (direct business)	$F10=A10+B10+B11+E10$
F12	Technical Provisions - Total - Annuities stemming from non-life insurance contracts and relating to health insurance obligations	$F12=A12+B12+E12$
F13	Technical Provisions - Total - Health reinsurance (reinsurance accepted)	$F13=A13+B13+E13$
F14	Technical Provisions - Total - Total (Health similar to life insurance)	$F14=F10+F12+F13$

Technical Annex II: List of quantitative reporting items

S.12.01.b

Life and Health SLT Technical Provisions

ITEM		INSTRUCTIONS
<i>Technical provisions calculated as a whole</i>		
A1	Technical provisions calculated as a whole - Insurance with profit participation	Amount of Technical provisions calculated as a whole regarding LoB Insurance with profit participation See cross-templates checks tab CAS 30 See cross-templates checks tab CAS 34 See cross-templates checks tab CAS 35
A3	Technical provisions calculated as a whole - Index-linked and unit-linked insurance	Amount of Technical provisions calculated as a whole regarding LoB Index-linked and unit-linked insurance
A5	Technical provisions calculated as a whole - Other life insurance	Amount of Technical provisions calculated as a whole regarding LoB Other life insurance <i>See cross-templates checks tab CAS 30</i>
A6	Technical provisions calculated as a whole - Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Amount of Technical provisions calculated as a whole regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations See cross-templates checks tab CAS 30
A7	Technical provisions calculated as a whole - Accepted reinsurance	Amount of Technical provisions calculated as a whole regarding LoB Life accepted reinsurance $A7=A7A+A7B+A7C$ <i>See cross-templates checks tab CAS 30</i>
A7A	Technical provisions calculated as a whole - Accepted reinsurance, Of which WP (Insurance with profit participation on Accepted reinsurance (Gross))	Amount of Technical provisions calculated as a whole regarding LoB Life Accepted reinsurance, Of which WP (Insurance with profit participation on Accepted reinsurance (Gross))
A7B	Technical provisions calculated as a whole - Accepted reinsurance, Of which UL (Index-linked and unit-linked insurance on Accepted reinsurance (Gross))	Amount of Technical provisions calculated as a whole regarding LoB Life Accepted reinsurance, Of which UL (Index-linked and unit-linked insurance on Accepted reinsurance (Gross))
A7C	Technical provisions calculated as a whole - Accepted reinsurance, Of which OL (Other life insurance on Accepted reinsurance (Gross))	Amount of Technical provisions calculated as a whole regarding LoB Life Accepted reinsurance, Of which OL (Other life insurance on Accepted reinsurance (Gross))
A9	Technical provisions calculated as a whole - Total (Life other than health insurance, incl. Unit-Linked)	$A9=A1+A3+A5+A6+A7$
A10	Technical provisions calculated as a whole - Health insurance (direct business)	Amount of Technical provisions calculated as a whole regarding LoB Health SLT insurance (direct business) See cross-templates checks tab CAS 27
A12	Technical provisions calculated as a whole - Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Amount of Technical provisions calculated as a whole regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations See cross-templates checks tab CAS 27
A13	Technical provisions calculated as a whole - Health reinsurance (reinsurance accepted)	Amount of Technical provisions calculated as a whole regarding LoB Health SLT reinsurance (reinsurance accepted) See cross-templates checks tab CAS 27
A14	Technical provisions calculated as a whole - Total (Health similar to life insurance)	$A14=A10+A12+A13$

ITEM

INSTRUCTIONS

Technical provisions calculated as a sum of a best estimate and a risk margin - Best estimate

B1	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Insurance with profit participation	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Insurance with profit participation See cross-templates checks tab CAS 31 See cross-templates checks tab CAS 34 See cross-templates checks tab CAS 36 See cross-templates checks tab CAS 56 See cross-templates checks tab CAS 57 See cross-templates checks tab CAS 58 See cross-templates checks tab CAS 75 See cross-templates checks tab CAS 76 See cross-templates checks tab CAS 77
B2	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Index-linked and unit-linked insurance, Contracts without options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Index-linked and unit-linked insurance, Contracts without options and guarantees See cross-templates checks tab CAS 33
B3	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Index-linked and unit-linked insurance, Contracts with options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Index-linked and unit-linked insurance, Contracts with options and guarantees See cross-templates checks tab CAS 33
B4	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Other life insurance, Contracts without options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Other life insurance, Contracts without options and guarantees See cross-templates checks tab CAS 31
B5	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Other life insurance, Contracts with options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Other life insurance, Contracts with options and guarantees See cross-templates checks tab CAS 31
B6	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations See cross-templates checks tab CAS 31
B7	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Accepted reinsurance	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Life Accepted reinsurance See cross-templates checks tab CAS 31
B9	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Total (Life other than health insurance, incl. Unit-Linked)	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1), Total (Life other than health insurance, incl. Unit-Linked) B9=SUM(B1:B7)
B10	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Health insurance (direct business), Contracts without options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Health SLT insurance (direct business), Contracts without options and guarantees See cross-templates checks tab CAS 28
B11	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross, Health insurance (direct business), Contracts with options and guarantees	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Health SLT insurance (direct business), Contracts with options and guarantees See cross-templates checks tab CAS 28

	ITEM	INSTRUCTIONS
B12	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross - Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations See cross-templates checks tab CAS 28
B13	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross - Health reinsurance (reinsurance accepted)	Amount of Gross Best estimate (no deduction of reinsurance and SPVs according to article 77(2) in L1) regarding LoB Health reinsurance (reinsurance accepted) See cross-templates checks tab CAS 28
B14	Technical provisions calculated as a sum of BE and RM, Best Estimate (BE) – Gross - Total (Health similar to life insurance)	'B14=SUM(B10:B13)
CA1	Total Recoverables from reinsurance and SPV before the adjustment for expected losses due to counterparty default – Insurance with profit participation	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables before performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Insurance with profit participation CA1=CB1+CC1+CD1
CA2	Total Recoverables from reinsurance and SPV before the adjustment for expected losses due to counterparty default – Index-linked and unit-linked insurance, Contracts without options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables before performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Index-linked and unit-linked insurance, Contracts without options and guarantees CA2=CB2+CC2+CD2
CA3	Total Recoverables from reinsurance and SPV before the adjustment for expected losses due to counterparty default – Index-linked and unit-linked insurance, Contracts with options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables before performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Index-linked and unit-linked insurance, Contracts with options and guarantees CA3=CB3+CC3+CD3
CA4	Total Recoverables from reinsurance and SPV before the adjustment for expected losses due to counterparty default – Other life insurance, Contracts without options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables before performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Other life insurance, Contracts without options and guarantees CA4=CB4+CC4+CD4
CA5	Total Recoverables from reinsurance and SPV before the adjustment for expected losses due to counterparty default – Other life insurance, Contracts with options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables before performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Other life insurance, Contracts with options and guarantees CA5=CB5+CC5+CD5
CA6	Total Recoverables from reinsurance and SPV before the adjustment for expected losses due to counterparty default – Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables before performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations CA6=CB6+CC6+CD6
CA7	Total Recoverables from reinsurance and SPV before the adjustment for expected losses due to counterparty default – Accepted reinsurance	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables before performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Life Accepted reinsurance CA7=CB7+CC7+CD7

	ITEM	INSTRUCTIONS
CA9	Total Recoverables from reinsurance and SPV before the adjustment for expected losses due to counterparty default - Total (Life other than health insurance, incl. Unit-Linked)	NOT APPLICABLE for the purpose of preparatory phase Total Amount of Recoverables before performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, Total (Life other than health insurance, incl. Unit-Linked) CA9=SUM(CA1:CA7)
CA10	Total Recoverables from reinsurance and SPV before the adjustment for expected losses due to counterparty default - Health insurance (direct business), Contracts without options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables before performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance regarding LoB Health SLT insurance (direct business), Contracts without options and guarantees
CA11	Total Recoverables from reinsurance and SPV before the adjustment for expected losses due to counterparty default - Health insurance (direct business), Contracts with options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables before performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance regarding LoB Health SLT insurance (direct business), Contracts with options and guarantees CA11=CB11+CC11+CD11
CA12	Total Recoverables from reinsurance and SPV before the adjustment for expected losses due to counterparty default - Annuities stemming from non-life insurance contracts and relating to health insurance obligations	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables before performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations CA12=CB12+CC12+CD12
CA13	Total Recoverables from reinsurance and SPV before the adjustment for expected losses due to counterparty default - Health reinsurance (reinsurance accepted)	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables before performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance regarding LoB Health reinsurance (reinsurance accepted) CA13=CB13+CC13+CD13
CA14	Total Recoverables from reinsurance and SPV before the adjustment for expected losses due to counterparty default - Total (Health similar to life insurance)	NOT APPLICABLE for the purpose of preparatory phase CA14=SUM(CA10:CA13)
CB1	Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses - Insurance with profit participation	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from "traditional" reinsurance, i.e. without SPV and Finite Reinsurance, calculated consistently with the boundaries of the contracts to which they relate, including also ceded intra group reinsurance, regarding LoB Insurance with profit participation
CB2	Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses - Index-linked and unit-linked insurance, Contracts without options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from "traditional" reinsurance, i.e. without SPV and Finite Reinsurance, calculated consistently with the boundaries of the contracts to which they relate, including also ceded intra group reinsurance, regarding LoB Index-linked and unit-linked insurance, Contracts without options and guarantees
CB3	Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses - Index-linked and unit-linked insurance, Contracts with options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from "traditional" reinsurance, i.e. without SPV and Finite Reinsurance, calculated consistently with the boundaries of the contracts to which they relate, including also ceded intra group reinsurance, regarding LoB Index-linked and unit-linked insurance, Contracts with options and guarantees
CB4	Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses - Other life insurance, Contracts without options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from "traditional" reinsurance, i.e. without SPV and Finite Reinsurance, calculated consistently with the boundaries of the contracts to which they relate, including also ceded intra group reinsurance, regarding LoB Other life insurance, Contracts without options and guarantees

	ITEM	INSTRUCTIONS
CB5	Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses – Other life insurance, Contracts with options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from “traditional” reinsurance, i.e. without SPV and Finite Reinsurance, calculated consistently with the boundaries of the contracts to which they relate, including also ceded intra group reinsurance, regarding LoB Other life insurance, Contracts with options and guarantees
CB6	Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses – Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from “traditional” reinsurance, i.e. without SPV and Finite Reinsurance, calculated consistently with the boundaries of the contracts to which they relate, including also ceded intra group reinsurance, regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations
CB7	Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses – Accepted reinsurance	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from “traditional” reinsurance, i.e. without SPV and Finite Reinsurance, calculated consistently with the boundaries of the contracts to which they relate, including also ceded intra group reinsurance, regarding LoB Life Accepted reinsurance
CB9	Total Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses – Total (Life other than health insurance, incl. Unit-Linked)	NOT APPLICABLE for the purpose of preparatory phase Total Amount of Recoverables from “traditional” reinsurance, i.e. without SPV and Finite Reinsurance, calculated consistently with the boundaries of the contracts to which they relate, including also ceded intra group reinsurance, Total (Life other than health insurance, incl. Unit-Linked) CB9=SUM(CB1:CB7)
CB10	Total Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses – Health insurance (direct business), Contracts without options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from “traditional” reinsurance, i.e. without SPV and Finite Reinsurance, calculated consistently with the boundaries of the contracts to which they relate, including also ceded intra group reinsurance regarding LoB Health SLT insurance (direct business), Contracts without options and guarantees
CB11	Total Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses – Health insurance (direct business), Contracts with options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from “traditional” reinsurance, i.e. without SPV and Finite Reinsurance, calculated consistently with the boundaries of the contracts to which they relate, including also ceded intra group reinsurance regarding LoB Health SLT insurance (direct business), Contracts with options and guarantees
CB12	Total Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses – Annuities stemming from non-life insurance contracts and relating to health insurance obligations	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from “traditional” reinsurance, i.e. without SPV and Finite Reinsurance, calculated consistently with the boundaries of the contracts to which they relate, including also ceded intra group reinsurance regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations
CB13	Total Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses – Gross - Health reinsurance (reinsurance accepted)	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from “traditional” reinsurance, i.e. without SPV and Finite Reinsurance, calculated consistently with the boundaries of the contracts to which they relate, including also ceded intra group reinsurance regarding LoB Health reinsurance (reinsurance accepted)
CB14	Total Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses – Total (Health similar to life insurance)	NOT APPLICABLE for the purpose of preparatory phase CB14=SUM(CB10:CB13)
CC1	Recoverables from SPV before adjustment for expected losses – Insurance with profit participation	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from SPV (Special purpose vehicles), calculated consistently with the boundaries of the contracts to which they relate, regarding LoB Insurance with profit participation. The amounts recoverable from a special purpose vehicle shall not exceed the aggregate maximum risk exposure of this SPV to the insurance or reinsurance undertaking

	ITEM	INSTRUCTIONS
CC2	Recoverables from SPV before adjustment for expected losses – Index-linked and unit-linked insurance, Contracts without options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from SPV (Special purpose vehicles), calculated consistently with the boundaries of the contracts to which they relate, regarding LoB Index-linked and unit-linked insurance, Contracts without options and guarantees. The amounts recoverable from a special purpose vehicle shall not exceed the aggregate maximum risk exposure of this SPV to the insurance or reinsurance undertaking
CC3	Recoverables from SPV before adjustment for expected losses – Index-linked and unit-linked insurance, Contracts with options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from SPV (Special purpose vehicles), calculated consistently with the boundaries of the contracts to which they relate, regarding LoB Index-linked and unit-linked insurance, Contracts with options and guarantees. The amounts recoverable from a special purpose vehicle shall not exceed the aggregate maximum risk exposure of this SPV to the insurance or reinsurance undertaking
CC4	Recoverables from SPV before adjustment for expected losses – Other life insurance, Contracts without options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from SPV (Special purpose vehicles), calculated consistently with the boundaries of the contracts to which they relate, regarding LoB Other life insurance, Contracts without options and guarantees. The amounts recoverable from a special purpose vehicle shall not exceed the aggregate maximum risk exposure of this SPV to the insurance or reinsurance undertaking
CC5	Recoverables from SPV before adjustment for expected losses – Other life insurance, Contracts with options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from SPV (Special purpose vehicles), calculated consistently with the boundaries of the contracts to which they relate, regarding LoB Other life insurance, Contracts with options and guarantees. The amounts recoverable from a special purpose vehicle shall not exceed the aggregate maximum risk exposure of this SPV to the insurance or reinsurance undertaking
CC6	Recoverables from SPV before adjustment for expected losses – Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from SPV (Special purpose vehicles), calculated consistently with the boundaries of the contracts to which they relate, regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations. The amounts recoverable from a special purpose vehicle shall not exceed the aggregate maximum risk exposure of this SPV to the insurance or reinsurance undertaking
CC7	Recoverables from SPV before adjustment for expected losses – Accepted reinsurance	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from SPV (Special purpose vehicles), calculated consistently with the boundaries of the contracts to which they relate, regarding LoB Life Accepted reinsurance. The amounts recoverable from a special purpose vehicle shall not exceed the aggregate maximum risk exposure of this SPV to the insurance or reinsurance undertaking
CC9	Total Recoverables from SPV before adjustment for expected losses – Total (Life other than health insurance, incl. Unit-Linked)	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from SPV (Special purpose vehicles), calculated consistently with the boundaries of the contracts to which they relate, Total (Life other than health insurance, incl. Unit-Linked). The amounts recoverable from a special purpose vehicle shall not exceed the aggregate maximum risk exposure of this SPV to the insurance or reinsurance undertaking. CC9=SUM(CC1:CC7)
CC10	Total Recoverables from SPV before adjustment for expected losses – Health insurance (direct business), Contracts without options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Total Recoverables from SPV before adjustment for expected losses regarding LoB Health SLT insurance (direct business), Contracts without options and guarantees. The amounts recoverable from a special purpose vehicle shall not exceed the aggregate maximum risk exposure of this SPV to the insurance or reinsurance undertaking
CC11	Total Recoverables from SPV before adjustment for expected losses – Health insurance (direct business), Contracts with options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Total Recoverables from SPV before adjustment for expected losses regarding LoB Health SLT insurance (direct business), Contracts with options and guarantees. The amounts recoverable from a special purpose vehicle shall not exceed the aggregate maximum risk exposure of this SPV to the insurance or reinsurance undertaking
CC12	Total Recoverables from SPV before adjustment for expected losses – Annuities stemming from non-life insurance contracts and relating to health insurance obligations	NOT APPLICABLE for the purpose of preparatory phase Amount of Total Recoverables from SPV before adjustment for expected losses regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations. The amounts recoverable from a special purpose vehicle shall not exceed the aggregate maximum risk exposure of this SPV to the insurance or reinsurance undertaking

ITEM		INSTRUCTIONS
CC13	Total Recoverables from SPV before adjustment for expected losses – Gross - Health reinsurance (reinsurance accepted)	NOT APPLICABLE for the purpose of preparatory phase Amount of Total Recoverables from SPV before adjustment for expected losses regarding LoB Health reinsurance (reinsurance accepted).The amounts recoverable from a special purpose vehicle shall not exceed the aggregate maximum risk exposure of this SPV to the insurance or reinsurance undertaking
CC14	Total Recoverables from SPV before adjustment for expected losses – Total (Health similar to life insurance)	NOT APPLICABLE for the purpose of preparatory phase CC14=SUM(CC10:CC13)
CD1	Recoverables from Finite Reinsurance before adjustment for expected losses – Insurance with profit participation	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from Finite Re, calculated consistently with the boundaries of the contracts to which they relate, including also ceded intra group reinsurance, regarding LoB Insurance with profit participation
CD2	Recoverables from Finite Reinsurance before adjustment for expected losses – Index-linked and unit-linked insurance, Contracts without options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from Finite Re, calculated consistently with the boundaries of the contracts to which they relate, including also ceded intra group reinsurance, regarding LoB Index-linked and unit-linked insurance, Contracts without options and guarantees
CD3	Recoverables from Finite Reinsurance before adjustment for expected losses – Index-linked and unit-linked insurance, Contracts with options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from Finite Re, calculated consistently with the boundaries of the contracts to which they relate, including also ceded intra group reinsurance, regarding LoB Index-linked and unit-linked insurance, Contracts with options and guarantees
CD4	Recoverables from Finite Reinsurance before adjustment for expected losses – Other life insurance, Contracts without options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from Finite Re, calculated consistently with the boundaries of the contracts to which they relate, including also ceded intra group reinsurance, regarding LoB Other life insurance, Contracts without options and guarantees
CD5	Recoverables from Finite Reinsurance before adjustment for expected losses – Other life insurance, Contracts with options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from Finite Re, calculated consistently with the boundaries of the contracts to which they relate, including also ceded intra group reinsurance, regarding LoB Other life insurance, Contracts with options and guarantees
CD6	Recoverables from Finite Reinsurance before adjustment for expected losses – Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from Finite Re, calculated consistently with the boundaries of the contracts to which they relate, including also ceded intra group reinsurance, regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations
CD7	Recoverables from Finite Reinsurance before adjustment for expected losses – Accepted reinsurance	NOT APPLICABLE for the purpose of preparatory phase Amount of Recoverables from Finite Re, calculated consistently with the boundaries of the contracts to which they relate, including also ceded intra group reinsurance, regarding LoB Life Accepted reinsurance
CD9	Total Recoverables from Finite Reinsurance before adjustment for expected losses – Total (Life other than health insurance, incl. Unit-Linked)	NOT APPLICABLE for the purpose of preparatory phase Total Amount of Recoverables from Finite Re, calculated consistently with the boundaries of the contracts to which they relate, including also ceded intra group reinsurance, Total (Life other than health insurance, incl. Unit-Linked). CD9=SUM(CD1:CD7)
CD10	Total Recoverables from Finite Reinsurance before adjustment for expected losses – Health insurance (direct business), Contracts without options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Total Recoverables from Finite Reinsurance before adjustment for expected losses regarding LoB Health SLT insurance (direct business), Contracts without options and guarantees
CD11	Total Recoverables from Finite Reinsurance before adjustment for expected losses – Health insurance (direct business), Contracts with options and guarantees	NOT APPLICABLE for the purpose of preparatory phase Amount of Total Recoverables from Finite Reinsurance before adjustment for expected losses regarding LoB Health SLT insurance (direct business), Contracts with options and guarantees

	ITEM	INSTRUCTIONS
CD12	Total Recoverables from Finite Reinsurance before adjustment for expected losses – Annuities stemming from non-life insurance contracts and relating to health insurance obligations	NOT APPLICABLE for the purpose of preparatory phase Amount of Total Recoverables from Finite Reinsurance before adjustment for expected losses regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations
CD13	Total Recoverables from Finite Reinsurance before adjustment for expected losses – Gross - Health reinsurance (reinsurance accepted)	NOT APPLICABLE for the purpose of preparatory phase Amount of Total Recoverables from Finite Reinsurance before adjustment for expected losses regarding LoB Health reinsurance (reinsurance accepted)
CD14	Total Recoverables from Finite Reinsurance before adjustment for expected losses – Total (Health similar to life insurance)	NOT APPLICABLE for the purpose of preparatory phase CD14=SUM(CD10:CD13)
C1	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Insurance with profit participation	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Insurance with profit participation See cross-templates checks tab CAS 38 See cross-templates checks tab CAS 56 See cross-templates checks tab CAS 57 See cross-templates checks tab CAS 58 See cross-templates checks tab CAS 75 See cross-templates checks tab CAS 76 See cross-templates checks tab CAS 77 See cross-templates checks tab CAS 19
C2	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Index-linked and unit-linked insurance, Contracts without options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Index-linked and unit-linked insurance, Contracts without options and guarantees See cross-templates checks tab CAS 20
C3	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Index-linked and unit-linked insurance, Contracts with options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Index-linked and unit-linked insurance, Contracts with options and guarantees See cross-templates checks tab CAS 20
C4	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Other life insurance, Contracts without options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Other life insurance, Contracts without options and guarantees See cross-templates checks tab CAS 19
C5	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Other life insurance, Contracts with options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Other life insurance, Contracts with options and guarantees See cross-templates checks tab CAS 19
C6	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations See cross-templates checks tab CAS 19

	ITEM	INSTRUCTIONS
C7	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Accepted reinsurance	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Life Accepted reinsurance See cross-templates checks tab CAS 19
C9	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Total (Life other than health insurance, incl. Unit-Linked)	Total Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, Total (Life other than health insurance, incl. Unit-Linked) C9=SUM(C1:C7)
C10	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Health insurance (direct business), Contracts without options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Health SLT insurance (direct business), Contracts without options and guarantees See cross-templates checks tab CAS 18
C11	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Health insurance (direct business), Contracts with options and guarantees	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Health SLT insurance (direct business), Contracts with options and guarantees See cross-templates checks tab CAS 18
C12	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations See cross-templates checks tab CAS 18
C13	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Gross - Health reinsurance (reinsurance accepted)	Amount of Recoverables after performing the adjustment for expected losses due to possibility of default of the reinsurer, as defined in art. 81 of L1, including ceded intra group reinsurance, regarding LoB Health reinsurance (reinsurance accepted) See cross-templates checks tab CAS 18
C14	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Total (Health similar to life insurance)	C14=SUM(C10:C13)
D1	Best Estimate minus recoverables from reinsurance and SPV – Insurance with profit participation	NOT APPLICABLE for the purpose of preparatory phase D1=B1-C1
D2	Best Estimate minus recoverables from reinsurance and SPV – Index-linked and unit-linked insurance, Contracts without options and guarantees	NOT APPLICABLE for the purpose of preparatory phase D2=B2-C2
D3	Best Estimate minus recoverables from reinsurance and SPV – Index-linked and unit-linked insurance, Contracts with options and guarantees	NOT APPLICABLE for the purpose of preparatory phase D3=B3-C3
D4	Best Estimate minus recoverables from reinsurance and SPV – Other life insurance, Contracts without options and guarantees	NOT APPLICABLE for the purpose of preparatory phase D4=B4-C4

	ITEM	INSTRUCTIONS
D5	Best Estimate minus recoverables from reinsurance and SPV – Other life insurance, Contracts with options and guarantees	NOT APPLICABLE for the purpose of preparatory phase D5=B5-C5
D6	Best Estimate minus recoverables from reinsurance and SPV – Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	NOT APPLICABLE for the purpose of preparatory phase D6=B6-C6
D7	Best Estimate minus recoverables from reinsurance and SPV – Accepted reinsurance	NOT APPLICABLE for the purpose of preparatory phase D7=B7-C7
D9	Best Estimate minus recoverables from reinsurance and SPV – Total (Life other than health insurance, incl. Unit-Linked)	NOT APPLICABLE for the purpose of preparatory phase D9=SUM(D1:D7)
D10	Best Estimate minus recoverables from reinsurance and SPV – Health insurance (direct business), Contracts without options and guarantees	NOT APPLICABLE for the purpose of preparatory phase D10=B10-C10
D11	Best Estimate minus recoverables from reinsurance and SPV – Health insurance (direct business), Contracts with options and guarantees	NOT APPLICABLE for the purpose of preparatory phase D11=B11-C11
D12	Best Estimate minus recoverables from reinsurance and SPV – Annuities stemming from non-life insurance contracts and relating to health insurance obligations	NOT APPLICABLE for the purpose of preparatory phase D12=B12-C12
D13	Best Estimate minus recoverables from reinsurance and SPV - Health reinsurance (reinsurance accepted)	NOT APPLICABLE for the purpose of preparatory phase D13=B13-C13
D14	Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default – Total (Health similar to life insurance)	NOT APPLICABLE for the purpose of preparatory phase D14=SUM(D10:D13)
E1	Risk Margin - Insurance with profit participation	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Insurance with profit participation See cross-templates checks tab CAS 32 See cross-templates checks tab CAS 34 See cross-templates checks tab CAS 37
E2	Risk Margin - Index-linked and unit-linked insurance	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Index-linked and unit-linked insurance
E4	Risk Margin - Other life insurance	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Other life insurance See cross-templates checks tab CAS 32
E6	Risk Margin - Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations See cross-templates checks tab CAS 32
E7	Risk Margin - Accepted reinsurance	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Life accepted reinsurance See cross-templates checks tab CAS 32
E9	Risk Margin - Total (Life other than health insurance, incl. Unit-Linked)	E9=E1+E2+E4+E6+E7

ITEM		INSTRUCTIONS
E10	Risk Margin - Health insurance (direct business)	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Health SLT insurance (direct business) See cross-templates checks tab CAS 29
E12	Risk Margin - Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations See cross-templates checks tab CAS 29
E13	Risk Margin - Health reinsurance (reinsurance accepted)	Amount of Risk margin, as defined in Article 77(3) of the Solvency II Directive, regarding LoB Health SLT reinsurance (reinsurance accepted) See cross-templates checks tab CAS 29
E14	Risk Margin - Total (Health similar to life insurance)	E14=E10+E12+E13
Technical provisions - Total		
F1	Technical Provisions - Total - Insurance with profit participation	'F1=A1+B1+E1
F2	Technical Provisions - Total - Index-linked and unit-linked insurance	'F2=A3+B2+B3+E2
F4	Technical Provisions - Total - Other life insurance	'F4=A5+B4+B5+E4
F6	Technical Provisions - Total - Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	'F6=A6+B6+E6
F7	Technical Provisions - Total - Accepted reinsurance	'F7=A7+B7+E7
F9	Technical Provisions - Total - Total (Life other than health insurance, incl. Unit-Linked)	'F9=F1+F2+F4+F6+F7
F10	Technical Provisions - Total - Health insurance (direct business)	F10=A10+B10+B11+E10
F12	Technical Provisions - Total - Annuities stemming from non-life insurance contracts and relating to health insurance obligations	F12=A12+B12+E12
F13	Technical Provisions - Total - Health reinsurance (reinsurance accepted)	F13=A13+B13+E13
F14	Technical Provisions - Total - Total (Health similar to life insurance)	F14=F10+F12+F13
FB1	Technical Provisions minus Recoverables from reinsurance and SPV – Total - Insurance with profit participation	NOT APPLICABLE for the purpose of preparatory phase 'FB1=F1-C1
FB2	Technical Provisions minus Recoverables from reinsurance and SPV – Total - Index-linked and unit-linked insurance	NOT APPLICABLE for the purpose of preparatory phase 'FB2=F2-C2-C3
FB4	Technical Provisions minus Recoverables from reinsurance and SPV – Total - Other life insurance	NOT APPLICABLE for the purpose of preparatory phase FB4=F4-C4-C5
FB6	Technical Provisions minus Recoverables from reinsurance and SPV – Total - Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	NOT APPLICABLE for the purpose of preparatory phase FB6=F6-C6

	ITEM	INSTRUCTIONS
FB7	Technical Provisions minus Recoverables from reinsurance and SPV – Total - Accepted reinsurance	NOT APPLICABLE for the purpose of preparatory phase FB7=F7-C7=FB7A+FB7B+FB7C
FB7A	Technical Provisions minus Recoverables from reinsurance and SPV – Total - Accepted reinsurance, Of which WP (Insurance with profit participation on Accepted reinsurance (Gross))	NOT APPLICABLE for the purpose of preparatory phase FB7A
FB7B	Technical Provisions minus Recoverables from reinsurance and SPV – Total - Accepted reinsurance, Of which UL (Index-linked and unit-linked insurance on Accepted reinsurance (Gross))	NOT APPLICABLE for the purpose of preparatory phase FB7B
FB7C	Technical Provisions minus Recoverables from reinsurance and SPV – Total - Accepted reinsurance, Of which OL (Other life insurance on Accepted reinsurance (Gross))	NOT APPLICABLE for the purpose of preparatory phase FB7C
FB9	Technical Provisions minus Recoverables from reinsurance and SPV – Total - Total (Life other than health insurance, incl. Unit-Linked)	NOT APPLICABLE for the purpose of preparatory phase FB9=FB1+FB2+FB4+FB6+FB7
FB10	Technical Provisions minus Recoverables from reinsurance and SPV – Total - Health insurance (direct business)	NOT APPLICABLE for the purpose of preparatory phase FB10=F10-C10-C11
FB12	Technical Provisions minus Recoverables from reinsurance and SPV – Total - Annuities stemming from non-life insurance contracts and relating to health insurance obligations	NOT APPLICABLE for the purpose of preparatory phase FB12=F12-C12
FB13	Technical Provisions minus Recoverables from reinsurance and SPV – Total - Health reinsurance (reinsurance accepted)	NOT APPLICABLE for the purpose of preparatory phase FB13=F13-C13
FB14	Technical Provisions minus Recoverables from reinsurance and SPV – Total - Total (Health similar to life insurance)	NOT APPLICABLE for the purpose of preparatory phase FB14=FB10+FB12+FB13

Best Estimate of products with a surrender option

IA1	Best Estimate of products with a surrender option - Insurance with profit participation	NOT APPLICABLE for the purpose of preparatory phase Amount of Best Estimate of products with a surrender option regarding LoB Insurance with profit participation
IA2	Best Estimate of products with a surrender option - Index-linked and unit-linked insurance	NOT APPLICABLE for the purpose of preparatory phase Amount of Best Estimate of products with a surrender option regarding LoB Index-linked and unit-linked insurance
IA4	Best Estimate of products with a surrender option - Other life insurance	NOT APPLICABLE for the purpose of preparatory phase Amount of Best Estimate of products with a surrender option regarding LoB Other life insurance
IA6	Best Estimate of products with a surrender option - Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	NOT APPLICABLE for the purpose of preparatory phase Amount of Best Estimate of products with a surrender option regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations

	ITEM	INSTRUCTIONS
IA9	Best Estimate of products with a surrender option - Total (Life other than health insurance, incl. Unit-Linked)	NOT APPLICABLE for the purpose of preparatory phase IA9=IA1+IA2+IA4+IA6
IA10	Best Estimate of products with a surrender option - Health insurance (direct business)	NOT APPLICABLE for the purpose of preparatory phase Amount of Best Estimate of products with a surrender option regarding LoB Health SLT insurance (direct business)
IA12	Best Estimate of products with a surrender option - Annuities stemming from non-life insurance contracts and relating to health insurance obligations	NOT APPLICABLE for the purpose of preparatory phase Amount of Best Estimate of products with a surrender option regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations
IA14	Best Estimate of products with a surrender option - Total (Health similar to life insurance)	NOT APPLICABLE for the purpose of preparatory phase IA14=IA10+IA12
Additional information		
J1, J2, J4, J6, J7, J9, J10, J12, J13, J14	Gross BE for different countries - Home country	Amount of gross BE by country of the location of risk underwritten, when the country is the home country, for each of the following Life LoB and totals (Life other than health insurance, incl. Unit-Linked and Health similar to life insurance): 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 reinsurance Total (Life other than health insurance, incl. Unit-Linked) 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) Regardless of the materiality threshold, the home country has to be reported.
JA1, JA2, JA4, JA6, JA7, JA9, JA10, JA12, JA13, JA14	Gross BE for different countries - For countries in the materiality threshold [one line for each country in the materiality threshold]	Amount of gross BE by country of the location of risk underwritten, for each of the countries in the materiality threshold, except the home country, for each of the following Life LoB and totals (Life other than health insurance, incl. Unit-Linked and Health similar to life insurance): 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 reinsurance Total (Life other than health insurance, incl. Unit-Linked) Health insurance (direct business) Annuities stemming from non-life insurance contracts and relating to health insurance obligations Health reinsurance (reinsurance accepted)

	ITEM	INSTRUCTIONS
JE1, JE2, JE4, JE6, JE7, JE9, JE10, JE12, JE13, JE14	Gross BE for different countries - For EEA countries outside the materiality threshold	<p>Total (Health similar to life insurance)</p> <p>Amount of gross BE by country of the location of risk underwritten, for EEA countries outside the materiality threshold, except the home country, for each of the following Life LoB and totals (Life other than health insurance, incl. Unit-Linked and Health similar to life insurance):</p> <ul style="list-style-type: none"> 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 reinsurance Total (Life other than health insurance, incl. Unit-Linked) 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)
JF1, JF2, JF4, JF6, JF7, JF9, JF10, JF12, JF13, JF14	Gross BE for different countries - For non-EEA countries outside the materiality threshold	<p>Amount of gross BE by country of the location of risk underwritten, for non-EEA countries outside the materiality threshold, except the home country, for each of the following Life LoB and totals (Life other than health insurance, incl. Unit-Linked and Health similar to life insurance):</p> <ul style="list-style-type: none"> 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 reinsurance Total (Life other than health insurance, incl. Unit-Linked) Health SLT insurance (direct business) Annuities stemming from non-life insurance contracts and relating to health insurance obligations Health SLT reinsurance (reinsurance accepted) Total (Health similar to life insurance)
BA1	Gross Best Estimate for Cash flow, Cash out-flow, Future guaranteed benefits - Insurance with profit participation	<p>NOT APPLICABLE for the purpose of preparatory phase</p> <p>Amount of discounted Cash out-flows (Payments to policyholders and beneficiaries other than future discretionary benefits) for future guaranteed benefits, regarding LoB Insurance with profit participation</p>
BB1	Gross Best Estimate for Cash flow, Cash out-flows, Future discretionary benefits - Insurance with profit participation	<p>NOT APPLICABLE for the purpose of preparatory phase</p> <p>Amount of discounted Cash out-flows (Payments to policyholders and beneficiaries) for future discretionary benefits (FDB), regarding LoB Insurance with profit participation. FDB means future benefits other than index-linked or unit-linked benefits of insurance or reinsurance contracts which have one of the following characteristics:</p> <ul style="list-style-type: none"> a) The benefits are legally or contractually based on one or several of the following results: <ul style="list-style-type: none"> (i) the performance of a specified group of contracts or a specified type of contract or a single contract; (ii) the realised or unrealised investment return on a specified pool of assets held by the insurance or reinsurance undertaking; (iii) the profit or loss of the insurance or reinsurance undertaking or fund corresponding to the contract; b) the benefits are based on a declaration of the insurance or reinsurance undertaking and the timing or the amount of the benefits is at its full or partial discretion.
BA2	Gross Best Estimate for Cash flow, Cash out-flow, Future benefits - Index-linked and unit-linked insurance	<p>NOT APPLICABLE for the purpose of preparatory phase</p> <p>Amount of discounted Cash out-flows (Payments to policyholders and beneficiaries other than future discretionary benefits) for future guaranteed benefits, regarding LoB Insurance with profit participation</p>
BA4	Gross Best Estimate for Cash flow, Cash out-flow, Future benefits - Other life insurance	<p>NOT APPLICABLE for the purpose of preparatory phase</p> <p>Amount of discounted Cash out-flows (Payments to policyholders and beneficiaries other than future discretionary benefits) for future guaranteed benefits, regarding LoB Other life insurance</p>

	ITEM	INSTRUCTIONS
BA6	Gross Best Estimate for Cash flow, Cash out-flow, Future benefits - Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted Cash out-flows (Payments to policyholders and beneficiaries other than future discretionary benefits) for future guaranteed benefits, regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations
BA7	Gross Best Estimate for Cash flow, Cash out-flow, Future benefits - Accepted reinsurance	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted Cash out-flows (Payments to policyholders and beneficiaries other than future discretionary benefits) for future guaranteed benefits, regarding LoB Accepted reinsurance
BA10	Gross Best Estimate for Cash flow, Cash out-flow, Future benefits - Health insurance (direct business)	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted Cash out-flows (Payments to policyholders and beneficiaries other than future discretionary benefits) for future guaranteed benefits, regarding LoB Health insurance (direct business)
BA12	Gross Best Estimate for Cash flow, Cash out-flow, Future benefits - Annuities stemming from non-life insurance contracts and relating to health insurance obligations	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted Cash out-flows (Payments to policyholders and beneficiaries other than future discretionary benefits) for future guaranteed benefits, regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations
BA13	Gross Best Estimate for Cash flow, Cash out-flow, Future benefits - Health reinsurance (reinsurance accepted)	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted Cash out-flows (Payments to policyholders and beneficiaries other than future discretionary benefits) for future guaranteed benefits, regarding LoB Health SLT reinsurance (reinsurance accepted)
BC1	Gross Best Estimate for Cash flow, Cash out-flows, Future expenses and other cash out-flows - Insurance with profit participation	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted Cash out-flows for Future expenses and other cash out-flows (expenses that will be incurred in servicing insurance and reinsurance obligations, and other cash-flow items such as taxation payments which are, or are expected to be, charged to policyholders, or are required to settle the insurance or reinsurance obligations), regarding LoB Insurance with profit participation
BC2	Gross Best Estimate for Cash flow, Cash out-flow, Future expenses and other cash out-flows - Index-linked and unit-linked insurance	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted Cash out-flows for Future expenses and other cash out-flows (expenses that will be incurred in servicing insurance and reinsurance obligations, and other cash-flow items such as taxation payments which are, or are expected to be, charged to policyholders, or are required to settle the insurance or reinsurance obligations), regarding LoB Index-linked and unit-linked insurance
BC4	Gross Best Estimate for Cash flow, Cash out-flow, Future expenses and other cash out-flows - Other life insurance	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted Cash out-flows for Future expenses and other cash out-flows (expenses that will be incurred in servicing insurance and reinsurance obligations, and other cash-flow items such as taxation payments which are, or are expected to be, charged to policyholders, or are required to settle the insurance or reinsurance obligations), regarding LoB Other life insurance
BC6	Gross Best Estimate for Cash flow, Cash out-flow, Future expenses and other cash out-flows - Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted Cash out-flows for Future expenses and other cash out-flows (expenses that will be incurred in servicing insurance and reinsurance obligations, and other cash-flow items such as taxation payments which are, or are expected to be, charged to policyholders, or are required to settle the insurance or reinsurance obligations), regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations
BC7	Gross Best Estimate for Cash flow, Cash out-flow, Future expenses and other cash out-flows - Accepted reinsurance	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted Cash out-flows Future expenses and other cash out-flows (expenses that will be incurred in servicing insurance and reinsurance obligations, and other cash-flow items such as taxation payments which are, or are expected to be, charged to policyholders, or are required to settle the insurance or reinsurance obligations), regarding LoB Accepted reinsurance
BC9	Gross Best Estimate for Cash flow, Cash out-flow, Future expenses and other cash out-flows - Total (Life other than health insurance, incl. Unit-Linked)	NOT APPLICABLE for the purpose of preparatory phase 'BC9=BC1+BC2+BC4+BC6+BC7

	ITEM	INSTRUCTIONS
BC10	Gross Best Estimate for Cash flow, Cash out-flow, Future expenses and other cash out-flows - Health insurance (direct business)	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted Cash out-flows for Future expenses and other cash out-flows (expenses that will be incurred in servicing insurance and reinsurance obligations, and other cash-flow items such as taxation payments which are, or are expected to be, charged to policyholders, or are required to settle the insurance or reinsurance obligations), regarding LoB Health insurance (direct business)
BC12	Gross Best Estimate for Cash flow, Cash out-flow, Future expenses and other cash out-flows - Annuities stemming from non-life insurance contracts and relating to health insurance obligations	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted Cash out-flows for Future expenses and other cash out-flows (expenses that will be incurred in servicing insurance and reinsurance obligations, and other cash-flow items such as taxation payments which are, or are expected to be, charged to policyholders, or are required to settle the insurance or reinsurance obligations), regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations
BC13	Gross Best Estimate for Cash flow, Cash out-flow, Future expenses and other cash out-flows - Health reinsurance (reinsurance accepted)	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted Cash out-flows for Future expenses and other cash out-flows (expenses that will be incurred in servicing insurance and reinsurance obligations, and other cash-flow items such as taxation payments which are, or are expected to be, charged to policyholders, or are required to settle the insurance or reinsurance obligations), regarding LoB Health SLT reinsurance (reinsurance accepted)
BC14	Gross Best Estimate for Cash flow, Cash out-flow, Future expenses and other cash out-flows - Total (Health similar to life insurance)	NOT APPLICABLE for the purpose of preparatory phase 'BC14=BC10+BC12+BC13
BD1	Gross Best Estimate for Cash flow, Cash in-flows, Future premiums - Insurance with profit participation	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted Cash in-flows from future premiums and any additional cash-flows that results from those premiums, including reinsurance premiums, regarding LoB Insurance with profit participation.
BD2	Gross Best Estimate for Cash flow, Cash in-flows, Future premiums - Index-linked and unit-linked insurance	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted Cash in-flows from future premiums and any additional cash-flows that results from those premiums, including reinsurance premiums, regarding LoB Index-linked and unit-linked insurance.
BD4	Gross Best Estimate for Cash flow, Cash in-flows, Future premiums - Other life insurance	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted Cash in-flows from future premiums and any additional cash-flows that results from those premiums, including reinsurance premiums, regarding LoB Other life insurance
BD6	Gross Best Estimate for Cash flow, Cash in-flows, Future premiums - Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted Cash in-flows from future premiums and any additional cash-flows that results from those premiums, including reinsurance premiums, regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations
BD7	Gross Best Estimate for Cash flow, Cash in-flows, Future premiums - Accepted reinsurance	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted Cash in-flows from future premiums and any additional cash-flows that results from those premiums, including reinsurance premiums, regarding LoB Accepted reinsurance
BD9	Gross Best Estimate for Cash flow, Cash in-flows, Future premiums - Total (Life other than health insurance, incl. Unit-Linked)	NOT APPLICABLE for the purpose of preparatory phase 'BD9=BD1+BD2+BD4+BD6+BD7
BD10	Gross Best Estimate for Cash flow, Cash in-flows, Future premiums - Health insurance (direct business)	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted Cash in-flows from future premiums and any additional cash-flows that results from those premiums, including reinsurance premiums, regarding LoB Health insurance (direct business)
BD12	Gross Best Estimate for Cash flow, Cash in-flows, Future premiums - Annuities stemming from non-life insurance contracts and relating to health insurance obligations	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted Cash in-flows from future premiums and any additional cash-flows that results from those premiums, including reinsurance premiums, regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations

ITEM		INSTRUCTIONS
BD13	Gross Best Estimate for Cash flow, Cash in-flows, Future premiums - Health reinsurance (reinsurance accepted)	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted Cash in-flows from future premiums and any additional cash-flows that results from those premiums, including reinsurance premiums, regarding LoB Health SLT reinsurance (reinsurance accepted)
BD14	Gross Best Estimate for Cash flow, Cash in-flows, Future premiums - Total (Health similar to life insurance)	NOT APPLICABLE for the purpose of preparatory phase 'BD14=BD10+BD12+BD13
BF1	Gross Best Estimate for Cash flow, Cash in-flows, Other cash in-flows - Insurance with profit participation	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted any other cash in-flows not included in Future premiums and not including investment returns, regarding LoB Insurance with profit participation
BF2	Gross Best Estimate for Cash flow, Cash in-flows, Other cash in-flows - Index-linked and unit-linked insurance	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted any other cash in-flows not included in Future premiums and not including investment returns, regarding LoB Index-linked and unit-linked insurance
BF4	Gross Best Estimate for Cash flow, Cash in-flows, Other cash in-flows - Other life insurance	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted any other cash in-flows not included in Future premiums and not including investment returns, including reinsurance premiums, regarding LoB Other life insurance
BF6	Gross Best Estimate for Cash flow, Cash in-flows, Other cash in-flows - Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted any other cash in-flows not included in Future premiums and not including investment returns, regarding LoB Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations
BF7	Gross Best Estimate for Cash flow, Cash in-flows, Other cash in-flows - Accepted reinsurance	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted any other cash in-flows not included in Future premiums and not including investment returns, including reinsurance premiums, regarding LoB Accepted reinsurance
BF9	Gross Best Estimate for Cash flow, Cash in-flows, Other cash in-flows - Total (Life other than health insurance, incl. Unit-Linked)	NOT APPLICABLE for the purpose of preparatory phase 'BF9=BF1+BF2+BF4+BF6+BF7
BF10	Gross Best Estimate for Cash flow, Cash in-flows, Other cash in-flows - Health insurance (direct business)	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted any other cash in-flows not included in Future premiums and not including investment returns, regarding LoB Health insurance (direct business)
BF12	Gross Best Estimate for Cash flow, Cash in-flows, Other cash in-flows - Annuities stemming from non-life insurance contracts and relating to health insurance obligations	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted any other cash in-flows not included in Future premiums and not including investment returns, regarding LoB Annuities stemming from non-life insurance contracts and relating to health insurance obligations
BF13	Gross Best Estimate for Cash flow, Cash in-flows, Other cash in-flows - Health reinsurance (reinsurance accepted)	NOT APPLICABLE for the purpose of preparatory phase Amount of discounted any other cash in-flows not included in Future premiums and not including investment returns, regarding LoB Health SLT reinsurance (reinsurance accepted)
BF14	Gross Best Estimate for Cash flow, Cash in-flows, Other cash in-flows - Total (Health similar to life insurance)	NOT APPLICABLE for the purpose of preparatory phase 'BF14=BF10+BF12+BF13

ITEM		INSTRUCTIONS
O1, O2, O4, O6, O7, O10, O12, O13	Percentage of gross TP calculated using simplified methods	<p>NOT APPLICABLE for the purpose of preparatory phase</p> <p>Indicate the percentage of gross TP calculated by using simplified methods, for each of the following lines of business:</p> <ul style="list-style-type: none"> 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 reinsurance Health SLT insurance (direct business) Annuities stemming from non-life insurance contracts and relating to health insurance obligations Health SLT reinsurance (reinsurance accepted)
P1, P2, P4, P6, P7, P10, P12, P13	Surrender value	<p>NOT APPLICABLE for the purpose of preparatory phase</p> <p>Indicate the amount of surrender value, as mentioned in art. 185 (3) (f) of the L1 directive, net of taxes: amount to be paid to the policyholder in case of early termination of the contract (i.e. before it becomes payable by maturity or occurrence of the insured event, such as death), net of charges and policy loans; does not concern contracts without options, given that surrender value is an option. Report to be made for the following LoB:</p> <ul style="list-style-type: none"> 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 reinsurance Health SLT insurance (direct business) Annuities stemming from non-life insurance contracts and relating to health insurance obligations Health SLT reinsurance (reinsurance accepted)
P9	Surrender value, Total (Life other than health insurance, incl. Unit-Linked)	<p>NOT APPLICABLE for the purpose of preparatory phase</p> <p>'P9=P1+P2+P4+P6+P7</p>
P14	Surrender value, Total (Health similar to life insurance)	<p>NOT APPLICABLE for the purpose of preparatory phase</p> <p>'P14=P10+P12+P13</p>
Q1, Q2, Q4, Q6, Q7, Q10, Q12, Q13	Additional information in case of use of discount rates other than risk-free rates	<p>NOT APPLICABLE for the purpose of preparatory phase</p> <p>Indicate the amount of best estimate calculated using rates other than the risk-free rate as discount rates, for each of the following lines of business:</p> <ul style="list-style-type: none"> 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 reinsurance Health SLT insurance (direct business) Annuities stemming from non-life insurance contracts and relating to health insurance obligations Health SLT reinsurance (reinsurance accepted)
Q9	Additional information in case of use of discount rates other than risk-free rates, Total (Life other than health insurance, incl. Unit-Linked)	<p>NOT APPLICABLE for the purpose of preparatory phase</p> <p>'Q9=Q1+Q2+Q4+Q6+Q7</p>
Q14	Additional information in case of use of discount rates other than risk-free rates, Total (Health similar to life insurance)	<p>NOT APPLICABLE for the purpose of preparatory phase</p> <p>'Q14=Q10+Q12+Q13</p>

Technical Annex II: List of quantitative reporting items

S.17.01.a

Non-life Technical Provisions

ITEM		INSTRUCTIONS
<i>Technical provisions calculated as a whole</i>		
A1-P1	Technical provisions calculated as a whole (REPL.)	The amount of total TP in case of replicable or hedgeable (re) insurance obligations, as defined in art 77.4 of L1 Text, for each line of business See cross-templates checks tab CQS 7 See cross-templates checks tab CAS 21 See cross-templates checks tab CQS 10 See cross-templates checks tab CAS 24
Q1	Total Non-Life obligations, Technical provisions calculated as a whole	Q1=SUM(A1:P1)
<i>Technical provisions calculated as a sum of a best estimate and a risk margin - Best estimate</i>		
A5-P5	Premium provisions, Gross	The amount of best estimate for premium provisions, gross, for each line of business
A12-P12	Premium provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default, for each line of business	The amount of best estimate for premium provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default, for each line of business
A13-P13	Net best estimate of Premium provisions	The amount of net best estimate for premium provisions, for each line of business regarding direct business A13=A5-A12 B13=B5-B12 C13=C5-C12 D13=D5-D12 E13=E5-E12 F13=F5-F12 G13=G5-G12 H13=H5-H12 I13=I5-I12 J13=J5-J12 K13=K5-K12 L13=L5-L12 M13=M5-M12 N13=N5-N12 O13=O5-O12 P13=P5-P12
Q5-Q13	Total Non-Life obligations, Premium provisions	Q5=SUM(A5:P5) Q12=SUM(A12:P12) Q13=SUM(A13:P13)
A14-P14	Claims provisions, Gross	The amount of best estimate for claims provisions, gross, for each line of business
A21-P21	Claims provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default	The amount of best estimate for claims provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default, for each line of business

A22-P22	Net best estimate of Claims provisions	<p>The amount of net best estimate for claims provisions, for each line of business</p> <p>A22=A14-A21 B22=B14-B21 C22=C14-C21 D22=D14-D21 E22=E14-E21 F22=F14-F21 G22=G14-G21 H22=H14-H21 I22=I14-I21 J22=J14-J21 K22=K14-K21 L22=L14-L21 M22=M14-M21 N22=N14-N21 O22=O14-O21 P22=P14-P21</p>
Q14-Q22	Total Non-Life obligations, Claims provisions	<p>Q14=SUM(A14:P14) Q21=SUM(A21:P21) Q22=SUM(A22:P22)</p>
A23-P23	Total best estimate, Gross	<p>The amount of Total gross best estimate, for each line of business</p> <p>A23=A5+A14 See cross-templates checks tab CQS 11 & See cross-templates checks tab CAS 25 B23=B5+B14 See cross-templates checks tab CQS 11 & See cross-templates checks tab CAS 25 C23=C5+C14 See cross-templates checks tab CQS 11 & See cross-templates checks tab CAS 25 D23=D5+D14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22 E23=E5+E14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22 F23=F5+F14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22 G23=G5+G14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22 H23=H5+H14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22 I23=I5+I14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22 J23=J5+J14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22 K23=K5+K14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22 L23=L5+L14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22 M23=M5+M14 See cross-templates checks tab CQS 11 & See cross-templates checks tab CAS 25 N23=N5+N14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22 O23=O5+O14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22 P23=P5+P14 See cross-templates checks tab CQS 8 & See cross-templates checks tab CAS 22</p>

A24-P24	Total best estimate, Net	<p>The amount of Total net best estimate, for each line of business</p> <p>A24=A13+A22 See cross-templates checks tab CQS 26 & See cross-templates checks tab CQS 45 & See cross-templates checks tab CAS 40 & See cross-templates checks tab CAS 59</p> <p>B24=B13+B22 See cross-templates checks tab CQS 27 & See cross-templates checks tab CQS 46 & See cross-templates checks tab CAS 41 & See cross-templates checks tab CAS 60</p> <p>C24=C13+C22 See cross-templates checks tab CQS 28 & See cross-templates checks tab CQS 47 & See cross-templates checks tab CAS 42 & See cross-templates checks tab CAS 61</p> <p>D24=D13+D22 See cross-templates checks tab CQS 29 & See cross-templates checks tab CQS 48 & See cross-templates checks tab CAS 43 & See cross-templates checks tab CAS 62</p> <p>E24=E13+E22 See cross-templates checks tab CQS 30 & See cross-templates checks tab CQS 49 & See cross-templates checks tab CAS 44 & See cross-templates checks tab CAS 63</p> <p>F24=F13+F22 See cross-templates checks tab CQS 31 & See cross-templates checks tab CQS 50 & See cross-templates checks tab CAS 45& See cross-templates checks tab CAS 64</p> <p>G24=G13+G22 See cross-templates checks tab CQS 32 & See cross-templates checks tab CQS 51 & See cross-templates checks tab CAS 46& See cross-templates checks tab CAS 65</p> <p>H24=H13+H22 See cross-templates checks tab CQS 33 & See cross-templates checks tab CQS 52 & See cross-templates checks tab CAS 47 & See cross-templates checks tab CAS 66</p> <p>I24=I13+I22 See cross-templates checks tab CQS 34 & See cross-templates checks tab CQS 53 & See cross-templates checks tab CAS 48 & See cross-templates checks tab CAS 67</p> <p>J24=J13+J22 See cross-templates checks tab CQS 35 & See cross-templates checks tab CQS 54 & See cross-templates checks tab CAS 49 & See cross-templates checks tab CAS 68</p> <p>K24=K13+K22 See cross-templates checks tab CQS 36 & See cross-templates checks tab CQS 55 & See cross-templates checks tab CAS 50 & See cross-templates checks tab CAS 69</p> <p>L24=L13+L22 See cross-templates checks tab CQS 37 & See cross-templates checks tab CQS 56 & See cross-templates checks tab CAS 51 & See cross-templates checks tab CAS 70</p> <p>M24=M13+M22 See cross-templates checks tab CQS 39 & See cross-templates checks tab CQS 58 & See cross-templates checks tab CAS 53 & See cross-templates checks tab CAS 72</p> <p>N24=N13+N22 See cross-templates checks tab CQS 38 & See cross-templates checks tab CQS 57 & See cross-templates checks tab CAS 52 & See cross-templates checks tab CAS 71</p> <p>O24=O13+O22 See cross-templates checks tab CQS 40 & See cross-templates checks tab CQS 60 & See cross-templates checks tab CAS 54 & See cross-templates checks tab CAS 74</p> <p>P24=P13+P22 See cross-templates checks tab CQS 41 & See cross-templates checks tab CQS 59 & See cross-templates checks tab CAS 55 & See cross-templates checks tab CAS 73</p>
A25-P25	Risk margin	<p>The amount of risk margin, as required by L1 (article 77 (3)). The risk margin is calculated to whole portfolio of (re) insurance obligations and then allocated to each single line of business</p> <p>See cross-templates checks tab CQS 9</p> <p>See cross-templates checks tab CAS 23</p> <p>See cross-templates checks tab CQS 12</p> <p>See cross-templates checks tab CAS 26</p>
Q23	Total Non-Life obligations, Total best estimate - Gross	<p>Q23=SUM(A23:P23)</p> <p>See cross-templates checks tab CQS 25</p>
Q24	Total Non-Life obligations, Total best estimate - Net	<p>Q24=SUM(A24:P24)</p>
Q25	Total Non-Life obligations, Total risk margin	<p>Q25=SUM(A25:P25)</p>

Technical provisions - Total

A26-P26	Technical provisions - Total	<p>The amount of Total technical provisions, for each line of business</p> <p>A26=A1+A23+A25 B26=B1+B23+B25 C26=C1+C23+C25 D26=D1+D23+D25 E26=E1+E23+E25 F26=F1+F23+F25 G26=G1+G23+G25 H26=H1+H23+H25 I26=I1+I23+I25 J26=J1+J23+J25 K26=K1+K23+K25 L26=L1+L23+L25 M26=M1+M23+M25 N26=N1+N23+N25 O26=O1+O23+O25 P26=P1+P23+P25</p>
A27-P27	Technical provisions, Recoverable from reinsurance contract/SPV after the adjustment for expected losses due to counterparty default - Total	<p>The amount of Recoverable from reinsurance contract/SPV after the adjustment for expected losses due to counterparty default, for each line of business</p> <p>A27=A12+A21 See cross-templates checks tab CQS 3 & See cross-templates checks CAS 17 B27=B12+B21 See cross-templates checks tab CQS 3 & See cross-templates checks CAS 17 C27=C12+C21 See cross-templates checks tab CQS 3 & See cross-templates checks CAS 17 D27=D12+D21 See cross-templates checks tab CAS 16 & See cross-templates checks tab CQS 2 E27=E12+E21 See cross-templates checks tab CAS 16 & See cross-templates checks tab COS 2 F27=F12+F21 See cross-templates checks tab CAS 16 & See cross-templates checks tab COS 2 G27=G12+G21 See cross-templates checks tab CAS 16 & See cross-templates checks tab CQS 2 H27=H12+H21 See cross-templates checks tab CAS 16 & See cross-templates checks tab CQS 2 I27=I12+I21 See cross-templates checks tab CAS 16 & See cross-templates checks tab COS 2 J27=J12+J21 See cross-templates checks tab CAS 16 & See cross-templates checks tab COS 2 K27=K12+K21 See cross-templates checks tab CAS 16 & See cross-templates checks tab COS 2 L27=L12+L21 See cross-templates checks tab CAS 16 & See cross-templates checks tab CQS 2 M27=M12+M21 See cross-templates checks tab CQS 3 & See cross-templates checks CAS 17 N27=N12+N21 See cross-templates checks tab CAS 16 & See cross-templates checks tab COS 2 O27=O12+O21 See cross-templates checks tab CAS 16 & See cross-templates checks tab COS 2 P27=P12+P21 See cross-templates checks tab CAS 16 & See cross-templates checks tab CQS 2</p>
A28-P28	Technical provisions, Technical provisions minus recoverables from reinsurance and SPV - Total	<p>The amount of Technical provisions minus recoverables from reinsurance and SPV, for each line of business</p> <p>A28=A1+A24+A25 B28=B1+B24+B25 C28=C1+C24+C25 D28=D1+D24+D25 E28=E1+E24+E25 F28=F1+F24+F25 G28=G1+G24+G25 H28=H1+H24+H25 I28=I1+I24+I25 J28=J1+J24+J25 K28=K1+K24+K25 L28=L1+L24+L25 M28=M1+M24+M25 N28=N1+N24+N25 O28=O1+O24+O25 P28=P1+P24+P25</p>

Q26	Technical provisions - Total, Total non-life obligations	Q26=SUM(A26:P26) See cross-templates checks tab CQS 25 See cross-templates checks tab CAS 39
Q27	Technical provisions, Recoverable from reinsurance contract/SPV after the adjustment for expected losses due to counterparty default - Total, Total non-life obligations	Q27=SUM(A27:P27) See cross-templates checks tab CQS 24 See cross-templates checks tab CAS 38
Q28	Technical provisions, Technical provisions minus recoverables from reinsurance and SPV - Total, Total non-life obligations	Q28=SUM(A28:P28)

Technical Annex II: List of quantitative reporting items

TP-E1-L

Non-life Technical Provisions - Best Estimate by country

ITEM

INSTRUCTIONS

Technical provisions calculated as a whole - NOT APPLICABLE for the purpose of preparatory phase

A1-L1	Technical provisions calculated as a whole (REPL.) - Direct business and accepted proportional reinsurance	The amount of total TP in case of replicable or hedgeable (re) insurance obligations, as defined in art 77.4 of L1 Text, for each line of business regarding direct business and accepted proportional reinsurance
A2-L2	Direct business	NOT APPLICABLE for the purpose of preparatory phase The amount of TP, for the direct business part, in case of replicable or hedgeable (re) insurance obligations, as defined in art 77.4 of L1 Text, for each line of business regarding direct business and accepted proportional reinsurance
A3-L3	Accepted proportional reinsurance business	NOT APPLICABLE for the purpose of preparatory phase The amount of TP, for the accepted proportional reinsurance business part, in case of replicable or hedgeable (re) insurance obligations, as defined in art 77.4 of L1 Text, for each line of business regarding direct business and accepted proportional reinsurance
M1-P1	Technical provisions calculated as a whole (REPL.) - Accepted non-proportional reinsurance	The amount of total TP, for the accepted non-proportional reinsurance business part, in case of replicable or hedgeable (re) insurance obligations, as defined in art 77.4 of L1 Text, for each line of business regarding accepted non-proportional reinsurance
M4-P4	Accepted non-proportional reinsurance business	NOT APPLICABLE for the purpose of preparatory phase The amount of TP, for the accepted non-proportional reinsurance business part, in case of replicable or hedgeable (re) insurance obligations, as defined in art 77.4 of L1 Text, for each line of business regarding accepted non-proportional reinsurance
Q1-Q4	Total Non-Life obligations, Technical provisions calculated as a whole	NOT APPLICABLE for the purpose of preparatory phase (with the exception of Q1) Q1=SUM(A1:P1) Q2=SUM(A2:L2) Q3=SUM(A3:L3) Q4=SUM(M4:P4)

Technical provisions calculated as a sum of a best estimate and a risk margin - Best estimate

A5A-L5A	Premium provisions, Gross	A5A=SUM(A5:A6) ... L5A=SUM(L5:L6)
A5-L5	Premium provisions, Gross - direct business	NOT APPLICABLE for the purpose of preparatory phase The amount of best estimate for premium provisions, gross direct business, for each line of business regarding direct business and accepted proportional reinsurance
A6-L6	Premium provisions, Gross - accepted proportional reinsurance business	NOT APPLICABLE for the purpose of preparatory phase The amount of best estimate for premium provisions, gross direct business, for each line of business regarding direct business and accepted proportional reinsurance
M5A-P5A	Premium provisions, Gross	M5A=M7 ... P5A=P7
Q5A	Premium provisions, Gross	Q5A=SUM(Q5:Q7)
A8-L8	Premium provisions, Total recoverable from reinsurance/SPV before the adjustment for expected losses due to counterparty default - Direct business and accepted proportional reinsurance	NOT APPLICABLE for the purpose of preparatory phase The amount of best estimate for premium provisions, Total recoverable from reinsurance/SPV before the adjustment for expected losses due to counterparty default, for each line of business regarding direct business and accepted proportional reinsurance A8=A9+A10+A11 B8=B9+B10+B11 C8=C9+C10+C11 D8=D9+D10+D11 E8=E9+E10+E11 F8=F9+F10+F11 G8=G9+G10+G11

	ITEM	INSTRUCTIONS
A9-L9	Premium provisions, Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses - Direct business and accepted proportional reinsurance	<p>H8=H9+H10+H11 I8=I9+I10+I11 J8=J9+J10+J11 K8=K9+K10+K11 L8=L9+L10+L11</p> <p>NOT APPLICABLE for the purpose of preparatory phase The amount of best estimate for premium provisions, Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses, for each line of business regarding direct business and accepted proportional reinsurance</p>
A10-L10	Premium provisions, Recoverables from SPV before adjustment for expected losses - Direct business and accepted proportional reinsurance	<p>NOT APPLICABLE for the purpose of preparatory phase The amount of best estimate for premium provisions, Recoverables from SPV before adjustment for expected losses, for each line of business regarding direct business and accepted proportional reinsurance</p>
A11-L11	Premium provisions, Recoverables from Finite Reinsurance before adjustment for expected losses - Direct business and accepted proportional reinsurance	<p>NOT APPLICABLE for the purpose of preparatory phase The amount of best estimate for premium provisions, Recoverables from Finite Reinsurance before adjustment for expected losses, for each line of business regarding direct business and accepted proportional reinsurance</p>
A12-L12	Premium provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default - Direct business and accepted proportional reinsurance	<p>The amount of best estimate for premium provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default, for each line of business regarding direct business and accepted proportional reinsurance</p>
A13-L13	Net best estimate of Premium provisions - Direct business and accepted proportional reinsurance	<p>The amount of net best estimate for premium provisions, for each line of business</p> <p>A13=A5+A6-A12 B13=B5+B6-B12 C13=C5+C6-C12 D13=D5+D6-D12 E13=E5+E6-E12 F13=F5+F6-F12 G13=G5+G6-G12 H13=H5+H6-H12 I13=I5+I6-I12 J13=J5+J6-J12 K13=K5+K6-K12 L13=L5+L6-L12</p>
M7-P7	Premium provisions, Gross - accepted non-proportional reinsurance business	<p>NOT APPLICABLE for the purpose of preparatory phase The amount of best estimate for premium provisions, gross accepted non-proportional reinsurance business, for each line of business regarding accepted non-proportional reinsurance</p>
M8-P8	Premium provisions, Total recoverable from reinsurance/SPV before the adjustment for expected losses due to counterparty default - Accepted non-proportional reinsurance	<p>NOT APPLICABLE for the purpose of preparatory phase The amount of best estimate for premium provisions, Total recoverable from reinsurance/SPV before the adjustment for expected losses due to counterparty default, for each line of business regarding non-accepted proportional reinsurance</p> <p>M8=M9+M10+M11 N8=N9+N10+N11 O8=O9+O10+O11 P8=P9+P10+P11</p>

	ITEM	INSTRUCTIONS
M9-P9	Premium provisions, Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses - Accepted non-proportional reinsurance	NOT APPLICABLE for the purpose of preparatory phase The amount of best estimate for premium provisions, Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses, for each line of business regarding accepted non-proportional reinsurance
M10-P10	Premium provisions, Recoverables from SPV before adjustment for expected losses - Accepted non-proportional reinsurance	NOT APPLICABLE for the purpose of preparatory phase The amount of best estimate for premium provisions, Recoverables from SPV before adjustment for expected losses, for each line of business regarding accepted non-proportional reinsurance
M11-P11	Premium provisions, Recoverables from Finite Reinsurance before adjustment for expected losses - Accepted non-proportional reinsurance	NOT APPLICABLE for the purpose of preparatory phase The amount of best estimate for premium provisions, Recoverables from Finite Reinsurance before adjustment for expected losses, for each line of business regarding accepted non-proportional reinsurance
M12-P12	Premium provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default - Accepted non-proportional reinsurance	The amount of best estimate for premium provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default, for each line of business regarding accepted non-proportional reinsurance
M13-P13	Net best estimate of Premium provisions - Accepted non-proportional reinsurance	The amount of net best estimate for premium provisions, for each line of business regarding accepted non-proportional reinsurance M13=M7-M12 N13=N7-N12 O13=O7-O12 P13=P7-P12
Q5-Q13	Total Non-Life obligations, Premium provisions	NOT APPLICABLE for the purpose of preparatory phase (with the exception of Q12 and Q13) O5=SUM(A5:L5) Q6=SUM(A6:L6) Q7=SUM(M7:P7) Q8=SUM(A8:P8) Q9=SUM(A9:P9) Q10=SUM(A10:P10) Q11=SUM(A11:P11) Q12=SUM(A12:P12) Q13=SUM(A13:P13)
A14A-L14A	Claims provisions, Gross	A14A=SUM(A14:A15) ... L14A=SUM(L14:L15)
A14-L14	Claims provisions, Gross - direct business	NOT APPLICABLE for the purpose of preparatory phase The amount of best estimate for claims provisions, gross direct business, for each line of business regarding direct business and accepted proportional reinsurance
A15-L15	Claims provisions, Gross - accepted proportional reinsurance business	NOT APPLICABLE for the purpose of preparatory phase The amount of best estimate for claims provisions, gross direct business, for each line of business regarding direct business and accepted proportional reinsurance
M14A-P14A	Claims provisions, Gross	M14A=M16 ... P14A=P16
Q14A	Claims provisions, Gross	Q14A=SUM(Q14:Q16)

	ITEM	INSTRUCTIONS
A17-L17	Claims provisions, Total recoverable from reinsurance/SPV before the adjustment for expected losses due to counterparty default - Direct business and accepted proportional reinsurance	NOT APPLICABLE for the purpose of preparatory phase The amount of best estimate for claims provisions, Total recoverable from reinsurance/SPV before the adjustment for expected losses due to counterparty default, for each line of business regarding direct business and accepted proportional reinsurance A17=A18+A19+A20 B17=B18+B19+B20 C17=C18+C19+C20 D17=D18+D19+D20 E17=E18+E19+E20 F17=F18+F19+F20 G17=G18+G19+G20 H17=H18+H19+H20 I17=I18+I19+I20 J17=J18+J19+J20 K17=K18+K19+K20 L17=L18+L19+L20
A18-L18	Claims provisions, Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses - Direct business and accepted proportional reinsurance	NOT APPLICABLE for the purpose of preparatory phase The amount of best estimate for claims provisions, Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses, for each line of business regarding direct business and accepted proportional reinsurance
A19-L19	Claims provisions, Recoverables from SPV before adjustment for expected losses - Direct business and accepted proportional reinsurance	NOT APPLICABLE for the purpose of preparatory phase The amount of best estimate for claims provisions, Recoverables from SPV before adjustment for expected losses, for each line of business regarding direct business and accepted proportional reinsurance
A20-L20	Claims provisions, Recoverables from Finite Reinsurance before adjustment for expected losses - Direct business and accepted proportional reinsurance	NOT APPLICABLE for the purpose of preparatory phase The amount of best estimate for claims provisions, Recoverables from Finite Reinsurance before adjustment for expected losses, for each line of business regarding direct business and accepted proportional reinsurance
A21-L21	Claims provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default - Direct business and accepted proportional reinsurance	The amount of best estimate for claims provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default, for each line of business regarding direct business and accepted proportional reinsurance
A22-L22	Net best estimate of Claims provisions - Direct business and accepted proportional reinsurance	The amount of net best estimate for claims provisions, for each line of business regarding direct business and accepted proportional reinsurance A22=A14+A15-A21 B22=B14+B15-B21 C22=C14+C15-C21 D22=D14+D15-D21 E22=E14+E15-E21 F22=F14+F15-F21 G22=G14+G15-G21 H22=H14+H15-H21 I22=I14+I15-I21 J22=J14+J15-J21 K22=K14+K15-K21 L22=L14+L15-L21
M16-P16	Claims provisions, Gross - accepted non-proportional reinsurance business	NOT APPLICABLE for the purpose of preparatory phase The amount of best estimate for claims provisions, gross accepted non-proportional reinsurance business, for each line of business regarding accepted non-proportional reinsurance

	ITEM	INSTRUCTIONS
M17-P17	Claims provisions, Total recoverable from reinsurance/SPV before the adjustment for expected losses due to counterparty default - Accepted non-proportional reinsurance	NOT APPLICABLE for the purpose of preparatory phase The amount of best estimate for claims provisions, Total recoverable from reinsurance/SPV before the adjustment for expected losses due to counterparty default, for each line of business regarding non-accepted proportional reinsurance M17=M18+M19+M20 N17=N18+N19+N20 O17=O18+O19+O20 P17=P18+P19+P20
M18-P18	Claims provisions, Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses - Accepted non-proportional reinsurance	NOT APPLICABLE for the purpose of preparatory phase The amount of best estimate for claims provisions, Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses, for each line of business regarding accepted non-proportional reinsurance
M19-P19	Claims provisions, Recoverables from SPV before adjustment for expected losses - Accepted non-proportional reinsurance	NOT APPLICABLE for the purpose of preparatory phase The amount of best estimate for claims provisions, Recoverables from SPV before adjustment for expected losses, for each line of business regarding accepted non-proportional reinsurance
M20-P20	Claims provisions, Recoverables from Finite Reinsurance before adjustment for expected losses - Accepted non-proportional reinsurance	NOT APPLICABLE for the purpose of preparatory phase The amount of best estimate for claims provisions, Recoverables from Finite Reinsurance before adjustment for expected losses, for each line of business regarding accepted non-proportional reinsurance
M21-P21	Claims provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default - Accepted non-proportional reinsurance	The amount of best estimate for claims provisions, Total recoverable from reinsurance/SPV after the adjustment for expected losses due to counterparty default, for each line of business regarding accepted non-proportional reinsurance
M22-P22	Net best estimate of Claims provisions - Accepted non-proportional reinsurance	The amount of net best estimate for claims provisions, for each line of business regarding accepted non-proportional reinsurance M22=M16-M21 N22=N16-N21 O21=O16-O21 P22=P16-P21
Q14-Q22	Total Non-Life obligations, Claims provisions	NOT APPLICABLE for the purpose of preparatory phase (with the exception of Q21 and Q22) O14=SUM(A14:L14) Q15=SUM(A15:L15) Q16=SUM(M16:P16) Q17=SUM(A17:P17) Q18=SUM(A18:P18) Q19=SUM(A19:P19) Q20=SUM(A20:P20) Q21=SUM(A21:P21) Q22=SUM(A22:P22)
A23-L23	Total best estimate, Gross - Direct business and accepted proportional reinsurance	The amount of Total gross best estimate, for each line of business regarding direct business and accepted proportional reinsurance A23=A5+A6+A14+A15 B23=B5+B6+B14+B15 C23=C5+C6+C14+C15 D23=D5+D6+D14+D15 E23=E5+E6+E14+E15 F23=F5+F6+F14+F15 G23=G5+G6+G14+G15 H23=H5+H6+H14+H15

	ITEM	INSTRUCTIONS
		I23=I5+I6+I14+I15 J23=J5+J6+J14+J15 K23=K5+K6+K14+K15 L23=L5+L6+L14+L15
A24-L24	Total best estimate, Net - Direct business and accepted proportional reinsurance	The amount of Total net best estimate, for each line of business regarding direct business and accepted proportional reinsurance A24=A13+A22 B24=B13+B22 C24=C13+C22 D24=D13+D22 E24=E13+E22 F24=F13+F22 G24=G13+G22 H24=H13+H22 I24=I13+I22 J24=J13+J22 K24=K13+K22 L24=L13+L22
M23-P23	Total best estimate, Gross - Accepted non-proportional reinsurance	The amount of Total gross best estimate, for each line of business regarding accepted non-proportional reinsurance M23=M7+M16 N23=N7+N16 O23=O7+O16 P23=P7+P16
M24-P24	Total best estimate, Net - Accepted non-proportional reinsurance	The amount of Total net best estimate, for each line of business regarding accepted non-proportional reinsurance M24=M13+M22 N24=N13+N22 O24=O13+O22 P24=P13+P22
A25-P25	Technical provisions calculated as a sum of a best estimate and a risk margin - Risk margin	The amount of risk margin, as required by L1 (article 77 (3)). The risk margin is calculated to whole portfolio of (re) insurance obligations and then allocated to each single line of business, regarding Direct business and accepted proportional reinsurance and Accepted non-proportional reinsurance
Q23	Total Non-Life obligations, Total best estimate - Gross	Q23=SUM(A23:P23)
Q24	Total Non-Life obligations, Total best estimate - Net	Q24=SUM(A24:P24)
Q25	Total Non-Life obligations, Total risk margin	Q25=SUM(A25:P25)
Technical provisions - Total		
A26-L26	Technical provisions, Total - Direct business and accepted proportional reinsurance	B26=B1+B23+B25 C26=C1+C23+C25 D26=D1+D23+D25 E26=E1+E23+E25 F26=F1+F23+F25 G26=G1+G23+G25 H26=H1+H23+H25 I26=I1+I23+I25 J26=J1+J23+J25 K26=K1+K23+K25 L26=L1+L23+L25
A27-L27	Technical provisions, Total - Recoverable from reinsurance contract/SPV after the adjustment for expected losses due to counterparty default - Direct business and accepted proportional reinsurance	B27=B12+B21 C27=C12+C21 D27=D12+D21 E27=E12+E21 F27=F12+F21 G27=G12+G21 H27=H12+H21 I27=I12+I21

	ITEM	INSTRUCTIONS
		J27=J12+J21 K27=K12+K21 L27=L12+L21
A28-L28	Technical provisions, Total - Technical provisions minus recoverables from reinsurance and SPV - Direct business and accepted proportional reinsurance	B28=B1+B24+B25 C28=C1+C24+C25 D28=D1+D24+D25 E28=E1+E24+E25 F28=F1+F24+F25 G28=G1+G24+G25 H28=H1+H24+H25 I28=I1+I24+I25 J28=J1+J24+J25 K28=K1+K24+K25 L28=L1+L24+L25
M26-P26	Technical provisions, Total - Accepted non-proportional reinsurance	N26=N1+N23+N25 O26=O1+O23+O25 P26=P1+P23+P25
M27-M27	Technical provisions, Total - Recoverable from reinsurance contract/SPV after the adjustment for expected losses due to counterparty default - Accepted non-proportional reinsurance	N27=N12+N21 O27=O12+O21 P27=P12+P21
M28-P28	Technical provisions, Total - Technical provisions minus recoverables from reinsurance and SPV - Accepted non-proportional reinsurance	N28=N1+N24+N25 O28=O1+O24+O25 P28=P1+P24+P25
Q26	Technical provisions, Total	Q26=SUM(A26:P26)
Q27	Technical provisions, Total - Recoverable from reinsurance contract/SPV after the adjustment for expected losses due to counterparty default - Total	Q27=SUM(A27:P27)
Q28	Technical provisions, Total - Technical provisions minus recoverables from reinsurance and SPV - Total	Q28=SUM(A28:P28)

Additional information

A29-P29	Additional information in case of use of discount rates other than risk-free rates	NOT APPLICABLE for the purpose of preparatory phase Discount rates used in case of use of rates other than the risk-free rate as discount rates for the calculation of technical provisions. Reported for each LoB regarding Direct business and accepted proportional reinsurance and Accepted non- proportional reinsurance
A30-P30	Line of Business (LoB), further segmentation by (Homogeneous Risk Groups - HRG) - Premium provisions	NOT APPLICABLE for the purpose of preparatory phase Information regarding if the (re) insurance undertaking further segmented LoB into homogenous risk groups according to nature of the risks underlying the contract. The following options shall be used, for each line of business regarding Direct business and accepted proportional reinsurance and Accepted non- proportional reinsurance, in respect of premium provisions: The segmentation is performed in the respective LoB: Y The segmentation is not performed in the respective LoB: N

ITEM		INSTRUCTIONS
A31-P31	Number of HRG - Premium provisions	NOT APPLICABLE for the purpose of preparatory phase Information regarding the number of HRG in the segmentation, for each line of business where that segmentation was performed, regarding Direct business and accepted proportional reinsurance and Accepted non-proportional reinsurance, in respect of premium provisions
A32-P32	Line of Business (LoB), further segmentation by (Homogeneous Risk Groups HRG) - Claims provisions	NOT APPLICABLE for the purpose of preparatory phase Information regarding if the (re) insurance undertaking further segmented LoB into homogenous risk groups according to nature of the risks underlying the contract. The following options shall be used, for each line of business regarding Direct business and accepted proportional reinsurance and Accepted non-proportional reinsurance, in respect of claims provisions: The segmentation is performed in the respective LoB: Y The segmentation is not performed in the respective LoB: N
A33-P33	Number of HRG - Claims provisions	NOT APPLICABLE for the purpose of preparatory phase Information regarding the number of HRG in the segmentation, for each line of business where that segmentation was performed, regarding Direct business and accepted proportional reinsurance and Accepted non-proportional reinsurance, in respect of claims provisions
A34-P34	Best estimate Premium Provisions, Cash out-flows, future benefits and claims	NOT APPLICABLE for the purpose of preparatory phase The amount of split, for each LoB regarding Direct business and accepted proportional reinsurance and Accepted non-proportional reinsurance, of cash flows for future benefits and claims used to determine the gross best estimate of premium provisions, i.e. the probability-weighted average of future cash out-flows, discounted to take into account the time value of money (expected present value of future cash-flows). In case of use of stochastic a methodology for the cash-flow projection, it is required to report the average scenario
A35-P35	Best estimate Premium Provisions, Cash out-flows, future expenses and other cash-out flows	NOT APPLICABLE for the purpose of preparatory phase The amount of split, for each LoB regarding Direct business and accepted proportional reinsurance and Accepted non-proportional reinsurance, of cash flows for future expenses and other cash out-flows used to determine the gross best estimate of premium provisions, i.e. the probability-weighted average of future cash out-flows, discounted to take into account the time value of money (expected present value of future cash-flows). In case of use of stochastic a methodology for the cash-flow projection, it is required to report the average scenario
A36-P36	Best estimate Premium Provisions, Cash in-flows, future premiums	NOT APPLICABLE for the purpose of preparatory phase The amount of split, for each LoB regarding Direct business and accepted proportional reinsurance and Accepted non-proportional reinsurance, of cash flows for future premiums used to determine the gross best estimate of premium provisions, i.e. the probability-weighted average of future cash in-flows, discounted to take into account the time value of money (expected present value of future cash-flows). In case of use of stochastic a methodology for the cash-flow projection, it is required to report the average scenario
A37-P37	Best estimate Premium Provisions, Cash in-flows, Other cash-in flows (incl. Recoverables from salvages and subrogations)	NOT APPLICABLE for the purpose of preparatory phase The amount of split, for each LoB regarding Direct business and accepted proportional reinsurance and Accepted non-proportional reinsurance, of cash flows for other cash in-flows, including recoverables from salvages and subrogations, used to determine the gross best estimate of premium provisions, i.e. the probability-weighted average of future cash in-flows, discounted to take into account the time value of money (expected present value of future cash-flows). In case of use of stochastic a methodology for the cash-flow projection, it is required to report the average scenario
Q34-Q37	Total Non-Life obligations, Best estimate of Premium provisions - Gross	NOT APPLICABLE for the purpose of preparatory phase Q35=SUM(A35:P35) Q36=SUM(A36:P36) Q37=SUM(A37:P37)
A38-P38	Best estimate Claims Provisions, Cash out-flows, future benefits and claims	NOT APPLICABLE for the purpose of preparatory phase The amount of split, for each LoB regarding Direct business and accepted proportional reinsurance and Accepted non-proportional reinsurance, of cash flows for future benefits and claims used to determine the gross best estimate of Claims provisions, i.e. the probability-weighted average of future cash out-flows, discounted to take into account the time value of money (expected present value of future cash-flows). In case of use of stochastic a methodology for the cash-flow projection, it is required to report the average scenario

	ITEM	INSTRUCTIONS
A39-P39	Best estimate Claims Provisions, Cash out-flows, future expenses and other cash-out flows	NOT APPLICABLE for the purpose of preparatory phase The amount of split, for each LoB regarding Direct business and accepted proportional reinsurance and Accepted non-proportional reinsurance, of cash flows for future expenses and other cash out-flows used to determine the gross best estimate of Claims provisions, i.e. the probability-weighted average of future cash out-flows, discounted to take into account the time value of money (expected present value of future cash-flows). In case of use of stochastic a methodology for the cash-flow projection, it is required to report the average scenario
A40-P40	Best estimate Claims Provisions, Cash in-flows, future premiums	NOT APPLICABLE for the purpose of preparatory phase The amount of split, for each LoB regarding Direct business and accepted proportional reinsurance and Accepted non-proportional reinsurance, of cash flows for future premiums used to determine the gross best estimate of Claims provisions, i.e. the probability-weighted average of future cash in-flows, discounted to take into account the time value of money (expected present value of future cash-flows). In case of use of stochastic a methodology for the cash-flow projection, it is required to report the average scenario
A41-P41	Best estimate Claims Provisions, Cash in-flows, Other cash-in flows (incl. Recoverables from salvages and subrogations)	NOT APPLICABLE for the purpose of preparatory phase The amount of split, for each LoB regarding Direct business and accepted proportional reinsurance and Accepted non-proportional reinsurance, of cash flows for other cash in-flows, including recoverables from salvages and subrogations, used to determine the gross best estimate of Claims provisions, i.e. the probability-weighted average of future cash in-flows, discounted to take into account the time value of money (expected present value of future cash-flows). In case of use of stochastic a methodology for the cash-flow projection, it is required to report the average scenario
Q38-Q41	Total Non-Life obligations, Best estimate of Claims provisions - Gross	NOT APPLICABLE for the purpose of preparatory phase Q38=SUM(A38:P38) Q39=SUM(A39:P39) Q40=SUM(A40:P40) Q41=SUM(A41:P41)
A42-P42	Use of simplified methods and techniques to calculate technical provisions - Percentage of TP calculated using simplified method and techniques	NOT APPLICABLE for the purpose of preparatory phase In case of use of simplified methods/ techniques to calculate technical provisions, report the percentage of TP calculated using those simplified method and techniques, for each LoB regarding Direct business and accepted proportional reinsurance and Accepted non-proportional reinsurance. The percentage have to be calculated considering the total technical provisions, including the technical provisions calculated as a whole.
Q42	Total Non-Life obligations, Total amount of TP calculated using simplified methods and techniques	NOT APPLICABLE for the purpose of preparatory phase Q42=SUM(A42:P42)
A43-L43	Gross Best estimate for different countries - Home country	Amount of gross BE, direct business only (excluding accepted reinsurance) by country, according the following criteria: -localization of risk for "Medical expense", "Income protection", "Workers' compensation", "Fire and other damage to property" and "Credit and suretyship" Line of business; -country of underwriting for all other Line of business. In some cases undertaking may need to use their judgment/approximations to provide correct data, in line with assumptions used for the calculation of TP. Application of a materiality threshold: are requested to be reported all the most important countries representing up to 90% of the BE (regarding direct business) for each Line of business, with the amount regarding countries outside the threshold being reported in the applicable "other-EEA" or "other-non EEA" elements. Regardless of the materiality threshold, the home country has to be reported
A44-L44 [one line for each country in the materiality threshold]	Gross Best estimate for different countries - For countries in the materiality threshold [one line for each country in the materiality threshold]	Amount of gross BE, direct business only (excluding accepted reinsurance) by country, according the following criteria: -localization of risk for "Medical expense", "Income protection", "Workers' compensation", "Fire and other damage to property" and "Credit and suretyship" Line of business; -country of underwriting for all other Line of business.

	ITEM	INSTRUCTIONS
		Application of a materiality threshold: are requested to be reported all the most important countries representing up to 90% of the BE (regarding direct business) for each Line of business, with the amount regarding countries outside the threshold being reported in the applicable "other-EEA" or "other-non EEA" elements. Regardless of the materiality threshold, the home country has to be reported
A45-L45	Total gross Best estimate for EEA countries outside the materiality threshold	<p>Amount of gross BE, direct business only (excluding accepted reinsurance) by country, according the following criteria:</p> <ul style="list-style-type: none"> -localization of risk for "Medical expense", "Income protection", "Workers' compensation", "Fire and other damage to property" and "Credit and suretyship" Line of business; -country of underwriting for all other Line of business. <p>Application of a materiality threshold: are requested to be reported all the most important countries representing up to 90% of the BE (regarding direct business) for each Line of business, with the amount regarding countries outside the threshold being reported in the applicable "other-EEA" or "other-non EEA" elements. Regardless of the materiality threshold, the home country has to be reported</p>
A46-L46	Total gross Best estimate for non-EEA countries outside the materiality threshold	<p>Amount of gross BE, direct business only (excluding accepted reinsurance) by country, according the following criteria:</p> <ul style="list-style-type: none"> -localization of risk for "Medical expense", "Income protection", "Workers' compensation", "Fire and other damage to property" and "Credit and suretyship" Line of business; -country of underwriting for all other Line of business. <p>Application of a materiality threshold: are requested to be reported all the most important countries representing up to 90% of the BE (regarding direct business) for each Line of business, with the amount regarding countries outside the threshold being reported in the applicable "other-EEA" or "other-non EEA" elements. Regardless of the materiality threshold, the home country has to be reported</p>
Q43-Q46	Total Non-Life obligations, Total amount of gross Best estimate by country	<p>Q43=SUM(A43:L43) Q44=SUM(A44:L44) Q45=SUM(A45:L45) Q46=SUM(A46:L46)</p>

Technical Annex II: List of quantitative reporting items

S.23.01.a.b

Own Funds

ITEM		INSTRUCTIONS
A1	Ordinary share capital (gross of own shares) – total	Ordinary share capital (gross of own shares). This is the ordinary share capital of the undertaking which fully satisfies the criteria for Tier 1 or Tier 2 items. Any share capital which does not fully satisfy the criteria should be treated as preference share capital notwithstanding their description or designation. $A1=B1+C1$
B1	Ordinary share capital (gross of own shares) – tier 1 unrestricted	This is the amount of paid up ordinary share capital which meets the criteria for Tier 1 - unrestricted
C1	Ordinary share capital (gross of own shares) – tier 2	This is the amount of called up ordinary share capital which meets the criteria for Tier 2
A2	Share premium account related to ordinary share capital - total	The total share premium account related to ordinary share capital of the undertaking. $A2 = B2 + C2$
B2	Share premium account related to ordinary shares – tier 1 unrestricted	This is the amount of the share premium account related to ordinary shares which meets the criteria for Tier 1 unrestricted because it relates to share capital treated as unrestricted Tier 1
C2	Share premium account related to ordinary shares – tier 2	This is the amount of the share premium account related to ordinary shares which meets the criteria for Tier 2 because it relates to share capital treated as Tier 2
A3	Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings -	The initial fund, members' contributions or the equivalent basic own-funds item for mutual and mutual-type undertakings. $A3 = B3 + C3$
B3	Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings –	This is the amount of the initial fund, members' contributions or the equivalent basic own-funds item for mutual and mutual-type undertakings, which meets the criteria for Tier 1 unrestricted
C3	Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings – tier 2	This is the amount of the initial fund, members' contributions or the equivalent basic own-funds item for mutual and mutual-type undertakings, which meets the criteria for Tier 2
A4	Subordinated mutual member accounts – total	This is the total of subordinated mutual member accounts. $A4 = B4 + C4 + D4$
B4	Subordinated mutual member accounts – tier 1 restricted	This is the amount of subordinated mutual member accounts that meet the criteria for Tier 1 restricted
C4	Subordinated mutual member accounts – tier 2	This is the amount of subordinated mutual member accounts that meet the criteria for Tier 2
D4	Subordinated mutual member accounts – tier 3	This is the amount of subordinated mutual member accounts that meet the criteria for Tier 3
A6	Surplus funds – total	This is the total of surplus funds that fall under Article 91 (2) of the Solvency II Framework Directive (Directive 2009/138.EC). $A6 = B6$
B6	Surplus funds – tier 1 unrestricted	This is the surplus funds that fall under Article 91 (2) of the Solvency II Framework Directive (Directive 2009/138.EC) which are regarded as Tier 1, unrestricted items
A8	Preference shares – total	This is the total of preference shares issued by the undertaking. $A8 = B8+ C8 + D8$
B8	Preference shares – tier 1 restricted	This is the amount of the preference shares issued by the undertaking that meet the criteria for Tier 1 restricted
C8	Preference shares – tier 2	This is the amount of the preference shares issued by the undertaking that meet the criteria for Tier 2
D8	Preference shares – tier 3	This is the amount of the preference shares issued by the undertaking that meet the criteria for Tier 3
A9	Share premium account related to preference shares – total	The total share premium account related to preference share capital of the undertaking. $A9=B9+C9+D9$
B9	Share premium account related to preference shares – tier 1 restricted	This is the amount of the share premium account which relates to preference shares which meets the criteria for Tier 1 restricted items because it relates to preference shares treated as Tier 1 restricted items
C9	Share premium account related to preference shares – tier 2	This is the amount of the share premium account which relates to preference shares which meets the criteria for Tier 2 because it relates to preference shares treated as Tier 2
D9	Share premium account related to preference shares – tier 3	This is the amount of the share premium account which relates to preference shares which meets the criteria for Tier 3 because it relates to preference shares treated as Tier 3
A12	Reconciliation reserve (solo)	The reconciliation reserve represents reserves (e.g. retained earnings), net of adjustments (e.g. ring fenced funds) but it also reconciles difference between accounting valuation and Solvency 2 valuation $A12 = B12$
B12	Reconciliation reserve - tier 1 unrestricted (solo)	The reconciliation reserve represents reserves (e.g. retained earnings), net of adjustments (e.g. ring fenced funds) but it also reconciles difference between accounting valuation and Solvency 2 valuation $B12 = B29$

A13	Subordinated liabilities – total	This is the total of subordinated liabilities issued by the undertaking. A13 = B13 + C13 + D13
B13	Subordinated liabilities – tier 1 restricted	This is the amount of subordinated liabilities issued by the undertaking which meet the criteria for Tier 1 restricted items
C13	Subordinated liabilities – tier 2	This is the amount of subordinated liabilities issued by the undertaking which meet the criteria for Tier 2
D13	Subordinated liabilities – tier 3	This is the amount of subordinated liabilities issued by the undertaking which meet the criteria for Tier 3
A15	An amount equal to the value of net deferred tax assets - total	This is the total net deferred tax assets of the undertaking. A15 = D15
D15	An amount equal to the value of net deferred tax assets – tier 3	This is the amount of net deferred tax assets of the undertaking classified as tier 3
A16	Other items approved by supervisory authority as basic own funds not specified above	This is the total of any items of basic own funds not identified above. During preparatory phase this should only include those items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as available basic own funds under Solvency 2. A16=B16+B16A+C16+D16
B16	Other items approved by supervisory authority as basic own funds not specified above - tier 1 unrestricted items	This is the amount of any items of basic own funds not identified above which meet the criteria for Tier 1, unrestricted items. During preparatory phase this should only include those items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as available basic own funds under Solvency 2
B16A	Other items approved by supervisory authority as basic own funds not specified above - Tier 1 restricted items	This is the amount of any items of basic own funds not identified above which meet the criteria for Tier 1, restricted items. During preparatory phase this should only include those items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as available basic own funds under Solvency 2
C16	Other items approved by supervisory authority as basic own funds not specified above - tier 2	This is the amount of any items of basic own funds not identified above which meet the criteria for Tier 2. During preparatory phase this should only include those items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as available basic own funds under Solvency 2
D16	Other items approved by supervisory authority as basic own funds not specified above - tier 3	This is the amount of any items of basic own funds not identified above which meet the criteria for Tier 3. During preparatory phase this should only include those items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as available basic own funds under Solvency 2
B502	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	These items are either: i) items that appear in the lists of own fund items, but fail to meet the classification criteria or the transitional provisions; or ii) items intended to perform the role of own funds which are not on the list of own fund items and have not been approved by the supervisory authority, and do not appear on the balance sheet as liabilities. Subordinated liabilities which do not count as basic own funds should not be reported here, but as subordinated liabilities that do not count as basic own funds on the balance sheet (BS-C1 L15D). These should be deducted from Tier 1 as they are neither balance sheet liabilities nor basic own funds. Failure to deduct them would result in them being incorrectly included in the reconciliation reserve. See cross-templates checks tab CQS 1 See cross-templates checks tab CGS 6 See cross-templates checks tab CAS 78
A503	Deduction for participations in financial and credit institutions - solo - total	This is the total deduction for participations in financial and credit institutions. The reporting of this data item is only applicable to solo reporting A503 = B503 + C503 + D503 See cross-templates checks tab CQS 1 See cross-templates checks tab CGS 6 See cross-templates checks tab QCGS 1 See cross-templates checks tab CAS 78
B503	Deduction for participations in financial and credit institutions - tier 1 unrestricted items	This is the amount of the deduction for participations in financial and credit institutions that are deducted from tier 1 unrestricted. The reporting of this data item is only applicable to solo reporting
C503	Deduction for participations in financial and credit institutions - tier 1 restricted items	This is the amount of the deduction for participations in financial and credit institutions that are deducted from tier 1 restricted. The reporting of this data item is only applicable to solo reporting
D503	Deduction for participations in financial and credit institutions - tier 2	This is the amount of the deduction for participations in financial and credit institutions that are deducted from tier 2. The reporting of this data item is only applicable to solo reporting

A20	Total basic own funds after adjustments (solo)	This is the total of all items of basic own funds after adjustments for a solo undertaking. A20 = B20 + B20A + C20 + D20 or check formula: A20= A1+A2+A3+A4+A6+A8+A9+A12+A13+A15+A16-B502-A503 See cross-templates checks tab CQS 1 See cross-templates checks tab CGS 6 See cross-templates checks tab QCGS 1 See cross-templates checks tab CAS 78
B20	Total basic own funds after adjustments (solo) – tier 1 unrestricted items	This is the total of all items of basic own funds after adjustments which meet the criteria for Tier 1 unrestricted items for a solo undertaking. B20= B1+B2+B3+B6+B12+B16-B502-B503
B20A	Total basic own funds after adjustments (solo) – tier 1 restricted items	This is the total of all items of basic own funds after adjustments which meet the criteria for Tier 1 restricted items for a solo undertaking. B20A= B4+B8+B9+B13+B16A-C503
C20	Total basic own funds after adjustments (solo) – tier 2	This is the total of all items of basic own funds after adjustments which meet the criteria for Tier 2 for a solo undertaking. C20= C1+C2+C3+C4+C8+C9+C13+C16-D503
D20	Total basic own funds after adjustments (solo) – tier 3	This is the total of all items of basic own funds after adjustments which meet the criteria for Tier 3 for a solo undertaking. D20= D4+D8+D9+D13+D15+D16

Ancillary own funds

A33	Unpaid and uncalled ordinary share capital callable on demand – total	NOT APPLICABLE for the purpose of preparatory phase This is the total of unpaid share capital that has not been called up A33=C33
C33	Unpaid and uncalled ordinary share capital callable on demand – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the total of unpaid share capital that has not been called up, that meets the criteria for Tier 2
A34	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand - total	NOT APPLICABLE for the purpose of preparatory phase This is the total of unpaid initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings which has not been called up. A34 = C34
C34	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the total of unpaid initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings which has not been called up, that meets the criteria for Tier 2
A35	Unpaid and uncalled preference shares callable on demand - total	NOT APPLICABLE for the purpose of preparatory phase This is the total amount of unpaid preference shares which has not been called up. A35=C35+D35
C35	Unpaid and uncalled preference shares callable on demand – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the total amount of unpaid preference shares which has not been called up, that meets the criteria for Tier 2
D35	Unpaid and uncalled preference shares callable on demand – tier 3	NOT APPLICABLE for the purpose of preparatory phase This is the total amount of unpaid preference shares which has not been called up. That meets the criteria for Tier 3
A36	A legally binding commitment to subscribe and pay for subordinated liabilities on demand	NOT APPLICABLE for the purpose of preparatory phase This is the total amount of legally binding commitments to subscribe and pay for subordinated liabilities on demand. A36 = C36 + D36
C36	A legally binding commitment to subscribe and pay for subordinated liabilities on demand – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the total amount of legally binding commitments to subscribe and pay for subordinated liabilities on demand that meet the criteria for Tier 2
D36	A legally binding commitment to subscribe and pay for subordinated liabilities on demand – tier 3	NOT APPLICABLE for the purpose of preparatory phase This is the total amount of legally binding commitments to subscribe and pay for subordinated liabilities on demand that meet the criteria for Tier 3
A37	Letters of credit and guarantees under Article 96(2) of the Framework Directive – total	NOT APPLICABLE for the purpose of preparatory phase This is the total of letters of credit and guarantees which are held in trust for the benefit of insurance creditors by an independent trustee and provided by credit institutions authorised in accordance with Directive 2006/48/EC. A37 = C37
C37	Letters of credit and guarantees under Article 96(2) of the Framework Directive – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the amount of letters of credit and guarantees, which are held in trust for the benefit of insurance creditors by an independent trustee and provided by credit institutions authorised in accordance with Directive 2006/48/EC, which meet the criteria for Tier 2
A38	Letters of credit and guarantees other than under Article 96(2) of the Framework Directive - total	NOT APPLICABLE for the purpose of preparatory phase This is the total of letters of credit and guarantees, other than those which are held in trust for the benefit of insurance creditors by an independent trustee and provided by credit institutions authorised in accordance with Directive 2006/48/EC A38=C38+D38
C38	Letters of credit and guarantees other than under Article 96(2) of the Framework Directive – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the amount of letters of credit and guarantees, other than those which are held in trust for the benefit of insurance creditors by an independent trustee and provided by credit institutions authorised in accordance with Directive 2006/48/EC, which meet the criteria for Tier 2

D38	Letters of credit and guarantees other than under Article 96(2) of the Framework Directive – tier 3	NOT APPLICABLE for the purpose of preparatory phase This is the amount of letters of credit and guarantees, other than those which are held in trust for the benefit of insurance creditors by an independent trustee and provided by credit institutions authorised in accordance with Directive 2006/48/EC, which meet the criteria for Tier 3
A39	Supplementary members calls under Article 96(3) of the Framework Directive - total	NOT APPLICABLE for the purpose of preparatory phase This is the total of any future claims which mutual or mutual-type associations of shipowners with variable contributions solely insuring risks listed in classes 6, 12 and 17 in Part A of Annex I may have against their members by way of a call for supplementary contributions, with the following 12 months. A39 = C39
C39	Supplementary members calls under Article 96(3) of the Framework Directive – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the total of any future claims which mutual or mutual-type associations of shipowners with variable contributions solely insuring risks listed in classes 6, 12 and 17 in Part A of Annex I may have against their members by way of a call for supplementary contributions, with the following 12 months, that meet the criteria for Tier 2
A40	Supplementary members calls - other than under Article 96(3) of the Framework Directive	NOT APPLICABLE for the purpose of preparatory phase This is the total of any future claims which mutual or mutual-type associations of shipowners with variable contributions solely insuring risks listed in classes 6, 12 and 17 in Part A of Annex I may have against their members by way of a call for supplementary contributions, other than within the following 12 months. A40=C40+D40
C40	Supplementary members calls - other than under Article 96(3) of the Framework Directive – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the total of any future claims which mutual or mutual-type associations of shipowners with variable contributions solely insuring risks listed in classes 6, 12 and 17 in Part A of Annex I may have against their members by way of a call for supplementary contributions, other than within the following 12 months, that meet the criteria for Tier 2
D40	Supplementary members calls - other than under Article 96(3) of the Framework Directive – tier 3	NOT APPLICABLE for the purpose of preparatory phase This is the total of any future claims which mutual or mutual-type associations of shipowners with variable contributions solely insuring risks listed in classes 6, 12 and 17 in Part A of Annex I may have against their members by way of a call for supplementary contributions, other than within the following 12 months, that meet the criteria for Tier 3
A42	Other ancillary own funds - total	During interim reporting, this is the total of all items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as ancillary own funds under Solvency 2. A42 = C42 + D42
C42	Other ancillary own funds – tier 2	During interim reporting, this the total of all items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as ancillary own funds under Solvency 2, that meet criteria for Tier 2
D42	Other ancillary own funds – tier 3	During interim reporting, this the total of all items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as ancillary own funds under Solvency 2, that meet criteria for Tier 3
A43	Total ancillary own funds (solo)	This is the total of the items that comprise ancillary own funds for a solo undertaking. A43=C43+D43 or check formula: A43 = SUM(A33:A40) + A42
C43	Total ancillary own funds (solo)– tier 2	This is the amount of the items that comprise ancillary own funds for a solo undertaking, that meet the criteria for Tier 2. C43 = SUM(C33:C40) + C42
D43	Total ancillary own funds (solo) – tier 3	This is the amount of the items that comprise ancillary own funds for a solo undertaking, that meet the criteria for Tier 3. D43 = D35+D36+D38+D40+D42

Available and eligible own funds solo

A46	Total available own funds to meet the SCR (solo) - total	This is the total own funds of the undertaking, comprising basic own funds after adjustments plus ancillary own funds, that are available to meet the SCR for a solo undertaking. A46=B46+C46+D46+E46
B46	Total available own funds to meet the SCR (solo) – tier 1 unrestricted items	This is the total own funds of the undertaking, comprising basic own funds after adjustments, that are available to meet the SCR for a solo undertaking and that meet the criteria to be included in Tier 1 unrestricted items. B46 = B20
C46	Total available own funds to meet the SCR (solo) – tier 1 restricted items	This is the total own funds of the undertaking, comprising basic own funds after adjustments, that are available to meet the SCR for a solo undertaking and that meet the criteria to be included in Tier 1 restricted items. C46 = B20A
D46	Total available own funds to meet the SCR (solo) – tier 2	This is the total own funds of the undertaking, comprising basic own funds after adjustments plus ancillary own funds, that are available to meet the SCR for a solo undertaking and that meet the criteria to be included in Tier 2. D46=C20+C43
E46	Total available own funds to meet the SCR (solo) – tier 3	This is the total own funds of the undertaking, comprising basic own funds after adjustments plus ancillary own funds, that are available to meet the SCR for a solo undertaking and that meet the criteria to be included in Tier 3. E46=D20+D43

A47	Total available own funds to meet the MCR (solo)	This is the total own funds of the undertaking, comprising basic own funds after adjustments, that are available to meet the MCR for a solo undertaking. A47=B47+C47+D47
B47	Total available own funds to meet the MCR (solo) – tier 1 unrestricted items	This is the total own funds of the undertaking, comprising basic own funds after adjustments, that are available to meet the MCR for a solo undertaking and that meet the criteria to be included in Tier 1 unrestricted items. B47 =B46
C47	Total available own funds to meet the MCR (solo) – tier 1 restricted items	This is the total own funds of the undertaking, comprising basic own funds after adjustments, that are available to meet the MCR for a solo undertaking and that meet the criteria to be included in Tier 1 restricted items. C47 = C46
D47	Total available own funds to meet the MCR (solo) – tier 2	This is the total own funds of the undertaking, comprising basic own funds after adjustments, that are available to meet the MCR for a solo undertaking and that meet the criteria to be included in Tier 2. D47 = C20
A50	Total eligible own funds to meet the SCR	This is the total own funds which are eligible under the limits. A50=B50+C50+D50+E50
B50	Total eligible own funds to meet the SCR – tier 1 unrestricted items	This is the total own funds which are eligible under the limits set out to meet the SCR, that meet the criteria for Tier 1 unrestricted items. B50=max(B46,0)
C50	Total eligible own funds to meet the SCR – tier 1 restricted items	This is the total own funds which are eligible under the limits to meet the SCR, that meet the criteria for Tier 1 restricted items. C50=MAX(0,(MIN(B50*0.25, C46)))
D50	Total eligible own funds to meet the SCR – tier 2	This is the total own funds which are eligible under the limits to meet the SCR, that meet the criteria for Tier 2. D50=MAX(0,(MIN(0.5*A52,((C46)-C50)+ (D46))))
E50	Total eligible own funds to meet the SCR – tier 3	This is the total own funds which are eligible under the limits to meet the SCR, that meet the criteria for Tier 3. E50=MAX(0,MIN(((0.5*A52)-D50), 0.15*A52, (E46)))
A51	Total eligible own funds to meet the MCR	This is the total own funds which are eligible under the limits to meet the MCR. A51=B51+C51+D51
B51	Total eligible own funds to meet the MCR – tier 1 unrestricted items	This is the total own funds which are eligible under the limits to meet the MCR, that meet the criteria for Tier 1 unrestricted items. B51=B50
C51	Total eligible own funds to meet the MCR – tier 1 restricted items	This is the total own funds which are eligible under the limits to meet the MCR, that meet the criteria for Tier 1 restricted items C51=C50
D51	Total eligible own funds to meet the MCR – tier 2	This is the total own funds which are eligible under the limits to meet the MCR, that meet the criteria for Tier 2. D51=MAX(0,(MIN(0.2*A53,((C47)-C51)+ (D47))))
A52	SCR (solo)	This is the total SCR of the undertaking and should correspond to SCR number disclosed on relevant SCR template: if the undertaking is using a full internal model (SCR B2C) or a partial internal model or the standard formula (SCR B2A).
A53	MCR (solo)	This is the MCR of the undertaking and should correspond to the total MCR disclosed in MCR B4A or MCR B4B for composite undertakings (where relevant)
A54	Ratio of eligible own funds to SCR	NOT APPLICABLE for the purpose of preparatory phase This is the ratio of eligible own funds to the SCR.
A55	Ratio of eligible own funds to MCR	NOT APPLICABLE for the purpose of preparatory phase This is the ratio of eligible own funds to the MCR

Reconciliation Reserve

B23	Excess of assets over liabilities	This is an excess of assets over liabilities as disclosed on the Solvency 2 balance sheet; the cell 'B23=BSC-C1 "L27" When this data item is applicable to groups, it is only applicable for consolidation method
B24	Own shares (included as assets on the balance sheet)	This is the amount of own shares held by the undertaking When this data item is applicable to groups, it is only applicable for consolidation method See cross-templates checks tab CQS 1 See cross-templates checks tab CGS 6 See cross-templates checks tab QCGS 1 See cross-templates checks tab CAS 78
B25	Foreseeable dividends and distributions	This is the foreseeable dividends and distributions of the undertaking. When this data item is applicable to groups, it is only applicable for consolidation method See cross-templates checks tab CQS 1 See cross-templates checks tab CGS 6 See cross-templates checks tab QCGS 1 See cross-templates checks tab CAS 78

B26	Other basic own fund items	This is the total amount of other basic own funds items included in the reconciliation reserve. When this data item is applicable to groups, it is only applicable for consolidation method Solo formula- 'B26= A1-+A2+A3+A4 +A6+A8+A9+A15+A16 Group formula - 'B26=A1+A2+A3+A4 +A6+A8+A9+A15+A16+A18
B27	Adjustment for restricted own fund items in respect of ring fenced funds	This is the amount of adjustment for restricted own fund items in respect of ring fenced funds. See cross-templates checks tab CQS 1 See cross-templates checks tab CGS 6 See cross-templates checks tab QCGS 1 See cross-templates checks tab CAS 78
B28	Other non available own funds	This are other non available own funds of related undertaking When this data item is applicable to groups, it is only applicable for consolidation method
B29	Reconciliation reserve - total (solo)	This the total reconciliation reserve for a solo undertaking. B29 = B23-B24-B25-B26-B27
A30	Expected profits included in future premiums (EPIFP) - Life business	The reconciliation reserve includes an amount of the excess of assets over liabilities that corresponds to the expected profit in future premiums (EPIFP). This cell represents that amount for the life business of the undertaking and is included for disclosure purposes. Calculation methodology to be provided in Level III. A30=B30
A31	Expected profits included in future premiums (EPIFP) - Non- life business	The reconciliation reserve includes an amount of the excess of assets over liabilities that corresponds to the expected profit in future premiums (EPIFP). This cell represents that amount for the non-life business of the undertaking and is included for disclosure purposes. Calculation methodology to be provided in Level III.
A32	Total EPIFP	This is the total amount calculated as EPIFP. Calculation methodology to be provided in Level III. A32=A30+A31
A56	Paid in - total	This is the total of paid in ordinary share capital. A56 = B56
B56	Paid in – tier 1	This is the total of paid in ordinary share capital, that meets the criteria for Tier 1; B56 = D60
A57	Called up but not yet paid in - total	This is the total amount of ordinary shares which have been called up but not yet paid in. A57 = C57
C57	Called up but not yet paid in – tier 2	This is the amount of ordinary shares which have been called up but not yet paid in that meet the criteria for Tier 2. C57 = D61
A58	Own shares held	This is the total amount of own shares held by the undertaking. A58 = B58
B58	Own shares held – tier 1	This is the total amount of own shares held by the undertaking, that meets the criteria for tier 1. B58 = "BS-C1 A28A"
A59	Total ordinary share capital	This is the total of ordinary share capital. Note, own shares held will be included in either paid in or called up but not paid in. A59=A56+A57
B59	Total ordinary share capital – tier 1	This is the total of ordinary share capital that meets the criteria for Tier 1. B59 = B56 + B58
C59	Total ordinary share capital – tier 2	This is the total of ordinary share capital that meets the criteria for Tier 2.
A67	Paid in – total	This is the total of paid in initial fund members' contributions or the equivalent basic own - fund items for mutual and mutual - type undertaking. A67 = B67
B67	Pain in – tier 1	This is the total of initial fund members' contributions or the equivalent basic own - fund item for mutual and mutual - type undertaking that meets the criteria for Tier 1. B67 = D70
A68	Called up but not yet paid in – total	This is the total of called up but not yet paid in initial fund members' contributions or the equivalent basic own - fund items for mutual and mutual - type undertaking A68 = C68
C68	Called up but not yet paid in – tier 2	This is the total of initial fund members' contributions or the equivalent basic own - fund item for mutual and mutual - type undertaking that meets the criteria for Tier 2. C68 = D71
A69	Total initial fund	This is the total initial fund A69 = B69 + C69
B69	Total initial fund – tier 1	This is the total of the initial fund that meets the criteria for Tier 1. B69 = B67
C69	Total initial fund – tier 2	This is the total of the initial fund that meets the criteria for Tier 2. C69 = C68
A73	Dated subordinated MMA – total	This is the total amount of dated subordinated MMA A73= B73+D73+F73
B73	Dated subordinated MMA – tier 1	This is the total amount of date subordinated MMA that meet the criteria for Tier 1.
C73	Dated subordinated MMA – tier 1 of which counted under transitionals	This is the total amount of date subordinated MMA that meet the criteria for Tier 1 which are counted under the transitional provisions.

D73	Dated subordinated MMA – tier 2	This is the total amount of date subordinated MMA that meet the criteria for Tier 2.
E73	Dated subordinated MMA – tier 2 of which counted under transitionals	This is the total amount of date subordinated MMA that meet the criteria for Tier 2 which are counted under the transitional provisions.
F73	Dated subordinated MMA – tier 3	This is the total amount of date subordinated MMA that meet the criteria for Tier 3.
A74	Undated subordinated MMA with a call option - total	This is the total of undated subordinated MMA with a call option. A74= B74+D74+F74
B74	Undated subordinated MMA with a call option – tier 1	This is the total of undated subordinated MMA with a call option that meet the criteria for Tier 1.
C74	Undated subordinated MMA with a call option – tier 1 of which counted under transitionals	This is the total of undated subordinated MMA with a call option that meet the criteria for Tier 1 which are counted under the transitional provisions.
D74	Undated subordinated MMA with a call option – tier 2	This is the total of undated subordinated MMA with a call option that meet the criteria for Tier 2.
E74	Undated subordinated MMA with a call option – tier 2 of which counted under transitionals	This is the total of undated subordinated MMA with a call option that meet the criteria for Tier 2 which are counted under the transitional provisions.
F74	Undated subordinated MMA with a call option – tier 3	This is the total of undated subordinated MMA with a call option that meet the criteria for Tier 3.
A75	Undated subordinated MMA with no contractual opportunity to redeem – total	This is the total of undated subordinated MMA with no contractual opportunity to redeem. A75= B75+D75+F75
B75	Undated subordinated MMA with no contractual opportunity to redeem – tier 1	This is the total of undated subordinated MMA with no contractual opportunity to redeem that meet the criteria for Tier 1.
C75	Undated subordinated MMA with no contractual opportunity to redeem – tier 1 of which counted under transitionals	This is the total of undated subordinated MMA with no contractual opportunity to redeem that meet the criteria for Tier 1 which are counted under the transitional provisions.
D75	Undated subordinated MMA with no contractual opportunity to redeem – tier 2	This is the total of undated subordinated MMA with no contractual opportunity to redeem that meet the criteria for Tier 2.
E75	Undated subordinated MMA with no contractual opportunity to redeem – tier 2 of which counted under transitionals	This is the total of undated subordinated MMA with no contractual opportunity to redeem that meet the criteria for Tier 2 which are counted under the transitional provisions.
F75	Undated subordinated MMA with no contractual opportunity to redeem – tier 3	This is the total of undated subordinated MMA with no contractual opportunity to redeem that meet the criteria for Tier 3.
A76	Total subordinated MMA - total	This is the total subordinated MMA. A76=A73+A74+A75
B76	Total subordinated MMA – tier 1	This is the total of the subordinated MMA that meet the criteria for Tier 1. B76=B73+B74+B75
C76	Total subordinated MMA – tier 1 of which counted under transitionals	This is the total of the subordinated MMA that meet the criteria for Tier 1 which are counted under the transitional provisions. C76=C73+C74+C75
D76	Total subordinated MMA – tier 2	This is the total of the subordinated MMA that meet the criteria for Tier 2. D76=D73+D74+D75
E76	Total subordinated MMA – tier 2 of which counted under transitionals	This is the total of the subordinated MMA that meet the criteria for Tier 2 which are counted under the transitional provisions. E76=E73+E74+E75
F76	Total subordinated MMA – tier 3	This is the total of the subordinated MMA that meet the criteria for Tier 3. F76=F73+F74+F75
A79	Dated preference shares - total	This is the total dated preference shares. A79=C79+D79+F79
B79	Dated preference shares – tier 1	This is the total of dated preference shares that meet the criteria for Tier 1.
C79	Dated preference shares – tier 1 of which counted under transitionals	This is the total of dated preference shares that meet the criteria for Tier 1 which are counted under the transitional provisions.
D79	Dated preference shares – tier 2	This is the total of dated preference shares that meet the criteria for Tier 2.
E79	Dated preference shares – tier 2 of which counted under transitionals	This is the total of dated preference shares that meet the criteria for Tier 2 which are counted under the transitional provisions.
F79	Dated preference shares – tier 3	This is the total of dated preference shares that meet the criteria for Tier 3.
A80	Undated preference shares with a call option - total	This is the total undated preference shares with a call option.A80=B80+D80+F80
B80	Undated preference shares with a call option – tier 1	This is the total of undated preference shares with a call option that meet the criteria for Tier 1.
C80	Undated preference shares with a call option – tier 1 of which counted under transitionals	This is the total of undated preference shares with a call option that meet the criteria for Tier 1 which are counted under the transitional provisions.

D80	Undated preference shares with a call option – tier 2	This is the total of undated preference shares with a call option that meet the criteria for Tier 2 .
E80	Undated preference shares with a call option – tier 2 of which counted under transitionals	This is the total of undated preference shares with a call option that meet the criteria for Tier 2 which are counted under the transitional provisions.
F80	Undated preference shares with a call option – tier 3	This is the total of undated preference shares with a call option that meet the criteria for Tier 3.
A81	Undated preference shares with no contractual opportunity to redeem - total	This is the total undated preference shares with no contractual opportunity to redeem.
B81	Undated preference shares with no contractual opportunity to redeem – tier 1	This is the total of undated preference shares with no contractual opportunity to redeem that meet the criteria for Tier 1.
C81	Undated preference shares with no contractual opportunity to redeem – tier 1 of which counted under transitionals	This is the total of undated preference shares with no contractual opportunity to redeem that meet the criteria for Tier 1 which are counted under the transitional provisions.
D81	Undated preference shares with no contractual opportunity to redeem – tier 2	This is the total of undated preference shares with no contractual opportunity to redeem that meet the criteria for Tier 2.
E81	Undated preference shares with no contractual opportunity to redeem – tier 2 of which counted under transitionals	This is the total of undated preference shares with no contractual opportunity to redeem that meet the criteria for Tier 2 which are counted under the transitional provisions.
F81	Undated preference shares with no contractual opportunity to redeem – tier 3	This is the total of undated preference shares with no contractual opportunity to redeem that meet the criteria for Tier 3.
A82	Total preference shares - total	This is the total preference shares. $A82=B82+D82+F82$
B82	Total preference shares – tier 1	This is the total of preference shares that meet the criteria for Tier 1. $B82=B79+B80+B81$
C82	Total preference shares – tier 1 of which counted under transitionals	This is the total of preference shares that meet the criteria for Tier 1 which are counted under the transitional provisions. $C82=C79+C80+C81$
D82	Total preference shares – tier 2	This is the total of preference shares that meet the criteria for Tier 2. $D82=D79+D80+D81$
E82	Total preference shares – tier 2 of which counted under transitionals	This is the total of preference shares that meet the criteria for Tier 2 which are counted under the transitional provisions. $E82=E79+E80+E81$
F82	Total preference shares – tier 3	This is the total of preference shares that meet the criteria for Tier 3. $F82=F79+F80+F81$
A92	Dated subordinated liabilities - total	This is the total of dated subordinated liabilities. $A92=B92+D92+F92$
B92	Dated subordinated liabilities– tier 1	This is the amount of dated subordinated liabilities that meets the criteria for Tier 1.
C92	Dated subordinated liabilities – tier 1 of which counted under transitionals	This is the amount of dated subordinated liabilities that meets the criteria for Tier 1 which are counted under the transitional provisions.
D92	Dated subordinated liabilities– tier 2	This is the amount of dated subordinated liabilities that meets the criteria for Tier 2.
E92	Dated subordinated liabilities– tier 2 of which counted under transitionals	This is the amount of dated subordinated liabilities that meets the criteria for Tier 2 which are counted under the transitional provisions.
F92	Dated subordinated liabilities– tier 3	This is the amount of dated subordinated liabilities that meets the criteria for Tier 3.
A93	Undated subordinated liabilities with a call option - total	This is the total of undated subordinated liabilities that have a call option. $A93=B93+D93+F93$
B93	Undated subordinated liabilities with a call option – tier 1	This is the amount of undated subordinated liabilities with a call option that meets the criteria for Tier 1.
C93	Undated subordinated liabilities with a call option – tier 1 of which counted under transitionals	This is the amount of undated subordinated liabilities with a call option that meets the criteria for Tier 1 which are counted under the transitional provisions.
D93	Undated subordinated liabilities with a call option – tier 2	This is the amount of undated subordinated liabilities with a call option that meets the criteria for Tier 2.
E93	Undated subordinated liabilities with a call option – tier 2 of which counted under transitionals	This is the amount of undated subordinated liabilities with a call option that meets the criteria for Tier 2 which are counted under the transitional provisions.
F93	Undated subordinated liabilities with a call option – tier 3	This is the amount of undated subordinated liabilities with a call option that meets the criteria for Tier 3.
A94	Undated subordinated liabilities with no contractual opportunity to redeem - total	This is the total of undated subordinated liabilities with no contractual opportunity to redeem. $A94=B94+D94+F94$
B94	Undated subordinated liabilities with no contractual opportunity to redeem – tier 1	This is the amount of undated subordinated liabilities with no contractual opportunity to redeem that meets the criteria for Tier 1.

C94	Undated subordinated liabilities with no contractual opportunity to redeem – tier 1 of which counted under transitionals	This is the amount of undated subordinated liabilities with no contractual opportunity to redeem that meets the criteria for Tier 1 which are counted under the transitional provisions.
D94	Undated subordinated liabilities with no contractual opportunity to redeem – tier 2	This is the amount of undated subordinated liabilities with no contractual opportunity to redeem that meets the criteria for Tier 2.
E94	Undated subordinated liabilities with no contractual opportunity to redeem – tier 2 of which counted under transitionals	This is the amount of undated subordinated liabilities with no contractual opportunity to redeem that meets the criteria for Tier 2 which are counted under the transitional provisions.
F94	Undated subordinated liabilities with no contractual opportunity to redeem – tier 3	This is the amount of undated subordinated liabilities with no contractual opportunity to redeem that meets the criteria for Tier 3.
A95	Total subordinated liabilities – total	This is the total of subordinated liabilities. $A95=A92+A93+A94$
B95	Total subordinated liabilities – tier 1	This is the total of subordinated liabilities that meets the criteria for Tier 1. $B95=B92+B93+B94$
C95	Total subordinated liabilities – tier 1 of which counted under transitionals	This is the total of subordinated liabilities that meets the criteria for Tier 1 which are counted under the transitional provisions $C95=C92+C93+C94$
D95	Total subordinated liabilities – tier 2	This is the amount of subordinated liabilities that meets the criteria for Tier 2. $D95=D92+D93+D94$
E95	Total subordinated liabilities – tier 2 of which counted under transitionals	This is the amount of subordinated liabilities that meets the criteria for Tier 2 which are counted under the transitional provisions. $E95=E92+E93+E94$
F95	Total subordinated liabilities – tier 3	This is the amount of subordinated liabilities that meets the criteria for Tier 3. $F95=F92+F93+F94$
A108	Items for which an amount was approved – tier 2 initial amounts	This the initial amount approved for ancillary own funds for which an amount was approved under tier 2.
B108	Items for which an amount was approved – tier 2 current amounts	This is the current amount for ancillary own funds for which an amount was approved under tier 2.
C108	Items for which an amount was approved – tier 3 initial amounts	This the initial amount approved for ancillary own funds for which an amount was approved under tier 3.
D108	Items for which an amount was approved – tier 3 current amounts	This is the current amount for ancillary own funds for which an amount was approved under tier 3.
B109	Items for which a method was approved – tier 2 current amounts	This is the current amount for ancillary own funds for which a method was approved under tier 2.
D109	Items for which a method was approved – tier 3 current amounts	This is the current amount for ancillary own funds for which a method was approved under tier 3.
Q1	Difference in the valuation of assets	Cells A30 and AS30 are taken from BS-C1 $Q1 = A30 - AS30$
Q2	Difference in the valuation of technical provisions	Cells L1, L4, L6B, L7, L10, LS1, LS4, LS6B, LS7, LS10 and AS14 are taken from BS-C1 $Q2 = (L1+L4+L6B+L7+L10) - (LS1+LS4+LS6B+LS7+LS10+AS14)$
Q3	Difference in the valuation of other liabilities	Cells L25A and LS25A are taken from BS-C1 $Q3 = (L25A -LS25A) - Q2$
Q4	Total of reserves and retained earnings from financial statements	This is total reserves and retained earnings taken from the financial statements.
Q5	Other, please explain why you need to use this line.	
Q6	Reserves from financial statements adjusted for Solvency II valuation differences	$Q6 = Q1-Q2-Q3+Q4+Q5$
Q7	Excess of assets over liabilities attributable to basic own fund items (excluding the reconciliation reserve)	$Q7 = B26$
Q8	Excess of assets over liabilities	$Q8 = B23 = Q6+ Q7$

Technical Annex II: List of quantitative reporting items
S.23.01.f.g.
Own Funds

	ITEM	INSTRUCTIONS
A1	Ordinary share capital (gross of own shares) – total	Ordinary share capital (gross of own shares). This is the ordinary share capital of the undertaking which fully satisfies the criteria for Tier 1 or Tier 2 items. Any share capital which does not fully satisfy the criteria should be treated as preference share capital notwithstanding their description or designation. A1=B1+C1
B1	Ordinary share capital (gross of own shares) – tier 1 unrestricted	This is the amount of paid up ordinary share capital which meets the criteria for Tier 1 - unrestricted
C1	Ordinary share capital (gross of own shares) – tier 2	This is the amount of called up ordinary share capital which meets the criteria for Tier 2
A1A	Non-available called but not paid in ordinary share capital at group level	This is the total amount of called but not paid in ordinary share capital which is deemed non-available as defined in Article 222(2)-(5) of the Directive. This data item is only applicable when reporting at group level. A1A=C1A
C1A	Non-available called but not paid in ordinary share capital at group level – tier 2	This is the total amount of called but not paid in ordinary share capital which is deemed non-available as defined in Article 222(2)-(5) of the Directive which meets the criteria for Tier 2. This data item is only applicable when reporting at group level
A2	Share premium account related to ordinary share capital - total	The total share premium account related to ordinary share capital of the undertaking. A2 = B2 + C2
B2	Share premium account related to ordinary shares – tier 1 unrestricted	This is the amount of the share premium account related to ordinary shares which meets the criteria for Tier 1 unrestricted because it relates to share capital treated as unrestricted Tier 1
C2	Share premium account related to ordinary shares – tier 2	This is the amount of the share premium account related to ordinary shares which meets the criteria for Tier 2 because it relates to share capital treated as Tier 2
A3	Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings - total	The initial fund, members' contributions or the equivalent basic own-funds item for mutual and mutual-type undertakings. A3 = B3 + C3
B3	Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings – tier 1 unrestricted	This is the amount of the initial fund, members' contributions or the equivalent basic own-funds item for mutual and mutual-type undertakings, which meets the criteria for Tier 1 unrestricted
C3	Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings – tier 2	This is the amount of the initial fund, members' contributions or the equivalent basic own-funds item for mutual and mutual-type undertakings, which meets the criteria for Tier 2
A4	Subordinated mutual member accounts – total	This is the total of subordinated mutual member accounts. A4 = B4 + C4 + D4
B4	Subordinated mutual member accounts – tier 1 restricted	This is the amount of subordinated mutual member accounts that meet the criteria for Tier 1 restricted
C4	Subordinated mutual member accounts – tier 2	This is the amount of subordinated mutual member accounts that meet the criteria for Tier 2
D4	Subordinated mutual member accounts – tier 3	This is the amount of subordinated mutual member accounts that meet the criteria for Tier 3
A5	Non-available subordinated mutual member accounts at group level - total	This is the total amount of subordinated mutual member accounts which are deemed not available at group level, as defined in Article 222(2)-(5) of the Directive. This data item is only applicable when reporting at group level. A5 = B5 + C5 + D5
B5	Non-available subordinated mutual member accounts at group level – tier 1 restricted	This is the amount of subordinated mutual member accounts which are deemed non-available as defined in Article 222(2)-(5) of Solvency II Framework Directive (Directive 2009/138.EC) that meet the criteria for Tier 1 restricted This data item is only applicable when reporting at group level
C5	Non-available subordinated mutual member accounts at group level – tier 2	This is the amount of subordinated mutual member accounts which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 2. This data item is only applicable when reporting at group level
D5	Non-available subordinated mutual member accounts at group level – tier 3	This is the amount of subordinated mutual member accounts which are deemed non-available as defined in Article 222(2)-(5) of Solvency II Framework Directive (Directive 2009/138.EC) that meet the criteria for Tier 3. This data item is only applicable when reporting at group level
A6	Surplus funds – total	This is the total of surplus funds that fall under Article 91 (2) of the Solvency II Framework Directive (Directive 2009/138.EC). A6 = B6
B6	Surplus funds – tier 1 unrestricted	This is the surplus funds that fall under Article 91 (2) of the Solvency II Framework Directive (Directive 2009/138.EC) which are regarded as Tier 1, unrestricted items

A7	Non-available surplus funds at group level) -total	This is the total amount of surplus funds which are deemed non-available as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC). A7=B7 This data item is only applicable when reporting at group level
B7	Non-available surplus funds at group level) – tier 1 unrestricted	This is the amount of subordinated mutual member accounts which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 1 unrestricted items. This data item is only applicable when reporting at group level
A8	Preference shares – total	This is the total of preference shares issued by the undertaking. A8 = B8+ C8 + D8
B8	Preference shares – tier 1 restricted	This is the amount of the preference shares issued by the undertaking that meet the criteria for Tier 1 restricted
C8	Preference shares – tier 2	This is the amount of the preference shares issued by the undertaking that meet the criteria for Tier 2
D8	Preference shares – tier 3	This is the amount of the preference shares issued by the undertaking that meet the criteria for Tier 3
A9	Share premium account related to preference shares – total	The total share premium account related to preference share capital of the undertaking. A9=B9+C9+D9
B9	Share premium account related to preference shares – tier 1 restricted	This is the amount of the share premium account which relates to preference shares which meets the criteria for Tier 1 restricted items because it relates to preference shares treated as Tier 1 restricted items
C9	Share premium account related to preference shares – tier 2	This is the amount of the share premium account which relates to preference shares which meets the criteria for Tier 2 because it relates to preference shares treated as Tier 2
D9	Share premium account related to preference shares – tier 3	This is the amount of the share premium account which relates to preference shares which meets the criteria for Tier 3 because it relates to preference shares treated as Tier 3
A10	Non-available preference shares at group level – total	This is the total amount of preference shares which are deemed non-available as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC). This data item is only applicable when reporting at group level. A10=B10+C10+D10
B10	Non-available preference shares at group level – tier 1 restricted	This is the amount of preference shares which are deemed non - available as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC) that meet the criteria for Tier 1 restricted items. This data item is only applicable when reporting at group level
C10	Non-available preference shares at group level – tier 2	This is the amount of preference shares which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 2. This data item is only applicable when reporting at group level
D10	Non-available preference shares at group level – tier 3	This is the amount of preference shares which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 3. This data item is only applicable when reporting at group level
A11	Non-available share premium account related to preference shares at group level – total	This is the total amount of the share premium account relating to preference shares that is deemed non-available as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC). This data item is only applicable when reporting at group level A11=B11+C11+D11
B11	Non-available share premium account related to preference shares at group level – tier 1 restricted items	This is the amount of the share premium account relating to preference shares that is deemed non-available as defined in Article 222(2)-(5) of the Directive which meets the criteria for Tier 1 restricted items (see B9 for definition). This data item is only applicable when reporting at group level
C11	Non-available share premium account related to preference shares at group level – tier 2	This is the amount of the share premium account relating to preference shares that is deemed non-available as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC) which meets the criteria for Tier 2. This data item is only applicable when reporting at group level
D11	Non-available share premium account related to preference shares at group level – tier 3	This is the amount of the share premium account relating to preference shares that is deemed non-available as defined in Article 222(2)-(5) of the Directive which meets the criteria for Tier 3. This data item is only applicable when reporting at group level
A12A	Reconciliation reserve (group)	The reconciliation reserve represents reserves (e.g. retained earnings), net of adjustments (e.g. for ring fenced funds), but is also reconciles differences between accounting valuation and Solvency II valuation. A12A = B12A This data item is only applicable when reporting at group level
B12A	Reconciliation reserve – tier 1 unrestricted (group)	The reconciliation reserve represents reserves (e.g. retained earnings), net of adjustments (e.g. for ring fenced funds), but is also reconciles differences between accounting valuation and Solvency II valuation. B12A = B29A This data item is only applicable when reporting at group level
A13	Subordinated liabilities – total	This is the total of subordinated liabilities issued by the undertaking. A13 = B13 + C13 + D13
B13	Subordinated liabilities – tier 1 restricted	This is the amount of subordinated liabilities issued by the undertaking which meet the criteria for Tier 1 restricted items

C13	Subordinated liabilities – tier 2	This is the amount of subordinated liabilities issued by the undertaking which meet the criteria for Tier 2
D13	Subordinated liabilities – tier 3	This is the amount of subordinated liabilities issued by the undertaking which meet the criteria for Tier 3
A14	Non-available subordinated liabilities at group level - total	This is the total amount of subordinated liabilities which are deemed non-available as defined in Article 222(2)-(5) of the Directive. A14 = B14+C14+ D14 This data item is only applicable when reporting at group level
B14	Non-available subordinated liabilities at group level – tier 1 restricted	This is the amount of subordinate liabilities which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 1 restricted items. This data item is only applicable when reporting at group level
C14	Non-available subordinated liabilities at group level – tier 2	This is the amount of subordinated liabilities which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 2. This data item is only applicable when reporting at group level
D14	Non-available subordinated liabilities at group level – tier 3	This is the amount of subordinated liabilities which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 3. This data item is only applicable when reporting at group level
A15	An amount equal to the value of net deferred tax assets - total	This is the total net deferred tax assets of the undertaking. A15 = D15
D15	An amount equal to the value of net deferred tax assets – tier 3	This is the amount of net deferred tax assets of the undertaking classified as tier 3
A15A	Non available deferred tax assets at group level –total	This is the amount of net deferred tax assets which are deemed non-available as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC). A15A = D15A This data item is only applicable when reporting at group level
D15A	Non available deferred tax assets at group level –tier 3	This is the amount of net deferred tax assets which are deemed non-available as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC). This data item is only applicable when reporting at group level
A16	Other items approved by supervisory authority as basic own funds not specified above	This is the total of any items of basic own funds not identified above. During preparatory phase this should only include those items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as available basic own funds under Solvency 2. A16=B16+B16A+C16+D16
B16	Other items approved by supervisory authority as basic own funds not specified above - tier 1 unrestricted items	This is the amount of any items of basic own funds not identified above which meet the criteria for Tier 1, unrestricted items. During preparatory phase this should only include those items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as available basic own funds under Solvency 2
B16A	Other items approved by supervisory authority as basic own funds not specified above - Tier 1 restricted items	This is the amount of any items of basic own funds not identified above which meet the criteria for Tier 1, restricted items. During preparatory phase this should only include those items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as available basic own funds under Solvency 2
C16	Other items approved by supervisory authority as basic own funds not specified above - tier 2	This is the amount of any items of basic own funds not identified above which meet the criteria for Tier 2. During preparatory phase this should only include those items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as available basic own funds under Solvency 2
D16	Other items approved by supervisory authority as basic own funds not specified above - tier 3	This is the amount of any items of basic own funds not identified above which meet the criteria for Tier 3. During preparatory phase this should only include those items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as available basic own funds under Solvency 2
A17	Non-available own funds related to non-EEA entities, due to local restrictions: regulatory or otherwise, at group level - total	This is the total amount of own fund items related to non - EEA entities which are deemed non-available (due to local restrictions: regulatory or otherwise), as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC). This represents non available non-EEA own funds at group level when all the own funds of a non-EEA entity are considered to be non available at group level due to the restrictions to their availability and fungibility (in this case they should not be counted twice and consequently they should not be indicated separately in other cells) A17=B17+B17A+C17+D17 This data item is only applicable when reporting at group level
B17	Non-available own funds related to non-EEA entities, due to local restrictions: regulatory or otherwise, at group level – tier 1 unrestricted items	This is the amount of own fund items related to non - EEA entities, which are deemed non-available (due to local restrictions: regulatory or otherwise) as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC) that meet the criteria for Tier 1 unrestricted items. This data item is only applicable when reporting at group level

B17A	Non-available own funds related to non-EEA entities, due to local restrictions: regulatory or otherwise, at group level - tier 1 restricted	This is the amount of own fund items related to non - EEA entities, which are deemed non-available (due to local restrictions: regulatory or otherwise) as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC) that meet the criteria for Tier 1 restricted items. This data item is only applicable when reporting at group level
C17	Non-available own funds related to non-EEA entities, due to local restrictions: regulatory or otherwise, at group level - tier 2	This is the amount of own fund items related to non - EEA entities, which are deemed non-available (due to local restrictions: regulatory or otherwise) as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC) that meet the criteria for Tier 2. This data item is only applicable when reporting at group level
D17	Non-available own funds related to non-EEA entities, due to local restrictions: regulatory or otherwise, at group level - tier 3	This is the amount of own fund items related to non - EEA entities, which are deemed non-available (due to local restrictions: regulatory or otherwise) as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC) that meet the criteria for Tier 3. This data item is only applicable when reporting at group level
A18	Minority interests at group level (if not reported as part of another own fund item)- total	This may only be completed by groups and is the total of minority interests in the group being reported upon. This lines should be reported if minority interests have not been already included in other items of BOF (i.e. minority interests should not be counted twice). $A18=B18+B18A +C18+D18$
B18	Minority interests at group level (if not reported as part of another own fund item)- tier 1 unrestricted items	he amount of minority interests in the group being reported upon that meets the criteria for Tier 1 unrestricted items. This is only reported by groups
B18A	Minority interests at group level (if not reported as part of another own fund item)- tier 1 restricted items	This may only be completed by groups and is the amount of minority interests in the group being reported upon that meets the criteria for Tier 1 restricted items
C18	Minority interests at group level (if not reported as part of another own fund item)- tier 2	This may only be completed by groups and is the amount of minority interests in the group being reported upon that meets the criteria for Tier 2
D18	Minority interests at group level (if not reported as part of another own fund item)- tier 3	This may only be completed by groups and is the amount of minority interests in the group being reported upon that meets the criteria for Tier 3
A19	Non available minority interests at group level () - total	This is the total amount of minority interests which are deemed non-available as defined in Article 222(2)-(5) of the Directive. This is only applicable when reporting at group level. $A19=B19+B19A +C19+D19$
B19	Non available minority interests at group level - tier 1 unrestricted	This is the amount of minority interests which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 1 unrestricted. This data item is only applicable at group level
B19A	Non available minority interests at group level - tier 1 restricted	This is the amount of minority interests which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 1 restricted. This data item is only applicable at group level
C19	Non available minority interests at group level - tier 2	This is the amount of minority interests which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 2. This data item is only applicable at group level
D19	Non available minority interests at group level - tier 3	This is the amount of minority interests which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 3. This data item is only applicable when reporting at group level
B502	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	These items are either: i) items that appear in the lists of own fund items, but fail to meet the classification criteria or the transitional provisions; or ii) items intended to perform the role of own funds which are not on the list of own fund items and have not been approved by the supervisory authority, and do not appear on the balance sheet as liabilities. Subordinated liabilities which do not count as basic own funds should not be reported here, but as subordinated liabilities that do not count as basic own funds on the balance sheet (BS-C1 L15D). These should be deducted from Tier 1 as they are neither balance sheet liabilities nor basic own funds. Failure to deduct them would result in them being incorrectly included in the reconciliation reserve. See cross-templates checks tab CQS 1 See cross-templates checks tab CGS 6 See cross-templates checks tab CAS 78
A603	Deductions for participations related credit institutions, investment firms and financial institutions (Level I Article 228) - total	This is the total of deductions of the participations in other financial entities, including non regulated financial entities carrying out financial activities, according to art. 228 (paragraphs 1 and 2) of the directive. $A603= B603 + C603+ D603$ This data item is only applicable when reporting at group level
B603	Deductions for participations related credit institutions, investment firms and financial institutions (Level I Article 228) - tier 1 unrestricted items	This is the deduction of the participations in other financial entities, including non regulated financial entities carrying out financial activities, according to art. 228 (paragraphs 1 and 2) of the directive, - tier 1 unrestricted items. This data item is only applicable when reporting at group level

C603	Deductions for participations related credit institutions, investment firms and financial institutions (Level I Article 228) – tier 1 restricted items	This is the deduction of the participations in other financial entities, including non regulated financial entities carrying out financial activities, according to art. 228 (paragraphs 1 and 2) of the directive, – tier 1 restricted items. This data item is only applicable when reporting at group level
D603	Deductions for participations related credit institutions, investment firms and financial institutions (Level I Article 228) – tier 2	This is the deduction of the participations in other financial entities, including non regulated financial entities carrying out financial activities, according to art. 228 (paragraphs 1 and 2) of the directive., tier 2. This data item is only applicable when reporting at group level
A604	Deductions for participations where there is non-availability of information (Article 229) – total	This is the total deduction of the participations in related undertakings when the information necessary for calculating the group solvency is not available, according to art. 229 of the directive. A604 = B604 + C604 + D604 + E604 This data item is only applicable when reporting at group level
B604	Deductions for participations where there is non-availability of information (Article 229) – tier 1 unrestricted items.	This is the deduction of the participations in related undertakings when the information necessary for calculating the group solvency is not available, according to art. 229 of the directive, tier 1 unrestricted items. This data item is only applicable when reporting at group level
C604	Deductions for participations where there is non-availability of information (Article 229) – tier 1 restricted items	This is the deduction of the participations in related undertakings when the information necessary for calculating the group solvency is not available, according to art. 229 of the directive, – tier 1 restricted items. This data item is only applicable when reporting at group level
D604	Deductions for participations where there is non-availability of information (Article 229) – tier 2	This is the deduction of the participations in related undertakings when the information necessary for calculating the group solvency is not available, according to art. 229 of the directive, Tier 2. This data item is only applicable when reporting at group level
E604	Deductions for participations where there is non-availability of information (Article 229) – tier 3	This is the deduction of the participations in related undertakings when the information necessary for calculating the group solvency is not available, according to art. 229 of the directive, Tier 3. This data item is only applicable when reporting at group level
A605	Deduction for participations included by using D&A when a combination of methods is used – total	This is the deduction of the participations in related undertakings included with the D&A when a combination of methods is used. A605 = B605 + C605 + D605 + E605 This data item is only applicable when reporting at group level
B605	Deduction for participations included by using D&A when a combination of methods is used– tier 1 unrestricted items	This is the deduction of the participations in related undertakings included with the D&A when a combination of methods is used – tier 1 unrestricted items. This data item is only applicable when reporting at group level
C605	Deduction for participations included by using D&A when a combination of methods is used – tier 1 restricted items	This is the deduction of the participations in related undertakings included with the D&A when a combination of methods is used -tier 1 restricted items. This data item is only applicable when reporting at group level
D605	Deduction for participations included by using D&A when a combination of methods is used – tier 2	This is the deduction of the participations in related undertakings included with the D&A when a combination of methods is used - tier 2. This data item is only applicable when reporting at group level
E605	Deduction for participations included by using D&A when a combination of methods is used – tier 3	This is the deduction of the participations in related undertakings included with the D&A when a combination of methods is used - tier 3 . This data item is only applicable when reporting at group level
A606	Total of non-available own fund items at group level – total	This is the total of non- available own funds items. A606 = A1A+A5+A7+A10+A11+A14+A15A+A17+A19 This data item is only applicable when reporting at group level
B606	Total of non-available own fund items – Tier 1 unrestricted items	This is the total of non- available own funds items in Tier 1 unrestricted items. B606= B7+B17+B19 This data item is only applicable when reporting at group level
C606	Total of non-available own fund items – tier 1 restricted items	This is the total of non-available own fund items – tier 1 restricted items. C606= B5+B10+B11+B14+B17A+B19A This data item is only applicable when reporting at group level
D606	Total of non-available own fund items – tier 2	This is the total of non-available own fund items – tier 2. D606=C1A+C5+C10+C11+C14+C17+C19 This data item is only applicable when reporting at group level
E606	Total of non-available own fund items – tier 3	This is the total of non-available own fund items – tier 3. E606=D5+D10+D11+D14+D15A+D17+D19 This data item is only applicable when reporting at group level
A607	Total deductions – total	This is a total amount of deductions not included in the reconciliation reserves. A607= B607+ C607+D607+E607 or check formulae: A607 = A603+A604+A605+A606 This data item is only applicable when reporting at group level
B607	Total deductions – tier 1 unrestricted items	This is a total amount of deductions from tier 1 unrestricted not included in the reconciliation reserves. B607=B603+B604+B605+B606 This data item is only applicable when reporting at group level

C607	Total deductions – tier 1 restricted items	This is a total amount of deductions from tier 1 restricted not included in the reconciliation reserves. C607=C603+C604+C605+C606 This data item is only applicable when reporting at group level
D607	Total deductions – tier 2	This is a total amount of deductions from tier 2 not included in the reconciliation reserves. D607=D603+D604+D605+D606 This data item is only applicable when reporting at group level
E607	Total deductions – tier 3	This is a total amount of deductions from tier 3 not included in the reconciliation reserves. E607=E604+E605+E606 This data item is only applicable when reporting at group level
A21	Total basic own funds after adjustment (group)	This is the total of all items of basic own funds after adjustments for a group. A21 = B21 + B21A + C21 + D21 or check formula: A21= A1+A2+A3+A4+A6+A8+A9+A12A+A13+ A15 + A16+A18 -A502 - A607
B21	Total basic own funds after adjustment (group) - tier 1 unrestricted	This is the total of all items of basic own funds after adjustments which meet the criteria for Tier 1 unrestricted for a group. B21= B1+B2+B3+B6+B12A+B16+B18 -B502 - B607
B21A	Total basic own funds after adjustment (group) - tier 1 restricted	These are the total basic own funds after adjustments (group) – tier 1 restricted items B21A=B4+B8+B9+B13+B16A+B18A -C607
C21	Total basic own funds after adjustment (group) - tier 2	This is the total of all items of basic own funds after adjustments which meet the criteria for Tier 2 for a group. C21= C1+C2+C3+C4+C8+C9+C13+C16+C18 -D607
D21	Total basic own funds after adjustment (group) - tier 3	This is the total of all items of basic own funds after adjustments which meet the criteria for Tier 3 for a group. D21= D4+D8+D9+D13+D15+D16+D18 -E607

Ancillary own funds

A33	Unpaid and uncalled ordinary share capital callable on demand – total	NOT APPLICABLE for the purpose of preparatory phase This is the total of unpaid share capital that has not been called up A33=C33
C33	Unpaid and uncalled ordinary share capital callable on demand – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the total of unpaid share capital that has not been called up, that meets the criteria for Tier 2
A34	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand - total	NOT APPLICABLE for the purpose of preparatory phase This is the total of unpaid initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings which has not been called up. A34 = C34
C34	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the total of unpaid initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings which has not been called up, that meets the criteria for Tier 2
A35	Unpaid and uncalled preference shares callable on demand - total	NOT APPLICABLE for the purpose of preparatory phase This is the total amount of unpaid preference shares which has not been called up. A35=C35+D35
C35	Unpaid and uncalled preference shares callable on demand – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the total amount of unpaid preference shares which has not been called up, that meets the criteria for Tier 2
D35	Unpaid and uncalled preference shares callable on demand – tier 3	NOT APPLICABLE for the purpose of preparatory phase This is the total amount of unpaid preference shares which has not been called up. That meets the criteria for Tier 3
A36	A legally binding commitment to subscribe and pay for subordinated liabilities on demand	NOT APPLICABLE for the purpose of preparatory phase This is the total amount of legally binding commitments to subscribe and pay for subordinated liabilities on demand. A36 = C36 + D36
C36	A legally binding commitment to subscribe and pay for subordinated liabilities on demand – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the total amount of legally binding commitments to subscribe and pay for subordinated liabilities on demand that meet the criteria for Tier 2
D36	A legally binding commitment to subscribe and pay for subordinated liabilities on demand – tier 3	NOT APPLICABLE for the purpose of preparatory phase This is the total amount of legally binding commitments to subscribe and pay for subordinated liabilities on demand that meet the criteria for Tier 3
A37	Letters of credit and guarantees under Article 96(2) of the Framework Directive – total	NOT APPLICABLE for the purpose of preparatory phase This is the total of letters of credit and guarantees which are held in trust for the benefit of insurance creditors by an independent trustee and provided by credit institutions authorised in accordance with Directive 2006/48/EC. A37 = C37

C37	Letters of credit and guarantees under Article 96(2) of the Framework Directive – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the amount of letters of credit and guarantees, which are held in trust for the benefit of insurance creditors by an independent trustee and provided by credit institutions authorised in accordance with Directive 2006/48/EC, which meet the criteria for Tier 2
A38	Letters of credit and guarantees other than under Article 96(2) of the Framework Directive - total	NOT APPLICABLE for the purpose of preparatory phase This is the total of letters of credit and guarantees, other than those which are held in trust for the benefit of insurance creditors by an independent trustee and provided by credit institutions authorised in accordance with Directive 2006/48/EC $A38 = C38 + D38$
C38	Letters of credit and guarantees other than under Article 96(2) of the Framework Directive – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the amount of letters of credit and guarantees, other than those which are held in trust for the benefit of insurance creditors by an independent trustee and provided by credit institutions authorised in accordance with Directive 2006/48/EC, which meet the criteria for Tier 2
D38	Letters of credit and guarantees other than under Article 96(2) of the Framework Directive – tier 3	NOT APPLICABLE for the purpose of preparatory phase This is the amount of letters of credit and guarantees, other than those which are held in trust for the benefit of insurance creditors by an independent trustee and provided by credit institutions authorised in accordance with Directive 2006/48/EC, which meet the criteria for Tier 3
A39	Supplementary members calls under Article 96(3) of the Framework Directive - total	NOT APPLICABLE for the purpose of preparatory phase This is the total of any future claims which mutual or mutual-type associations of shipowners with variable contributions solely insuring risks listed in classes 6, 12 and 17 in Part A of Annex I may have against their members by way of a call for supplementary contributions, with the following 12 months. $A39 = C39$
C39	Supplementary members calls under Article 96(3) of the Framework Directive – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the total of any future claims which mutual or mutual-type associations of shipowners with variable contributions solely insuring risks listed in classes 6, 12 and 17 in Part A of Annex I may have against their members by way of a call for supplementary contributions, with the following 12 months, that meet the criteria for Tier 2
A40	Supplementary members calls - other than under Article 96(3) of the Framework Directive	NOT APPLICABLE for the purpose of preparatory phase This is the total of any future claims which mutual or mutual-type associations of shipowners with variable contributions solely insuring risks listed in classes 6, 12 and 17 in Part A of Annex I may have against their members by way of a call for supplementary contributions, other than within the following 12 months. $A40 = C40 + D40$
C40	Supplementary members calls - other than under Article 96(3) of the Framework Directive – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the total of any future claims which mutual or mutual-type associations of shipowners with variable contributions solely insuring risks listed in classes 6, 12 and 17 in Part A of Annex I may have against their members by way of a call for supplementary contributions, other than within the following 12 months, that meet the criteria for Tier 2
D40	Supplementary members calls - other than under Article 96(3) of the Framework Directive – tier 3	NOT APPLICABLE for the purpose of preparatory phase This is the total of any future claims which mutual or mutual-type associations of shipowners with variable contributions solely insuring risks listed in classes 6, 12 and 17 in Part A of Annex I may have against their members by way of a call for supplementary contributions, other than within the following 12 months, that meet the criteria for Tier 3
A41	Non available ancillary own funds at group level – total	NOT APPLICABLE for the purpose of preparatory phase This is the total amount of ancillary own funds which are deemed non-available as defined in Article 222(2)-(5) of the Directive. $A41 = C31 + D41$
C41	Non available ancillary own funds at group level – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the amount of ancillary own funds which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 2
D41	Non available ancillary own funds at group level – tier 3	NOT APPLICABLE for the purpose of preparatory phase This is the amount of ancillary own funds which are deemed non-available as defined in Article 222(2)-(5) of the Directive that meet the criteria for Tier 3
A42	Other ancillary own funds - total	During interim reporting, this is the total of all items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as ancillary own funds under Solvency 2. $A42 = C42 + D42$
C42	Other ancillary own funds – tier 2	During interim reporting, this the total of all items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as ancillary own funds under Solvency 2, that meet criteria for Tier 2
D42	Other ancillary own funds – tier 3	During interim reporting, this the total of all items currently counted as own funds under Solvency 1 (which in certain cases are subject to approval) and which would require supervisory approval to count as ancillary own funds under Solvency 2, that meet criteria for Tier 3
A44	Total ancillary own funds (group)	This is the total of the items that comprise ancillary own funds for a group. $A44 = C44 + D44$

C44	Total ancillary own funds (group)- tier 2	This is the amount of the items that comprise ancillary own funds for a group for that meet the criteria for Tier 2. C44 = SUM(C33:C40) - C41 + C42
D44	Total ancillary own funds (group) - tier 3	This is the amount of the items that comprise ancillary own funds for a group, that meet the criteria for Tier 3. D44 = D35+D36+D38+D40-D41+D42

Available and eligible own funds (group)

A45	Investment firms and financial institutions	Own funds in investment firms and financial institutions.
A45A	Institutions for occupational retirement provision	Own funds in institutions for occupational retirement provision.
A45B	Non regulated entities carrying out financial activities	Own funds in Non regulated entities carrying out financial activities.
A45C	Total own funds of other financial sectors	Total own funds in other financial sectors. A45C = A45+A45A+A45B
A45D	Own funds aggregated when using the D&A and or a combination of method - Total - NET	These are the total own funds of the related undertakings that have to be added for the calculation of the aggregated own funds when using the D&A or a combination of methods. The own funds figure reported here should be net of non available own funds and of the deduction ex Art. 228 and Art. 229. The total OF reported in the cell derives from the "manual" aggregation of the sole OF of insurance, reinsurance undertakings and insurance
B45D	Own funds aggregated when using the D&A and or a combination of method - Tier 1 unrestricted - NET	These are the total own funds of the related undertakings that have to be added for the calculation of the aggregated own funds when using the D&A or a combination of methods, classified as Tier 1 unrestricted
C45D	Own funds aggregated when using the D&A and or a combination of method - Tier 1 restricted - NET	These are the total own funds of the related undertakings that have to be added for the calculation of the aggregated own funds when using the D&A or a combination of methods, classified as Tier 1 restricted
D45D	Own funds aggregated when using the D&A and or a combination of method - Tier 2 - NET	These are the total own funds of the related undertakings that have to be added for the calculation of the aggregated own funds when using the D&A or a combination of methods, classified as Tier 2
E45D	Own funds aggregated when using the D&A and or a combination of method - Tier 3	These are the total own funds of the related undertakings that have to be added for the calculation of the aggregated own funds when using the D&A or a combination of methods, classified as Tier 3
A45E	Own funds aggregated when using the D&A and a combination of method net of IGT - Total	These are the own funds reported in cell A45D net of the intra-group transactions for the calculation of the aggregated group eligible own funds.
B45E	Own funds aggregated when using the D&A and a combination of method net of IGT - Tier 1 unrestricted items	These are the own funds net of the intra-group transactions for the calculation of the aggregated group eligible own funds, classified as Tier 1 unrestricted items
C45E	Own funds aggregated when using the D&A and a combination of method without IGT - Tier 1 restricted items	These are the own funds without the intra-group transactions for the calculation of the aggregated group eligible own funds, classified as Tier 1 restricted
D45E	Own funds aggregated when using the D&A and a combination of method net of IGT - Tier 2	These are the own funds net of the intra-group transactions for the calculation of the aggregated group eligible own funds, classified as Tier 2
E45E	Own funds aggregated when using the D&A and a combination of method net of IGT - Tier 3	These are the own funds net of the intra-group transactions for the calculation of the aggregated group eligible own funds, classified as Tier 3
A48	Total available own funds to meet the SCR (group)	This is the total own funds of the undertaking, comprising basic own funds after adjustments plus ancillary own funds, that are available to meet the SCR for a group. A48=B48+C48+D48+E48
B48	Total available own funds to meet the SCR (group) - tier 1 unrestricted items	This is the total own funds of the undertaking, comprising basic own funds after adjustments, that are available to meet the SCR for a group and that meet the criteria to be included in Tier 1 unrestricted items. B48 = B21
C48	Total available own funds to meet the SCR (group) - tier 1 restricted items	This is the total own funds of the undertaking, comprising basic own funds after adjustments, that are available to meet the SCR for a group and that meet the criteria to be included in Tier 1 restricted items. C48 = B21A
D48	Total available own funds to meet the SCR (group) - tier 2	This is the total own funds of the undertaking, comprising basic own funds after adjustments plus ancillary own funds, that are available to meet the SCR for a group and that meet the criteria to be included in Tier 2. D48=C21+C44
E48	Total available own funds to meet the SCR (group) - tier 3	This is the total own funds of the undertaking, comprising basic own funds after adjustments plus ancillary own funds, that are available to meet the SCR for a group and that meet the criteria to be included in Tier 3. E48=D21+D44
A49	Total available own funds to meet the minimum group SCR (group)	This is the total own funds of the group, comprising basic own funds after adjustments, that are available to meet the minimum group SCR. A49=B49+C49+D49

B49	Total available own funds to meet the minimum group SCR (group) – tier 1 unrestricted items	This is the total own funds of the group, comprising basic own funds after adjustments, that are available to meet the minimum SCR for a group and that meet the criteria to be included in Tier 1 unrestricted items. B49 = B48
C49	Total available own funds to meet the minimum group SCR (group) – tier 1 restricted items	This is the total own funds of the group, comprising basic own funds after adjustments, that are available to meet the minimum SCR for a group and that meet the criteria to be included in Tier 1 restricted items C49 = C48
D49	Total available own funds to meet the minimum group SCR (group) – tier 2	This is the total own funds of the group, comprising basic own funds after adjustments, that are available to meet the minimum SCR for a group and that meet the criteria to be included in Tier 2. D49=C21
A50A	Total eligible own funds to meet the SCR (group)– total	This is the total group own funds which are eligible under the limits. A50A = B50A+C50A+D50A+E50A
B50A	Total eligible own funds to meet the SCR (group) – tier 1 unrestricted items	This is the total group own funds which are eligible under the limits set out to meet the SCR, that meet the criteria for Tier 1 unrestricted items B50A=B48
C50A	Total eligible own funds to meet the SCR (group)– tier 1 restricted items	This is the total own funds which are eligible under the limits set out to meet the SCR, that meet the criteria for Tier 1 restricted items C50A=MAX(0,(MIN(B50A*0.25, C48)))
D50A	Total eligible own funds to meet the SCR (group) – tier 2	This is the total own funds which are eligible under the limits set out to meet the SCR, that meet the criteria for Tier 2 D50A=MAX(0,(MIN(0.5*A52A,((C48)-C50A)+ (D48))))
E50A	Total eligible own funds to meet the SCR (group) – tier 3	This is the total own funds which are eligible under the limits set out to meet the SCR, that meet the criteria for Tier 3 E50A=MAX(0,MIN(((0.5*A52A)-D50A), 0.15*A52A, (E48)))
A51A	Total available own funds to meet the minimum group SCR– total	This is the total available own funds to meet the minimum group SCR A51A=B51A+C51A+D51A
B51A	Total available own funds to meet the minimum group SCR – tier 1 unrestricted items	This is the total own funds of the group, that are available to meet the minimum group SCR that meet the criteria to be included in Tier 1 unrestricted items. B51A=B50A
C51A	Total available own funds to meet the minimum group SCR – tier 1 COF1 unrestricted items	This is the total own funds of the group, that are available to meet the minimum group SCR that meet the criteria to be included in Tier 1 unrestricted items. C51A=C50A
D51A	Total available own funds to meet the minimum group SCR – tier 2	This is the total own funds of the group, that are available to meet the minimum group SCR that meet the criteria to be included in Tier 2 D51A=MAX(0,(MIN(0.2*A53A,((C48)-C51A)+ (D48))))
A52A	Consolidated Group SCR	This is the total group SCR calculated using method 1: consolidated method and it should correspond to SCR number disclosed on relevant SCR templates; If group is using internal model SCR B2C (A52A = SCR_B2C "B12")or if group is using a partial internal model or a standard formula SCR B2A (A52A = SCR_B2A "A20")
A53A	Minimum consolidated Group SCR (Article 230)	This is the minimum group SCR calculated using method 1: consolidated method and it should correspond to SCR number disclosed on relevant SCR templates; If group is using internal model - SCR B2C (A53A = SCR_B2C "B13")or if group is using a partial internal model or a standard formula - SCR B2A (A53A = SCR_B2A "A21")
A54A	Ratio of Eligible own funds to SCR (excluding other financial sectors)	NOT APPLICABLE for the purpose of preparatory phase A54A = A50A/(SCRB2A "A20"- SCRB2A "A15")
A55A	Ratio of Eligible own funds to Minimum Group SCR	NOT APPLICABLE for the purpose of preparatory phase A55A= A51A/A53A
A53B	SCR for entities included with D&A method	This is the total of solvency capital requirements for entities included with Deduction and Aggregation method
A55B	Ratio of Eligible own funds to SCR including other financial sectors' own funds and capital requirements	NOT APPLICABLE for the purpose of preparatory phase A55B= (A45C+A50A+A45E)/(A52A+A53B)
Reconciliation Reserve		
B23	Excess of assets over liabilities	This is an excess of assets over liabilities as disclosed on the Solvency 2 balance sheet; the cell 'B23=BSC-C1 "L27" When this data item is applicable to groups, it is only applicable for consolidation method
B24	Own shares (included as assets on the balance sheet)	This is the amount of own shares held by the undertaking When this data item is applicable to groups, it is only applicable for consolidation method See cross-templates checks tab CQS 1 See cross-templates checks tab CGS 6 See cross-templates checks tab QCGS 1 See cross-templates checks tab CAS 78

B25	Foreseeable dividends and distributions	This is the foreseeable dividends and distributions of the undertaking. When this data item is applicable to groups, it is only applicable for consolidation method See cross-templates checks tab CQS 1 See cross-templates checks tab CGS 6 See cross-templates checks tab QCGS 1 See cross-templates checks tab CAS 78
B26	Other basic own fund items	This is the total amount of other basic own funds items included in the reconciliation reserve. When this data item is applicable to groups, it is only applicable for consolidation method Group formula - 'B26=A1+A2+A3+A4 +A6+A8+A9+A15+A16+A18
B27	Adjustment for restricted own fund items in respect of ring fenced funds	This is the amount of adjustment for restricted own fund items in respect of ring fenced funds. See cross-templates checks tab CQS 1 See cross-templates checks tab CGS 6 See cross-templates checks tab QCGS 1 See cross-templates checks tab CAS 78
B28	Other non available own funds	This are other non available own funds of related undertaking When this data item is applicable to groups, it is only applicable for consolidation method
B29A	Reconciliation reserve – total (group)	This is the total reconciliation reserve for a group. B29A = B23-B24-B25-B26-B27-B28
A30	Expected profits included in future premiums (EPIFP) - Life business	The reconciliation reserve includes an amount of the excess of assets over liabilities that corresponds to the expected profit in future premiums (EPIFP). This cell represents that amount for the life business of the undertaking and is included for disclosure purposes. Calculation methodology to be provided in Level III. A30=B30
A31	Expected profits included in future premiums (EPIFP) - Non- life business	The reconciliation reserve includes an amount of the excess of assets over liabilities that corresponds to the expected profit in future premiums (EPIFP). This cell represents that amount for the non-life business of the undertaking and is included for disclosure purposes. Calculation methodology to be provided in Level III.
A32	Total EPIFP	This is the total amount calculated as EPIFP. Calculation methodology to be provided in Level III. A32=A30+A31
A56	Paid in - total	NOT APPLICABLE for the purpose of preparatory phase This is the total of paid in ordinary share capital. A56 = B56
B56	Paid in – tier 1	NOT APPLICABLE for the purpose of preparatory phase This is the total of paid in ordinary share capital, that meets the criteria for Tier 1; B56 = D60
A57	Called up but not yet paid in - total	NOT APPLICABLE for the purpose of preparatory phase This is the total amount of ordinary shares which have been called up but not yet paid in. A57 = C57
C57	Called up but not yet paid in – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the amount of ordinary shares which have been called up but not yet paid in that meet the criteria for Tier 2. C57 = D61
A58	Own shares held	NOT APPLICABLE for the purpose of preparatory phase This is the total amount of own shares held by the undertaking. A58 = B58
B58	Own shares held – tier 1	NOT APPLICABLE for the purpose of preparatory phase This is the total amount of own shares held by the undertaking, that meets the criteria for tier 1. B58 = "BS-C1 A28A"
A59	Total ordinary share capital	NOT APPLICABLE for the purpose of preparatory phase This is the total of ordinary share capital. Note, own shares held will be included in either paid in or called up but not paid in. A59=A56+A57
B59	Total ordinary share capital – tier 1	NOT APPLICABLE for the purpose of preparatory phase This is the total of ordinary share capital that meets the criteria for Tier 1. B59 = B56 + B58
C59	Total ordinary share capital – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the total of ordinary share capital that meets the criteria for Tier 2. C59 =C57
A67	Paid in – total	NOT APPLICABLE for the purpose of preparatory phase This is the total of paid in initial fund members' contributions or the equivalent basic own - fund items for mutual and mutual - type undertaking. A67 = B67

B67	Pain in – tier 1	NOT APPLICABLE for the purpose of preparatory phase This is the total of initial fund members' contributions or the equivalent basic own - fund item for mutual and mutual - type undertaking that meets the criteria for Tier 1. B67 = D70
A68	Called up but not yet paid in – total	NOT APPLICABLE for the purpose of preparatory phase This is the total of called up but not yet paid in initial fund members' contributions or the equivalent basic own - fund items for mutual and mutual - type undertaking A68 = C68
C68	Called up but not yet paid in – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the total of initial fund members' contributions or the equivalent basic own - fund item for mutual and mutual - type undertaking that meets the criteria for Tier 2. C68 = D71
A69	Total initial fund	NOT APPLICABLE for the purpose of preparatory phase This is the total initial fund A69 = B69 + C69
B69	Total initial fund – tier 1	NOT APPLICABLE for the purpose of preparatory phase This is the total of the initial fund that meets the criteria for Tier 1. B69 = B67
C69	Total initial fund – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the total of the initial fund that meets the criteria for Tier 2. C69 = C68
A73	Dated subordinated MMA – total	NOT APPLICABLE for the purpose of preparatory phase This is the total amount of dated subordinated MMA A73= B73+D73+F73
B73	Dated subordinated MMA – tier 1	NOT APPLICABLE for the purpose of preparatory phase This is the total amount of date subordinated MMA that meet the criteria for Tier 1.
C73	Dated subordinated MMA – tier 1 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the total amount of date subordinated MMA that meet the criteria for Tier 1 which are counted under the transitional provisions.
D73	Dated subordinated MMA – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the total amount of date subordinated MMA that meet the criteria for Tier 2.
E73	Dated subordinated MMA – tier 2 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the total amount of date subordinated MMA that meet the criteria for Tier 2 which are counted under the transitional provisions.
F73	Dated subordinated MMA – tier 3	NOT APPLICABLE for the purpose of preparatory phase This is the total amount of date subordinated MMA that meet the criteria for Tier 3.
A74	Undated subordinated MMA with a call option - total	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated subordinated MMA with a call option. A74= B74+D74+F74
B74	Undated subordinated MMA with a call option – tier 1	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated subordinated MMA with a call option that meet the criteria for Tier 1.
C74	Undated subordinated MMA with a call option – tier 1 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated subordinated MMA with a call option that meet the criteria for Tier 1 which are counted under the transitional provisions.
D74	Undated subordinated MMA with a call option – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated subordinated MMA with a call option that meet the criteria for Tier 2.
E74	Undated subordinated MMA with a call option – tier 2 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated subordinated MMA with a call option that meet the criteria for Tier 2 which are counted under the transitional provisions.
F74	Undated subordinated MMA with a call option – tier 3	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated subordinated MMA with a call option that meet the criteria for Tier 3.
A75	Undated subordinated MMA with no contractual opportunity to redeem – total	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated subordinated MMA with no contractual opportunity to redeem. A75= B75+D75+F75
B75	Undated subordinated MMA with no contractual opportunity to redeem – tier 1	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated subordinated MMA with no contractual opportunity to redeem that meet the criteria for Tier 1.
C75	Undated subordinated MMA with no contractual opportunity to redeem – tier 1 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated subordinated MMA with no contractual opportunity to redeem that meet the criteria for Tier 1 which are counted under the transitional provisions.
D75	Undated subordinated MMA with no contractual opportunity to redeem – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated subordinated MMA with no contractual opportunity to redeem that meet the criteria for Tier 2.

E75	Undated subordinated MMA with no contractual opportunity to redeem – tier 2 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated subordinated MMA with no contractual opportunity to redeem that meet the criteria for Tier 2 which are counted under the transitional provisions.
F75	Undated subordinated MMA with no contractual opportunity to redeem – tier 3	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated subordinated MMA with no contractual opportunity to redeem that meet the criteria for Tier 3.
A76	Total subordinated MMA - total	NOT APPLICABLE for the purpose of preparatory phase This is the total subordinated MMA. $A76=A73+A74+A75$
B76	Total subordinated MMA – tier 1	NOT APPLICABLE for the purpose of preparatory phase This is the total of the subordinated MMA that meet the criteria for Tier 1. $B76=B73+B74+B75$
C76	Total subordinated MMA – tier 1 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the total of the subordinated MMA that meet the criteria for Tier 1 which are counted under the transitional provisions. $C76=C73+C74+C75$
D76	Total subordinated MMA – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the total of the subordinated MMA that meet the criteria for Tier 2. $D76=D73+D74+D75$
E76	Total subordinated MMA – tier 2 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the total of the subordinated MMA that meet the criteria for Tier 2 which are counted under the transitional provisions. $E76=E73+E74+E75$
F76	Total subordinated MMA – tier 3	NOT APPLICABLE for the purpose of preparatory phase This is the total of the subordinated MMA that meet the criteria for Tier 3. $F76=F73+F74+F75$
A79	Dated preference shares - total	NOT APPLICABLE for the purpose of preparatory phase This is the total dated preference shares. $A79=C79+D79+F79$
B79	Dated preference shares – tier 1	NOT APPLICABLE for the purpose of preparatory phase This is the total of dated preference shares that meet the criteria for Tier 1.
C79	Dated preference shares – tier 1 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the total of dated preference shares that meet the criteria for Tier 1 which are counted under the transitional provisions.
D79	Dated preference shares – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the total of dated preference shares that meet the criteria for Tier 2.
E79	Dated preference shares – tier 2 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the total of dated preference shares that meet the criteria for Tier 2 which are counted under the transitional provisions.
F79	Dated preference shares – tier 3	NOT APPLICABLE for the purpose of preparatory phase This is the total of dated preference shares that meet the criteria for Tier 3.
A80	Undated preference shares with a call option - total	NOT APPLICABLE for the purpose of preparatory phase This is the total undated preference shares with a call option. $A80=B80+D80+F80$
B80	Undated preference shares with a call option – tier 1	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated preference shares with a call option that meet the criteria for Tier 1.
C80	Undated preference shares with a call option – tier 1 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated preference shares with a call option that meet the criteria for Tier 1 which are counted under the transitional provisions.
D80	Undated preference shares with a call option – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated preference shares with a call option that meet the criteria for Tier 2 .
E80	Undated preference shares with a call option – tier 2 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated preference shares with a call option that meet the criteria for Tier 2 which are counted under the transitional provisions.
F80	Undated preference shares with a call option – tier 3	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated preference shares with a call option that meet the criteria for Tier 3.
A81	Undated preference shares with no contractual opportunity to redeem - total	NOT APPLICABLE for the purpose of preparatory phase This is the total undated preference shares with no contractual opportunity to redeem.
B81	Undated preference shares with no contractual opportunity to redeem – tier 1	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated preference shares with no contractual opportunity to redeem that meet the criteria for Tier 1.
C81	Undated preference shares with no contractual opportunity to redeem – tier 1 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated preference shares with no contractual opportunity to redeem that meet the criteria for Tier 1 which are counted under the transitional provisions.
D81	Undated preference shares with no contractual opportunity to redeem – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated preference shares with no contractual opportunity to redeem that meet the criteria for Tier 2.

E81	Undated preference shares with no contractual opportunity to redeem – tier 2 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated preference shares with no contractual opportunity to redeem that meet the criteria for Tier 2 which are counted under the transitional provisions.
F81	Undated preference shares with no contractual opportunity to redeem – tier 3	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated preference shares with no contractual opportunity to redeem that meet the criteria for Tier 3.
A82	Total preference shares - total	NOT APPLICABLE for the purpose of preparatory phase This is the total preference shares. $A82=B82+D82+F82$
B82	Total preference shares – tier 1	NOT APPLICABLE for the purpose of preparatory phase This is the total of preference shares that meet the criteria for Tier 1. $B82=B79+B80+B81$
C82	Total preference shares – tier 1 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the total of preference shares that meet the criteria for Tier 1 which are counted under the transitional provisions. $C82=C79+C80+C81$
D82	Total preference shares – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the total of preference shares that meet the criteria for Tier 2. $D82=D79+D80+D81$
E82	Total preference shares – tier 2 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the total of preference shares that meet the criteria for Tier 2 which are counted under the transitional provisions. $E82=E79+E80+E81$
F82	Total preference shares – tier 3	NOT APPLICABLE for the purpose of preparatory phase This is the total of preference shares that meet the criteria for Tier 3. $F82=F79+F80+F81$
A92	Dated subordinated liabilities - total	NOT APPLICABLE for the purpose of preparatory phase This is the total of dated subordinated liabilities. $A92=B92+D92+F92$
B92	Dated subordinated liabilities– tier 1	NOT APPLICABLE for the purpose of preparatory phase This is the amount of dated subordinated liabilities that meets the criteria for Tier 1.
C92	Dated subordinated liabilities – tier 1 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the amount of dated subordinated liabilities that meets the criteria for Tier 1 which are counted under the transitional provisions.
D92	Dated subordinated liabilities– tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the amount of dated subordinated liabilities that meets the criteria for Tier 2.
E92	Dated subordinated liabilities– tier 2 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the amount of dated subordinated liabilities that meets the criteria for Tier 2 which are counted under the transitional provisions.
F92	Dated subordinated liabilities– tier 3	NOT APPLICABLE for the purpose of preparatory phase This is the amount of dated subordinated liabilities that meets the criteria for Tier 3.
A93	Undated subordinated liabilities with a call option - total	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated subordinated liabilities that have a call option. $A93=B93+D93+F93$
B93	Undated subordinated liabilities with a call option – tier 1	NOT APPLICABLE for the purpose of preparatory phase This is the amount of undated subordinated liabilities with a call option that meets the criteria for Tier 1.
C93	Undated subordinated liabilities with a call option – tier 1 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the amount of undated subordinated liabilities with a call option that meets the criteria for Tier 1 which are counted under the transitional provisions.
D93	Undated subordinated liabilities with a call option – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the amount of undated subordinated liabilities with a call option that meets the criteria for Tier 2.
E93	Undated subordinated liabilities with a call option – tier 2 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the amount of undated subordinated liabilities with a call option that meets the criteria for Tier 2 which are counted under the transitional provisions.
F93	Undated subordinated liabilities with a call option – tier 3	NOT APPLICABLE for the purpose of preparatory phase This is the amount of undated subordinated liabilities with a call option that meets the criteria for Tier 3.
A94	Undated subordinated liabilities with no contractual opportunity to redeem - total	NOT APPLICABLE for the purpose of preparatory phase This is the total of undated subordinated liabilities with no contractual opportunity to redeem. $A94=B94+D94+F94$
B94	Undated subordinated liabilities with no contractual opportunity to redeem – tier 1	NOT APPLICABLE for the purpose of preparatory phase This is the amount of undated subordinated liabilities with no contractual opportunity to redeem that meets the criteria for Tier 1.
C94	Undated subordinated liabilities with no contractual opportunity to redeem – tier 1 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the amount of undated subordinated liabilities with no contractual opportunity to redeem that meets the criteria for Tier 1 which are counted under the transitional provisions.

D94	Undated subordinated liabilities with no contractual opportunity to redeem – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the amount of undated subordinated liabilities with no contractual opportunity to redeem that meets the criteria for Tier 2.
E94	Undated subordinated liabilities with no contractual opportunity to redeem – tier 2 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the amount of undated subordinated liabilities with no contractual opportunity to redeem that meets the criteria for Tier 2 which are counted under the transitional provisions.
F94	Undated subordinated liabilities with no contractual opportunity to redeem – tier 3	NOT APPLICABLE for the purpose of preparatory phase This is the amount of undated subordinated liabilities with no contractual opportunity to redeem that meets the criteria for Tier 3.
A95	Total subordinated liabilities – total	NOT APPLICABLE for the purpose of preparatory phase This is the total of subordinated liabilities. $A95=A92+A93+A94$
B95	Total subordinated liabilities – tier 1	NOT APPLICABLE for the purpose of preparatory phase This is the total of subordinated liabilities that meets the criteria for Tier 1. $B95=B92+B93+B94$
C95	Total subordinated liabilities – tier 1 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the total of subordinated liabilities that meets the criteria for Tier 1 which are counted under the transitional provisions $C95=C92+C93+C94$
D95	Total subordinated liabilities – tier 2	NOT APPLICABLE for the purpose of preparatory phase This is the amount of subordinated liabilities that meets the criteria for Tier 2. $D95=D92+D93+D94$
E95	Total subordinated liabilities – tier 2 of which counted under transitionals	NOT APPLICABLE for the purpose of preparatory phase This is the amount of subordinated liabilities that meets the criteria for Tier 2 which are counted under the transitional provisions. $E95=E92+E93+E94$
F95	Total subordinated liabilities – tier 3	NOT APPLICABLE for the purpose of preparatory phase This is the amount of subordinated liabilities that meets the criteria for Tier 3. $F95=F92+F93+F94$
A108	Items for which an amount was approved – tier 2 initial amounts	NOT APPLICABLE for the purpose of preparatory phase This the initial amount approved for ancillary own funds for which an amount was approved under tier 2.
B108	Items for which an amount was approved – tier 2 current amounts	NOT APPLICABLE for the purpose of preparatory phase This is the current amount for ancillary own funds for which an amount was approved under tier 2.
C108	Items for which an amount was approved – tier 3 initial amounts	NOT APPLICABLE for the purpose of preparatory phase This the initial amount approved for ancillary own funds for which an amount was approved under tier 3.
D108	Items for which an amount was approved – tier 3 current amounts	NOT APPLICABLE for the purpose of preparatory phase This is the current amount for ancillary own funds for which an amount was approved under tier 3.
B109	Items for which a method was approved – tier 2 current amounts	NOT APPLICABLE for the purpose of preparatory phase This is the current amount for ancillary own funds for which a method was approved under tier 2.

Technical Annex II: List of quantitative reporting items

S.25.01

Solvency Capital Requirement - for undertakings on Standard Formula or Partial Internal Models

ITEM		INSTRUCTIONS
A001	Article 112 ?(Y/N)	NOT APPLICABLE for the purpose of preparatory reporting Identifies whether the reported figures have been requested under Article 112(7), to provide an estimate of the SCR using standard formula
A30	Ring Fenced Fund? (Y/N)	Identifies whether the reported figures are with regard to RFF or with regard to remaining part. One of the options in the following list shall be used: When the items reported refer to a RFF: Y When the items reported refer to a Remaining part: N
A0	Fund number	Identification number for a ring fenced fund; This number is attributed by the undertaking and must be consistent over time and with the fund number in TP (L) F3, item A3, Assets D1 item A2 and Own Funds items A0115.1 ...n. This item is to be completed only when item A30 = Y.
A1	Net solvency capital requirement (including the loss absorbing capacity of technical provisions) – market risk	Amount of the capital charge, including adjustment for the loss absorbing capacity of technical provisions, for market risk, as calculated using the standard formula. If the undertaking does not use the standard formula to calculate any market risks, this item shall not be reported, otherwise it will only reflect either those elements of the market risk calculated using the standard formula, or the part of the undertaking's business for which market risk SCR is calculated using the standard formula. This item equals item C23 on SCR-B3A.
B1	Gross solvency capital requirement (excluding the loss absorbing capacity of technical provisions) – market risk	Amount of the capital charge, excluding adjustment for the loss absorbing capacity of technical provisions, for market risk, as calculated using the standard formula. If the undertaking does not use the standard formula to calculate any market risks, this item shall not be reported, otherwise it will only reflect either those elements of the market risk calculated using the standard formula, or the part of the undertaking's business for which market risk SCR is calculated using the standard formula. This item equals item D23 on SCR-B3A.
AA01 - AA013	Elements of standard formula sub risk modules are covered by partial internal model ? (Y/N)	Identifies whether some elements/or all of the risk within standard formula sub risk modules are calculated using partial internal model if Y, means that some elements/or all of the risks within standard formula sub risk modules are calculated using partial internal model if N, means that all risks within standard formula sub risk modules are covered by the standard formula
A2	Net solvency capital requirement (including the loss absorbing capacity of technical provisions) – counterparty default risk	Amount of capital charge, including adjustment for the loss absorbing capacity of technical provisions, for counterparty default risk, as calculated using the standard formula. If the undertaking does not use the standard formula to calculate any counterparty default risks, this item shall not be reported, otherwise it will only reflect either those elements of the counterparty default risk calculated using the standard formula, or the part of the undertaking's business for which counterparty default risk SCR is calculated using the standard formula. This item equals item D4 on SCR-B3B.
B2	Gross solvency capital requirement (excluding the loss absorbing capacity of technical provisions) – counterparty default risk	Amount of the capital charge, excluding adjustment for the loss absorbing capacity of technical provisions, for counterparty default risk, as calculated using the standard formula. If the undertaking does not use the standard formula to calculate any counterparty default risks, this item shall not be reported, otherwise it will only reflect either those elements of the counterparty default risk calculated using the standard formula, or the part of the undertaking's business for which counterparty default risk SCR is calculated using the standard formula. This item equals item C4 on SCR-B3B.
A02	Elements of standard formula sub risk modules are covered by partial internal model ? (Y/N)	Identifies whether some elements/or all of the risk within standard formula sub risk modules are calculated using partial internal model if N, means that all risks within standard formula sub risk modules are covered by the standard formula
A3	Net solvency capital requirement (including the loss absorbing capacity of technical provisions) – life underwriting risk	Amount of the capital charge, including adjustment for the loss absorbing capacity of technical provisions, for life underwriting risk, as calculated using the standard formula. If the undertaking does not use the standard formula to calculate any life underwriting risk, this item shall not be reported, otherwise it will only reflect either those elements of the life underwriting risk calculated using the standard formula, or the part of the undertaking's business for which life underwriting risk SCR is calculated using the standard formula. This item equals item C11 on SCR-B3C.
B3	Gross solvency capital requirement (excluding the loss absorbing capacity of technical provisions) – life underwriting risk	Amount of the capital charge, excluding adjustment for the loss absorbing capacity of technical provisions, for life underwriting risk, as calculated using the standard formula. If the undertaking does not use the standard formula to calculate any life underwriting risk, this item shall not be reported, otherwise it will only reflect either those elements of the life underwriting risk calculated using the standard formula, or the part of the undertaking's business for which life underwriting risk SCR is calculated using the standard formula. This item equals item D11 on SCR-B3C.
A03	Elements of standard formula sub risk modules are covered by partial internal model ? (Y/N)	Identifies whether some elements/or all of the risk within standard formula sub risk modules are calculated using partial internal model if Y, means that some elements/or all of the risks within standard formula sub risk modules are calculated using partial internal model if N, means that all risks within standard formula sub risk modules are covered by the standard formula
A4	Net solvency capital requirement (including the loss absorbing capacity of technical provisions) – health underwriting risk	Amount of the capital charge, including adjustment for the loss absorbing capacity of technical provisions, for health underwriting risk, as calculated using the standard formula. If the undertaking does not use the standard formula to calculate any health underwriting risk, this item shall not be reported, otherwise it will only reflect either those elements of the health underwriting risk calculated using the standard formula, or the part of the undertaking's business for which health underwriting risk SCR is calculated using the standard formula. This item equals item B27 on SCR-B3D.

B4	Gross solvency capital requirement (excluding the loss absorbing capacity of technical provisions) – health underwriting risk	Amount of the capital charge, excluding adjustment for the loss absorbing capacity of technical provisions, for health underwriting risk, as calculated using the standard formula. If the undertaking does not use the standard formula to calculate any health underwriting risk, this item shall not be reported, otherwise it will only reflect either those elements of the health underwriting risk calculated using the standard formula, or the part of the undertaking's business for which health underwriting risk SCR is calculated using the standard formula. This item equals item A27 on SCR-B3D.
A04	Elements of standard formula sub risk modules are covered by partial internal model ? (Y/N)	Identifies whether some elements/or all of the risk within standard formula sub risk modules are calculated using partial internal model. if Y, means that some elements/or all of the risks within standard fomula sub risk modules are calculated using partial internal model if N, means that all risks within standard fomula sub risk modules are covered by the standard formula.
A5	Net solvency capital requirement (including the loss absorbing capacity of technical provisions) – non-life underwriting risk	Amount of the capital charge, including adjustment for the loss absorbing capacity of technical provisions, for non-life underwriting risk, as calculated using the standard formula. If the undertaking does not use the standard formula to calculate any non-life underwriting risk, this item shall not be reported, otherwise it will only reflect either those elements of the non-life underwriting risk calculated using the standard formula, or the part of the undertaking's business for which non-life underwriting risk SCR is calculated using the standard formula. This item equals item A18 on SCR-B3E.
B5	Gross solvency capital requirement (excluding the loss absorbing capacity of technical provisions) – non-life underwriting risk	Capital charge for health underwriting risk cannot be expressed gross of the loss absorbing capacity of technical provisions, considering the structure of the calculation of the capital charge. Hence B5=A5
A05	Elements of standard formula sub risk modules are covered by partial internal model ? (Y/N)	Identifies whether elements of standard formula sub risk modules are calculated using covered by partial internal mode. if Y, means that some elements or all of the risks within standard fomula sub risk modules are by partial internal model if N, means that all risks within standard fomula sub risk modules are covered by the standard formula
A6	Diversification – net components	Amount of the diversification effects between Basic SCR net components
B6	Diversification – gross components	Amount of the diversification effects between Basic SCR gross components
A7	Net solvency capital requirement (including the loss absorbing capacity of technical provisions) - Intangible asset risk	Amount of the capital charge for intangible assets risk
B7	Gross solvency capital requirement (excluding the loss absorbing capacity of technical provisions) - Intangible assets risk	Capital charge for intangible assets risk cannot be expressed gross of the loss absorbing capacity of technical provisions, considering the structure of the calculation of the capital charge. Hence B7=A7
A07	Elements of standard formula sub risk modules are covered by partial internal model ? (Y/N)	Identifies whether elements of standard formula sub risk modules are calculated using covered by partial internal model if Y, means that some elements or all of the risks within standard fomula sub risk modules are by partial internal model if N, means that all risks within standard fomula sub risk modules are covered by the standard formula
A10	Basic Solvency Capital Requirement – Net	Amount of the basic capital requirements, including adjustment for the loss absorbing capacity of technical provisions, as calculated using the standard formula. If the undertaking does not use the standard formula, this item shall not be reported, otherwise it will only reflect either those elements calculated using the standard formula, or the part of the undertaking's business for which SCR is calculated using the standard formula. This amount shall be calculated as a sum of the net capital charges for each risk module within the standard formula, including adjustment for diversification effect within standard formula. $A10 = \text{sum}(A1...A7)$.
B10	Basic Solvency Capital Requirement – Gross	Amount of the basic capital requirements, excluding adjustment for the loss absorbing capacity of technical provisions, as calculated using the standard formula. If the undertaking does not use the standard formula, this item shall not be reported, otherwise it will only reflect either those elements calculated using the standard formula, or the part of the undertaking's business for which SCR is calculated using the standard formula. This amount shall be calculated as a sum of the net capital charges for each risk module within the standard formula, including adjustment for diversification effect within standard formula $B10 = \text{sum}(B1...B7)$.
A11	Loss – absorbing capacity of technical provisions	Amount of the overall adjustment for loss absorbing capacity of technical provisions. $A11 = \max(\min(B10-A10;A11B);0)$
A12	Loss – absorbing capacity of deferred taxes	Amount of the adjustment for loss absorbing capacity of deferred taxes.
A13	Capital requirement for operational risk	Amount of the capital requirements for operational risk module as calculated using the standard formula. If the undertaking does not use the standard formula to calculate any operational risk , this item shall not be reported, otherwise it will only reflect either those elements of the market risk calculated using the standard formula, or the part of the undertaking's business for which market risk SCR is calculated using the standard formula. This item equals item A16 on SCR-B3G.

A013	Elements of standard formula sub risk modules are covered by partial internal model ? (Y/N)	Identifies whether elements of standard formula sub risk modules are calculated using covered by partial internal model if Y, means that some elements or all of the risks within standard fomula sub risk modules are by partial internal model if N, means that all risks within standard fomula sub risk modules are covered by the standard formula
A31	Individual Notional SCR for the rind fenced fund/remaining part	NOT APPLICABLE when reporting at undertaking level Amount of the notional SCR for the ring fenced fund or for the remaining part. This item has to be reported only when reporting SCR calculation for a ring fenced fund or when reporting SCR calculation for the remaining part. $A31 = A10 - A11 - A12 + A13$
A14A	Diversification between ring fenced funds and between ring fenced funds and remaining part	Amount of the adjustment for a diversification effect between ring fenced funds and between ring fenced funds and remaining part, when the supervisor has approved such diversification. This item has to be reported only when reporting SCR calculation at undertaking level, for the undertaking with ring fenced funds. This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level
A14C	Net Solvency Capital Requirement calculated using standard formula	Amount of the capital requirements, including adjustment for the loss absorbing capacity of technical provisions, as calculated using the standard formula. If the undertaking does not use the standard formula, this item shall not be reported, otherwise it will only reflect either those elements calculated using the standard formula, or the part of the business for which SCR is calculated using the standard formula. This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level
A8	Remaining part of the Solvency Capital Requirement calculated using partial internal model : Net solvency capital requirement (including the loss absorbing capacity of technical provisions and/or deferred taxes when applicable)	Amount of the capital charge, including adjustment for the loss absorbing capacity of technical provisions, as calculated using a partial internal model if any. This amount will only reflect either those elements of the SCR calculated using the partial internal model, or the part of the business for which SCR is calculated using the partial internal model. This item equals item B7 on SCR-B2B. This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level
A9	Diversification effects (between standard formula and partial internal model components) - Net	Amount of the adjustment for the diversification effect between risk modules calculated using the standard formula and components calculated using partial internal models, including the loss absorbing capacity of technical provisions. This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level
A17	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional)	Amount of the capital requirement, calculated according to the rules stated in Art. 17 of Directive 2003/41/EC, for ring-fenced funds relating to pension business operated under Art. 4 of Directive 2003/41/EC. This item is be reported only during the transitional period. This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level
A15	Capital requirement for other financial sectors (Non-insurance capital requirements) (groups only)	Amount of capital requirement for other financial sectors. This item is only applicable to group reporting where the group includes an undertaking which is subject to non-insurance capital requirements, such as a bank, and is the capital requirement calculated in accordance with the appropriate requirements. $A15 = A15A + A15B + A15C$ This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level
A15A	Capital requirement for credit institutions, investment firms and financial institutions	Amount of capital requirement for credit institutions, investment firms and financial institutions. This item is only applicable to group reporting where the group includes undertakings which are credit institutions, investment firms and financial institutions and they are subject to capital requirements, calculated in accordance with the relevant sectoral rules.
A15B	Capital requirement for Institutions for occupational retirement provisions	Amount of capital requirement for institutions for occupational retirement provisions. This item is only applicable to group reporting where the group includes undertaking which are Institutions for occupational retirement provision and subject to non-insurance capital requirements calculated in accordance with the relevant sectoral rules.
A15C	Capital requirement for non regulated entities carrying out financial activities	Amount of capital requirement for non regulated entities carrying out financial activities. This item is only applicable to group reporting where the group includes undertakings which are non - regulated entities carrying out financial activities. This figure represents a notional solvency requirement, calculated if the relevant sectoral rules were to be applied. This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level
A16	Capital requirement for non-controlled participation requirements (groups only)	Amount of the proportional share of the Solvency Capital Requirements of the related insurance and reinsurance undertakings and insurance holding companies which are not controlled participations. This item is only applicable to group reporting and corresponds, for those non controlled entities, to the capital requirement calculated in accordance with the appropriate requirements (whether S2 or sectoral rules depending on the types of undertakings). This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level
A18	Solvency capital requirement, excluding capital add-on	Amount of the total diversified SCR before any capital add-on. $A18 = A14C + A8 + A9 + A17 + A15 + A16$ This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level
A19	Capital add-ons already set	NOT APPLICABLE for the purpose of preparatory phase

		<p>Amount of capital add-on that had been set at the reporting reference date. It will not include capital add-ons set between that date and the submission of the data to the supervisory authority, nor any set after the submission of the data.</p> <p>This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level</p>
A20	Solvency capital requirement	<p>Amount of the SCR. This item has to be reported only when reporting SCR calculation at undertaking level. A20 = A18+A19</p> <p>This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level</p>
A21	Minimum consolidated group solvency capital requirement (groups only)	<p>Amount of the minimum consolidated group Solvency Capital Requirement as stated in art. 230 of Directive 2009/138/EC. This item is applicable to group reporting only.</p> <p>This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level</p>
A14B	Total amount of notional Solvency Capital Requirements for ring fenced funds (other than those related to business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional))	<p>Amount of the sum of notional SCRs of all ring-fenced funds. In case of partial internal model, this item will include notional SCR of ring fenced funds calculated by using the standard formula only. The particular ring-fenced funds relating to business operated in accordance with Art. 4 of Directive 2003/41/EC shall be excluded from this item.</p> <p>This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level</p>
A14	Total amount of notional Solvency Capital Requirements for remaining part	<p>Amount of the notional SCRs of remaining part (A31 on SCR B2A Remaining Part).</p> <p>In case of partial internal model, this item will include notional SCR of remaining part calculated by using the standard formula only.</p> <p>This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level</p>
A11A	Gross future discretionary benefits	<p>NOT APPLICABLE for preparatory phase</p> <p>Amount of technical provisions without risk margin in relation to future discretionary benefits gross of reinsurance.</p> <p>This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level</p>
A11B	Net future discretionary benefits	<p>Amount of technical provisions without risk margin in relation to future discretionary benefits net of reinsurance.</p> <p>This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level</p>

Technical Annex II: List of quantitative reporting items

S.25.02

Solvency Capital Requirement - for undertakings on Partial Internal Models

ITEM		INSTRUCTIONS
A1	Components in descending order of size	<p>Identification, using free text, of each of the components that can be identified by the undertaking within the partial internal model. These components may not exactly align with the risks defined for the standard formula. Each component shall be identified using a separate entry, in descending order. The order will depend on the size of the components reported in item B1 (if they are reported, otherwise, according to item C1).</p> <p>Undertakings shall identify and report components consistently across different reporting periods, unless there has been some change to internal model affecting the categories.</p>
A1A	Unique number of component	<p>Unique number of each component of the partial internal model, agreed with their national supervisory authority to identify uniquely components from their model. This number shall always be used with the appropriate component description reported in each item A1.</p>
A1B	Modelling approach to calculation of loss absorbing capacity of technical provisions	<p>To identify modelling approach to a calculation of the loss absorbing capacity of technical provisions . The following closed list of options shall be used:</p> <ul style="list-style-type: none"> . Modelled and identifiable; . Modelled but not identifiable; . Not modelled. <p>Depending on each case, the information reported in cell B1, C1 and B5 will vary:</p> <ul style="list-style-type: none"> - if it is modelled and identifiable, B1 and C1 will be respectively reported for the capital charge including and excluding this loss absorbing capacity, and B5 will not be reported and an estimate of an adjustment will be reported for information only in C5 . if it is modelled but not identifiable, B1 and C1 will both be reported for the capital charge including this loss absorbing capacity,i.e. net basis; and B5 will not be reported and an estimate of an adjustment will be reported for information only in C5 - if it is not modelled, B1 and C1 will both be reported for the capital charge excluding this loss absorbing capacity, i.e. on gross basis and B5 will be reported.
A1C	Modelling approach to calculation of loss absorbing capacity of deferred taxes	<p>To identify modelling approach to a calculation of the loss absorbing capacity of deferred taxes . The following closed list of options shall be used:</p> <ul style="list-style-type: none"> . Modelled and identifiable; . Modelled but not identifiable; . Not modelled. <p>Depending on each case, the information reported in cell B1, C1 and B6 will vary:</p> <ul style="list-style-type: none"> - if it is modelled and identifiable, B1 and C1 will be respectively reported for the capital charge including/ and excluding loss absorbing capacity, and B6 will not be reported and an estimate of an adjustment will be reported for information only in C6 . if it is modelled but not identifiable, B1 and C1 will both be reported for the capital charge including this loss absorbing capacity,i.e. net basis; and B6 will not be reported and an estimate of an adjustment will be reported for information only in C6 - if it is not modelled, B1 and C1 will both be reported for the capital charge excluding this loss absorbing capacity, i.e. on gross basis and B6 will be reported.
B1	Net solvency capital requirement (including the loss absorbing capacity of technical provisions and /or deferred taxes when applicable) of each component	<p>Amount of the net capital charge for each component, including adjustments for loss absorbing capacity of technical provision or deferred taxes when applicable, calculated by the partial internal model on an undiversified basis, to the extent that these adjustments are modeled within components.</p> <p>The capital charges shall be reported in decreasing order of size (which may of course change from one reporting period to another).</p> <ul style="list-style-type: none"> - if modelled and identifiable or not identifiable, B1 represents net capital charge, including loss absorbing capacity, for each component: B5 and/ or B6 will not be reported: an estimate of an adjustment will be reported for information only in C5 and/or C6 '- if not modelled, B1 represents gross capital charge, excluding loss absorbing capacity, for each component; i.e. B5 and/or B6 will be reported.
C1	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions and/or deferred taxes when applicable) of each component	<p>Amount of the gross capital charge for each component (gross of adjustments for loss absorbing capacity of technical provision or deferred taxes when applicable) calculated by the partial internal model on an undiversified basis, to the extent that these adjustments are modeled within components.</p>

		-if modelled and identifiable,C1 represents gross capital charge i.e. excluding this loss absorbing capacity, for each component; B5 and or B6 will not be reported; an estimate of an adjustment will be reported for information only in C5 and/or C6 '- if modelled but not identifiable, C1 will be reported for the capital charge including this loss absorbing capacity,i.e. net basis; B5 and /or B6 will not be reported; an estimate of an adjustment will be reported for information only in C5 and/or C6 - if not modelled, C1 represents gross capital charge, i.e. excluding this loss absorbing capacity; B5 and/or B6 will be reported.
B2	Total of undiversified components – net	B2 = Sum (all B1 items)
C2	Total of undiversified components - gross	C2 = Sum (all C1 items)
B3	Diversification – net components	The total amount of the diversification within net components calculated using the partial internal model.
C3	Diversification – gross components	The total amount of the diversification within gross components calculated using the partial internal model.
B4	Net solvency capital requirement calculated using partial internal model including the loss absorbing capacity of technical provisions and/or deferred taxes ,if modelled within components	The amount of the total solvency capital requirement calculated using partial internal model after diversification and including adjustments for loss absorbing capacity of technical provisions and deferred tax, to the extent that those adjustments are modelled within components and are identifiable or not identifiable (in such cases, B5 and B6 will not be reported and an estimate of an adjustment will be reported for information only in C5 and C6 respectively). In cases where those adjustments for loss absorbing capacity of technical provisions and deferred tax are not modeled within components, B4 represents the SCR on gross basis, excluding those adjustments, B4= C4. B4= B2+B3
C4	Gross solvency capital requirement calculated using partial internal model excluding the loss absorbing capacity of technical provisions and/or deferred taxes, if modelled within components	The amount of the total solvency capital requirement calculated using partial internal model after diversification and excluding adjustments for loss absorbing capacity of technical provisions and deferred tax, to the extent that those adjustments are modelled and identifiable within components. When adjustments are modelled and identifiable by component, the amounts in item C4 will differ from the corresponding amounts in item B4 to the extent of this loss absorbing capacity; An estimate of respective adjustments will be reported for information only in C5 and C6 as appropriate. When adjustments for loss absorbing capacity of technical provisions and deferred tax are modelled but non identifiable by component, both items B4 and C4 will be reported on net basis, i.e. including those adjustments. An estimate of the respective adjustments will reported for information only in C5 and C6. as When adjustment is not modelled within components , both items B4 and C4 will be reported on gross basis.; the adjustment are to be reported in B5 and/or B6 as appropriate C4=C2+C3
B5	Loss-absorbing capacity of technical provisions if not modelled within partial internal model	Amount of the overall adjustment for net loss absorbing capacity of technical provision. This item is to be reported only if adjustments are not modeled within each component.
B6	Loss absorbing capacity for deferred taxes if not modelled within partial internal model	Amount of the adjustment for net deferred taxation. This item is to be reported only if adjustments are not modeled within each component.
B7	Solvency capital requirement calculated using a partial internal model	Amount of the net solvency capital charge calculated using partial internal models.B7= B4+ B5+B6 This item equals item A8 on SCR B2A.
C5	Estimate of loss-absorbing capacity of technical provisions if modelled within components	This item is only reported for information, in cases where adjustments for loss absorbing capacity of technical provision are modelled within components. C5 = if(B5<>0,0,max (min(C4-B4-C6;A11B);0))
C6	Estimate of loss-absorbing capacity of deferred tax if modelled within components	This item is only reported for information, in cases where adjustments for loss absorbing capacity of deferred taxes are modelled within components.
B8	Total amount of Notional Solvency Capital Requirements for ring fenced funds (other than those related to business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional) and remaining part	An amount of the sum of notional SCRs of all ring-fenced funds calculated by partial internal model
B8AA	Total amount of Notional Solvency Capital Requirements for remaining part	An amount on notional SCR for remaining part calculated using partial internal model
B8A	Diversification between ring fenced funds and between ring fenced funds and remaining part	NOT APPLICABLE for the purpose of preparatory phase Amount of the diversification adjustment for ring fenced funds, when the supervisor has approved such diversification.
A11A	Gross future discretionary benefits	Amount of technical provisions without risk margin in relation to future discretionary benefits gross of reinsurance

A11B	Net future discretionary benefits	Amount of technical provisions without risk margin in relation to future discretionary benefits net of reinsurance
B9	Date of formal approval of partial internal model	NOT APPLICABLE for the purpose of preparatory phase The date on which the partial internal model was approved, reported using ISO 8601.

Technical Annex II: List of quantitative reporting items

S.25.03

Solvency Capital Requirement - for undertakings on Full Internal Models

ITEM		INSTRUCTIONS
A1	Components in descending order of size	Identification, using free text, of each of the components that can be identified by the undertaking within the full internal model. These components may not exactly align with the risks defined for the standard formula. Each component shall be identified using a separate entry, in descending order. The order will depend on the size of the components reported in item B1. Undertakings shall identify and report components consistently across different reporting periods, unless there has been some change to internal model affecting the categories.
A1A	Unique number of component	Unique number of each component of the full internal model, agreed with their national supervisory authority to identify uniquely components from their model. This number shall always be used with the appropriate component description reported in each item A1.
A1B	Modelling approach to calculation of loss absorbing capacity of technical provisions	To identify modelling approach to a calculation of the loss absorbing capacity of technical provisions . The following closed list of options shall be used: . Modelled and identifiable; . Modelled but not identifiable; . Not modelled. Depending on each case, the information reported in cell B1, C1 and B5 will vary: - if it is modelled and identifiable, B1 and C1 will be respectively reported for the capital charge including and excluding this loss absorbing capacity, and B5 will not be reported and an estimate of an adjustment will be reported for information only in C5 - if it is modelled but not identifiable, B1 and C1 will both be reported for the capital charge including this loss absorbing capacity,i.e. net basis; and B5 will not be reported and an estimate of an adjustment will be reported for information only in C5 - if it is not modelled, B1 and C1 will both be reported for the capital charge excluding this loss absorbing capacity, i.e. on gross basis and B5 will be reported.
A1C	Modelling approach to calculation of loss absorbing capacity of deferred taxes	To identify modelling approach to a calculation of the loss absorbing capacity of deferred taxes . The following closed list of options shall be used: . Modelled and identifiable; . Modelled but not identifiable; . Not modelled. Depending on each case, the information reported in cell B1, C1 and B6 will vary: - if it is modelled and identifiable, B1 and C1 will be respectively reported for the capital charge including/ and excluding loss absorbing capacity, and B6 will not be reported and an estimate of an adjustment will be reported for information only in C6 - if it is modelled but not identifiable, B1 and C1 will both be reported for the capital charge including this loss absorbing capacity,i.e. net basis; and B6 will not be reported and an estimate of an adjustment will be reported for information only in C6 - if it is not modelled, B1 and C1 will both be reported for the capital charge excluding this loss absorbing capacity, i.e. on gross basis and B6 will be reported.
B1	Net solvency capital requirement (including the loss absorbing capacity of technical provisions and /or deferred taxes when applicable) of each component	Amount of the capital charge for each component, including adjustments for loss absorbing capacity of technical provision and/ or deferred taxes when applicable, calculated by the full internal model on an undiversified basis, to the extent that these adjustments are modeled within components. The capital charges shall be reported in decreasing order of size (which may of course change from one reporting period to another). - if modelled and identifiable or not identifiable, B1 represents net capital charge, including loss absorbing capacity, for each component: B5 and/ or B6 will not be reported: an estimate of an adjustment will be reported for information only in C5 and/or C6 - if not modelled, B1 represents gross capital charge, excluding loss absorbing capacity, for each component; i.e. B5 and/or B6 will be reported.
C1	Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions and/or deferred taxes when applicable)	Amount of the gross capital charge for each component (gross of adjustments for loss absorbing capacity of technical provision or deferred taxes when applicable) calculated by the full internal model on an undiversified basis, to the extent that these adjustments are modelled and identifiable within components.

		<p>-if modelled and identifiable, C1 represents gross capital charge i.e. excluding this loss absorbing capacity, for each component; B5 and or B6 will not be reported; an estimate of an adjustment will be reported for information only in C5 and/or C6</p> <p>- if modelled but not identifiable, C1 will be reported for the capital charge including this loss absorbing capacity,i.e. net basis; B5 and /or B6 will not be reported; an estimate of an adjustment will be reported for information only in C5 and/or C6</p> <p>- if not modelled, C1 represents gross capital charge, i.e. excluding this loss absorbing capacity; B5 and/or B6 will be reported.</p>
B2	Total of undiversified components - net	$B2 = \text{Sum (all B1 items)}$
C2	Total of undiversified components – gross	$C2 = \text{Sum (all C1 items)}$
B3	Diversification – net components	The total amount of the diversification within net solvency capital requirements per components calculated using the full internal model.
C3	Diversification – gross components	The total amount of the diversification within gross solvency capital requirement per components calculated using the full internal model.
B4	Net solvency capital requirement calculated using full internal model before adjustments	The amount of the total solvency capital requirement calculated using full internal model after diversification and including adjustments for loss absorbing capacity of technical provisions and deferred tax, to the extent that those adjustments are modelled within components and are identifiable or not identifiable (in such cases, B5 and B6 will not be reported and an estimate of an adjustment will be reported for $B4 = B2 + B3$)
C4	Gross solvency capital requirement calculated using full internal model before adjustments	<p>The amount of the total solvency capital requirement calculated using full internal model after diversification and excluding adjustments for loss absorbing capacity of technical provisions and deferred tax, to the extent that those adjustments are modelled and identifiable within components.</p> <p>When adjustments are modelled and identifiable by component, the amounts in item C4 will differ from the corresponding amounts in item B4 to the extent of this loss absorbing capacity; An estimate of respective adjustments will be reported for information only in C5 and C6 as appropriate.</p> <p>When adjustments for loss absorbing capacity of technical provisions and deferred tax are modelled but non identifiable by component, both items B4 and C4 will be reported on net basis, i.e. including those adjustments. An estimate of the respective adjustments will reported for information only in C5 and C6. as appropriate.</p> <p>When adjustment is not modelled within components , both items B4 and C4 will be reported on gross basis.; the adjustment are to be reported in B5 and/or B6 as $C4 = C2 + C3$</p>
B5	Loss-absorbing capacity of technical provisions if not modelled within components	Amount of the overall adjustment for net loss absorbing capacity of technical provision. This item is to be reported only if adjustments are not modeled within each component.
B6	Loss absorbing capacity for deferred taxes if not modelled within components	Amount of the adjustment for net deferred taxation. This item is to be reported only if adjustments are not modeled within each component.
B7	Capital requirement for other financial sectors (Non-insurance capital requirements) (groups only)	<p>Amount of capital requirement for other financial sectors. This item is only applicable to group reporting where the group includes an undertaking which is subject to non-insurance capital requirements, such as a bank, and is the capital requirement calculated in accordance with the appropriate requirements.</p> <p>$B7 = B7A + B7B + B7C$</p>
B7A	Capital requirement for credit institutions, investment firms and financial institutions	Amount of capital requirement for credit institutions, investment firms and financial institutions. This item is only applicable to group reporting where the group includes undertakings which are credit institutions, investment firms and financial institutions and they are subject to capital requirements, calculated in accordance with the relevant sectoral rules.
B7B	Capital requirement for institutions for occupational retirement provision	Amount of capital requirement for institutions for occupational retirement provisions. This item is only applicable to group reporting where the group includes undertaking which are Institutions for occupational retirement provision and subject to non-insurance capital requirements calculated in accordance with the relevant sectoral rules.
B7C	Capital requirement for non regulated entities carrying out financial activities	Amount of capital requirement for non regulated entities carrying out financial activities. This item is only applicable to group reporting where the group includes undertakings which are non - regulated entities carrying out financial activities. This figure represents a notional solvency requirement, calculated if the relevant sectoral rules were to be applied.

B8	Capital requirement for non-controlled participation requirements (groups only)	Amount of the proportional share of the Solvency Capital Requirements of the related insurance and reinsurance undertakings and insurance holding companies which are not controlled participations. This item is only applicable to group reporting and corresponds, for those non controlled entities, to the capital requirement calculated in accordance with the appropriate requirements (whether S2 or sectoral rules depending on the types of undertakings).
B9	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional)	Amount of the capital requirement, calculated according to the rules stated in Art. 17 of Directive 2003/41/EC, for ring-fenced funds relating to pension business operated under Art. 4 of Directive 2003/41/EC. This item is reported only during the transitional period.
B10	The net capital requirement calculated using full internal model, excluding capital add-on	Amount of the total diversified SCR before any capital add-on. $B10 = B4 + B5 + B6 + B7 + B8 + B9$
B11	Capital add-ons already set	NOT APPLICABLE for the purpose of preparatory phase Amount of capital add-on that had been set at the reporting reference date. It will not include capital add-ons set between that date and the submission of the data to the supervisory authority, nor any set after the submission of the data.
B12	Solvency capital requirement calculated using full internal model	Amount of total SCR calculated using full internal model $B12 = B10 + B11$
B13	Minimum consolidated group solvency capital requirement (groups only)	Amount of the minimum consolidated group Solvency Capital Requirement as stated in art. 230 of Directive 2009/138/EC. This item is applicable to group reporting only. This item has to be reported only when reporting SCR calculation at the undertaking level.
C5	Estimate of loss-absorbing capacity of technical provisions if modelled within components	This item is only reported for information, in cases where adjustments for loss absorbing capacity of technical provision are modelled within components. $C5 = \text{if}(B5 < > 0, 0, \text{max}(\text{min}(C4 - B4 - C6; A11B); 0))$
C6	Estimate of loss-absorbing capacity of deferred tax if modelled within components	This item is only reported for information, in cases where adjustments for loss absorbing capacity of deferred taxes are modelled within components.
B14	Total amount of Notional Solvency Capital Requirements for ring fenced funds (other than those related to business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional) and remaining part	An amount of the sum of notional SCRs of all ring-fenced funds calculated by full internal model
B14AA	Total amount of Notional Solvency Capital Requirements for remaining part	Amount on notional SCR for remaining part calculated using full internal model
B14A	Diversification between ring fenced funds and between ring fenced funds and remaining part	NOT APPLICABLE for the purpose of preparatory phase Amount of the diversification adjustment for ring fenced funds, when the supervisor has approved such diversification.
A11A	Gross future discretionary benefits	Amount of technical provisions without risk margin in relation to future discretionary benefits gross of reinsurance
A11B	Net future discretionary benefits	Amount of technical provisions without risk margin in relation to future discretionary benefits net of reinsurance
B15	Date of formal approval of internal model	NOT APPLICABLE for the purpose of preparatory phase The date on which the full internal model was approved, reported using ISO 8601.

Technical Annex II: List of quantitative reporting items

S.26.01

Solvency Capital Requirement - Market risk

ITEM		INSTRUCTIONS
A00	Simplifications spread risk ; bonds and loans (Y/N)	Identify whether an undetaking used simplifications for the calculation of spread risk with regard to bonds and loans. The following options shall be used: Y; N.
AA01	Captives simplifications – interest rate risk (Y/N)	Identify whether a captive undertaking used simplifications for the calculation of interest rate risk. The following options shall be used: Y; N.
AA02	Captives simplifications – spread risk (Y/N)	Identify whether a captive undetaking used simplifications for the calculation of spread risk. The following options shall be used: Y; N.
AA03	Captives simplifications – market risk concentration (Y/N)	Identify whether a captive undetaking used simplifications for the calculation of market risk concentration. The following options shall be used: Y; N.
A30	Ring Fenced Fund? (Y/N)	Identifies whether the reported figures are with regard to RFF or with regard to remaining part . One of the options in the following list shall be used: When the items reported refer to a RFF: Y When the items reported refer to a Remaining part: N
A0	Fund number	Identification number for a ring fenced fund; This number is attributed by the undertaking and must be consistent over time and with the fund number in TP (L) F3, item A3, Assets D1 item A2 and Own Funds items A0115.1 ...n. This item is to be reported only when item A30 = Y.
Interest rate risk		
C0	Absolute value after shock – Net solvency capital requirement (including the loss absorbing capacity of technical provisions) - interest rate risk	This is the net capital charge for interest rate risk, i.e after adjustment for the loss absorbing capacity of technical provisions: If AA01=Y, this item represents the net capital charge for interest rate risk calculated using simplified calculations for captive undertakings.
D0	Absolute value after shock – Gross solvency capital requirement (excluding the loss-absorbing capacity of technical provisions) – interest rate risk	This is the gross capital charge for interest rate risk, i.e before adjustment for the loss absorbing capacity of technical provisions: If AA01=Y, this item represents the net capital charge for interest rate risk calculated using simplified calculations for captive undertakings.
A1	Initial absolute values before shock – Assets – Interest rate risk	This is the total value of the assets sensitive to interest rate down shock risk, before shock
A2	Initial absolute values before shock – Assets – Interest rate risk	This is the total value of the asset-sensitive to interest rate up shock risk , before shock
A1A	Initial absolute values before shock – Liabilities – Interest rate risk	This is the total value of the liabilities sensitive to interest rate down shock risk, before shock
A2A	Initial absolute values before shock – Liabilities – Interest rate risk	This is the total value of the liabilities sensitive to interest rate up shock risk , before shock
B1	Absolute values after shock – Assets – Interest rate risk – interest rate down shock	This is the absolute value of assets subject to interest rate down risks after the shock.
B2	Absolute values after shock – Assets – Interest rate risk – interest rate up shock	This is the absolute value of assets subject to interest rate up risks after the shock.
B1A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Interest rate risk- interest rate down shock	This is the absolute value of liabilities (including the loss absorbing capacity of technical provisions) subject to interest rate down risks after the shock.
B2A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provision – Interest rate risk- interest rate up shock	This is the absolute value of liabilities (including the loss absorbing capacity of technical provisions) subject to interest rate up risks after the shock.
C1	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – interest rate risk- interest rate down shock	This is the net capital charge for interest rate down risk, after adjustment for the loss absorbing capacity of technical provisions. $C1 = (A1 - B1) - (A1A - B1A)$ If AA01=Y, item C1 represents the net capital charge for interest rate down risk calculated using simplifications.
C2	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – interest rate risk- interest rate up shock	This is the net capital charge for interest rate up risk, after adjustment for the loss absorbing capacity of technical provisions. $C2 = (A2 - B2) - (A2A - B2A)$. The value of $C2 \geq 0$ If AA01=Y, item C2 represents the net capital charge for interest rate up risk calculated using simplifications.
B1B	Absolute values after shock – Liabilities Interest rate risk- interest rate down shock (excluding the loss-absorbing capacity of technical provisions)	This is the absolute value of liabilities (excluding the loss absorbing capacity of technical provisions) subject to interest rate down risks after the shock.
B2B	Absolute values after shock – Liabilities Interest rate risk- interest rate up shock (excluding the loss-absorbing capacity of technical provisions)	This is the absolute value of liabilities (excluding the loss absorbing capacity of technical provisions) subject to interest rate up risks after the shock.

D1	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- interest rate risk - interest rate down shock	This is the gross capital charge for the interest rate down risk, i.e excluding the loss absorbing capacity of Technical provisions The $D1 = (A1 - B1) - (A1A - B1B)$, the value of $D1 \geq 0$ IF $AA01=Y$, D1 represents the gross capital charge for interest rate down risk calculated using simplifications.
D2	Absolute value after shock – Gross solvency capital (excluding the loss-	This is the gross capital charge for interest rate up risk i.e excluding the loss absorbing capacity of Technical provisions.

	absorbing capacity of technical provisions)- interest rate up shock	$D2 = (A2 - B2) - (A2A - B2B)$ If $AA01=Y$, item D2 represents the net capital charge for interest rate up risk calculated using simplifications.
Equity risk		
C3	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – equity risk	This is the net capital charge for equity risk, i.e after adjustment for the loss absorbing capacity of technical provisions. The value of C3 ≥ 0 .
D3	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- equity risk	This is the gross capital charge for equity risk, i.e before adjustment for the loss absorbing capacity of technical provisions. The value of D3 ≥ 0 .
A4	Initial absolute values before shock – Assets – equity risk – type 1 equities	This is the initial absolute value of the assets subject to the equity risk charge related to type 1 equities $A4 = A5 + A6 + A7$
A4A	Initial absolute values before shock – Liabilities – equity risk – type 1 equities	This is the initial absolute value of the liabilities ,subject to equity risk related to type 1 equities.
B4	Absolute values after shock – Assets – Equity risk – type 1 equities	This is the absolute value of the assets underlying equity risk charge for type 1 equities category, after the shock. $B4 = B5 + B6 + B7$
B4A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provision – Equity risk –type 1 equities	This is the absolute value of the liabilities underlying equity risk charge for type 1 equities, after the shock and including the loss absorbing capacity of technical provisions.
C4	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – equity risk –type 1 equities	This is the net capital charge for equity risk (for type 1 equities), after adjustment for the loss absorbing capacity of technical provisions. $C4 = (A4 - B4) - (A4A - B4A)$ The value of C4 ≥ 0 .
B4B	Absolute values after shock – Liabilities (excluding the loss absorbing capacity of technical provisions) - equity risk –type 1 equities	This is the absolute value of the liabilities underlying equity risk charge (for type 1 equities), after the shock but excluding the loss absorbing capacity of technical provisions.
D4	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- Equity risk –type 1 equities	This is the gross capital charge for equity risk for type 1 equities, i.e excluding the loss absorbing capacity of technical provisions $D4 = (A4 - B4) - (A4A - B4B)$ The value of D4 ≥ 0 .
A5	Initial absolute values before shock – Assets – equity risk –type 1 equities – type 1 equity	This is the initial absolute value of the assets subject to the equity risk,(for type 1 equities, type 1 equity).
B5	Absolute values after shock – Assets – equity risk –type 1 equities –type 1 equity	This is the absolute value of the assets subject the equity risk charge , (for type 1 equities, type 1 equity), after the shock.
A6	Initial absolute values before shock – Assets – equity risk –type 1 equities – strategic participation	This is the initial absolute value of the assets subject to the equity risk (for type 1 equities, strategic participations).
B6	Absolute values after shock – Assets – equity risk –type 1 equities – strategic participation	This is the absolute value of the assets subject to equity risk (for type 1 equities, strategic participations), after the shock.
A7	Absolute values before shock – Assets – equity risk – type 1 equities – duration based	This is the absolute value of the assets subject to the equity risk (for type 1 equities, duration based).
B7	Absolute values after shock – Assets – equity risk – type 1 equities – duration based	This is the absolute value of the assets subject to equity risk (for type 1 equities, duration based), after the shock
A8	Initial absolute values before shock – Assets – equity risk –type 2 equities	This is the initial absolute value of the assets subject to the equity risk for type 2 equities $A8 = A9 + A10 + A11$
A8A	Initial absolute values before shock – Liabilities – equity risk –type 2 equities	This is the initial absolute value of liabilities subject to the equity risk-for type 2 equities
B8	Absolute values after shock – Assets – Equity risk – type 2 equities	This is the absolute value of the assets subject to equity risk charge for type 2 equities, after the shock. $B8 = B9 + B10 + B11$
B8A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provision – Equity risk –type 2 equities	This is the absolute value of liabilities subject to equity risk (for type 2 equities), after the shock and including the loss absorbing capacity of technical provisions
C8	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – equity risk –type 2 equities	This is the net capital charge for equity risk (for type 2 equities) after adjustment for the loss absorbing capacity of technical provisions. $C8 = (A8 - B8) - (A8A - B8A)$ The value of C8 ≥ 0 .

B8B	Absolute values after shock – Liabilities (excluding the loss absorbing capacity of technical provisions) equity risk –type 2 equities	This is the absolute value of the liabilities subject to equity risk (for type 2 equities), after the shock but excluding the loss absorbing capacity of technical provisions.
D8	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- Equity risk –type 2 equities	This is the gross capital charge for equity risk for type 2 equities, i.e excluding the loss absorbing capacity of technical provisions The $D8 = (A8 - B8) - (A8A - B8B)$ The value of $D8 \geq 0$
A9	Initial absolute values before shock – Assets – equity risk –type 2 equities –type 2 equity	This is the value of the assets subject to the equity risk for type 2 equities
B9	Absolute values after shock – Assets – equity risk –type 2 equities –type 2 equity	This is the absolute value of the assets subject to equity risk (for type 2 equities), after the equity shock.
A10	Initial absolute values before shock – Assets – equity risk – type 2 equities – strategic participations	This is the value of the assets subject to the equity risk for type 2 equities, strategic participations).
B10	Absolute values after shock – Assets – equity risk –type 2 equities – strategic participations	This is the absolute value of the assets subject to equity risk (for type 2 equities, strategic participations), after the equity shock.
A11	Initial absolute values before shock – Assets – equity risk – type 2 equities - duration based	This is the absolute value of the assets subject to the equity risk (for type 2 equities, duration based)
B11	Absolute values after shock – Assets – Equity risk – type 2 equities - duration based	This is the absolute value of the assets subject to equity risk for type 2 equities category, duration based, after the shock

Property risk

A12	Initial absolute values before shock – Assets – Property risk	This is the absolute value of the assets subject to the property risk-
A12A	Initial absolute values before shock – Liabilities – Property risk	This is the value of the liabilities value subject to the property risk charge.
B12	Absolute values after shock – Assets – Property risk	This is the absolute value of the assets subject to property risk charge, after the property shock.
B12A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provision – Property risk	This is the absolute value of the liabilities underlying property risk charge, after the property shock and including the loss absorbing capacity of technical provisions
C12	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – property risk	This is the net capital charge for property risk, after adjustment for the loss absorbing capacity of technical provisions. $C12 = (A12 - B12) - (A12A - B12A)$ The value of $C12 \geq 0$.
B12B	Absolute values after shock – Liabilities (excluding the loss absorbing capacity of technical provisions) - property risk	This is the absolute value of the liabilities underlying property risk charge, after the property shock but excluding the loss absorbing capacity of technical provisions.
D12	Absolute value after shock – Gross solvency capital(excluding the loss-absorbing capacity of technical provisions)- Property risk	This is the gross capital charge for property risk, i.e excluding the loss absorbing capacity of technical provisions. $D12 = (A12 - B12) - (A12A - B12B)$ The value of $D12 \geq 0$

Spread risk

C13	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – spread risk	This is the net capital charge for spread risk, after adjustment for the loss absorbing capacity of technical provisions. $C13 = (C14 + C15 + C18)$ The value of $C13 \geq 0$.
D13	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- spread risk	This is the gross capital charge for spread risk, before adjustment for the loss absorbing capacity of technical provisions. $D13 = (D14 + D15 + D18)$ The value of $D13 \geq 0$
A14	Initial absolute values before shock – Assets – spread risk – bonds and loans	This is the absolute value of the assets subject to the spread risk-for bonds and loans.
A14A	Initial absolute values before shock – Liabilities – spread risk – bonds and loans	This is the absolute value of the liabilities subject to the spread risk for bonds and loans.

B14	Absolute values after shock – Assets – spread risk – bonds and loans	This is the absolute value of the assets subject to the spread risk for bonds and loans, after the shock.
B14A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provision – spread risk – bonds and loans	This is the absolute value of the liabilities underlying the spread risk charge for bonds and loans, after the shock and including the loss absorbing capacity of technical provisions.
C14	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – spread risk – bonds and loans	This is the net capital charge for spread risk on bonds and loans, after adjustment for the loss absorbing capacity of technical provisions. $C14 = (A14 - B14) - (A14A - B14A)$ The value of $C14 \geq 0$. If $Y00 = Y$, $C14$ represents the net solvency capital requirement for spread risk - bonds and loans, calculated using simplifications
B14B	Absolute values after shock – Liabilities (excluding the loss absorbing capacity of technical provisions)– spread risk – bonds and loans	This is the absolute value of the liabilities subject to the spread risk for bonds and loans, after the shock but excluding the loss absorbing capacity of technical provisions.
D14	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- spread risk - bonds and loans	This is the gross capital charge for spread risk on bonds and loans, i.e excluding the loss absorbing capacity of technical provisions . $D14 = (A14 - B14) - (A14A - B14B)$ The value of $D14 \geq 0$. If $A00 = Y$, $D14$ represents gross solvency capital requirement for spread risk - bonds and loans calculated using simplifications. -
C15	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – spread risk - credit derivatives	This is the net capital charge for spread risk on credit derivatives, after adjustment for the loss absorbing capacity of technical provisions. The value of $C15 \geq 0$
D15	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- spread risk - credit derivatives	This is the gross capital charge for spread risk on credit derivatives, i.e before adjustment for the loss absorbing capacity of technical provisions. . The value of $D15 \geq 0$.
A16	Initial absolute values before shock – Assets - spread risk – credit derivatives – downward shock on credit derivatives	This is the absolute value of assets subject to the downward shock in respect to the spread risk on credit derivatives.
A16A	Initial absolute values before shock – Liabilities - spread risk – credit derivatives – downward shock on credit derivatives	This is the absolute value of the liabilities subject to the downward shock in respect to spread risk on credit derivatives.
B16	Absolute values after shock – Assets – spread risk – credit derivatives – downward shock on credit derivatives	This is the absolute value of the assets subject the downward shock for spread risk on credit derivatives, after the shock.
B16A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provision – spread risk –credit derivatives – downward shock on credit derivatives	This is the absolute value of the liabilities subject to the downward shock for spread risk on credit derivatives, after the shock and including the loss absorbing capacity of technical provisions.
C16	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – spread risk - credit derivatives – downward shock on credit derivatives	This is the net capital charge for the downward shock for spread risk on credit derivatives, after adjustment for the loss absorbing capacity of technical provisions. $C16 = (A16 - B16) - (A16A - B16A)$ The value of $C16 \geq 0$.
B16B	Absolute values after shock – Liabilities (excluding the loss absorbing capacity of technical provisions)– spread risk –credit derivatives – downward shock on credit derivatives	This is the absolute value of the liabilities subject to the downward shock for spread risk on credit derivatives, after the shock but excluding the loss absorbing capacity of technical provisions.
D16	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- spread risk - credit derivatives – downward shock on credit derivatives	This is the gross capital charge for the downward shock for spread risk on credit derivatives, i.e excluding the loss absorbing capacity of technical provisions. $D16 = (A16 - B16) - (A16A - B16B)$ The value of $D16 \geq 0$.
A17	Initial absolute values before shock – Assets - spread risk – credit derivatives - upward shock on credit derivatives	This is the absolute-value of assets subject to the upward shock in respect to the spread risk on credit derivatives-
A17A	Initial absolute values before shock – Liabilities - spread risk – credit derivatives - upward shock on credit derivatives	This is the absolute value of the liabilities subject to-the upward shock in respect to spread risk on credit derivatives.

B17	Absolute values after shock – Assets – spread risk – credit derivatives – upward shock on credit derivatives	This is the absolute value of the assets subject to the upward shock for spread risk on credit derivatives, after the shock
B17A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provision – spread risk – credit derivatives – upward shock on credit derivatives	This is the absolute value of the liabilities subject to the upward shock for spread risk on credit derivatives, after the shock and including the loss absorbing capacity of technical provisions.

C17	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – spread risk - credit derivatives – upward shock on credit derivatives	This is the net capital charge for the upward shock for spread risk on credit derivatives, after adjustment for the loss absorbing capacity of technical provisions. C17 = (A17 – B17) – (A17A- B17A) The value of C17 >= 0.
B17B	Absolute values after shock – Liabilities (excluding the loss absorbing capacity of technical provisions) – spread risk – credit derivatives – upward shock on credit derivatives	This is the absolute value of the liabilities subject to the upward shock for spread risk on credit derivatives, after the shock but excluding the loss absorbing capacity of technical provisions.
D17	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- spread risk - credit derivatives –upward shock on credit derivatives	This is the gross capital charge for the upward shock for spread risk on credit derivatives. i.e excluding the loss absorbing capacity of technical provisions. D17 = (A17 – B17) – (A17A- B17B) The value of D17 >= 0.
A18	Initial absolute values before shock – Assets – spread risk – tradable securities or other financial instruments based on repackage loans	This is the absolute value of the assets subject to the spread risk for tradable securities or other financial instruments based on repackage loans.
A18A	Initial absolute values before shock – Liabilities – spread risk – tradable securities or other financial instruments based on repackage loans	This is the absolute value of the liabilities subject to the spread risk on tradable securities or other financial instruments based on repackage loans.
B18	Absolute values after shock – Assets – spread risk – tradable securities or other financial instruments based on repackage loans	This is the absolute value of the assets subject to the spread risk on tradable securities or other financial instruments based on repackage loans, after the shock.
B18A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provision – spread risk – tradable securities or other financial instruments based on repackage loans)	This is the absolute value of the liabilities subject to the spread risk on tradable securities or other financial instruments based on repackage loans, after the shock and including the loss absorbing capacity of technical provisions.
C18	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – spread risk - tradable securities or other financial instruments based on repackage loans	This is the net capital charge for spread risk on tradable securities or other financial instruments based on repackage loans, after adjustment for the loss absorbing capacity of technical provisions. C18 = (A18 – B18) – (A18A- B18A) The value of C18 >= 0.
B18B	Absolute values after shock – Liabilities (excluding the loss absorbing capacity of technical provisions)- spread risk – tradable securities or other financial instruments based on repackage loans	This is the absolute value of the liabilities subject to the spread risk on tradable securities or other financial instruments based on repackage loans, after the shock but excluding the loss absorbing capacity of technical provisions.
D18	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- spread risk - tradable	This is the gross capital charge for spread risk on tradable securities or other financial instruments based on repackage loans, i.e excluding the loss absorbing capacity of technical provisions. D18 = (A18 – B18) – (A18A- B18B)
Concentration risk		
A19	Initial absolute values before shock – Assets – market risk concentrations	This is the absolute value of the asset subject to the market risk concentrations For captive undertakings, if A003=Y, item A19 represents the absolute value of the assets subject to the market risk concentration, after taking into account exemptions allowed for captives.
A19A	Initial absolute values before shock – Liabilities – market risk concentrations	This is the absolute value of the liabilities subject to the market risk concentration.

		For captive undertakings, if A003=Y, item A19A represents the absolute value of the assets subject to the market risk concentration, after taking into account exemptions allowed for by captives.
C19	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – market risk concentrations	This is the net capital charge for market risk concentrations, after adjustment for the loss absorbing capacity of technical provisions, aggregated for each single name exposure. For captive undertakings, if cell A003=Y, the item C19 represents net capital charge for market risk concentration, calculated using simplified calculation.
D19	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- market risk concentrations	This is the gross capital charge for market risk concentrations, aggregated for each single name exposure, i.e excluding the loss absorbing capacity of technical provisions.
Currency risk		
A20	Initial absolute values before shock – Assets – currency risk	This is the absolute value of assets subject to the currency risk
A20A	Initial absolute values before shock – Liabilities – currency risk	This is the value of the liabilities subject to the currency risk.
C20	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – currency risk	This is the sum for the different currencies of: - the capital requirement (including the loss absorbing capacity of technical provisions) for an increase in value of the foreign currency against the local currency; - the capital requirement (including the loss absorbing capacity of technical provisions) for a decrease in value of the foreign currency against the local currency.
D20	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions) currency risk	This is the sum for the different currencies of: - the capital requirement (excluding the loss absorbing capacity of technical provisions) for an increase in value of the foreign currency against the local currency; - the capital requirement (excluding the loss absorbing capacity of technical provisions) for a decrease in value of the foreign currency against the local currency.
Counter-cyclical premium risk NOT APPLICABLE for the purpose of interim measures		
A21	Initial absolute values before shock – Assets – counter-cyclical premium risk	NOT APPLICABLE for the purpose of preparatory phase This is the absolute value of the assets subject to the counter-cyclical premium risk
A21A	Initial absolute values before shock – Liabilities – counter-cyclical premium risk	NOT APPLICABLE for the purpose of preparatory phase This is the value of the liabilities subject to the counter-cyclical premium risk
B21	Absolute values after shock – Assets – counter-cyclical premium risk	NOT APPLICABLE for the purpose of preparatory phase This is the absolute value of the asset subject to the counter-cyclical premium risk charge, after the shock
B21A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provision – counter-cyclical premium risk	NOT APPLICABLE for the purpose of preparatory phase This is the absolute value of the liabilities subject to the counter-cyclical premium risk, after the shock, including the loss absorbing capacity of technical provisions
C21	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – counter-cyclical premium risk	NOT APPLICABLE for the purpose of preparatory phase This is the net capital charge for counter-cyclical premium risk, after adjustment for the loss absorbing capacity of technical provisions. $C21 = (A21 - B21) - (A21A - B21A)$ The value of C21 ≥ 0 .
B21B	Absolute values after shock – Liabilities (excluding the loss absorbing capacity of technical provisions) – counter-cyclical premium risk	NOT APPLICABLE for the purpose of preparatory phase This is the absolute value of liabilities subject to counter-cyclical premium risk, after the shock but excluding the loss absorbing capacity of technical provisions.
D21	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- counter-cyclical premium risk	NOT APPLICABLE for the purpose of preparatory phase This is the gross capital charge for counter-cyclical premium risk, i.e excluding the loss absorbing capacity of technical provisions. $D21 = (A21 - B21) - (A21A - B21B)$ The value of D21 ≥ 0 .
Diversification within market risk module		
C22	Diversification within market risk module -net	This is the diversification effect within the market risk module as a result of the aggregation of the net capital requirements (including loss absorbing capacity of technical provisions) of the single risk sub-modules.
D22	Diversification within market risk module - gross	This is the diversification effect within the market risk module as a result of the aggregation of the gross capital requirements (excluding loss absorbing capacity of technical provisions) of the single risk sub-modules.
Total solvency capital requirement for market risk		
C23	Total net solvency capital requirements (including the loss absorbing capacity of technical provisions) for market risk	This is the total net capital charge for all market risks, including loss absorbing capacity of technical provisions, calculated using the standard formula. Without precluding the final design of reporting on SCR, it should be the same as reported on SCR B2A, item A1. For the purpose of preparatory phase, in case of undertakings with ring fenced funds, and when reporting the most material ring fenced fund and the remaining part, the reference between item C23 and item A1 on SCR B2A is not applicable

D23	Gross solvency capital (excluding the loss-absorbing capacity of technical provisions) for market risk	This is the total gross capital charge for all market risks, excluding loss absorbing capacity of technical provisions, calculated using the standard formula. It should be the same as reported on SCR B2A. item B1.
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		For the purpose of preparatory phase, in case of undertakings with ring fenced funds and when reporting the most material ring fenced funds and the remaining part, the reference between item D23 and item B1 on SCR B2A is not applicable.
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Technical Annex II: List of quantitative reporting items

S.26.02

Solvency Capital Requirement - Counterparty default risk

	ITEM	INSTRUCTIONS
A00	Simplifications used (Y/N)	Identify whether an undertakings used simplifications for the calculation of counter party default risk. The following options shall be used: Y; N.
A001	Captive simplifications (Y/N)	Identify whether a captive undertakings used simplifications for the calculation of counter party default risk. The following options shall be used: Y; N.
A30	Ring Fenced Fund? (Y/N)	Identifies whether the reported figures are with regard to RFF or with regard to remaining part . One of the options in the following list shall be used: When the items reported refer to a RFF: Y When the items reported refer to a Remaining part: N
A0	Fund number	Identification number for a ring fenced fund; This number is attributed by the undertaking and must be consistent over time and with the fund number in TP (L) F3, item A3, Assets D1 item A2 and Own Funds items A0115.1 ...n. This item is to be reported only when item A30 = Y.
A10	Name of a single name exposure	Identify, for each of the 10 largest single name exposures in terms of the Loss Given Default, the name of the exposure
AA10	Code of single name exposure	Identification code: - Legal Entity Identifier (LEI) if available; - Interim entity identifier (pre-LEI) if available. If none is available this item should not be reported
AB10	Type of code	Identification of the code used in AB10: - LEI - Pre-LEI
A1	Type 1 exposures – Single name exposure X – Loss Given Default	The value of the Loss Given Default for each of the 10 largest single name exposure.
B1	Type 1 exposures – Single name exposure X – Probability of Default	The-Probability of Default for each of the 10 largest single name exposure.
C0	Type 1 exposures – Gross solvency capital requirement (excluding the loss-absorbency capacity of technical provisions)	This is the gross capital charge (excluding the loss-absorbency capacity of technical provisions) for counterparty default risk arising from all Type 1 exposures as defined for Solvency 2 purposes.
C1	Type 2 exposures – Gross solvency capital requirement (excluding the loss-absorbency capacity of technical provisions)	This is the gross capital charge (excluding the loss-absorbency capacity of technical provisions) for counterparty default risk arising from all Type 2 exposures, as defined for Solvency 2 purposes
A2	Type 2 exposures - Receivables from Intermediaries due for more than 3 months – Loss Given Default	This is the value of Loss Given Default for Type 2 counterparty risk arising from intermediaries due for more than 3 months.
A3	Type 2 exposures - All type 2 exposures other than receivables from Intermediaries due for more than 3 months – Loss Given Default	This is the value of Loss Given Default for Type 2 counterparty risk arising from all type 2 exposures other than receivables from Intermediaries due for more than 3 months.
C3	Diversification within counterparty default risk module – gross solvency capital requirement	This is the amount of gross diversification effect allowed in aggregation of capital requirements for counterparty default risk for Type 1 and Type 2 exposures. $C3 = C4 - (C0 + C1)$
D4	Total net solvency capital requirement (including the loss absorbing capacity of technical provisions) for counterparty default risk	This is the total amount of the net capital charge (including the loss-absorbency capacity of technical provisions) for counterparty default risk. The amount should agree with the figures reported in item A2 of SCR-B2A.
C4	Total gross solvency capital requirement (excluding the loss - absorbing capacity of technical provisions) for counterparty default risk	This is the total amount of the gross capital charge (excluding the loss-absorbency capacity of technical provisions) for counterparty default risk. The amount should agree with the amount reported in item B2 of SCR-B2A.

Technical Annex II: List of quantitative reporting items
S.26.03
Solvency Capital Requirement - Life underwriting risk

	ITEM	INSTRUCTIONS
A01	Simplifications used : mortality risk - (Y/N)	Identify whether an undertaking used simplifications for a calculation of mortality risk. The following options shall be used: Y; N.
A02	Simplifications used - longevity (Y/N)	Identify whether an undertaking used simplifications for the calculation of longevity risks. The following options shall be used: Y; N.
A03	Simplifications used : disability-morbidity risk - (Y/N)	Identify whether an undertaking used simplifications for the calculation of disability - morbidity risk. The following options shall be used: Y; N.
A04	Simplifications used : lapse risk - (Y/N)	Identify whether an undertaking used simplifications for the calculation of lapse risk. The following options shall be used: Y; N.
A05	Simplifications used : life expense risk - (Y/N)	Identify whether an undertaking used simplifications for the calculation of life expense risk. The following options shall be used: Y; N.
A06	Simplifications used : life catastrophe risk - (Y/N)	Identify whether an undertaking used simplifications for the calculation of life catastrophe risk. The following options shall be used: Y; N.
A001	Captives simplifications (Y/N)	Identify whether a captive undertaking used simplifications for the calculation of life underwriting risk. The following options shall be used: Y; N. If item A001=Y, items A01 to A06 are applicable where relevant.
A30	Ring Fenced Fund? (Y/N)	Identifies whether the reported figures are with regard to RFF or with regard to remaining part . One of the options in the following list shall be used: When the items reported refer to a RFF: Y When the items reported refer to a Remaining part: N
A0	Fund number	Identification number for a ring fenced fund; This number is attributed by the undertaking and must be consistent over time and with the fund number in TP (L) F3, item A3, Assets D1 item A2 and Own Funds items A0115.1 ...n. This item is to be reported only when item A30 = Y.

Mortality risk

A1	Initial absolute values before shock – Assets – Mortality risk	This is the absolute value of the assets subject to mortality risk, before the shock.
A1A	Initial absolute values before shock – Liabilities – Mortality risk	This is the absolute value of liabilities subject to mortality risk, before the shock.
B1	Absolute values after shock – Assets – Mortality risk	This is the absolute value of the assets subject to mortality risk after the shock (i.e. permanent increase in mortality rates).
B1A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Mortality risk	This is the absolute value of the liabilities (including the loss absorbing capacity of technical provisions) subject to risk , after the shock (i.e. permanent increase in mortality rates).
C1	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Mortality risk	This is the net capital charge for mortality risk after the shock (after adjustment for the loss absorbing capacity of technical provisions). $C1 = (A1 - A1A) - (B1 - B1A)$, $C1 \geq 0$. If $A01 = Y$, C1 represents net capital charge for mortality risk calculated using simplifications.
B1B	Absolute values after shock – Liabilities (excluding the loss-absorbing capacity of technical provisions) – Mortality risk	This is the absolute value of the liabilities subject to mortality risk, after the shock (permanent increase in mortality rates).
D1	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- Mortality risk	This is the gross capital charge for mortality risk. $D1 = (A1 - A1A) - (B1 - B1B)$, $D1 \geq 0$. If $A01 = Y$, D1 represents gross capital charge for mortality risk calculated using simplifications.

Longevity risk

A2	Initial absolute values before shock – Assets – Longevity risk	This is the absolute value of the assets subject to longevity risk, before the shock.
A2A	Initial absolute values before shock – Liabilities – Longevity risk	This is the absolute value of liabilities subject to longevity risk charge, before the shock.
B2	Absolute values after shock – Assets – Longevity risk	This is the absolute value of the assets subject to longevity risk, after the shock (i.e. permanent decrease in mortality rates).

B2A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Longevity risk	This is the absolute value of the liabilities (including the loss absorbing capacity of technical provisions subject to longevity risk, after the shock (i.e. permanent decrease in mortality rates).
C2	Absolute value after shock – Net solvency capital requirements	This is the net capital charge for longevity risk after the shock (after adjustment for the loss absorbing capacity of technical provisions).

	(including the loss absorbing capacity of technical provisions) – Longevity risk	$C2 = (A2 - A2A) - (B2 - B2A)$, $C2 >= 0$. If $A02=Y$, $C2$ represents net capital charge for longevity risk calculated using simplifications
B2B	Absolute values after shock – Liabilities (excluding the loss-absorbing capacity of technical provisions)– Longevity risk	This is the absolute value of the liabilities subject to longevity risk charge, after the shock (permanent decrease in mortality rates).
D2	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- Longevity risk	This is the gross capital charge for longevity risk. $D2 = (A2 - A2A) - (B2 - B2B)$, $D2 >= 0$. If $A02=Y$, $D2$ represents gross capital charge for longevity risk calculated using simplifications.

Disability – morbidity risk

A3	Initial absolute values before shock – Assets – Disability - morbidity risk	This is the absolute value of the assets subject to disability - morbidity risk, before the shock.
A3A	Initial absolute values before shock – Liabilities – Disability- morbidity risk	This is the absolute value of liabilities subject to disability – morbidity risk, before the shock.
B3	Absolute values after shock – Assets – Disability - morbidity risk	This is the absolute value of the assets subject to disability – morbidity risk, after the shock (i.e. as prescribed by standard formula: an increase in disability and morbidity rates which are used in calculation of technical provisions to reflect the disability and morbidity experience in the next following 12 months, and for all months after the following 12 months and a decrease in the disability and morbidity rates recovery rates used in the calculation of technical provisions in respect of next 12 months and for all year thereafter.
B3A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Disability - morbidity risk	This is the absolute value of liabilities (including the loss absorbing capacity of technical provisions) subject to disability - morbidity risk, after the shock (i.e. as prescribed by standard formula, see description provided in definition to cell B3).
C3	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Disability – morbidity risk	This is the net capital charge for disability - morbidity risk, after adjustment for the loss absorbing capacity of technical provisions. $C3 = (A3 - A3A) - (B3 - B3A)$, $C3 >= 0$. If $A03=Y$, $C3$ represents net capital charge for disability and morbidity risk calculated using simplifications.
B3B	Absolute values after shock – Liabilities – Disability - morbidity risk (excluding the loss-absorbing capacity of technical provisions)	This is the absolute value of the liabilities subject to disability - morbidity risk, after the shock (i.e. as prescribed by standard formula, see description provided in definition to cell B3).
D3	Absolute value after shock – Gross solvency capital- Disability - morbidity risk (excluding the loss-absorbing capacity of technical provisions)	This is the gross capital charge for disability – morbidity risk. $D3 = (A3 - A3A) - (B3 - B3B)$, $D3 >= 0$. If $A03=Y$, $D3$ represents gross capital charge for disability and morbidity risk calculated using simplifications.

Lapse risk

C04	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Lapse risk	This is the overall net capital charge for lapse risk, after adjustment for the loss absorbing capacity of technical provisions. $C04 = \text{Max} (C4, C5, C6)$ If $A04=Y$, $C04$ represents net capital charge for lapse risk calculated using simplifications.
D04	Absolute value after shock – Gross solvency capital- Lapse risk (excluding the loss-absorbing capacity of technical provisions)	This is the overall gross capital charge (excluding the loss-absorbing capacity of technical provisions) for lapse risk. If $A04=Y$, $D04$ represents gross capital charge for lapse risk calculated using simplifications.
A4	Initial absolute values before shock – Assets – Lapse risk- risk of increase in lapse rates	This is the absolute value of the assets subject to the risk of an increase in lapse rates, before the shock
A4A	Initial absolute values before shock – Liabilities – Lapse risk – risk of increase in lapse rates	This is the absolute value of liabilities subject to the risk of an increase in lapse rates, before the shock.
B4	Absolute values after shock – Assets – Lapse risk –risk of	This is the absolute value of the assets subject to the risk of an increase in lapse rates, after the shock (i.e. permanent increase in the lapse rates).

	increase in lapse rates	If A04=Y, B4 is calculated using simplified calculation for lapse rates.
B4A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Lapse risk –risk of increase in lapse rates	This is the absolute value of liabilities (including the loss absorbing capacity of technical provisions) subject to the risk of an increase in lapse rates, after the shock (i.e. permanent increase in the lapse rates). If A04=Y, B4A is calculated using simplified calculation for lapse rates.
C4	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Lapse risk –risk of increase in lapse rates	This is the net capital charge for the risk of a permanent increase in lapse rates, after adjustment for the loss absorbing capacity of technical provisions. $C4 = (A4 - A4A) - (B4 - B4A)$, $C4 >= 0$. If A04=Y, C4 represents net capital charge for a permanent increase in lapse rates, calculated using simplified calculation for lapse rate, after adjustment for the loss absorbing capacity of technical provisions.
B4B	Absolute values after shock – Liabilities (excluding the loss-absorbing capacity of technical provisions – Lapse risk –risk of increase in lapse rates)	This is the absolute value of the liabilities subject to the risk of a permanent increase in lapse rates, after the shock (permanent increase in lapse rates). If A04=Y, B4B is calculated using simplified calculation for lapse rates.
D4	Absolute value after shock – Gross solvency capital- Lapse risk –risk of increase lapse rates (excluding the loss-absorbing capacity of technical provisions)	This is the gross capital charge (excluding the loss-absorbing capacity of technical provisions) for the risk of a permanent increase in lapse rates. . $D4 = (A4 - A4A) - (B4 - B4B)$, $D4 >= 0$. If A04=Y, C4 represents gross capital charge for a permanent increase in lapse rates, calculated using simplified calculation for lapse rate.
A5	Initial absolute values before shock – Assets – Lapse risk- risk of decrease in lapse rates	This is the absolute value of the assets subject to the risk of a permanent decrease in lapse rates, before the shock.
A5A	Initial absolute values before shock – Liabilities – Lapse risk – risk of decrease in lapse rates	This is the absolute value of liabilities subject to the risk of a permanent decrease in lapse rates, before the shock.
B5	Absolute values after shock – Assets – Lapse risk –risk of decrease in lapse rates	This is the absolute value of the assets subject to the risk of a permanent decrease in lapse rates, after the shock (i.e. permanent decrease in the rates of lapse rates). If A04=Y, B5 is calculated using simplified calculation for lapse rates.
B5A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Lapse risk –risk of decrease in lapse rates	This is the absolute value of the liabilities (including the loss absorbing capacity of technical provisions) subject to the risk of a permanent decrease in lapse rates, after the shock (i.e. permanent decrease of the rates of lapse rates). If A04=Y, B5A is calculated using simplified calculation for lapse rates.
C5	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Lapse risk –risk of decrease in lapse rates	This is the net capital charge for the risk of a permanent decrease in lapse rates, after adjustment for the loss absorbing capacity of technical provisions. $C5 = (A5 - A5A) - (B5 - B5A)$, $C5 >= 0$. If A04=Y, C5 represents net capital charge for a permanent decrease in lapse rates, calculated using simplified calculation for lapse rate, after adjustment for the loss absorbing capacity of technical provisions.
B5B	Absolute values after shock – Liabilities (excluding the loss-absorbing capacity of technical provisions)– Lapse risk –risk of decrease in lapse rates	This is the absolute value of the liabilities subject to the risk of a permanent decrease in lapse rates, after the shock (permanent decrease in lapse rates). If A04=Y, B5B is calculated using simplified calculation for lapse rates.
D5	Absolute value after shock – Gross solvency capital- Lapse risk (excluding the loss-absorbing capacity of technical provisions) –risk of decrease in lapse rates	This is the gross capital charge for the risk of a decrease in lapse rates as used to compute the risk. $D5 = (A5 - A5A) - (B5 - B5B)$, $D5 >= 0$. If A04=Y, C5 represents gross capital charge for a permanent decrease in lapse rates, calculated using simplified calculation for lapse rate
A6	Initial absolute values before shock – Assets – Lapse risk- mass lapse risk	This is the absolute value of the assets subject to mass lapse risk, before the shock.
A6A	Initial absolute values before shock – Liabilities – Lapse risk –mass lapse risk	This is the absolute value of liabilities subject to mass lapse risk, before the shock.
B6	Absolute values after shock – Assets – Lapse risk – mass lapse risk	This is the absolute value of the assets subject to mass lapse risk charge, after the shock.

B6A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Lapse risk – mass lapse risk	This is the absolute value of the liabilities (including the loss absorbing capacity of technical provisions) subject to mass lapse risk charge, after the shock.
C6	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Lapse risk – mass lapse risk	This is the net capital charge for mass lapse risk, after adjustment for the loss absorbing capacity of technical provisions. Net capital charge $C6 = (A6-A6A)-(B6-B6A)$, $C6 \geq 0$.
B6B	Absolute values after shock – Liabilities (excluding the loss-absorbing capacity of technical provisions)– Lapse risk – mass lapse risk	This is the absolute value of the liabilities subject to mass lapse risk charge, after the shock.
D6	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- Lapse risk – mass lapse risk	This is the gross capital charge for mass lapse risk, after the shock. Gross capital charge $D6 = (A6-A6A)-(B6-B6B)$, $D6 \geq 0$.

Life - expense risk

A7	Initial absolute values before shock – Assets – Life - expense risk	This is the absolute value of the assets subject to life - expense risk, before the shock
A7A	Initial absolute values before shock – Liabilities – Life - expense risk	This is the absolute value of liabilities subject to life -expense risk, before the shock
B7	Absolute values after shock – Assets – Life - expense risk	This is the absolute value of the assets subject to life expense risk, after the shock (i.e.shock as prescribed by standard formula: a % increase the amount of expenses taken into account in the calculation of technical provisions and increase in 1 percentage point to the expense inflation rate (expressed as a percentage) used for the calculation of technical provision) If $A05=Y$, $B7 = 0$
B7A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Life - expense risk	This is the absolute value of liabilities (including the loss absorbing capacity of technical provisions) subject to expense risk, after the shock (i.e a shock. as prescribed by standard formula, refer to description provided within definition to cell B7)). If $A05=Y$, $B7A = 0$
C7	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Life expense risk	This is the net capital charge for expense risk, including adjustment for the loss absorbing capacity of technical provisions. Net capital charge $C7 = (A7-A7A)-(B7-B7A)$, $C7 \geq 0$. If $A05=Y$, $C7$ represents net capital charge for life expense risk calculated using simplified calculation
B7B	Initial absolute values after shock – Liabilities (excluding the loss-absorbing capacity of technical provisions) – Life - expense risk	This is the absolute value of the liabilities subject to expense risk, after the shock (i.e.shock as prescribed by standard formula, refer to description provided within definition to cell B7).
D7	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions)- Life -expense risk	This is the gross capital charge for expense risk. Gross capital charge $D7 = (A7-A7A)-(B7-B7B)$, $D7 \geq 0$. If $A05=Y$, $D7$ represents gross capital charge for life expense risk calculated using simplified calculations.

Revision risk

A8	Initial absolute values before shock – Assets – Revision risk	This is the absolute value of the assets subject to revision risk,before the shock.
A8A	Initial absolute values before shock – Liabilities – Revision risk	This is the absolute value of liabilities subject to revision risk,before the shock.
B8	Absolute values after shock – Assets – Revision risk	This is the absolute value of the assets subject to revision risk, after the shock (i.e. shock as prescribed by standard formula: a % increase in the amount of annuity benefits taken into account in the calculation of technical provisions.
B8A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Revision risk	This is the absolute value of liabilities (including the loss absorbing capacity of technical provisions) subject to revision risk charge, after the shock (i.e. as prescribed by standard formula, refer to a definition in item B8).

C8	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Revision risk	This is the net capital charge for revision risk including adjustment for the loss absorbing capacity of technical provisions. Net capital charge $C8 = (A8-A8A)-(B8-B8A)$, $C8 \geq 0$.
B8B	Absolute values after shock – Liabilities (excluding the loss-absorbing capacity of technical provisions) – Revision risk	This is the absolute value of the liabilities (excluding the loss-absorbing capacity of technical provisions) underlying revision risk charge, after the shock ((i.e. shock as prescribed by standard formula, refer to a definition provided in item B8), as used to compute the risk.
D8	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions) – Revision risk	This is the gross capital charge (excluding the loss-absorbing capacity of technical provisions) for revision risk. Gross capital charge $D8 = (A8-A8A)-(B8-B8B)$, $D8 \geq 0$.

Catastrophe risk

A9	Initial absolute values before shock – Assets – Life Catastrophe risk	This is the absolute value of the assets subject to life catastrophe risk, before the shock.
A9A	Initial absolute values before shock – Liabilities – Life Catastrophe risk	This is the absolute value of liabilities subject to life catastrophe risk, before the shock.
B9	Absolute values after shock – Assets – Life Catastrophe risk	This is the absolute value of the assets subject to life catastrophe risk, after the shock.
B9A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Life catastrophe risk	This is the absolute value of liabilities (including the loss absorbing capacity of technical provisions) subject to life catastrophe risk charge, after the shock
C9	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – life catastrophe risk	This is the net capital charge for life catastrophe risk including adjustment for the loss absorbing capacity of technical provisions. Net capital charge $C9 = (A9-A9A)-(B9-B9A)$, $C9 \geq 0$. If $A06=Y$, $C9$ represents net capital charge for life catastrophe risk calculated using simplified calculations.
B9B	Absolute values after shock – Liabilities (excluding the loss-absorbing capacity of technical provisions) – life catastrophe risk	This is the absolute value of the liabilities subject to life catastrophe risk, after the shock
D9	Absolute value after shock – Gross solvency capital (excluding the loss-absorbing capacity of technical provisions) – life catastrophe risk	This is the gross capital charge for life catastrophe risk. Gross capital charge $D9 = (A9-A9A)-(B9-B9B)$, $D9 \geq 0$. If $A06=Y$, $D9$ represents gross capital charge for life catastrophe risk calculated using simplified calculations.

Diversification within life underwriting risk module

C10	Diversification within life underwriting risk module – Net	This is the diversification effect within the life underwriting risk module as a result of the aggregation of the net capital requirements (after adjustment for the loss absorbing capacity of technical provisions) of the single risk sub-modules. $C10 = C11 - C1 - C2 - C3 - C04 - C7 - C8 - C9$
D10	Diversification within life underwriting risk module – Gross	This is the diversification effect within the life underwriting risk module as a result of the aggregation of the gross capital requirements (after adjustment for the loss absorbing capacity of technical provisions) of the single risk sub-modules. $D10 = D11 - D1 - D2 - D3 - D04 - D7 - D8 - D9$

Total life underwriting risk

C11	Total net solvency capital requirement (including the loss - absorbing capacity of technical provisions) for life underwriting risk	This is the total net capital charge for life underwriting risk, after adjustment for the loss absorbing capacity of technical provisions. The amount reported will correspond with that reported in item A3 on SCR-B2A.
D11	Total gross solvency capital requirement (excluding the loss - absorbing capacity of technical provisions) for life underwriting risk	This is the total gross capital charge for life underwriting risk, before adjustment for the loss absorbing capacity of technical provisions. The amount reported will correspond with that reported in item B3 on SCR-B2A.

Further details on revision risk

A12	USP- Factors applied for the revision risk shock	NOT APPLICABLE for the purpose of preparatory phase Revision shock – undertaking specific parameter as calculated by the undertaking and approved by the supervisory authority. This item is not reported where no undertaking specific parameter is used.
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Technical Annex II: List of quantitative reporting items

S.26.04

Solvency Capital Requirement - Health underwriting risk

ITEM		INSTRUCTIONS
A01	Simplifications used – health mortality (Y/N)	Identify whether an undetaking used simplifications for the calculation of health mortality risk. The following options shall be used: Y; N.
A02	Simplifications used – health longevity (Y/N)	Identify whether an undetaking used simplifications for the calculation of health longevity risks. The following options shall be used: Y; N.
A03	Simplifications used : health disability-morbidity risk - (Y/N)	Identify whether an undetaking used simplifications for the calculation of health disability morbidity risk. The following options shall be used: Y; N.
A04	Simplifications used : SLT lapse risk - (Y/N)	Identify whether an undetaking used simplifications for the calculation of SLT lapse risk. The following options shall be used: Y; N.
A05	Simplifications used : health expense risk - (Y/N)	Identify whether an undetaking used simplifications for the calculation of health expense risk. The following options shall be used: Y; N.
A001	Captives simplifications (Y/N)	Identify whether a captive undetaking used simplifications for the calculation of health underwriting risk. The following options shall be used: Y; N. If cell A001=Y, cell A01 ...A05 are applicable where relevant
A30	Ring Fenced Fund? (Y/N)	Identifies whether the reported figures are with regard to RFF or with regard to remaining part. One of the options in the following list shall be used: When the items reported refer to a RFF: Y When the items reported refer to a Remaining part: N
A0	Fund number	Identification number for a ring fenced fund; This number is attributed by the undetaking and must be consistent over time and with the fund number in TP (L) F3, item A3, Assets D1 item A2 and Own Funds items A0115.1 ...n. This item is to be reported only when item A30 = Y.

SLT HEALTH UNDERWRITING RISK

Health mortality risk

A1	Initial absolute values before shock – Assets – Health mortality risk	This is the absolute value of the assets subject to health mortality risk, before the shock.
A1A	Initial absolute values before shock – Liabilities –Health mortality risk	This is the absolute value of liabilities subject to health mortality risk, before the shock.
B1	Absolute values after shock – Assets – Health mortality risk	This is the absolute value of the assets subject to health mortality risk charge, after the shock (i.e. permanent increase in mortality rates).
B1A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Health mortality risk	This is the absolute value of the liabilities (including the loss absorbing capacity of technical provisions) subject to health mortality risk charge, after the shock (i.e. permanent increase in mortality rates).
C1	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) –Health mortality risk	This is the net capital charge for health mortality risk, after adjustment for the loss absorbing capacity of technical provisions. $C1 = (A1-A1A)-(B1-B1A)$, $C1 \geq 0$. If A01=Y, C1 represents net capital charge for health mortality risk calculated using simplifications.
B1B	Initial absolute values before shock – Liabilities –Health mortality risk	This is the absolute value of the liabilities subject to health mortality risk charge, after the shock (permanent increase in mortality rates).
D1	Absolute value after shock – Gross solvency capital (excluding the loss absorbing capacity of technical provisions) –Health mortality risk	This is the gross capital charge (excluding the loss absorbing capacity of technical provisions) for health mortality risk. $D1 = (A1-A1A)-(B1-B1B)$, $D1 \geq 0$. If A01=Y, D1 represents gross capital charge for health mortality risk calculated using simplifications.

Health longevity risk

A2	Initial absolute values before shock – Assets – Health longevity risk	This is the absolute value of the assets subject to health longevity risk, before the shock.
A2A	Initial absolute values before shock – Liabilities – Health longevity risk	This is the absolute value of liabilities subject to health longevity risk, before the shock.
B2	Absolute values after shock – Assets – Health longevity risk	This is the absolute value of the assets subject to health longevity risk after the shock (i.e. permanent decrease in mortality rates).
B2A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Health longevity risk	This is the absolute value of the liabilities (including the loss absorbing capacity of technical provisions) subject to health longevity risk, after the shock (i.e. permanent decrease in mortality rates).
C2	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Health longevity risk	This is the net capital charge for health longevity risk, after adjustment for the loss absorbing capacity of technical provisions. $C2 = (A2-A2A)-(B2-B2A)$, $C2 \geq 0$. If A02=Y, C2 represents net capital charge for health longevity risk calculated using simplifications.
B2B	Initial absolute values after shock – Liabilities – Health longevity risk	This is the absolute value of the liabilities subject to health longevity risk, after the shock (permanent decrease in mortality rates).
D2	Absolute value after shock – Gross solvency capital (excluding the loss absorbing capacity of technical provisions) – Health longevity risk	This is the gross capital charge (excluding the loss absorbing capacity of technical provisions) for health longevity risk. $D2 = (A2-A2A)-(B2-B2B)$, $D2 \geq 0$. If A02=Y, D2 represents gross capital charge for health longevity risk calculated using simplifications.

Health disability – morbidity risk

A3	Initial absolute values before shock – Assets – Health disability - morbidity risk	This is the absolute value of the assets subject to health disability- morbidity risk, before the shock.
A3A	Initial absolute values before shock – Liabilities – Health disability - morbidity risk	This is the absolute value of liabilities subject to health disability – morbidity risk charge, before the shock.
B3	Absolute values after shock – Assets – Health disability - morbidity risk	This is the absolute value of the assets subject to health disability – morbidity risk charge, after the shock (i.e. as prescribed by standard formula)
B3A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Health disability - morbidity risk	This is the absolute value of liabilities (including the loss absorbing capacity of technical provisions) subject to health disability – morbidity risk, after the shock (i.e. as prescribed by standard formula).
C3	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Health disability - morbidity risk	This is the net capital charge for health disability – morbidity risk, after adjustment for the loss absorbing capacity of technical provisions. $C3 = (A3-A3A)-(B3-B3A)$, $C3 \geq 0$. If $A03=Y$, C3 represents net capital charge for health disability – morbidity risk calculated using simplifications.
B3B	Initial absolute values after shock – Liabilities – Health disability - morbidity risk	This is the absolute value of the liabilities underlying health disability - morbidity risk charge, after the shock (i.e. as prescribed by standard formula) as used to compute the risk.
D3	Absolute value after shock – Gross solvency capital (excluding the loss absorbing capacity of technical provisions) – Health disability - morbidity risk	This is the gross capital charge (excluding the loss absorbing capacity of technical provisions) for health disability - morbidity risk. $D3 = (A3-A3A)-(B3-B3B)$, $D3 \geq 0$. If $A03=Y$, D3 represents gross capital charge for health disability – morbidity risk calculated using simplifications.

SLT Health lapse risk

C04	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – SLT Health lapse risk	This is the overall net capital charge for SLT health lapse risk, after adjustment for the loss absorbing capacity of technical provisions If $A04=Y$, C04 represents net capital charge for SLT health lapse risk calculated using simplifications.
D04	Absolute value after shock – Gross solvency capital (excluding the loss absorbing capacity of technical provisions) - SLT Health lapse risk	This is the overall gross capital charge (excluding the loss absorbing capacity for technical provisions) for SLT health lapse risk. If $A04=Y$, D04 represents gross capital charge for SLT health lapse risk calculated using simplifications.
A4	Initial absolute values before shock – Assets – SLT health lapse risk- risk of increase in lapsation	This is the absolute value of the assets subject to the risk of an increase in lapsation rates, before the shock.
A4A	Initial absolute values before shock – Liabilities – SLT health lapse risk – risk of increase in lapsation	This is the absolute value of liabilities subject to the risk of an increase in lapsation rates, before the shock.
B4	Absolute values after shock – Assets – SLT health lapse risk –risk of increase in lapsation	This is the absolute value of the assets subject to the risk of an increase in lapsation rates after the shock (i.e. permanent increase in the rates of lapsation). If $A04=Y$, B4 is calculated using simplified calculation for SLT health lapse rates.
B4A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – SLT health lapse risk –risk of increase in lapsation	This is the absolute value of the liabilities (including the loss absorbing capacity of technical provisions) subject to the risk of an increase in lapsation rates, after the shock (i.e. permanent increase of the rates of lapsation). If $A04=Y$, B4A is calculated using simplified calculation for SLT health lapse rates.
C4	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – SLT health lapse risk –risk of increase in lapsation	This is the net capital charge for the risk of a permanent increase in lapsation rates, after adjustment for the loss absorbing capacity of technical provisions. $C4 = (A4-A4A)-(B4-B4A)$, $C4 \geq 0$. If $A04=Y$, C4 represents net capital charge for a permanent increase in SLT health lapse rates, calculated using simplified calculation for SLT health lapse rate, after adjustment for the loss absorbing capacity of technical provisions.
B4B	Initial absolute values after shock – Liabilities – SLT health lapse risk –risk of increase in lapsation	This is the absolute value of the liabilities underlying the risk of a permanent increase in lapsation rates, after the shock (permanent increase in lapsation rates) as used to compute the risk. If $A04=Y$, B4B is calculated using simplified calculation for SLT health lapse rates.
D4	Absolute value after shock – Gross solvency capital (excluding the loss absorbing capacity of technical provisions) - SLT health lapse risk –risk of increase in lapsation	This is the gross capital charge (excluding the loss absorbing capacity for technical provisions) for the risk of a permanent increase in lapsation rates . $D4 = (A4-A4A)-(B4-B4B)$, $D4 \geq 0$. If $A04=Y$, C4 represents gross capital charge for a permanent increase in lapse rates, calculated using simplified calculation for SLT health lapse rate.
A5	Initial absolute values before shock – Assets – SLT health lapse risk- risk of decrease in lapsation	This is the absolute value of the assets subject to the risk of a permanent decrease in lapsation rates, before the shock.
A5A	Initial absolute values before shock – Liabilities – SLT health lapse risk – risk of decrease in lapsation	This is the absolute value of liabilities subject to the risk of a permanent decrease in lapsation rates, before the shock.

B5	Absolute values after shock – Assets – SLT health lapse risk –risk of decrease in lapsation	This is the absolute value of the assets subject to the risk of a permanent decrease in lapsation rates, after the shock (i.e. permanent decrease in the rates of lapsation). If A04=Y, B5 is calculated using simplified calculation for SLT health lapse rates.
B5A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – SLT health lapse risk –risk of decrease in lapsation	This is the absolute value of the liabilities (including the loss absorbing capacity of technical provisions) subject to the risk of a permanent decrease in lapsation rates, after the shock (i.e. permanent decrease of the rates of lapsation). If A04=Y, B5A is calculated using simplified calculation for SLT health lapse rates.
C5	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – SLT health lapse risk –risk of decrease in lapsation	This is the net capital charge for the risk of a permanent decrease in lapsation rates, after adjustment for the loss absorbing capacity of technical provisions. $C5 = (A5-A5A)-(B5-B5A)$, $C5 \geq 0$. If A04=Y, C5 represents net capital charge for a permanent decrease in SLT health lapse rates, calculated using simplified calculation for SLT health lapse rate, after adjustment for the loss absorbing capacity of technical provisions
B5B	Initial absolute values after shock – Liabilities – SLT health lapse risk –risk of decrease in lapsation	This is the absolute value of the liabilities subject to the risk of a permanent decrease in lapsation rates, after the shock (permanent decrease in lapsation rates). If A04=Y, B5B is calculated using simplified calculation for lapse rates.
D5	Absolute value after shock – Gross solvency capital (excluding the loss absorbing capacity of technical provisions) - SLT health lapse risk –risk of decrease in lapsation	This is the gross capital charge (excluding the loss absorbing capacity for technical provisions) for the risk of a permanent decrease in lapsation rates $D5 = (A5-A5A)-(B5-B5B)$, $D5 \geq 0$. If A04=Y, C5 represents gross capital charge for a permanent decrease in SLT health lapse rates, calculated using simplified calculation for SLT health lapse rate
A6	Initial absolute values before shock – Assets – SLT health lapse risk- mass lapse risk	This is the absolute value of the assets subject to mass lapse risk, before the shock.
A6A	Initial absolute values before shock – Liabilities – SLT health lapse risk –mass lapse risk	This is the absolute value of liabilities subject to mass lapse risk , before the shock.
B6	Absolute values after shock – Assets – SLT health lapse risk – mass lapse risk	This is the absolute value of the assets subject to ass lapse risk, after the shock.
B6A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – SLT health lapse risk – mass lapse risk	This is the absolute value of liabilities (including the loss absorbing capacity of technical provisions) subject to mass lapse risk, after the shock.
C6	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – SLT health lapse risk – mass lapse risk	This is the net capital charge for SLT health lapse risk - mass lapse risk, after adjustment for the loss absorbing capacity of technical provisions. Net capital charge $C6 = (A6-A6A)-(B6-B6A)$, $C6 \geq 0$.
B6B	Initial absolute values after shock – Liabilities – SLT health lapse risk – mass lapse risk	This is the absolute value of the liabilities subject to mass lapse risk, after the shock.
D6	Absolute value after shock – Gross solvency capital (excluding the loss absorbing capacity of technical provisions) - SLT health lapse risk – mass lapse risk	This is the gross capital charge (excluding the loss absorbing capacity for technical provisions) for SLT health lapse risk - mass lapse risk. Gross capital charge $D6 = (A6-A6A)-(B6-B6B)$, $D6 \geq 0$.
Health expense risk		
A7	Initial absolute values before shock – Assets – Health expense risk	This is the absolute value of the assets subject to expense risk, before the shock.
A7A	Initial absolute values before shock – Liabilities – Health expense risk	This is the absolute value of liabilities subject to expense risk, before the shock.
B7	Absolute values after shock – Assets – Health expense risk	This is the absolute value of the assets subject to health expense risk, after the shock
B7A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Health expense risk	This is the absolute value of liabilities (including the loss absorbing capacity of technical provisions) subject to health expense risk , after the shock
C7	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Health expense risk	This is the net capital charge for health expense risk, after adjustment for the loss absorbing capacity of technical provisions. Net capital charge $C7 = (A7-A7A)-(B7-B7A)$, $C7 \geq 0$. If A05=Y, C7 represents net capital charge for health expense risk calculated using simplified calculations.
B7B	Initial absolute values after shock – Liabilities – Health expense risk	This is the absolute value of the liabilities subject to expense risk charge, after the shock
D7	Absolute value after shock – Gross solvency capital (excluding the loss absorbing capacity of technical provisions) - Health expense risk	This is the gross capital charge (excluding the loss absorbing capacity of technical provisions) for health expense risk. Gross capital charge $D7 = (A7-A7A)-(B7-B7B)$, $D7 \geq 0$. If A05=Y, D7 represents gross capital charge for health expense risk calculated using simplified calculations.
Health revision risk		
A8	Initial absolute values before shock – Assets – Health revision risk	This is the absolute value of the assets subject to health revision risk, before the shock.

A8A	Initial absolute values before shock – Liabilities – Health revision risk	This is the absolute value of liabilities subject to health revision risk charge, before the shock.
B8	Absolute values after shock – Assets – Health revision risk	This is the absolute value of the assets subject to health revision risk, after the shock
B8A	Absolute values after shock – Liabilities (including the loss absorbing capacity of technical provisions) – Health revision risk	This is the absolute value of liabilities (including the loss absorbing capacity of technical provisions) subject to health revision risk, after the shock
C8	Absolute value after shock – Net solvency capital requirements (including the loss absorbing capacity of technical provisions) – Health revision risk	This is the net capital charge for health revision risk, after adjustment for the loss absorbing capacity of technical provisions. Net capital charge $C8 = (A8-A8A)-(B8-B8A)$, $C8 \geq 0$.
B8B	Initial absolute values after shock – Liabilities – Health revision risk	This is the absolute value of the liabilities subject to health revision risk charge, after the shock ((i.e. as prescribed by standard formula, a % increase in the annual amount payable for annuities exposed to revision risk).
D8	Absolute value after shock – Gross solvency capital (excluding the loss absorbing capacity of technical provisions) - Health revision risk	This is the gross capital charge (excluding the loss absorbing capacity of technical provisions) for health revision risk. Gross capital charge $D8 = (A8-A8A)-(B8-B8B)$, $D8 \geq 0$.
Diversification within module		
C9	-Diversification within SLT health underwriting risk module - Net	This is the diversification effect within the SLT health underwriting risk module as a result of the aggregation of the net capital requirements (after adjustment for the loss absorbing capacity of technical provisions) of the single risk sub-modules. $C9 = C10 - C1 - C2 - C3 - C04 - C7 - C8$
D9	Diversification within SLT health underwriting risk module - Gross	This is the diversification effect within the SLT health underwriting risk module as a result of the aggregation of the gross capital requirements (after adjustment for the loss absorbing capacity of technical provisions) of the single risk sub-modules. $D9 = D10 - D1 - D2 - D3 - D04 - D7 - D8$
Total SLT health underwriting risk		
C10	Net solvency capital requirements (including the loss absorbing capacity of technical provisions) for - SLT health underwriting risk	This is the total net capital charge for SLT health underwriting risk, after adjustment the loss absorbing capacity of technical provisions.
D10	Gross solvency capital (excluding the loss absorbing capacity of technical provisions) - SLT health underwriting risk	This is the total gross capital charge for SLT health underwriting risk.
Further details on revision risk		
A11	Revision shock USP	NOT APPLICABLE for the purpose of preparatory phase Revision shock – undertaking specific parameter as calculated by the undertaking and approved by the supervisor authority. This item is not reported where no undertaking specific parameter is used.
NSLT HEALTH UNDERWRITING RISK		
NSLT Health premium and reserve risk		
A12	Standard deviation for premium risk – USP-Medical expenses insurance and proportional reinsurance	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for premium risk for medical expenses insurance and proportional reinsurance as calculated by the undertaking and approved or prescribed by the supervisor authority. This item is not reported where no undertaking specific parameter is used.
A12A	Standard deviation for premium risk – USP - Adjustment factor for non – proportional reinsurance –Medical expenses insurance and proportional reinsurance	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific adjustment factor for non – proportional reinsurance of medical expenses line of business allows undertakings to take into account the risk – mitigating effect of particular per risk excess of loss reinsurance - as calculated by the undertaking and approved or prescribed by the supervisory authority Where no undertaking specific parameter is used, this cell should be left blank.
B12	Standard deviation for reserve risk – USP- Medical expenses insurance and proportional reinsurance	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for reserve risk for medical expenses and proportional reinsurance line of business as calculated by the undertaking and approved or prescribed by the supervisor authority. This item is not reported where no undertaking specific parameter is used.
C12	Volume measure for premium and reserve risk – volume measure for premium risk: Vprem - Medical expenses insurance and proportional reinsurance	The volume measure for premium risk for medical expenses and proportional reinsurance line of business
D12	Volume measure for premium and reserve risk –Volume measure reserve risk: Vres - Medical expenses insurance and proportional reinsurance	The volume measure for reserve risk for medical expenses and proportional reinsurance line of business
E12	Volume measure for premium and reserve risk – Geographical Diversification - Medical expenses insurance and proportional reinsurance	This represents the geographical diversification to be used for the volume measure for premium and reserve risk for medical expenses and proportional reinsurance. If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.

F12	Volume measure for premium and reserve risk - V - Medical expenses insurance and proportional reinsurance	The volume measure for NSLT health premium and reserve risk for medical expenses and proportional reinsurance line of business
A13	Standard deviation for premium risk – USP- Income protection insurance and proportional reinsurance	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for premium risk for income protection and proportional reinsurance as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used.
A13A	Standard deviation for premium risk – USP- Adjustment factor for non – proportional reinsurance –Income protection insurance and proportional reinsurance	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific adjustment factor for non – proportional reinsurance of income protection line of business allows undertakings to take into account the risk – mitigating effect of particular per risk excess of loss reinsurance - as calculated by the undertaking and approved or prescribed by the supervisory authority . This item is not reported where no undertaking specific parameter is used.
B13	Standard deviation for reserve risk – USP- Income protection insurance and proportional reinsurance	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for reserve risk for income protection and proportional reinsurance line of business as calculated by the undertaking and approved by the supervisory authority or prescribed. This item is not reported where no undertaking specific parameter is used.
C13	Volume measure for premium and reserve risk – volume measure for premium risk: Vprem – Income protection insurance and proportional reinsurance	The volume measure for premium risk for income protection and proportional reinsurance line of business
D13	Volume measure for premium and reserve risk –Volume measure reserve risk: Vres – Income protection insurance and proportional reinsurance	The volume measure for reserve risk for income protection and proportional reinsurance line of business
E13	Volume measure for premium and reserve risk – Geographical Diversification – Income protection insurance and proportional reinsurance	This represents the geographical diversification to be used for the volume measure for premium and reserve risk for income protection undertakings and proportional reinsurance If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F13	Volume measure for premium and reserve risk - V – Income protection insurance and proportional reinsurance	The volume measure for NSLT health premium and reserve risk for income protection and proportional reinsurance line of business
A14	Standard deviation for premium risk – USP- Workers' compensation insurance and proportional reinsurance	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for premium risk for workers' compensation and proportional reinsurance as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used.
A14A	Standard deviation for premium risk – USP - Adjustment factor for non – proportional reinsurance – Workers' compensation insurance and proportional reinsurance	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific adjustment factor for non – proportional reinsurance of workers' compensation and proportional reinsurance line of business allows undertakings to take into account the risk – mitigating effect of particular per risk excess of loss reinsurance - as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used.
B14	Standard deviation for reserve risk – USP- Workers' compensation insurance and proportional reinsurance	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for reserve risk for workers' compensation and proportional reinsurance line of business as calculated by the undertaking and approved by the supervisory authority or prescribed . This item is not reported where no undertaking specific parameter is used.
C14	Volume measure for premium and reserve risk – volume measure for premium risk: Vprem - Workers' compensation insurance and proportional reinsurance	The volume measure for premium risk for workers' compensation and proportional reinsurance line of business
D14	Volume measure for premium and reserve risk –Volume measure reserve risk: Vres - Workers' compensation insurance and proportional reinsurance	The volume measure for reserve risk for workers'compensation and proportional reinsurance line of business
E14	Volume measure for premium and reserve risk – Geographical Diversification - Workers' compensation insurance and proportional reinsurance	This represents the geographical diversification to be used for the volume measure for workers' compensation and proportional reinsurance If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F14	Volume measure for premium and reserve risk - V - Workers' compensation insurance and proportional reinsurance	The volume measure for NSLT health premium and reserve risk for workers' compensation and proportional reinsurance line of business
A15	Standard deviation for premium risk – USP - Non -proportional health reinsurance	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for premium risk for non proportional health insurance as calculated by the undertaking and approved or prescribed by the supervisory authority This item is not reported where no undertaking specific parameter is used.

A15A	Standard deviation for premium risk – USP - Adjustment factor for non – proportional reinsurance – Non - proportional health reinsurance	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific adjustment factor for non – proportional reinsurance of the non-proportional health insurance line of business allows undertakings to take into account the risk – mitigating effect of particular per risk excess of loss reinsurance - as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used.
B15	Standard deviation for reserve risk – USP- Non -proportional health reinsurance	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for reserve risk for non-proportional health reinsurance line of business as calculated by the undertaking and approved by the supervisory authority or prescribed. This item is not reported where no undertaking specific parameter is used.
C15	Volume measure for premium and reserve risk – volume measure for premium risk: Vprem - Non - proportional health reinsurance	The volume measure for premium risk for non -proportional health reinsurance line of business
D15	Volume measure for premium and reserve risk –Volume measure reserve risk: Vres - Non -proportional health reinsurance	The volume measure for reserve risk for non-proportional health reinsurance line of business
E15	Volume measure for premium and reserve risk – Geographical Diversification - Non -proportional health reinsurance	This represents the geographical diversification to be used for the volume measure for non-proportional health reinsurance If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F15	Volume measure for premium and reserve risk - V - Non -proportional health reinsurance	The volume measure for NSLT health premium and reserve risk for non-proportional health reinsurance line of business
A16	Combined standard deviation	This is the combined standard deviation for premium and reserve risk for all segments.
F16	Total Volume measure for premium and reserve risk	The total volume measure for premium and reserve risk, equal to the sum of the volume measures for premium and reserve risk for all lines of business: $F16 = \text{sum}(F12 : F15)$
A17	Total NSLT health premium and reserve risk	This is the total capital charge for the NSLT health premium and reserve risk sub module.
NSLT Health lapse risk		
A18	Initial absolute values before shock – Assets – Lapse risk	This is the absolute value of the assets subject to the NSLT health lapse risk, before the shock.
A18A	Initial absolute values before shock – Liabilities – Lapse risk	This is the absolute value of liabilities subject to the NSLT health lapse risk, before the shock.
B18	Absolute values after shock – Assets – Lapse risk	This is the absolute value of the assets subject to the NSLT health lapse risk, after the shock.
B18B	Absolute values after shock (excluding the loss absorbing capacity of technical provisions) – Liabilities – Lapse risk	This is the absolute value of the liabilities (excluding the loss absorbing capacity of technical provisions) subject to lapse risk, after the shock.
D18	Absolute value after shock (excluding the loss absorbing capacity of technical provisions) – Solvency capital requirement - Lapse risk	This is the capital charge (excluding the loss absorbing capacity of technical provisions) for NSLT health lapse risk. $\text{Solvency capital requirement } D18 = (A18 - A18A) - (B18 - B18B), D18 \geq 0.$
D19	Diversification within NSLT health underwriting risk - gross	This is the diversification effect within the NSLT health underwriting risk sub-module (excluding the loss absorbing capacity of technical provisions), as a result of the
D20	Total gross solvency capital requirement (excluding the loss absorbing capacity of technical provisions) for NSLT health underwriting	This is the total capital charge for the NSLT health underwriting risk sub module (excluding the loss absorbing capacity of technical provisions) .
Health Catastrophe risk		
B21	Net solvency capital requirement (including loss absorbing capacity of technical provisions) for health catastrophe risks - Mass accident risk sub module	The net solvency capital requirement for the mass risk sub-module calculated including loss absorbing capacity of technical provisions
A21	Gross solvency capital requirement (excluding loss absorbing capacity of technical provisions) for health catastrophe risks - Mass accident risk sub module	The gross solvency capital requirement for the mass risk sub-module, calculated excluding loss absorbing capacity of technical provisions. It should be equal to the item A23 of SCR – B3F.
B22	Net solvency capital requirement (including loss absorbing capacity of technical provisions) for health catastrophe risks - Accident concentration risk	The net solvency capital requirement for the accident concentration risk sub-module, calculated including loss absorbing capacity of technical provisions
A22	Gross solvency capital requirement (excluding loss absorbing capacity of technical provisions) for health catastrophe risks- Accident concentration risk	The gross solvency capital requirement for the accident concentration risk sub-module calculated excluding loss absorbing capacity of technical provisions. It should be equal to the item A24 of SCR – B3F.

B23	Net solvency capital requirement (including loss absorbing capacity of technical provisions) for health catastrophe risks - Pandemic risk	The net solvency capital requirement for the pandemic risk sub-module, calculated including loss absorbing capacity of technical provisions.
A23	Gross solvency capital requirement (excluding loss absorbing capacity of technical provisions) for health catastrophe risks - Pandemic risk	The gross solvency capital requirement for the pandemic risk sub-module is calculated excluding loss absorbing capacity of technical provisions. It should be equal to the item A25 of SCR – B3F.
B24	Diversification within health catastrophe risk - Net	This is the diversification effect within the health catastrophe risk sub-module as a result of the aggregation of the capital requirements for the risks of a mass accident, accident concentration and pandemic risk, calculated including loss absorbing capacity of technical provisions.
A24	Diversification within health catastrophe risk - Gross	This is the diversification effect within the health catastrophe risk sub-module as a result of the aggregation of the capital requirements for the risks of a mass accident, accident concentration and pandemic risk, calculated excluding loss absorbing capacity of technical provisions.
B25	Total net solvency capital requirement for health catastrophe risk (including loss absorbing capacity of technical provisions)	This is the total net capital charge (including loss absorbing capacity of technical provisions) for the health catastrophe risk sub –module
A25	Total gross solvency capital requirement (excluding loss absorbing capacity of technical provisions) for health catastrophe risk	This is the total gross capital charge for the health catastrophe risk sub – module (excluding loss absorbing capacity of technical provisions)
B26	-Diversification within health underwriting risk module – Net	This is the diversification effect within the health underwriting risk sub-module as a result of the aggregation of the capital requirements SLT health underwriting risk sub-module, NSLT health underwriting risk sub-module and health catastrophe risk sub-module, calculated including loss absorbing capacity of technical provision. $B26 = \text{SUM}(C10, A17, D20, B25) - B27$
A26	Diversification within health underwriting risk module – Gross	This is the diversification effect within the health underwriting risk sub-module as a result of the aggregation of the capital requirements SLT health underwriting risk sub-module, NSLT health underwriting risk sub-module and health catastrophe risk sub-module, calculated excluding loss absorbing capacity of technical provisions $A26 = \text{SUM}(D10, A17, D20, A25) - A27$
B27	Total net solvency capital requirement for health underwriting risk (including loss absorbing capacity of technical provisions)	This is the total net solvency capital requirement for the health underwriting risk module. The item B27 should agree with item A4 on SCR – B2A.
A27	Total gross solvency capital requirement (excluding loss - absorbing capacity of technical provisions) for health underwriting risk	This is the total gross solvency capital requirement for the health underwriting risk module. The item A27 should agree with item B4 on SCR – B2A.

Technical Annex II: List of quantitative reporting items

S.26.05

Solvency Capital Requirement - Non-life underwriting risk

ITEM		INSTRUCTIONS
A001	Captives simplifications – non life premium and reserve risk (Y/N)	Identify whether a captive undertaking used simplifications for the calculation of non-life premium and reserve risk. The following options shall be used: Y; N.
A30	Ring Fenced Fund? (Y/N)	Identifies whether the reported figures are with regard to RFF or with regard to remaining part . One of the options in the following list shall be used: When the items reported refer to a RFF: Y When the items reported refer to a Remaining part: N
A0	Fund number	Identification number for a ring fenced fund; This number is attributed by the undertaking and must be consistent over time and with the fund number in TP (L) F3, item A3, Assets D1 item A2 and Own Funds items A0115.1 ...n. This item is to be reported only when item A30 = Y.
Premium and Reserve Risk		
A1	Standard deviation for premium risk – USP Standard Deviation-Motor vehicle liability	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for premium risk for motor vehicle liability line of business as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used.
A1A	Standard deviation for premium risk – USP - Adjustment factor for non – proportional reinsurance - Motor vehicle liability	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific adjustment factor for non – proportional reinsurance of a motor vehicle liability line of business allows undertakings to take into account the risk – mitigating effect of particular per risk excess of loss reinsurance - as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used.
B1	Standard deviation for reserve risk – USP-Motor vehicle liability	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for reserve risk for motor vehicle liability line of business as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used.
C1	Volume measure for premium and reserve risk – volume measure for premium risk: Vprem - Motor vehicle liability	The volume measure for premium risk for motor vehicle liability line of business
D1	Volume measure for premium and reserve risk –Volume measure reserve risk: Vres - Motor vehicle liability	The volume measure for reserve risk for motor vehicle liability line of business, equal to the best estimate for the provisions for claims outstanding for the segment, after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles.
E1	Volume measure for premium and reserve risk – Geographical Diversification - Motor vehicle liability	The volume measure for motor vehicle liability line of business If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F1	Volume measure for premium and reserve risk - V - Motor vehicle liability	The volume measure for non – life premium and reserve risk for motor vehicle liability line of business $F1 = (C1 + D1) \times (0.75 + 0.25E1)$
A2	Standard deviation for premium risk – USP Standard Deviation -Motor, other classes	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for premium risk for Motor, other classes, line of business as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, A2 = 0
A2A	Standard deviation for premium risk – USP - Adjustment factor for non – proportional reinsurance - Motor, other classes	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific adjustment factor for non-proportional reinsurance of Motor, other classes, line of business, allowing undertakings to take into account the risk-mitigating effect of particular per risk excess of loss reinsurance, as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, A2A = 0
B2	Standard deviation for reserve risk – USP- Motor, other classes	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for reserve risk for Motor, other classes, line of business as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, B2 = 0
C2	Volume measure for premium and reserve risk – Vprem - Motor, other classes	The volume measure for premium risk for Motor, other classes , line of business

D2	Volume measure for premium and reserve risk – Vres - Motor, other classes	The volume measure for reserve risk for Motor, other classes, line of business, equal to the best estimate for the provisions for claims outstanding for the segment, after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles
E2	Volume measure for premium and reserve risk – Geographical Diversification - Motor, other classes	The volume measure for Motor, other classes, line of business If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F2	Volume measure for premium and reserve risk - V - Motor, other classes	The volume measure for non-life premium and reserve risk for Motor, other classes $F2 = (C2 + D2) \times (0.75 + 0.25E2)$
A3	Standard deviation for premium risk – USP Standard Deviation -Marine, aviation, transport (MAT)	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for premium risk for Marine, aviation, transport (MAT) line of business as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, A3 = 0
A3A	Standard deviation for premium risk – USP - Adjustment factor for non – proportional reinsurance - Marine, aviation, transport (MAT)	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific adjustment factor for non-proportional reinsurance of a Marine, aviation, transport (MAT) line of business, allowing undertakings to take into account the risk-mitigating effect of particular per risk excess of loss reinsurance, as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, A3A = 0
B3	Standard deviation for reserve risk – USP- Marine, aviation, transport (MAT)	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for reserve risk for Marine, aviation, transport (MAT) line of business as calculated by the undertaking and approved or prescribed by the supervisory authority This item is not reported where no undertaking specific parameter is used. IF A001 = Y, B3 = 0
C3	Volume measure for premium and reserve risk – Vprem - Marine, aviation, transport (MAT)	The volume measure for premium risk for Marine, aviation, transport (MAT) line of business
D3	Volume measure for premium and reserve risk – Vres - Marine, aviation, transport (MAT)	The volume measure for reserve risk for Marine, aviation, transport (MAT) line of business, equal to the best estimate for the provisions for claims outstanding for the segment, after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles.
E3	Volume measure for premium and reserve risk – Geographical Diversification - Marine, aviation, transport (MAT)	The volume measure for Marine, aviation, transport (MAT) line of business If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F3	Volume measure for premium and reserve risk - V - Marine, aviation, transport (MAT)	The volume measure for non-life premium and reserve risk for Marine, aviation, transport (MAT) line of business $F3 = (C3 + D3) \times (0.75 + 0.25E3)$
A4	Standard deviation for premium risk – USP Standard Deviation - Fire and other property damage	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for premium risk for Fire and other property damage line of business as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, A4 = 0
A4A	Standard deviation for premium risk – USP - Adjustment factor for non – proportional reinsurance - Fire and other property damage	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific adjustment factor for non-proportional reinsurance of a Fire and other property damage line of business, allowing undertakings to take into account the risk-mitigating effect of particular per risk excess of loss reinsurance, as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, A4A = 0
B4	Standard deviation for reserve risk – USP- Fire and other property damage	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for reserve risk for Fire and other property damage line of business as calculated by the undertaking and approved or prescribed by the supervisory authority This item is not reported where no undertaking specific parameter is used. IF A001 = Y, B4 = 0
C4	Volume measure for premium and reserve risk – Vprem - Fire and other property damage	The volume measure for premium risk for Fire and other property damage line of business
D4	Volume measure for premium and reserve risk – Vres - Fire and other property damage	The volume measure for reserve risk for Fire and other property damage line of business, equal to the best estimate for the provisions for claims outstanding for the segment, after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles.

E4	Volume measure for premium and reserve risk – Geographical Diversification - Fire and other property damage	For Fire and other property damage line of business undertakings may calculate the factor for geographical diversification DIV_g according to Solvency II requirements. If the factor for geographical diversification is not calculated, then E4 is set to the default value of 1. IF A001 = Y, E4 = 0
F4	Volume measure for premium and reserve risk - V - Fire and other property damage	The volume measure for non-life premium and reserve risk for Fire and other property damage line of business $F4 = (C4 + D4) \times (0.75 + 0.25E4)$
A5	Standard deviation for premium risk – USP Standard Deviation -Third party liability	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for premium risk for Third party liability line of business as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, A5 = 0
A5A	Standard deviation for premium risk – USP - Adjustment factor for non – proportional reinsurance - Third party liability	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific adjustment factor for non-proportional reinsurance of a Third party liability line of business allows undertakings to take into account the risk-mitigating effect of particular per risk excess of loss reinsurance, as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, A5A = 0
B5	Standard deviation for reserve risk – USP- Third party liability	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for reserve risk for Third party liability line of business as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, B5 = 0
C5	Volume measure for premium and reserve risk – Vprem - Third party liability	The volume measure for premium risk for Third party liability line of business
D5	Volume measure for premium and reserve risk – Vres - Third party liability	The volume measure for reserve risk for Third party liability line of business, equal to the best estimate for the provisions for claims outstanding for the segment, after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles.
E5	Volume measure for premium and reserve risk – Geographical Diversification - Third party liability	The volume measure for Third party liability line of business undertakings If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F5	Volume measure for premium and reserve risk - V - Third party liability	The volume measure for non-life premium and reserve risk for Third party liability line of business $F5 = (C5 + D5) \times (0.75 + 0.25E5)$
A6	Standard deviation for premium risk – USP Standard Deviation -Credit and suretyship	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for premium risk for Credit and suretyship line of business as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, A6 = 0
A6A	Standard deviation for premium risk – USP - Adjustment factor for non – proportional reinsurance – Credit and suretyship	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific adjustment factor for non-proportional reinsurance of a Credit and suretyship line of business, allowing undertakings to take into account the risk-mitigating effect of particular per risk excess of loss reinsurance, as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, A6A = 0
B6	Standard deviation for reserve risk – USP- Credit and suretyship	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for reserve risk for Credit and suretyship line of business as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, B6 = 0
C6	Volume measure for premium and reserve risk – Vprem - Credit and suretyship	The volume measure for premium risk for Credit and suretyship line of business
D6	Volume measure for premium and reserve risk – Vres - Credit and suretyship	The volume measure for reserve risk for Credit and suretyship line of business, equal to the best estimate for the provisions for claims outstanding for the segment, after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles.
E6	Volume measure for premium and reserve risk – Geographical Diversification - Credit and suretyship	The volume measure for Credit and suretyship line of business undertakings If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.

F6	Volume measure for premium and reserve risk - V - Credit and suretyship	The volume measure for non-life premium and reserve risk for Credit and suretyship line of business $F6 = (C6 + D6) \times (0.75 + 0.25E6)$
A7	Standard deviation for premium risk – USP Standard Deviation - Legal expenses	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for premium risk for Legal expenses line of business, calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, A7 = 0
A7A	Standard deviation for premium risk – USP - Adjustment factor for non – proportional reinsurance – Legal expenses	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific adjustment factor for non-proportional reinsurance of a Legal expenses line of business, allowing undertakings to take into account the risk-mitigating effect of particular per risk excess of loss reinsurance, as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, A7A = 0
B7	Standard deviation for reserve risk – USP- Legal expenses	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for reserve risk for Legal expenses line of business as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used.
C7	Volume measure for premium and reserve risk – Vprem - Legal expenses	The volume measure for premium risk for Legal expenses line of business
D7	Volume measure for premium and reserve risk – Vres - Legal expenses	The volume measure for reserve risk for Legal expenses line of business, equal to the best estimate for the provisions for claims outstanding for the segment, after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles.
E7	Volume measure for premium and reserve risk – Geographical Diversification - Legal expenses	The volume measure for Legal expenses line of business If the factor for geographical diversification is not calculated, then E7 is set to the default value of 1.
F7	Volume measure for premium and reserve risk - V - Legal expenses	The volume measure for non-life premium and reserve risk for Legal expenses line of business $F7 = (C7 + D7) \times (0.75 + 0.25E7)$
A8	Standard deviation for premium risk – USP Standard Deviation - Assistance	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for premium risk for Assistance line of business as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, A8 = 0
A8A	Standard deviation for premium risk – USP - Adjustment factor for non – proportional reinsurance – Assistance	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific adjustment factor for non-proportional reinsurance of an Assistance line of business, allowing undertakings to take into account the risk-mitigating effect of particular per risk excess of loss reinsurance, as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, A8A = 0
B8	Standard deviation for reserve risk – USP- Assistance	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for reserve risk for an Assistance line of business as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, this cell = 0
C8	Volume measure for premium and reserve risk – Vprem – Assistance	The volume measure for premium risk for Assistance line of business
D8	Volume measure for premium and reserve risk – Vres - Assistance	The volume measure for reserve risk for Assistance line of business, equal to the best estimate for the provisions for claims outstanding for the segment, after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles.

E8	Volume measure for premium and reserve risk – Geographical Diversification - Assistance	The volume measure for Assistance line of business If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F8	Volume measure for premium and reserve risk - V - Assistance	The volume measure for non-life premium and reserve risk for Assistance line of business $F8 = (C8 + D8) \times (0.75 + 0.25E8)$
A9	Standard deviation for premium risk – USP Standard Deviation - Miscellaneous	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for premium risk for Miscellaneous line of business as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, A9 = 0
A9A	Standard deviation for premium risk – USP - Adjustment factor for non – proportional reinsurance – Miscellaneous	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific adjustment factor for non-proportional reinsurance of a Miscellaneous line of business, allowing undertakings to take into account the risk-mitigating effect of particular per risk excess of loss reinsurance, as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, A9A = 0
B9	Standard deviation for reserve risk- USP – Miscellaneous	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for reserve risk for Miscellaneous line of business as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, B9 = 0
C9	Volume measure for premium and reserve risk – Vprem - Miscellaneous	The volume measure for premium risk for Miscellaneous line of business
D9	Volume measure for premium and reserve risk – Vres - Miscellaneous	The volume measure for reserve risk for Miscellaneous line of business, equal to the best estimate for the provisions for claims outstanding for the Miscellaneous line of business, after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles.
E9	Volume measure for premium and reserve risk – Geographical Diversification - Miscellaneous	The volume measure for Miscellaneous line of business If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F9	Volume measure for premium and reserve risk - V - Miscellaneous	The volume measure for non-life premium and reserve risk $F9 = (C9 + D9) \times (0.75 + 0.25E9)$
A10	Standard deviation for premium risk – USP Standard Diviation- Non – proportional reinsurance –property	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for premium risk Non-proportional reinsurance - property line of business as calculated by the undertaking and approved or prescribed by the supervisory authority This item is not reported where no undertaking specific parameter is used. IF A001 = Y, A10 = 0
A10A	Standard deviation for premium risk – USP - Adjustment factor for non – proportional reinsurance – property	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific adjustment factor for non-proportional reinsurance of a line of business, allowing undertakings to take into account the risk-mitigating effect of particular per risk excess of loss reinsurance, as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used.
B10	Standard deviation for reserve risk – USP-Non – proportional reinsurance - property	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for reserve risk for Non-proportional reinsurance – property line of business as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, B10 = 0
C10	Volume measure for premium and reserve risk – Vprem - Non – proportional reinsurance - property	The volume measure for premium risk for Non-proportional reinsurance – property line of business
D10	Volume measure for premium and reserve risk – Vres - Non – proportional reinsurance - property	The volume measure for reserve risk for Non-proportional reinsurance – property line of business, equal to the best estimate for the provisions for claims outstanding for the Non-proportional reinsurance – property , after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles.
E10	Volume measure for premium and reserve risk – Geographical Diversification -	The volume measure for Non-proportional reinsurance – property line of business

	Non – proportional reinsurance - property	IF A001 = Y, E10 = 0
F10	Volume measure for premium and reserve risk - V - Non – proportional reinsurance - property	The volume measure for non-life premium and reserve risk for Non-proportional reinsurance – property $F10 = (C10 + D10) \times (0.75 + 0.25E10)$ IF A001 = Y, F10 = 0
A11	Standard deviation for premium risk – USP Standard Deviation - Non – proportional reinsurance – casualty	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for premium risk for Non-proportional reinsurance – casualty line of business as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, A11 = 0
A11A	Standard deviation for premium risk – USP - Adjustment factor for non – proportional reinsurance – Non-proportional reinsurance-casualty	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific adjustment factor for non-proportional reinsurance of a Non-proportional reinsurance – casualty line of business, allowing undertakings to take into account the risk-mitigating effect of particular per risk excess of loss reinsurance, as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, A11A = 0
B11	Standard deviation for reserve risk – USP- Non – proportional reinsurance – casualty	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for reserve risk for Non-proportional reinsurance – casualty line of business as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, B11 = 0
C11	Volume measure for premium and reserve risk – Vprem - Non – proportional reinsurance – casualty	The volume measure for premium risk for Non-proportional reinsurance – casualty line of business
D11	Volume measure for premium and reserve risk – Vres - Non – proportional reinsurance - casualty	The volume measure for reserve risk for Non-proportional reinsurance – casualty line of business, equal to the best estimate for the provisions for claims outstanding for the Non-proportional reinsurance – casualty, after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles.
E11	Volume measure for premium and reserve risk – Geographical Diversification - Non – proportional reinsurance – casualty	The volume measure for Non-proportional reinsurance – casualty line of business If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F11	Volume measure for premium and reserve risk - V - Non – proportional reinsurance – casualty	The volume measure for non-life premium and reserve risk for Non-proportional reinsurance – casualty line of business $F11 = (C11 + D11) \times (0.75 + 0.25E11)$
A12	Standard deviation for premium risk – USP Standard Deviation - Non – proportional reinsurance – MAT	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for premium risk for Non-proportional reinsurance – MAT line of business as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, A12 = 0
A12A	Standard deviation for premium risk – USP - Adjustment factor for non – proportional reinsurance – Non-proportional reinsurance-MAT	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific adjustment factor for non-proportional reinsurance of a Non-proportional reinsurance – MAT line of business, allowing undertakings to take into account the risk-mitigating effect of particular per risk excess of loss reinsurance, as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, A12A = 0
B12	Standard deviation for reserve risk – USP - Non – proportional reinsurance – MAT	NOT APPLICABLE for the purpose of preparatory phase This is the undertaking specific standard deviation for reserve risk for Non-proportional reinsurance – MAT line of business as calculated by the undertaking and approved or prescribed by the supervisory authority. This item is not reported where no undertaking specific parameter is used. IF A001 = Y, B12 = 0
C12	Volume measure for premium and reserve risk – Vprem - Non – proportional reinsurance – MAT	The volume measure for premium risk for Non-proportional reinsurance – MAT line of business

D12	Volume measure for premium and reserve risk – Vprem - Non – proportional reinsurance – MAT	The volume measure for reserve risk for Non-proportional reinsurance – MAT line of business, equal to the best estimate for the provisions for claims outstanding for the Non-proportional reinsurance – MAT, after deduction of the amount recoverable from reinsurance contracts and special purpose vehicles.
E12	Volume measure for premium and reserve risk – Geographical Diversification - Non – proportional reinsurance – MAT	The volume measure for Non-proportional reinsurance – MAT line of business If the factor for geographical diversification is not calculated, then this item is set to the default value of 1.
F12	Volume measure for premium and reserve risk - V - Non – proportional reinsurance - MAT	The volume measure for non-life premium and reserve risk for Non-proportional reinsurance – MAT $F12 = (C12 + D12) \times (0.75 + 0.25E12)$
A13	Combined standard deviation	This is the combined standard deviation for premium and reserve risk for all segments.
F13	Total Volume measure for premium and reserve risk	The total volume measure for premium and reserve risk, equal to the sum of the volume measures for premium and reserve risk for all lines of business: $F13 = \text{sum}(F1:F12)$
A14	Total capital requirement for non – life premium and reserve risk	This is the total capital charge for the non-life premium and reserve risk sub module. IF A001=Y, item A14 represents total capital charge for non-life premium and reserve risk sub module calculated using simplified calculation.

Non life lapse risk

A15	Initial absolute values before shock – Assets – Non-life underwriting risk - Lapse risk	This is the absolute value of the assets subject to the Non-life lapse risk, before the shock.
A15A	Initial absolute values before shock – Liabilities – Non-life underwriting risk - Lapse risk	This is the absolute value of liabilities subject to the Non-life lapse risk, before the shock.
B15	Absolute values after shock – Assets – Non-life underwriting risk - Lapse risk	This is the absolute value of the assets subject to non life lapse risk, after the shock.
B15A	Absolute values after shock – Liabilities – Non-life underwriting risk - Lapse risk	This is the absolute value of the liabilities subject to non life lapse risk, after the shock.
C15	Solvency capital requirement - Non-life underwriting risk - Lapse risk	This is the capital charge for non life underwriting lapse risk. $C15 = (A15 - A15A) - (B15 - B15B)$, $C15 \geq 0$.

Non – life catastrophe risk

A16	Capital requirement for non – life catastrophe risk	This is the total non life catastrophe risk capital requirement. This cell should agree with C21 on template SCR – B3F.
A17	Diversification within non - life underwriting risk module	This is the diversification effect within the non-life underwriting risk sub-module as a result of the aggregation of the capital requirements premium and reserve risk, catastrophe risk and lapse risk. $A17 = A18 - C15 - A16 - A14$
A18	Total capital requirement for non-life underwriting risk	This is the solvency capital requirement for non-life underwriting risk sub module. This item should agree with A5 on SCR – B2A.

Technical Annex II: List of quantitative reporting items

S.26.06

Solvency Capital Requirement - Operational risk

ITEM		INSTRUCTIONS
A30	Ring Fenced Fund? (Y/N)	Identifies whether the reported figures are with regard to RFF or with regard to remaining part . One of the options in the following list shall be used: When the items reported refer to a RFF: Y When the items reported refer to a Remaining part: N
A0	Fund number	Identification number for a ring fenced fund; This number is attributed by the undertaking and must be consistent over time and with the fund number in TP (L) F3, item A3, Assets D1 item A2 and Own Funds items A0115.1 ...n. This item is to be reported only when item A30 = Y.
A1	Life gross technical provisions (excluding risk margin)	This is technical provisions for life insurance obligations. For these purposes, technical provisions should not include the risk margin, and should be without deduction of recoverables from reinsurance contracts and special purpose vehicles.
A2	Life gross technical provisions unit-linked (excluding risk margin)	This is technical provisions for life insurance obligations where the investment risk is borne by the policyholders. For these purposes, technical provisions should not include the risk margin, and should be without deduction of recoverables from reinsurance contracts and special purpose vehicles.
A3	Non-life gross technical provisions (excluding risk margin)	This is technical provisions for non-life insurance obligations. For these purposes, technical provisions should not include the risk margin, and should be without deduction of recoverables from reinsurance contracts and special purpose vehicles.
A4	Capital requirement for operational risk based on technical provisions	This is the capital requirement for operational risk based on technical provisions $A4 = 0.0045 * \max(0, (A1 - A2)) + 0.03 * \max(0, A3)$
A5	Earned life gross premiums (previous 12 months)	Premium earned during the previous 12 months for life insurance obligations, without deducting premium ceded to reinsurance
A6	Earned life gross premiums unit-linked (previous 12 months)	Premium earned during the previous 12 months for life insurance obligations where the investment risk is borne by the policyholders without deducting premium ceded to reinsurance
A7	Earned non-life gross premiums (previous 12 months)	Premium earned during the previous 12 months for non-life insurance obligations, without deducting premiums ceded to reinsurance
A8	Earned life gross premiums (12 months prior to the previous 12 months)	Premium earned during the 12 months prior to the previous 12 months for life insurance obligations, without deducting premium ceded to reinsurance
A9	Earned life gross premiums unit-linked (12 months prior to the previous 12 months)	Premium earned during the 12 months prior to the previous 12 months for life insurance obligations where the investment risk is borne by the policy holders without deducting premium ceded to reinsurance.
A10	Earned non-life gross premiums (12 months prior to the previous 12 months)	Premium earned during the 12 months prior to the previous 12 months for non-life insurance obligations, without deducting premiums ceded to reinsurance
A11	Capital requirement for operational risk based on earned premiums	This is the capital requirement for operational risks based on earned premiums.

A12	Capital requirement for operational risk charge before capping	This is the capital requirement for operational risk before capping adjustment A12 = Max (A4,A11)
A13	Percentage of Basic Solvency Capital Requirement	Without precluding the final design of reporting on SCR, this is the result of the percentage applied to the Basic SCR reported in item B10 on SCR-B2A
A14	Capital requirement for operational risk charge after capping	This is the capital requirement for operational risk after capping adjustment. A14 = min (A12, A13)
A15	Expenses incurred in respect of unit linked business (previous 12 months)	This is the amount of expenses incurred in the previous 12 months in respect of life insurance where the investment risk is borne by the policyholders.
A16	The total capital requirement for operational risk	This is the capital charge for operational risk. Without precluding the final design of reporting on SCR, the figure will correspond to in item A13 on SCR-B2A

Technical Annex II: List of quantitative reporting items

S.27.01

Solvency Capital Requirement - Non-life catastrophe risk

ITEM		INSTRUCTIONS
A0	Fund number	Identification number for a ring fenced fund; This number is attributed by the undertaking and must be consistent over time and with the fund number in TP (L) F3, item A3, Assets D1 item A2 and Own Funds items A0115.1 ...n. This item is to be reported only when item A30 = Y.
A30	Ring Fenced Fund? (Y/N)	Identifies whether the reported figures are with regard to RFF or with regard to remaining part . One of the options in the following list shall be used: When the items reported refer to a RFF: Y When the items reported refer to a Remaining part: N
Non-life catastrophe risk – Summary		
A1	Gross SCR – Natural catastrophe risk	This is the total gross catastrophe risk arising from all natural catastrophe perils and taking into consideration the diversification effect between the perils given in A7.
A2:A6	Gross SCR – Natural catastrophe risk perils	This is the total gross capital requirement per natural catastrophe peril, taking into consideration the diversification effect between zones and regions. Amounts for the following risk perils are to be reported, when present: Windstorm Earthquake Flood Hail Subsidence Per natural peril this amount is equal to the Gross Catastrophe Risk Charge: A2=AF39 A3=BE39 A4=CF33 A5=DF28 A6=EE3
A7	Gross SCR – Diversification between perils	Diversification effect arising from the aggregation of the total gross capital charges relating to different natural catastrophe perils. $A7 = \text{SUM}(A2:A6) - A1$
B1	Total risk mitigation – Natural catastrophe risk	This is the total risk mitigation effect of the undertaking’s specific reinsurance contracts and special purpose vehicles arising from all natural catastrophe perils and taking into consideration the diversification effect between the perils given in B7. $B1 = C1 - A1$
B2:B6	Total risk mitigation – Natural catastrophe risk perils	This is the total risk mitigation effect of the undertaking’s specific reinsurance contracts and special purpose vehicles per natural catastrophe peril. Amounts for the following risk perils are to be reported, when present: Windstorm Earthquake Flood Hail Subsidence $B2 = A2 - C2$ $B3 = A3 - C3$ $B4 = A4 - C4$ $B5 = A5 - C5$ $B6 = A6 - C6$
B7	Total risk mitigation – Diversification between perils	Diversification effect arising from the aggregation of the risk mitigation effect of the undertaking’s specific reinsurance contracts and special purpose vehicles relating to different natural catastrophe perils. $B7 = A7 - C7$
C1	Net SCR – Natural catastrophe risk	This is the total net catastrophe risk arising from all natural catastrophe perils and taking into consideration the diversification effect between the perils given in C7.
C2:C6	Net SCR – Natural catastrophe risk perils	This is the total net capital requirement per natural catastrophe peril, taking into consideration the diversification effect between zones and regions. Amounts for the following risk perils are to be reported, when present: Windstorm Earthquake Flood Hail Subsidence Per natural peril this amount is equal to the Net Catastrophe Risk Charge: C2=AI39 C3=BH39 C4=CI33 C5=DI28 C6=EH3
C7	Net SCR – Diversification between perils	Diversification effect arising from the aggregation of the total net capital charges relating to different natural catastrophe perils. $C7 = \text{SUM}(C2:C6) - C1$

	ITEM	INSTRUCTIONS
A8	Gross SCR – Catastrophe risk non-proportional property	This is the total gross catastrophe risk arising from non-proportional property reinsurance. A8=FB1
B8	Total risk mitigation – Catastrophe risk non-proportional property reinsurance	This is the total risk mitigation effect of the undertaking’s specific reinsurance contracts and special purpose vehicles for non-proportional property reinsurance. B8=A8-C8
C8	Net SCR – Catastrophe risk non-proportional property reinsurance	This is the total net catastrophe risk arising from non-proportional property reinsurance. C8=FE1
A9	Gross SCR – Man-made catastrophe risk	This is the total gross catastrophe risk arising from all man-made perils and taking into consideration the diversification between the perils given in A16.
A10:A15	Gross SCR – Man-made catastrophe risk perils	This is the total gross capital requirement per man-made peril, taking into consideration the diversification effect between sub-perils. Amounts for the following risk perils are to be reported, when present: Motor vehicle liability Marine Aviation Fire Liability Credit & Suretyship Per man-made peril this amount is equal to the Gross Catastrophe Risk Charge: A10=GA3 A11=HC3 A12=IC1 A13=JA1 A14=KC8 A15=LC12
A16	Gross SCR – Diversification between perils	Diversification effect arising from the aggregation of the total gross capital charges relating to different man-made perils. A16=SUM(A10:A15)-A9
B9	Total risk mitigation – Man-made catastrophe risk	This is the total risk mitigation effect of the undertaking’s specific reinsurance contracts and special purpose vehicles arising from all man-made perils and taking into consideration the diversification effect between the perils given in B16. B9=A9-C9
B10:B15	Total risk mitigation – Man-made catastrophe risk perils	This is the total risk mitigation effect of the undertaking’s specific reinsurance contracts and special purpose vehicles per man-made catastrophe peril. Amounts for the following risk perils are to be reported, when present: Motor vehicle liability Marine Aviation Fire Liability Credit & Suretyship B10=A10-C10 B11=A11-C11 B12=A12-C12 B13=A13-C13 B14=A14-C14 B15=A15-C15
B16	Total risk mitigation – Diversification between perils	Diversification effect arising from the aggregation of the risk mitigation effect of the undertaking’s specific reinsurance contracts and special purpose vehicles relating to different man-made perils. B16=A16-C16
C9	Net SCR – Man-made catastrophe risk	This is the total net catastrophe risk arising from all man-made catastrophe perils and taking into consideration the diversification effect between the perils given in C16.

	ITEM	INSTRUCTIONS
C10:C15	Net SCR – Man-made catastrophe risk perils	This is the total net capital requirement per man-made catastrophe peril, taking into consideration the diversification effect between zones and regions. Amounts for the following risk perils are to be reported, when present: Motor vehicle liability Marine Aviation Fire Liability Credit & Suretyship Per man-made peril this amount is equal to the Net Catastrophe Risk Charge: C10=GA6 C11=HC5 C12=IF1 C13=JA4 C14=KC10 C15=LC14
C16	Net SCR – Diversification between perils	Diversification effect arising from the aggregation of the total net capital charges relating to different man-made catastrophe perils. C16=SUM(C10:C15)-C9
A17	Gross SCR – Other non-life catastrophe risk	This is the total gross catastrophe risk arising from all "other non-life" perils and taking into consideration the diversification between the perils given in A18.
A18	Gross SCR – Diversification between perils	Diversification effect arising from the aggregation of the total gross capital charges relating to different "other non-life" perils. A18=MG2
B17	Total risk mitigation – Other non-life catastrophe risk	This is the total risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles arising from all "other non-life" perils and taking into consideration the diversification effect between the perils given in B18. B17=A17-C17
B18	Total risk mitigation – Diversification between perils	Diversification effect arising from the aggregation of the risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to different "other non-life" perils. B18=A18-C18
C17	Net SCR – Other non-life catastrophe risk	This is the total net catastrophe risk arising from all "other non-life" catastrophe perils and taking into consideration the diversification effect between the perils given in C18.
C18	Net SCR – Diversification between perils	Diversification effect arising from the aggregation of the total net capital charges relating to different "other non-life" catastrophe perils. C18=MG4
A19	Gross SCR - Total Non-life catastrophe risk before diversification	This is the total gross catastrophe risk arising from all the sub-modules (Natural catastrophe, Non-proportional property reinsurance, Man-made and "Other non-life" catastrophe risks) before the diversification between the sub-modules. A19=A1+A8+A9+A17
A20	Gross SCR - Diversification between sub-modules	Diversification effect arising from the aggregation of the total gross capital charges relating to different sub-modules (Natural catastrophe, Non-proportional property reinsurance, Man-made and "Other non-life" catastrophe risks). A20=A19-A21
A21	Gross SCR - Total Non-life catastrophe risk after diversification	This is the total gross catastrophe risk arising from all the sub-modules (Natural catastrophe, Non-proportional property reinsurance, Man-made and "Other non-life" catastrophe risks), taking into consideration the diversification between the sub-modules given in A20.
B19	Total risk mitigation – Total Non-life catastrophe risk before diversification	This is the total risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles arising from all the sub-modules (Natural catastrophe, Non-proportional property reinsurance, Man-made and "Other non-life" catastrophe risks), before the diversification between the sub-modules. B19=A19-C19
B20	Total risk mitigation – Diversification between sub-modules	Diversification effect arising from the aggregation of the risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to different sub-modules (Natural catastrophe, Non-proportional property reinsurance, Man-made and "Other non-life" catastrophe risks). B20=A20-C20
B21	Total risk mitigation – Total Non-life catastrophe risk after diversification	This is the total risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles arising from all the sub-modules (Natural catastrophe, Non-proportional property reinsurance, Man-made and "Other non-life" catastrophe risks), taking into consideration the diversification effect between the sub-modules given in B20. B21=A21-C21
C19	Net SCR - Total Non-life catastrophe risk before diversification	This is the total net catastrophe risk arising from all the sub-modules (Natural catastrophe, Non-proportional property reinsurance, Man-made and "Other non-life" catastrophe risks), before the diversification between the sub-modules. C19=C1+C8+C9+C17

	ITEM	INSTRUCTIONS
C20	Net SCR - Diversification between sub-modules	Diversification effect arising from the aggregation of the total net capital charges relating to different sub-modules (Natural catastrophe, Non-proportional property reinsurance, Man-made and "Other non-life" catastrophe risks). C20=C19-C21
C21	Net SCR - Total Non-life catastrophe risk after diversification	This is the total net catastrophe risk arising from all the sub-modules (Natural catastrophe, Non-proportional property reinsurance, Man-made and "Other non-life" catastrophe risks), taking into consideration the diversification between the sub-modules given in item C20.
Health catastrophe risk – Summary		
A22	Gross SCR – Health catastrophe risk	This is the total gross catastrophe risk arising from all Health catastrophe risk sub-modules and taking into consideration the diversification between the sub-modules given in A26.
A23:A25	Gross SCR – Health catastrophe risk sub-modules	This is the total gross capital requirement per Health catastrophe risk sub-modules, taking into consideration the diversification effect between the countries. Amounts for the following risk perils are to be reported, when present: Mass accident Accident concentration Pandemic Per Health catastrophe risk sub-module this amount is equal to the Gross Catastrophe Risk Charge: A23=NK34 A24=OG34 A25=PJ33
A26	Gross SCR – Diversification between sub-modules	Diversification effect arising from the aggregation of the total gross capital charges relating to different Health risk catastrophe sub-modules. A26=SUM(A23:A25)-A22
B22	Total risk mitigation – Health catastrophe risk	This is the total risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles arising from all Health risk catastrophe sub-modules and taking into consideration the diversification effect between the sub-modules given in B26. B22=A22-C22
B23:B25	Total risk mitigation – Health catastrophe risk sub-modules	This is the total risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles per Health catastrophe risk sub-module. Amounts for the following risk perils are to be reported, when present: Mass accident Accident concentration Pandemic B23=A23-C23 B24=A24-C24 B25=A25-C25
B26	Total risk mitigation – Diversification between sub-modules	Diversification effect arising from the aggregation of the risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to different Health catastrophe risk sub-modules. B26=A26-C26
C22	Net SCR – Health catastrophe risk	This is the total net catastrophe risk arising from all Health catastrophe risk sub-modules and taking into consideration the diversification effect between the sub-modules given in C26. Amount must be equal with the amount for Total capital requirement for health catastrophe risk (item A25) mentioned in the template for SCR Health underwriting risk (SCR-B3D).
C23:C25	Net SCR – Health catastrophe risk sub-modules	This is the total net capital requirement per Health catastrophe risk sub-module, taking into consideration the diversification effect between countries. Amounts for the following risk perils are to be reported, when present: Mass accident Accident concentration Pandemic Per Health catastrophe risk sub-module this amount is equal to the Net Catastrophe Risk Charge: C23=NN34 C24=OJ34 C25=PM33
C26	Net SCR – Diversification between sub-modules	Diversification effect arising from the aggregation of the total net capital charges relating to different Health catastrophe risk sub-modules. C26=SUM(C23:C25)-C22

ITEM

INSTRUCTIONS

Natural catastrophe risk – Windstorm

AA1:AA20	Estimation of the gross premium to be earned – EEA Region	<p>An estimate of the premiums to be earned by the insurance or reinsurance undertaking, during the following year in relation to the 20 EEA regions for the contract in relation to the obligations of lines of business :</p> <ul style="list-style-type: none"> · Fire and other damage, including the proportional reinsurance obligations; · Marine, aviation and transport insurance, including the proportional reinsurance obligations. <p>Premiums shall be gross, without deduction of premiums for reinsurance contracts. EEA regions are the following ones:</p> <p>Republic of Austria Kingdom of Belgium Czech Republic Swiss Confederation; Principality of Lichtenstein Kingdom of Denmark French Republic [except Guadeloupe, Martinique, the Collectivity of Saint Martin and Réunion] Federal Republic of Germany Republic of Iceland Ireland Grand Duchy of Luxemburg Kingdom of the Netherlands Kingdom of Norway Republic of Poland Kingdom of Spain; Principality of Andorra Kingdom of Sweden United Kingdom of Great Britain and Northern Ireland Guadeloupe Martinique Collectivity of Saint Martin Réunion</p>
AA21	Estimation of the gross premium to be earned – Total Windstorm EEA Regions before diversification	AA21=SUM(AA1:AA20)
AA22:AA35	Estimation of the gross premium to be earned – Other Regions	<p>An estimate of the premiums to be earned by the insurance or reinsurance undertaking, during the following year in relation to the 14 regions other than the EEA regions, for the contract in relation to the obligations of lines of business :</p> <ul style="list-style-type: none"> · Fire and other damage, including the proportional reinsurance obligations; · Marine, aviation and transport insurance, including the proportional reinsurance obligations. <p>Premiums shall be gross, without deduction of premiums for reinsurance contracts. The 14 other that the EEA regions are the following ones:</p> <p>Central and Western Asia Eastern Asia South and South-Eastern Asia Oceania Northern Africa Southern Africa Northern America excluding the United States of America Caribbean and Central America Eastern South America Northern, southern and western South America North-east United States of America South-east United States of America Mid-west United States of America Western United States of America</p>
AA36	Estimation of the gross premium to be earned - Total Windstorm Other Regions before diversifications	AA36=SUM(AA22:AA35)
AA37	Estimation of the gross premium to be earned - Total Windstorm all Regions before diversification	AA37=AA21+AA36
AB1:AB20	Exposure – EEA Region	<p>The sum of the total sum insured per each of the 20 EEA regions:</p> <ul style="list-style-type: none"> · For lines of business Fire and other damage, including the proportional reinsurance obligations, in relation to contracts that cover windstorm risk and where the risk is situated in this particular EEA region and

	ITEM	INSTRUCTIONS
		<ul style="list-style-type: none"> For lines of business Marine, aviation and transport insurance, including the proportional reinsurance obligations, in relation to contracts that cover onshore property damage by Windstorm and where the risk is situated in this particular EEA region. <p>The 20 EEA regions are the ones identifies in the instructions for items AA1:AA20</p>
AB21	Exposure – Total Windstorm EEA Regions before diversification	$AB21 = \text{SUM}(AB1:AB20)$
AB22:AB35	Exposure – Other Regions	<p>The sum of the total sum insured in relation to the 14 regions other than the EEA regions:</p> <ul style="list-style-type: none"> Fire and other damage, including the proportional reinsurance obligations; Marine, aviation and transport insurance, including the proportional reinsurance obligations. <p>The 14 other that the EEA regions are the ones identifies in the instructions for items AA22:AA35</p>
AB36	Exposure - Total Windstorm Other Regions before diversifications	$AB36 = \text{SUM}(AB22:AB35)$
AB37	Exposure - Total Windstorm all Regions before diversification	$AB37 = AB21 + AB36$
AC1:AC20	Specified Gross Loss – EEA Region	Specified gross windstorm loss per each of the 20 EEA regions, taking into consideration the effect of diversification between zones. The 20 EEA regions are the ones identifies in the instructions for items AA1:AA20.
AC21	Specified Gross Loss – Total Windstorm EEA Regions before diversification	$AC21 = \text{SUM}(AC1:AC20)$
AD1:AD20	Gross Cat Risk Charge Factor – EEA Region	<p>The Risk Charge Factor per each of the 20 EEA regions for Windstorm according to the Standard Formula, taking into consideration the effect of diversification between zones. The 20 EEA regions are the ones identifies in the instructions for items AA1:AA20.</p> <p> $AD1 = AC1/AB1$ $AD2 = AC2/AB2$ $AD3 = AC3/AB3$ $AD4 = AC4/AB4$ $AD5 = AC4/AB5$ $AD6 = AC6/AB6$ $AD7 = AC7/AB7$ $AD8 = AC8/AB8$ $AD9 = AC9/AB9$ $AD10 = AC10/AB10$ $AD11 = AC11/AB11$ $AD12 = AC12/AB12$ $AD13 = AC13/AB13$ $AD14 = AC14/AB14$ $AD15 = AC15/AB15$ $AD16 = AC16/AB16$ $AD17 = AC17/AB17$ $AD18 = AC18/AB18$ $AD19 = AC19/AB19$ $AD20 = AC20/AB20$ </p>
AD21	Gross Cat Risk Charge Factor – Total Windstorm EEA Regions before diversification	$AD21 = \text{SUM}(AD1:AD20)$
AE1:AE20	Scenario A or B – EEA Region	<p>The larger of the capital requirement for Windstorm risk for each of the 20 EEA regions according to scenario A or scenario B. The 20 EEA regions are the ones identifies in the instructions for items AA1:AA20.</p> <p>By determining the largest amount of scenario A and B, the risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, must be taken into account.</p>
AF1:AF20	Gross Catastrophe Risk Charge – EEA Region	Gross capital requirement arising from Windstorm for each of the 20 EEA Regions corresponding to the larger of scenario A or B. The 20 EEA regions are the ones identifies in the instructions for items AA1:AA20.
AF21	Gross Catastrophe Risk Charge – Total Windstorm EEA Regions before diversification	$AF21 = \text{SUM}(AF1:AF20)$

	ITEM	INSTRUCTIONS
AF36	Gross Catastrophe Risk Charge – Total Windstorm Other Regions before diversifications	The gross capital requirement for Windstorm risk in regions other than the EEA Regions. It is the amount of the instantaneous loss, without deduction of the amounts recoverable from reinsurance contracts and Special Purpose Vehicles. The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35
AF37	Gross Catastrophe Risk Charge – Total Windstorm all Regions before diversification	$AF37=AF21+AF36$
AF38	Gross Catastrophe Risk Charge – Diversification effect between regions	Diversification effect arising from the aggregation of the Windstorm risks relating to the different regions (both EEA Regions and "other regions") The EEA regions are the ones identified in the instructions for items AA1:AA20. The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35. $AF38=AF37-AF39$
AF39	Gross Catastrophe Risk Charge – Total Windstorm after diversification	This is the total gross capital requirement for Windstorm risk, taking into consideration the diversification effect reported in item AF38.
AG1:AG20	Estimated Risk Mitigation – EEA Region	Per each of the 20 EEA Regions, the estimated risk mitigation effect, corresponding to the selected scenario, of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated reinstatement premiums. The EEA regions are the ones identified in the instructions for items AA1:AA20.
AG21	Estimated Risk Mitigation – Total Windstorm EEA Regions before diversification	$AG21=SUM(AG1:AG20)$
AG36	Estimated Risk Mitigation – Total Windstorm Other Regions before diversifications	For all the regions other the EEA Regions, the estimated risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated reinstatement premiums. The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35
AG37	Estimated Risk Mitigation – Total Windstorm all Regions before diversification	$AG37=AG21+AG36$
AH1:AH20	Estimated Reinstatement Premiums – EEA Region	For each of the 20 EEA Regions, the estimated reinstatement premiums, corresponding to the selected scenario, as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril. The EEA regions are the ones identified in the instructions for items AA1:AA20.
AH21	Estimated Reinstatement Premiums – Total Windstorm EEA Regions before diversification	$AH21=SUM(AH1:AH20)$
AH36	Estimated Reinstatement Premiums – Total Windstorm Other Regions before diversifications	For all the regions other than the EEA Regions, the estimated reinstatement premiums, as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril. The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35
AH37	Estimated Reinstatement Premiums – Total Windstorm all Regions before diversification	$AH37=AH21+AH36$

	ITEM	INSTRUCTIONS
AI1:AI20	Net Catastrophe Risk Charge – EEA Region	<p>Net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, arising from Windstorms in each of the EEA regions, corresponding to the selected scenario.</p> <p>The EEA regions are the ones identified in the instructions for items AA1:AA20</p> <p>AI1=AF1-AG1+AH1 AI2=AF2-AG2+AH2 AI3=AF3-AG3+AH3 AI4=AF4-AG4+AH4 AI5=AF5-AG5+AH5 AI6=AF6-AG6+AH6 AI7=AF7-AG7+AH7 AI8=AF8-AG8+AH8 AI9=AF9-AG9+AH9 AI10=AF10-AG10+AH10 AI11=AF11-AG11+AH11 AI12=AF12-AG12+AH12 AI13=AF13-AG13+AH13 AI14=AF14-AG14+AH14 AI15=AF15-AG15+AH15 AI16=AF16-AG16+AH16 AI17=AF17-AG17+AH17 AI18=AF18-AG18+AH18 AI19=AF19-AG19+AH19 AI20=AF20-AG20+AH20</p>
AI21	Net Catastrophe Risk Charge – Total Windstorm EEA Regions before diversification	AI21=SUM(AI1:AI20)
AI36	Net Catastrophe Risk Charge – Total Windstorm Other Regions before diversifications	<p>Net capital requirement for Windstorm risk in regions other than the EEA Regions. It is the amount of the instantaneous loss, including the deduction of the amounts recoverable from reinsurance contracts and Special Purpose Vehicles.</p> <p>The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35</p>
AI37	Net Catastrophe Risk Charge - Total Windstorm all Regions before diversification	AI37=AI21+AI36
AI38	Net Catastrophe Risk Charge – Diversification effect between regions	<p>Diversification effect arising from the aggregation of the net capital requirements for Windstorm risks relating to the different regions (both EEA Regions and "other regions").</p> <p>The EEA regions are the ones identified in the instructions for items AA1:AA20. The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35.</p> <p>AI38=AI37-AI39</p>
AI39	Net Catastrophe Risk Charge – Total Windstorm after diversification	This is the total net capital requirement for Windstorm risk, taking into consideration the diversification effect given in item AI38.

ITEM
Natural catastrophe risk – Earthquake

INSTRUCTIONS

BA1:BA20	Estimation of the gross premium to be earned – EEA Region	<p>An estimate of the premiums to be earned, by the insurance or reinsurance undertaking, during the following year in relation to the 20 EEA regions, for the contract in relation to the obligations of lines of business:</p> <ul style="list-style-type: none"> · Fire and other damage, including the proportional reinsurance obligations; · Marine, aviation and transport insurance, including the proportional reinsurance obligations. <p>Premiums shall be gross, without deduction of premiums for reinsurance contracts. The 20 EEA regions are the following ones:</p> <p>Republic of Austria Kingdom of Belgium Republic of Bulgaria Republic of Croatia Republic of Cyprus Czech Republic Swiss Confederation; Principality of Lichtenstein French Republic [except Guadeloupe, Martinique, the Collectivity of Saint Martin and Réunion] Federal Republic of Germany Hellenic Republic Republic of Hungary Italian Republic; Republic of San Marino; Vatican City State Republic of Malta Portuguese Republic Romania Slovak Republic Republic of Slovenia Guadeloupe Martinique Collectivity of Saint Martin</p>
BA21	Estimation of the gross premium to be earned – Total Earthquake EEA Regions before diversification	BA21=SUM(BA1:BA20)
BA22:BA35	Estimation of the gross premium to be earned – Other Regions	<p>An estimate of the premiums to be earned by the insurance or reinsurance undertaking, during the following year in relation to each of the 14 regions other than the EEA Regions, for the contract in relation to the obligations of lines of business :</p> <ul style="list-style-type: none"> · Fire and other damage, including the proportional reinsurance obligations; · Marine, aviation and transport insurance, including the proportional reinsurance obligations. <p>Premiums shall be gross, without deduction of premiums for reinsurance contracts. The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35</p>
BA36	Estimation of the gross premium to be earned – Total Earthquake Other Regions before diversification	BA36=SUM(BA22:BA35)
BA37	Estimation of the gross premium to be earned – Total Earthquake all Regions before diversification	BA37=BA21+BA36
BB1:BB20	Exposure – EEA Region	<p>The sum of the total sum insured per each of the 20 EEA regions:</p> <ul style="list-style-type: none"> · For lines of business Fire and other damage, including the proportional reinsurance obligations, in relation to contracts that cover Earthquake risk and where the risk is situated in this particular EEA region and · For lines of business Marine, aviation and transport insurance, including the proportional reinsurance obligations, in relation to contracts that cover onshore property damage by Earthquake and where the risk is situated in this particular FFA region. <p>The 20 EEA regions are the ones identifies in the instructions for items BA1:BA20.</p>
BB21	Exposure – Total Earthquake EEA Regions before diversification	BB21=SUM(BB1:BB20)

	ITEM	INSTRUCTIONS
BB22:BB35	Exposure – Other Regions	The sum of the total sum insured in relation to each of the 14 regions other than the EEA Regions: <ul style="list-style-type: none"> · Fire and other damage, including the proportional reinsurance obligations; · Marine, aviation and transport insurance, including the proportional reinsurance obligations. The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35
BB36	Exposure – Total Earthquake Other Regions before diversification	BB36=SUM(BB22:BB35)
BB37	Exposure – Total Earthquake All Regions before diversification	BB37=BB21+BB36
BC1:BC20	Specified Gross Loss – EEA Region	Specified gross Earthquake loss for each of the 20 EEA regions, taking into consideration the effect of diversification between zones. The 20 EEA regions are the ones identifies in the instructions for items BA1:BA20.
BC21	Specified Gross Loss – Total Earthquake EEA Regions before diversification	BC21=SUM(BC1:BC20)
BD1:BD20	Gross Cat Risk Charge Factor – EEA Region	The Risk Charge Factor per each of the 20 EEA regions for Earthquake according to the Standard Formula, taking into consideration the effect of diversification between zones. The 20 EEA regions are the ones identifies in the instructions for items BA1:BA20. BD1=BC1/BB1 BD2=BC2/BB2 BD3=BC3/BB3 BD4=BC4/BB4 BD5=BC5/BB5 BD6=BC6/BB6 BD7=BC7/BB7 BD8=BC8/BB8 BD9=BC9/BB9 BD10=BC10/BB10 BD11=BC11/BB11 BD12=BC12/BB12 BD13=BC13/BB13 BD14=BC14/BB14 BD15=BC15/BB15 BD16=BC16/BB16 BD17=BC17/BB17 BD18=BC18/BB18 BD19=BC19/BB19 BD20=BC20/BB20
BD21	Gross Cat Risk Charge Factor – Total Earthquake EEA Regions before diversification	BD21=BC21/BB21
BE1:BE20	Gross Catastrophe Risk Charge – EEA Region	Gross capital requirement arising from Earthquakes in each of the 20 EEA Regions. The 20 EEA regions are the ones identifies in the instructions for items BA1:BA20.
BE21	Gross Catastrophe Risk Charge – Total Earthquake EEA Regions before diversification	BE21=SUM(BE1:BE20)
BE36	Gross Catastrophe Risk Charge – Other Regions before diversification	The gross capital requirement for Earthquake risk in regions other than the EEA Regions. It is the amount of the instantaneous loss, without deduction of the amounts recoverable from reinsurance contracts and Special Purpose Vehicles.
BE37	Gross Catastrophe Risk Charge – All Regions before diversification	BE37=BE21+BE36
BE38	Gross Catastrophe Risk Charge – Diversification effect between regions	Diversification effect arising from the aggregation of the Earthquake risks relating to the different regions (both EEA Regions and Other regions). BE38=BE37-BE39
BE39	Gross Catastrophe Risk Charge – Total Earthquake	This is the total gross capital requirement for Earthquake risk, taking into consideration the diversification effect given in BE38.

	ITEM	INSTRUCTIONS
BF1:BF20	Estimated Risk Mitigation – EEA Region	Per each of the 20 EEA Regions the estimated risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated reinstatement premiums. The 20 EEA regions are the ones identifies in the instructions for items BA1:BA20.
BF21	Estimated Risk Mitigation – Total Earthquake EEA Regions before diversification	$BF21 = \text{SUM}(BF1:BF20)$
BF36	Estimated Risk Mitigation – Other Regions before diversification	For all the regions other than the EEA Regions, the estimated risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated reinstatement premiums.
BF37	Estimated Risk Mitigation – All Regions before diversification	$BF37 = BF21 + BF36$
BG1:BG20	Estimated Reinstatement Premiums – EEA Region	Per each of the 20 EEA Regions the estimated reinstatement premiums as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril. The 20 EEA regions are the ones identifies in the instructions for items BA1:BA20.
BG21	Estimated Reinstatement Premiums – Total Earthquake EEA Regions before diversification	$BG21 = \text{SUM}(BG1:BG20)$
BG36	Estimated Reinstatement Premiums – Other Regions before diversification	For all the regions other than the EEA Regions, the estimated reinstatement premiums, as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril.
BG37	Estimated Reinstatement Premiums – All Regions before diversification	$BG37 = BG21 + BG36$
BH1:BH20	Net Catastrophe Risk Charge – EEA Region	Net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, arising from Earthquake in each of the 20 EEA regions. The 20 EEA regions are the ones identifies in the instructions for items BA1:BA20. $BH1 = BE1 - BF1 + BG1$ $BH2 = BE2 - BF2 + BG2$ $BH3 = BE3 - BF3 + BG3$ $BH4 = BE4 - BF4 + BG4$ $BH5 = BE5 - BF5 + BG5$ $BH6 = BE6 - BF6 + BG6$ $BH7 = BE7 - BF7 + BG7$ $BH8 = BE8 - BF8 + BG8$ $BH9 = BE9 - BF9 + BG9$ $BH10 = BE10 - BF10 + BG10$ $BH11 = BE11 - BF11 + BG11$ $BH12 = BE12 - BF12 + BG12$ $BH13 = BE13 - BF13 + BG13$ $BH14 = BE14 - BF14 + BG14$ $BH15 = BE15 - BF15 + BG15$ $BH16 = BE16 - BF16 + BG16$ $BH17 = BE17 - BF17 + BG17$ $BH18 = BE18 - BF18 + BG18$ $BH19 = BE19 - BF19 + BG19$ $BH20 = BE20 - BF20 + BG20$
BH21	Net Catastrophe Risk Charge – Total Earthquake EEA Region before diversification	$BH21 = \text{SUM}(BH1:BH20)$
BH36	Net Catastrophe Risk Charge – Other Regions before diversification	Net capital requirement for Earthquake risk in regions other than the EEA Regions. It is the amount of the instantaneous loss, including the deduction of the amounts recoverable from reinsurance contracts and Special Purpose Vehicles. $BH36 = BE36 - BF36 + BG36$
BH37	Net Catastrophe Risk Charge – All Regions before diversification	$BH37 = BH21 + BH36$

	ITEM	INSTRUCTIONS
BH38	Net Catastrophe Risk Charge – Diversification effect <u>between regions</u>	Diversification effect arising from the aggregation of the net capital requirements for Earthquake risks relating to the different regions (both EEA Regions and Other regions). BH38=BH37-BH39
BH39	Net Catastrophe Risk Charge – Total Earthquake	This is the total net capital requirement for Earthquake risk, taking into consideration the diversification effect given in BH38.
Natural catastrophe risk – Flood		
CA1:CA14	Estimation of the gross premium to be earned – EEA Region	<p>An estimate of the premiums to be earned, by the insurance or reinsurance undertaking, during the following year in relation to each of the 14 EEA regions, for the contract in relation to the obligations of lines of business :</p> <ul style="list-style-type: none"> · Fire and other damage, including the proportional reinsurance obligations; · Marine, aviation and transport insurance, including the proportional reinsurance obligations; · Other motor insurance, including the proportional reinsurance obligations. <p>Premiums shall be gross, without deduction of premiums for reinsurance contracts. The 14 EEA regions are the ones defined in Annex NLUR7 from Level II Implementing Measures:</p> <p>Republic of Austria Kingdom of Belgium Republic of Bulgaria Czech Republic Swiss Confederation; Principality of Lichtenstein French Republic [except Guadeloupe, Martinique, the Collectivity of Saint Martin and Réunion]; Principality of Monaco Federal Republic of Germany Republic of Hungary Italian Republic; Republic of San Marino; Vatican City State Republic of Poland Romania Slovak Republic Republic of Slovenia United Kingdom of Great Britain and Northern Ireland</p>
CA15	Estimation of the gross premium to be earned – Total Flood EEA Regions before diversification	CA15=SUM(CA1:CA14)
CA16:CA29	Estimation of the gross premium to be earned – Other Regions	<p>An estimate of the premiums to be earned by the insurance or reinsurance undertaking, during the following year in relation to each of the 14 regions other than the EEA Regions, for the contract in relation to the obligations of lines of business :</p> <ul style="list-style-type: none"> · Fire and other damage, including the proportional reinsurance obligations; · Marine, aviation and transport insurance, including the proportional reinsurance obligations; · Other motor insurance, including the proportional reinsurance obligations. <p>Premiums shall be gross, without deduction of premiums for reinsurance contracts. The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35</p>
CA30	Estimation of the gross premium to be earned – Total Flood Other Regions before diversification	CA30=SUM(CA16:CA29)
CA31	Estimation of the gross premium to be earned – Total Flood All Regions before diversification	CA31=CA15+CA30

	ITEM	INSTRUCTIONS
CB1:CB14	Exposure – EEA Region	<p>The sum of the total sum insured per each of the 20 EEA regions:</p> <ul style="list-style-type: none"> · For lines of business Fire and other damage, including the proportional reinsurance obligations, in relation to contracts that cover Flood risk and where the risk is situated in this particular EEA region and · For lines of business Marine, aviation and transport insurance, including the proportional reinsurance obligations, in relation to contracts that cover onshore property damage by Flood and where the risk is situated in this particular EEA region and · For lines of business Other motor insurance, including the proportional reinsurance obligations, multiplied by 1.5, in relation to contracts that cover onshore property damage by Flood and where the risk is situated in this particular EEA region. <p>The 14 EEA regions are the ones identifies in the instructions for items CA1:CA14.</p>
CB15	Exposure – Total Flood EEA Regions before diversification	CB15=SUM(CB1:CB14)
CB16:CB29	Exposure – Other Regions	<p>The sum of the total sum insured in relation to each of the 14 regions other than the EEA Regions:</p> <ul style="list-style-type: none"> · Fire and other damage, including the proportional reinsurance obligations; · Marine, aviation and transport insurance, including the proportional reinsurance obligations; · Other motor insurance, including the proportional reinsurance obligations. <p>The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35</p>
CB30	Exposure – Total Flood Other Regions before diversification	CB30=SUM(CB16:CB29)
CB31	Exposure – Total Flood All Regions before diversification	CB31=CB15+CB30
CC1:CC14	Specified Gross Loss – EEA Region	<p>Specified gross Flood loss in each of the 14 EEA regions, taking into consideration the effect of diversification between zones.</p> <p>The 14 EEA regions are the ones identifies in the instructions for items CA1:CA14.</p>
CC15	Specified Gross Loss – Total Flood EEA Regions before diversification	CC15=SUM(CC1:CC14)
CD1:CD14	Gross Cat Risk Charge Factor – EEA Region	<p>The Risk Charge Factor per each of the 14 EEA regions for Flood according to the Standard Formula, taking into consideration the effect of diversification between zones.</p> <p>The 14 EEA regions are the ones identifies in the instructions for items CA1:CA14.</p> <p>CD1=CC1/CB1 CD2=CC2/CB2 CD3=CC3/CB3 CD4=CC4/CB4 CD5=CC5/CB5 CD6=CC6/CB6 CD7=CC7/CB7 CD8=CC8/CB8 CD9=CC9/CB9 CD10=CC10/CB10 CD11=CC11/CB11 CD12=CC12/CB12 CD13=CC13/CB13 CD14=CC14/CB14</p>
CD15	Gross Cat Risk Charge Factor – Total Flood EEA Regions before diversification	CD15=CC15/CB15
CE1:CE14	Scenario A or B – EEA Region	<p>The larger of the capital requirement for Flood risk in each of the 14 EEA regions according to scenario A or scenario B.</p> <p>The 14 EEA regions are the ones identifies in the instructions for items CA1:CA14.</p> <p>By determining the largest amount of scenario A and B, the risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, must be taken into account.</p>
CF1:CF14	Gross Catastrophe Risk Charge – EEA Region	<p>Gross capital requirement arising from Floods in each of th 14 EEA Regions, corresponding to the larger of scenario A or B.</p> <p>The 14 EEA regions are the ones identifies in the instructions for items CA1:CA14.</p>

	ITEM	INSTRUCTIONS
CF15	Gross Catastrophe Risk Charge – Total Flood EEA Regions before diversification	CF15=SUM(CF1:CF14)
CF30	Gross Catastrophe Risk Charge – Total Flood Other Regions before diversification	The gross capital requirement for Flood risk in regions other than the EEA Regions. It is the amount of the instantaneous loss, without deduction of the amounts recoverable from reinsurance contracts and Special Purpose Vehicles.
CF31	Gross Catastrophe Risk Charge – Total Flood All Regions before diversification	CF31=CF15+CF30
CF32	Gross Catastrophe Risk Charge – Diversification effect between regions	Diversification effect arising from the aggregation of the Flood risks relating to the different regions (both EEA Regions and Other regions). CF32=CF31-CF33
CF33	Gross Catastrophe Risk Charge – Total Flood after diversification	This is the total gross capital requirement for Flood risk, taking into consideration the diversification effect given in CF32.
CG1:CG14	Estimated Risk Mitigation – EEA Region	Per each of the 14 EEA Regions the estimated risk mitigation effect, corresponding to the selected scenario, of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated reinstatement premiums. The 14 EEA regions are the ones identifies in the instructions for items CA1:CA14.
CG15	Estimated Risk Mitigation – Total Flood EEA Regions before diversification	CG15=SUM(CG1:CG14)
CG30	Estimated Risk Mitigation – Flood Other Regions before diversification	For all the regions other than the EEA Regions, the estimated risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated reinstatement premiums.
CG31	Estimated Risk Mitigation – Flood All Regions before diversification	CG31=CG15+CG30
CH1:CH14	Estimated Reinstatement Premiums – EEA Region	Per each of the 14 EEA Regions the estimated reinstatement premiums, corresponding to the selected scenario, as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril. The 14 EEA regions are the ones identifies in the instructions for items CA1:CA14.
CH15	Estimated Reinstatement Premiums – EEA Regions before diversification	CH15=SUM(CH1:CH14)
CH30	Estimated Reinstatement Premiums – Other Regions before diversification	For all the regions other than the EEA Regions, the estimated reinstatement premiums, as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril.
CH31	Estimated Reinstatement Premiums – All Regions before diversification	CH31=CH15+CH30

	ITEM	INSTRUCTIONS
CI1:CI14	Net Catastrophe Risk Charge – EEA Region before diversification	<p>Net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, arising from Flood in each of the 14 EEA regions, corresponding to the selected scenario.</p> <p>The 14 EEA regions are the ones identifies in the instructions for items CA1:CA14.</p> <p>CI1=CF1-CG1+CH1 CI2=CF2-CG2+CH2 CI3=CF3-CG3+CH3 CI4=CF4-CG4+CH4 CI5=CF5-CG5+CH5 CI6=CF6-CG6+CH6 CI7=CF7-CG7+CH7 CI8=CF8-CG8+CH8 CI9=CF9-CG9+CH9 CI10=CF10-CG10+CH10 CI11=CF11-CG11+CH11 CI12=CF12-CG12+CH12 CI13=CF13-CG13+CH13 CI14=CF14-CG14+CH14</p>
CI15	Net Catastrophe Risk Charge – Flood EEA Regions before diversification	CI15=SUM(CI1:CI14)
CI30	Net Catastrophe Risk Charge – Flood Other Regions before diversification	<p>Net capital requirement for Flood risk in regions other than the EEA Regions. It is the amount of the instantaneous loss, including the deduction of the amounts recoverable from reinsurance contracts and Special Purpose Vehicles.</p> <p>CI30=CF30-CG30+CH30</p>
CI31	Net Catastrophe Risk Charge – Flood All Regions before diversification	CI31=CI15+CI30
CI32	Net Catastrophe Risk Charge – Diversification effect between regions	<p>Diversification effect arising from the aggregation of the net capital requirements for Flood risks relating to the different regions (both EEA Regions and Other regions).</p> <p>CI32=CI31-CI33</p>
CI33	Net Catastrophe Risk Charge – Total Flood after diversification	This is the total net capital requirement for Flood risk, taking into consideration the diversification effect given in CI32.
Natural catastrophe risk – Hail		
DA1:DA9	Estimation of the gross premium to be earned – EEA Region	<p>An estimate of the premiums to be earned, by the insurance or reinsurance undertaking, during the following year in relation to each of the 9 EEA regions, for the contract in relation to the obligations of lines of business :</p> <ul style="list-style-type: none"> · Fire and other damage, including the proportional reinsurance obligations; · Marine, aviation and transport insurance, including the proportional reinsurance obligations; · Other motor insurance, including the proportional reinsurance obligations. <p>Premiums shall be gross, without deduction of premiums for reinsurance contracts.</p> <p>The 9 EEA regions are the ones defined in Annex NLUR8 from Level II Implementing Measures:</p> <p>Republic of Austria Kingdom of Belgium Swiss Confederation; Principality of Lichtenstein French Republic [except Guadeloupe, Martinique, the Collectivity of Saint Martin and Réunion]; Principality of Monaco Federal Republic of Germany Italian Republic; Republic of San Marino; Vatican City State Grand Duchy of Luxemburg Kingdom of the Netherlands Kingdom of Spain; Principality of Andorra</p>
DA10	Estimation of the gross premium to be earned – Total Hail EEA Regions before diversification	DA10=SUM(DA1:DA9)

ITEM		INSTRUCTIONS
DA11:DA24	Estimation of the gross premium to be earned – Other Regions	An estimate of the premiums to be earned by the insurance or reinsurance undertaking, during the following year and in relation to each of the 14 regions other than the EEA Regions, for the contract in relation to the obligations of lines of business : <ul style="list-style-type: none"> · Fire and other damage, including the proportional reinsurance obligations; · Marine, aviation and transport insurance, including the proportional reinsurance obligations; · Other motor insurance, including the proportional reinsurance obligations. Premiums shall be gross, without deduction of premiums for reinsurance contracts. The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35
DA25	Estimation of the gross premium to be earned – Total Hail Other Regions before diversification	DA25=SUM(DA11:DA24)
DA26	Estimation of the gross premium to be earned – Total Hail All Regions before diversification	DA26=DA10+DA25
DB1:DB9	Exposure – EEA Region	The sum of the total sum insured per each of th 9 EEA regions: <ul style="list-style-type: none"> · For lines of business Fire and other damage, including the proportional reinsurance obligations, in relation to contracts that cover Hail risk and where the risk is situated in this particular EEA region and · For lines of business Marine, aviation and transport insurance, including the proportional reinsurance obligations, in relation to contracts that cover onshore property damage by Hail and where the risk is situated in this particular EEA region and · For lines of business Other motor insurance, including the proportional reinsurance obligations, multiplied by 5, in relation to contracts that cover onshore property damage by Hail and where the risk is situated in this particular EEA region. The 9 EEA regions are the ones identifies in the instructions for items DA1:DA9.
DB10	Exposure – Total Hail EEA Regions before diversification	DB10=SUM(DB1:DB9)
DB11:DB24	Exposure – Other Regions	The sum of the total sum insured in relation to each of the 14 regions other than the EEA Regions: <ul style="list-style-type: none"> · Fire and other damage, including the proportional reinsurance obligations; · Marine, aviation and transport insurance, including the proportional reinsurance obligations; · Other motor insurance, including the proportional reinsurance obligations. The Other than the EEA Regions are the ones identified in the instructions for items AA22:AA35
DB25	Exposure – Total Hail Other Regions before diversification	DB25=SUM(DB11:DB24)
DB26	Exposure – Total Hail All Regions before diversification	DB26=DB10+DB25
DC1:DC9	Specified Gross Loss – EEA Region	Specified gross Hail loss in each of the 9 EEA regions, taking into consideration the effect of diversification between zones. The 9 EEA regions are the ones identifies in the instructions for items DA1:DA9.
DC10	Specified Gross Loss – Total Hail EEA Regions before diversification	DC10=SUM(DC1:DC9)
DD1:DD9	Gross Cat Risk Charge Factor – EEA Region	The Risk Charge Factor per each of the 9 EEA region for Hail according to the Standard Formula, taking into consideration the effect of diversification between zones. The 9 EEA regions are the ones identifies in the instructions for items DA1:DA9. DD1=DC1/DB1 DD2=DC2/DB2 DD3=DC3/DB3 DD4=DC4/DB4 DD5=DC5/DB5 DD6=DC6/DB6 DD7=DC7/DB7 DD8=DC8/DB8 DD9=DC9/DB9

	ITEM	INSTRUCTIONS
DD10	Gross Cat Risk Charge Factor – Total Hail EEA Regions before diversification	DD10=DC10/DB10
DE1:DE9	Scenario A or B – EEA Region	The larger of the capital requirement for Hail risk in each of the 9 EEA regions according to scenario A or scenario B. The 9 EEA regions are the ones identifies in the instructions for items DA1:DA9. By determining the largest amount of scenario A and B, the risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, must be taken into account.
DF1:DF9	Gross Catastrophe Risk Charge – EEA Region	Gross capital requirement arising from Hails in each of the 9 EEA Regions corresponding to the larger of scenario A or B. The 9 EEA regions are the ones identifies in the instructions for items DA1:DA9.
DF10	Gross Catastrophe Risk Charge – Total Hail EEA Regions before diversification	DF10=SUM(DF1:DF9)
DF25	Gross Catastrophe Risk Charge – Total Hail Other Regions before diversification	The gross capital requirement for Hail risk in regions other than the EEA Regions. It is the amount of the instantaneous loss, without deduction of the amounts recoverable from reinsurance contracts and Special Purpose Vehicles.
DF26	Gross Catastrophe Risk Charge – Total Hail All Regions before diversification	DF26=DF10+DF25
DF27	Gross Catastrophe Risk Charge – Diversification effect between regions	Diversification effect arising from the aggregation of the Hail risks relating to the different regions (both EEA Regions and other regions) DF27=DF26-DF28
DF28	Gross Catastrophe Risk Charge – Total Hail after diversification	This is the total gross capital requirement for Hail risk, taking into consideration the diversification effect given in DF27.
DG1:DG9	Estimated Risk Mitigation – EEA Region	Per each of the 9 EEA Regions the estimated risk mitigation effect, corresponding to the selected scenario, of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated reinstatement premiums. The 9 EEA regions are the ones identifies in the instructions for items DA1:DA9.
DG10	Estimated Risk Mitigation – Total Hail EEA Region before diversification	DG10=SUM(DG1:DG9)
DG25	Estimated Risk Mitigation – Total Hail Other Regions before diversification	For all the regions other than the EEA Regions, the estimated risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated reinstatement premiums.
DG26	Estimated Risk Mitigation – Total Hail All Regions before diversification	DG26=DG10+DG25
DH1:DH9	Estimated Reinstatement Premiums – EEA Region	Per each of the 9 EEA Regions the estimated reinstatement premiums, corresponding to the selected scenario, as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril. The 9 EEA regions are the ones identifies in the instructions for items DA1:DA9.
DH10	Estimated Reinstatement Premiums – Total Hail EEA Regions before diversification	DH10=SUM(DH1:DH9)
DH25	Estimated Reinstatement Premiums – Total Hail Other Regions before diversification	For all the regions other than the EEA Regions, the estimated reinstatement premiums, as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril.

ITEM		INSTRUCTIONS
DH26	Estimated Reinstatement Premiums – Total Hail All Regions before diversification	DH26=DH10+DH25
DI1:DI9	Net Catastrophe Risk Charge – EEA Region	Net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, arising from Hail in each of the 9 EEA Regions, corresponding to the selected scenario. The 9 EEA regions are the ones identified in the instructions for items DA1-DA9 DI1=DF1-DG1+DH1 DI2=DF2-DG2+DH2 DI3=DF3-DG3+DH3 DI4=DF4-DG4+DH4 DI5=DF5-DG5+DH5 DI6=DF6-DG6+DH6 DI7=DF7-DG7+DH7 DI8=DF8-DG8+DH8 DI9=DF9-DG9+DH9
DI10	Net Catastrophe Risk Charge – Total Hail EEA Regions before diversification	DI10=SUM(DI1:DI9)
DI25	Net Catastrophe Risk Charge – Total Hail Other Regions before diversification	Net capital requirement for Hail risk in regions other than the EEA Regions. It is the amount of the instantaneous loss, including the deduction of the amounts recoverable from reinsurance contracts and Special Purpose Vehicles. DI25=DF25-DG25+DH25
DI26	Net Catastrophe Risk Charge – Total Hail All Regions before diversification	DI26=DI10+DI25
DI27	Net Catastrophe Risk Charge – Diversification effect between regions	Diversification effect arising from the aggregation of the net capital requirements for Hail risks relating to the different regions (both EEA Regions and Other regions). DI27=DI26-DI28
DI28	Net Catastrophe Risk Charge – Total Hail after diversification	This is the total net capital requirement for Hail risk, taking into consideration the diversification effect given in DI27.

Natural catastrophe risk – Subsidence

EA1	Estimation of the gross premium to be earned	An estimate of the premiums to be earned, by the insurance or reinsurance undertaking, during the following year, for the contract in relation to the obligations of lines of business : · Fire and other damage, including the proportional reinsurance obligations. Premiums shall be gross, without deduction of premiums for reinsurance contracts, and in relation to the territory of the French Republic.
EB1	Exposure	The sum of the total sum insured made up of the geographical divisions of the territory of the French Republic: · For lines of business Fire and other damage, including the proportional reinsurance obligations, which are sufficiently homogeneous in relation to the subsidence risk that the insurance and reinsurance undertakings are exposed to in relation to the territory. Together the zones shall comprise the whole territory.
EC1	Specified Gross Loss	Specified gross Subsidence loss, taking into consideration the effect of diversification between zones.
ED1	Gross Cat Risk Charge Factor	The Risk Charge Factor of the territory of the French Republic for Subsidence according to the Standard Formula, taking into consideration the effect of diversification between zones. ED1=EC1/EB1
EE1	Gross Catastrophe Risk Charge	The gross capital requirement for Subsidence risk in the territory of the French Republic. It is the amount of the instantaneous loss, without deduction of the amounts recoverable from reinsurance contracts and Special Purpose Vehicles, which for Subsidence is equal to the Specified Gross Loss (item EC1).
EE2	Gross Catastrophe Risk Charge – Diversification effect between zones	Diversification effect arising from the aggregation of the Subsidence risks relating to the different zones of the territory of the French Republic. EE2=EE1-EE3
EE3	Gross Catastrophe Risk Charge – Total Subsidence	This is the total gross capital requirement for Subsidence risk, taking into consideration the diversification effect given in item EE2.
EF1	Estimated Risk Mitigation	The estimated risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated reinstatement premiums.

	ITEM	INSTRUCTIONS
EG1	Estimated Reinstatement Premiums	The estimated reinstatement premiums as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril.
EH1	Net Catastrophe Risk Charge	Net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, arising from Subsidence. $EH1=FF1-FF1+EG1$
EH2	Net Catastrophe Risk Charge – Diversification effect between zones	Diversification effect arising from the aggregation of the net capital requirements for Subsidence risks relating to the different zones of the territory of the French Republic. $EH2=EH1-EH3$
EH3	Net Catastrophe Risk Charge – Total Subsidence	This is the total net capital requirement for Subsidence risk, taking into consideration the diversification effect given in item EH2.
Natural catastrophe risk – Non-proportional property reinsurance		
FA1	Estimation of the gross premium to be earned	An estimate of the premiums to be earned, by the insurance or reinsurance undertaking, during the following year, for the contract in relation to the obligations of the line of business Non-proportional property reinsurance. Premiums shall be gross, without deduction of premiums for reinsurance contracts.
FB1	Gross Catastrophe Risk Charge	The gross capital requirement for non-proportional property reinsurance. It is the amount of the instantaneous loss, without deduction of the amounts recoverable from reinsurance contracts and Special Purpose Vehicles.
FC1	Estimated Risk Mitigation	The estimated risk mitigation effect of the undertaking's specific retrocession contracts and special purpose vehicles relating to risks arising from accepted non-proportional property reinsurance, excluding the estimated reinstatement premiums.
FD1	Estimated Reinstatement Premiums	The estimated reinstatement premiums as a result of the undertaking's specific retrocession contracts and special purpose vehicles relating to risks arising from accepted non-proportional property reinsurance.
FE1	Net Catastrophe Risk Charge	Net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific retrocession contracts and special purpose vehicles relating to risks arising from accepted non-proportional property reinsurance. $FE1=FB1-FC1+FD1$
Man-made catastrophe risk – Motor Vehicle Liability		
GA1	Number of vehicles insured by the insurance or reinsurance undertaking in lines of business Motor vehicle liability insurance, including proportional reinsurance obligations, with a deemed policy limit above 24M€	Number of vehicles insured by the insurance or reinsurance undertaking in lines of business Motor vehicle liability insurance, including proportional reinsurance obligations, with a deemed policy limit above 24,000,000 Euro.
GA2	Number of vehicles insured by the insurance or reinsurance undertaking in lines of business Motor vehicle liability insurance, including proportional reinsurance obligations, with a deemed policy limit below or equal to 24M€	Number of vehicles insured by the insurance or reinsurance undertaking in lines of business Motor vehicle liability insurance, including proportional reinsurance obligations, with a deemed policy limit below or equal to 24,000,000 Euro.
GA3	Gross Cat Risk Charge Motor Vehicle Liability	This is the total gross capital requirement for Motor Vehicle Liability risk.
GA4	Estimated Risk Mitigation	The estimated risk mitigation effect of the undertaking's specific retrocession contracts and special purpose vehicles relating to risks arising from Motor Vehicle Liability, excluding the estimated reinstatement premiums.
GA5	Estimated Reinstatement Premiums	The estimated reinstatement premiums as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from Motor Vehicle Liability.
GA6	Net Catastrophe Risk Charge Motor Vehicle Liability	Net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific retrocession contracts and special purpose vehicles, relating to risks arising from Motor Vehicle Liability. $GA6=GA3-GA4+GA5$
Man-made catastrophe risk – Marine Tanker Collision		
HA1	Type of cover Gross Cat Risk Charge Share marine hull in tanker t	This is the gross capital requirement, per each marine hull cover, for risks arising from Marine Tanker Collision. The maximum relates to all oil and gas tankers insured by the insurance or reinsurance undertaking in respect of tanker collision in lines of business: <ul style="list-style-type: none"> · Marine, aviation and transport, including proportional reinsurance obligations; · Non-proportional marine, aviation and transport reinsurance. The amount for this cover is equal to the sum insured accepted by the insurance or reinsurance undertaking for marine insurance and reinsurance in relation to each tanker.

ITEM		INSTRUCTIONS
HB1	Gross Cat Risk Charge Share marine liability in tanker t	This is the gross capital requirement, per marine liability cover, for risks arising from Marine Tanker Collision. The maximum relates to all oil and gas tankers insured by the insurance or reinsurance undertaking in respect of tanker collision in lines of business: <ul style="list-style-type: none"> · Marine, aviation and transport, including proportional reinsurance obligations; · Non-proportional marine, aviation and transport reinsurance. The amount for this cover is equal to the sum insured accepted by the insurance or reinsurance undertaking for marine insurance and reinsurance in relation to each tanker.
HC1	Gross Cat Risk Charge Share marine oil pollution liability in tanker t	This is the gross capital requirement, per marine oil pollution liability cover, for risks arising from Marine Tanker Collision. The maximum relates to all oil and gas tankers insured by the insurance or reinsurance undertaking in respect of tanker collision in lines of business: <ul style="list-style-type: none"> · Marine, aviation and transport, including proportional reinsurance obligations; · Non-proportional marine, aviation and transport reinsurance. The amount for this cover is equal to the sum insured accepted by the insurance or reinsurance undertaking for marine insurance and reinsurance in relation to each tanker.
HD1	Gross Cat Risk Charge Marine Tanker Collision	This is the total gross capital requirement for risks arising from Marine Tanker Collision. $HD1 = \text{SUM}(HA1:HC1)$
HE1	Estimated Risk Mitigation	The estimated risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from Marine Tanker Collision, <u>excluding the estimated reinstatement premiums.</u>
HF1	Estimated Reinstatement Premiums	The estimated reinstatement premiums as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from Marine Tanker Collision.
HG1	Net Catastrophe Risk Charge Marine Tanker Collision	The total net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific retrocession contracts and special purpose vehicles, relating to risks arising from Marine Tanker Collision. $HG1 = HD1 - HE1 + HF1$
HH1	Name vessel	Name of the corresponding vessel.
Man-made catastrophe risk – Marine Platform Explosion		
HA2:HE2	Gross Cat Risk Charge Marine Platform Explosion – Type of cover	This is the gross capital requirement, per type of cover (Property damage, Removal of wreckage, Loss of production income, Capping of the well or making the well secure, Liability insurance and reinsurance obligations), for risks arising from Marine Platform Explosion. The maximum relates to all oil and gas offshore platforms insured by the insurance or reinsurance undertaking in respect of platform explosion in lines of business: <ul style="list-style-type: none"> · Marine, aviation and transport, including proportional reinsurance obligations; · Non-proportional marine, aviation and transport reinsurance. The amount per type of cover is equal to the sum insured for the specific type of cover accepted by the insurance or reinsurance undertaking in relation to the selected platform.
HF2	Gross Cat Risk Charge Marine Platform Explosion	This is the total gross capital requirement for risks arising from Marine Platform Explosion. $HF2 = \text{SUM}(HA2:HE2)$
HG2	Estimated Risk Mitigation	The estimated risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from Marine Platform Explosion, <u>excluding the estimated reinstatement premiums.</u>
HH2	Estimated Reinstatement Premiums	The estimated reinstatement premiums as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from Marine Platform Explosion.
HI2	Net Catastrophe Risk Charge Marine Platform Explosion	Net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific retrocession contracts and special purpose vehicles, relating to risks arising from Marine Platform Explosion. $HI2 = HF2 - HG2 + HH2$
HJ2	Name platform	Name of the corresponding platform.
Man-made catastrophe risk – Marine		
HA3	Gross Cat Risk Charge Marine – Total before diversification	This is the total gross capital requirement, before diversification between types of events, for marine risks. $HA3 = HD1 + HF2$
HB3	Gross Cat Risk Charge Marine – Diversification between type of event	Diversification effect arising from the aggregation of the total gross capital charges relating to different type of events for marine risks. $HB3 = HA3 - HC3$
HC3	Gross Cat Risk Charge Marine – Total after diversification	This is the total gross capital requirement, after diversification between the types of events, for marine risks.

	ITEM	INSTRUCTIONS
HA4	Estimated Total Risk Mitigation - Total before diversification	This is the total risk mitigation effect, before diversification between types of events, of the undertaking's specific reinsurance contracts and special purpose vehicles arising from the marine risks. $HA4=HA3-HA5$
HB4	Estimated Total Risk Mitigation - Diversification between type of event	Diversification effect arising from the aggregation of the estimated total risk mitigation relating to different type of events for marine risks. $HB4=HA4-HC4$
HC4	Estimated Total Risk Mitigation - Total after diversification	This is the total risk mitigation effect, after diversification between types of events, of the undertaking's specific reinsurance contracts and special purpose vehicles arising from the marine risks. $HC4=HC3-HC5$
HA5	Net Cat Risk Charge Marine – Total before diversification	This is the total net capital requirement, before diversification between types of events, for marine risks. $HA5=HG1+HI2$
HB5	Net Cat Risk Charge Marine – Diversification between type of event	Diversification effect arising from the aggregation of the total net capital charges relating to different type of events for marine risks. $HB5=HA5-HC5$
HC5	Net Cat Risk Charge Marine – Total after diversification	This is the total net capital requirement, after diversification between the types of events, for marine risks.

Man-made catastrophe risk – Aviation

IA1:IB1	Gross Cat Risk Charge Aviation – Type of cover	This is the gross capital requirement, per type of cover (Aviation hull and Aviation liability), for risks arising from Aviation. The maximum relates to all aircrafts insured by the insurance or reinsurance undertaking in lines of business: <ul style="list-style-type: none"> Marine, aviation and transport, including proportional reinsurance obligations; Non-proportional marine, aviation and transport reinsurance. The amount per type of cover is equal to the sum insured for the specific type of cover accepted by the insurance or reinsurance undertaking for aviation insurance and <u>reinsurance and in relation to the selected aircraft.</u>
IC1	Gross Cat Risk Charge Aviation	This is the total gross capital requirement for risks arising from Aviation. $IC1=IA1+IB1$
ID1	Estimated Risk Mitigation	The estimated risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from Aviation, excluding the <u>estimated reinstatement premiums.</u>
IE1	Estimated Reinstatement Premiums	The estimated reinstatement premiums as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from Aviation.
IF1	Net Catastrophe Risk Charge Aviation – Total (row)	The total net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific retrocession contracts and special purpose vehicles, relating to risks arising from Aviation. $IF1=IC1-ID1+IE1$

Man-made catastrophe risk – Fire

JA1	Gross Cat Risk Charge Fire	This is the total gross capital requirement for Fire risks. Amount is equal to the largest fire risk concentration of an insurance or reinsurance undertaking being the set of buildings with the largest sum insured that meets the following conditions: <ul style="list-style-type: none"> The insurance or reinsurance undertaking has insurance or reinsurance obligations in lines of business Fire and other damage to property insurance, including proportional reinsurance obligations, in relation to each building which cover damage due to fire or explosion, including as a result of terrorist attacks. All buildings are partly or fully located within a radius of 200 meters.
JA2	Estimated Risk Mitigation	The estimated risk mitigation effect of the undertaking's specific retrocession contracts and special purpose vehicles relating to risks arising from Fire, excluding the <u>estimated reinstatement premiums.</u>
JA3	Estimated Reinstatement Premiums	The estimated reinstatement premiums as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from Fire.
JA4	Net Catastrophe Risk Charge Fire	The total net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific retrocession contracts and special purpose vehicles, relating to risks arising from Fire. $JA4=JA1-JA2+JA3$

Man-made catastrophe risk – Liability

KA1:KE1	Earned premium last 12 months	Premiums earned, per type of cover, by the insurance or reinsurance undertaking, during the last 12 months, in relation to insurance and reinsurance obligations in liability risks. for the following type of covers:
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	ITEM	INSTRUCTIONS
		<p>1. Professional malpractice liability insurance and proportional reinsurance obligations other than professional malpractice liability insurance and reinsurance for self-employed crafts persons or artisans;</p> <p>2. Employers liability insurance and proportional reinsurance obligations;</p> <p>3. Directors and officers liability insurance and proportional reinsurance obligations;</p> <p>4. Liability insurance and reinsurance obligations included in lines of business General liability insurance, including proportional reinsurance obligations, other than obligations included in liability risk groups 1 to 3 and other than personal liability insurance and proportional reinsurance and other than professional malpractice liability insurance and reinsurance for self-employed crafts persons or artisans;</p> <p>5. Non-proportional reinsurance.</p> <p>For this purpose premiums shall be gross, without deduction of premiums for reinsurance contracts</p>
KA2:KE2	Largest liability limit provided	The largest liability limit, per type of cover, provided by the insurance or reinsurance undertaking in liability risks.
KA3:KE3	Number of claims	The number of claims, per type of cover, which is equal to the lowest integer that exceeds the amount according to the provided formula.
KA4:KE4	Gross Cat Risk Charge Liability – Type of cover	This is the gross capital requirement, per type of cover, for liability risks.
KA5:KE5	Estimated Risk Mitigation – Type of cover	The estimated risk mitigation effect, per type of cover, of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from Liability, excluding the estimated reinstatement premiums.
KA6:KE6	Estimated Reinstatement Premiums – Type of cover	The estimated reinstatement premiums, per type of cover, as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from Liability.
KA7:KE7	Net Catastrophe Risk Charge Liability - Type of cover	Net capital requirement, per type of cover, after the deduction of the risk mitigating effect of the undertaking's specific retrocession contracts and special purpose vehicles, relating to risks arising from Liability.
KF1	Earned premium last 12 months - Total	$KF1 = \text{SUM}(KA1:KE1)$
KF4	Gross Cat Risk Charge Liability – Total	$KF4 = \text{SUM}(KA4:KE4)$
KF5	Estimated Risk Mitigation – Total	$KF5 = \text{SUM}(KA5:KE5)$
KF6	Estimated Reinstatement Premiums – Total	$KF6 = \text{SUM}(KA6:KE6)$
KF7	Net Catastrophe Risk Charge Liability - Total	$KF7 = \text{SUM}(KA7:KE7)$
KA8	Gross Cat Risk Charge Liability – Total before diversification	This is the total gross capital requirement, before diversification between types of cover, for liability risks. $KA8 = KF4$
KB8	Gross Cat Risk Charge Liability – Diversification between type of cover	Diversification effect arising from the aggregation of the total gross capital charges relating to different type of covers for liability risks. $KB8 = KA8 - KC8$
KC8	Gross Cat Risk Charge Liability – Total after diversification	This is the total gross capital requirement, after diversification between the types of covers, for liability risks.
KA9	Estimated Total Risk Mitigation – Total before diversification	This is the estimated total risk mitigation, before diversification between types of cover, for liability risks. $KA9 = KF5 + KF6$
KB9	Estimated Total Risk Mitigation – Diversification between type of cover	Diversification effect arising from the aggregation of the estimated total risk mitigation relating to different type of covers for liability risks. $KB9 = KA9 - KC9$
KC9	Estimated Total Risk Mitigation – Total after diversification	This is the estimated total risk mitigation, after diversification between the types of covers, for liability risks. $KC9 = KC8 - KC10$
KA10	Net Cat Risk Charge Liability – Total before diversification	This is the total net capital requirement, before diversification between types of cover, for liability risks. $KA10 = KF7$

	ITEM	INSTRUCTIONS
KB10	Net Cat Risk Charge Liability – Diversification between type of cover	Diversification effect arising from the aggregation of the total net capital charges relating to different type of covers for liability risks. KB10=KA10-KC10
KC10	Net Cat Risk Charge Liability – Total after diversification	This is the total net capital requirement, after diversification between the types of covers, for liability risks.
Man-made catastrophe risk – Credit & Suretyship		
LA1:LB1	Exposure (individual or group) – Largest exposure	Two largest gross credit insurance exposures of the insurance or reinsurance undertaking based on a comparison of the net loss-given-default of the credit insurance exposures, being the loss-given-default after deduction of the amounts recoverable <u>from reinsurance contracts and special purpose vehicles.</u>
LC1	Exposure (individual or group) – Total	Total of the two largest gross credit insurance exposures of the insurance or reinsurance undertaking based on a comparison of the net loss-given-default of the credit insurance exposures, being the loss-given-default after deduction of the amounts recoverable from reinsurance contracts and special purpose vehicles. LC1=LA1+LB1
LA2:LB2	Proportion of damaged caused by scenario – Largest exposure	Percentage representing the loss given default of the gross credit exposure without deduction of the amounts recoverable from reinsurance contracts and special purpose vehicles, for each of the two largest gross credit insurance exposures of the insurance <u>or reinsurance undertaking.</u>
LC2	Proportion of damaged caused by scenario – Total	Average loss given default of the two largest gross credit exposures without deduction of the amounts recoverable from reinsurance contracts and special purpose vehicles. LC2=LC3/LC1
LA3:LB3	Gross Cat Risk Charge Credit & Suretyship – Large Credit Default –Largest exposure	This is the gross capital requirement, per largest exposure, arising from the Large Credit Default scenario of Credit & Suretyship risks. LA3=LA1 x LA2 LB3=LB1 x LB2
LC3	Gross Cat Risk Charge Credit & Suretyship – Large Credit Default – Total	This is the total gross capital requirement arising from the Large Credit Default scenario of Credit & Suretyship risks. LC3=LA3+LB3
LA4:LB4	Estimated Risk Mitigation – Largest exposure	The estimated risk mitigation effect, per largest exposure, of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from the Large Credit Default scenario of Credit & Suretyship, excluding the estimated <u>reinstatement premiums.</u>
LC4	Estimated Risk Mitigation – Total	The estimated risk mitigation effect, for the two largest exposures, of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from the Large Credit Default scenario of Credit & Suretyship, excluding the estimated reinstatement premiums. LC4=LA4+LB4
LA5:LB5	Estimated Reinstatement Premiums – Largest exposure	The estimated reinstatement premiums, per largest exposure, as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from the Large Credit Default scenario of Credit & Suretyship.
LC5	Estimated Reinstatement Premiums – Total	The estimated reinstatement premiums, for the two largest exposures, as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from the Large Credit Default scenario of Credit & Suretyship. LC5=LA5+LB5
LA6:LB6	Net Catastrophe Risk Charge Credit & Suretyship – Large Credit Default – Type of cover	Net capital requirement, per largest exposure, after the deduction of the risk mitigating effect of the undertaking's specific retrocession contracts and special purpose vehicles, relating to risks arising from the Large Credit Default scenario of Credit & Suretyship. LA6=LA3-LA4+LA5 LB6=LB3-LB4+LB5
LC6	Net Catastrophe Risk Charge Credit & Suretyship – Large Credit Default – Total	The total net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific retrocession contracts and special purpose vehicles, relating to risks arising from the Large Credit Default scenario of Credit & Suretyship. LC6=LA6+LB6
LA7	Earned premium last 12 months	Gross premiums earned by the insurance or reinsurance undertaking, during the last 12 months, in lines of business Credit and Suretyship insurance.
LA8	Gross Cat Risk Charge Credit & Suretyship – Recession Risk	This is the total gross capital requirement for the Recession scenario of Credit & Suretyship risks.
LA9	Estimated Risk Mitigation	The estimated risk mitigation effect of the undertaking's specific retrocession contracts and special purpose vehicles relating to risks arising from the Recession scenario of Credit & Suretyship, excluding the estimated reinstatement premiums.

	ITEM	INSTRUCTIONS
LA10	Estimated Reinstatement Premiums	The estimated reinstatement premiums as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to risks arising from the Recession scenario of Credit & Suretyship.
LA11	Net Catastrophe Risk Charge Credit & Suretyship – Recession Risk	The total net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific retrocession contracts and special purpose vehicles, relating to risks arising from the Recession scenario of Credit & Suretyship. LA11=LA8-LA9+LA10
LA12	Gross Cat Risk Charge Credit & Suretyship – Total before diversification	This is the total gross capital requirement, before diversification between types of events, for Credit & Suretyship risks. LA12=LC3+LA8
LB12	Gross Cat Risk Charge Credit & Suretyship – Diversification between type of event	Diversification effect arising from the aggregation of the total gross capital charges relating to different type of events for Credit & Suretyship risks. LB12=LA12-LC12
LC12	Gross Cat Risk Charge Credit & Suretyship – Total after diversification	This is the total gross capital requirement, after diversification between the types of events, for Credit & Suretyship risks.
LA13	Estimated Total Risk Mitigation - Total before diversification	This is the total risk mitigation effect, before diversification between types of events, of the undertaking's specific reinsurance contracts and special purpose vehicles arising from the Credit & Suretyship risks. LA13=LA12-LA14
LB13	Estimated Total Risk Mitigation - Diversification between type of event	Diversification effect arising from the aggregation of the estimated total risk mitigation relating to different type of events for Credit & Suretyship risks. LB13=LB12-LB14
LC13	Estimated Total Risk Mitigation - Total after diversification	This is the total risk mitigation effect, after diversification between types of events, of the undertaking's specific reinsurance contracts and special purpose vehicles arising from the Credit & Suretyship risks. LC13=LC12-LC14
LA14	Net Cat Risk Charge Credit & Suretyship – Total before diversification	This is the total net capital requirement, before diversification between types of events, for Credit & Suretyship risks. LA14=LC6+LA11
LB14	Net Cat Risk Charge Credit & Suretyship – Diversification between type of event	Diversification effect arising from the aggregation of the total net capital charges relating to different type of events for Credit & Suretyship risks. LB14=LA13-LC14
LC14	Net Cat Risk Charge Credit & Suretyship – Total after diversification	This is the total net capital requirement, after diversification between the types of events, for Credit & Suretyship risks.

ITEM

INSTRUCTIONS

Health catastrophe risk – Mass accident

<p>NA1:NA31, NC1:NC31, NE1:NE31, NG1:NG31, NT1:NT31</p>	<p>Policyholders per type of event – Countries</p>	<p>All insured persons of the insurance or reinsurance undertaking who are inhabitants of each of the following countries:</p> <p>Republic of Austria Kingdom of Belgium Republic of Bulgaria Republic of Croatia Republic of Cyprus Czech Republic Kingdom of Denmark Republic of Estonia Republic of Finland French Republic Hellenic Republic Federal Republic of Germany Republic of Hungary Republic of Iceland Ireland Italian Republic Republic of Latvia Republic of Lithuania Grand Duchy of Luxemburg Republic of Malta Kingdom of the Netherlands Kingdom of Norway Republic of Poland Portuguese Republic Romania Slovak Republic Republic of Slovenia Kingdom of Spain Kingdom of Sweden Swiss Confederation United Kingdom of Great Britain and Northern Ireland</p> <p>and are insured against the following types of event:</p> <ol style="list-style-type: none"> 1. Death caused by an accident; 2. Permanent disability caused by an accident; 3. Disability that lasts 10 years caused by an accident; 4. Disability that lasts 12 months caused by an accident; 5. Medical treatment caused by an accident.
<p>NB1:NB31, ND1:ND31, NF1:NF31, NH1:NH31, NI1:NI31</p>	<p>Value of benefits payable per type of event – Countries</p>	<p>The value of the benefits shall be the sum insured or where the insurance contract provides for recurring benefit payments the best estimate of the benefit payments, using the cash-flow projection, in case of event type 1-5 identified in Items NA1 to NI31, for each of the countries identified in Items NA1 to NI31.</p> <p>Where the benefits of an insurance contract depend on the nature or extent of any injury resulting from event 1-5 identified in Items NA1 to NI31, the calculation of the value of the benefits shall be based on the maximum benefits obtainable under the contract which are consistent with the event. For medical expense insurance and reinsurance obligations the value of the benefits shall be based on an estimate of the average amounts paid in case of event 1-5 identified in Items NA1 to NI31, taking into account the specific guarantees the obligations include.</p>
<p>NK1:NK31</p>	<p>Gross Catastrophe Risk Charge – Countries</p>	<p>Gross capital requirement, for each of the countries identified in Items NA1 to NI31, arising from the health sub-module mass accident.</p>
<p>NK32</p>	<p>Gross Catastrophe Risk Charge - Total Mass accident all countries before diversification</p>	<p>This is the total gross capital requirement, before diversification between countries, for the health sub-module mass accident. $NK32 = \text{SUM}(NK1:NK31)$</p>
<p>NK33</p>	<p>Gross Catastrophe Risk Charge – Diversification effect between countries</p>	<p>Diversification effect arising from the aggregation of the health sub-module mass accident relating to the different countries. $NK33 = NK32 - NK34$</p>
<p>NK34</p>	<p>Gross Catastrophe Risk Charge - Total Mass accident all countries after diversification</p>	<p>This is the total gross capital requirement, after diversification between countries, for the health sub-module mass accident.</p>
<p>NL1:NL31</p>	<p>Estimated Risk Mitigation – Countries</p>	<p>For each of the countries identified in Items NA1 to NI31, the estimated risk mitigation effect of the undertaking’s specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated reinstatement premiums.</p>

	ITEM	INSTRUCTIONS
NL32	Estimated Risk Mitigation – Total	NL32=SUM(NL1:NL31)
NM1:NM31	Estimated Reinstatement Premiums – Countries	For each of the countries identified in Items NA1 to NI31, the estimated reinstatement premiums as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril.
NM32	Estimated Reinstatement Premiums – Total	NM32=SUM(NM1:NM31)
NN1:NN31	Net Catastrophe Risk Charge – Countries	Net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, arising from the health sub-module mass accident, for each of the countries identified in Items NA1 to NI31. NN1=NK1-NI1+NM1
NN32	Net Catastrophe Risk Charge - Total Mass accident all countries before diversification	This is the total net capital requirement, before diversification between countries, for the health sub-module mass accident. NN32=SUM(NN1:NN31)
NN33	Net Catastrophe Risk Charge – Diversification effect between countries	Diversification effect arising from the aggregation of the net capital requirements for the health sub-module mass accident risks relating to the different countries. NN33=NN32-NN34
NN34	Net Catastrophe Risk Charge – Total Mass accident all countries after diversification	This is the total net capital requirement for the health sub-module mass accident risk, taking into consideration the diversification effect given in NN33.
Health catastrophe risk – Concentration accident		
OA1:OA31	Largest known accident risk concentration – Countries	The largest accident risk concentration of an insurance or reinsurance undertaking, for each of the countries identified in Items NA1 to NI31, shall be equal to the largest number of persons for which the following conditions are met: <ul style="list-style-type: none"> · The insurance or reinsurance undertaking has a workers' compensation insurance or reinsurance obligation or a group income protection insurance or reinsurance obligation in relation to each of the persons; · The obligations in relation to each of the persons cover at least one of the events set out in the next item; · The persons are working in the same building which is situated in this particular country. <p>These persons are insured against the following types of event:</p> <ol style="list-style-type: none"> 1. Death caused by an accident; 2. Permanent disability caused by an accident; 3. Disability that lasts 10 years caused by an accident; 4. Disability that lasts 12 months caused by an accident; 5. Medical treatment caused by an accident.
OB1:OB31, OC1:OC31, OD1:OD31, OE1:OE31, OF1:OF31	Average sum insured per type of event – Countries	The value of the benefits shall be the sum insured or where the insurance contract provides for recurring benefit payments the best estimate of the benefit payments in case of event type 1-5 identified in Item NA1 to NI31. Where the benefits of an insurance contract depend on the nature or extent of any injury resulting from event 1-5, the calculation of the value of the benefits shall be based on the maximum benefits obtainable under the contract which are consistent with the event. For medical expense insurance and reinsurance obligations the value of the benefits shall be based on an estimate of the average amounts paid in case of event 1-5, taking into account the specific guarantees the obligations include.
OG1:OG31	Gross Catastrophe Risk Charge – Countries	Gross capital requirement, for each of the countries identified in Items NA1 to NI31, arising from the health sub-module concentration accident.
OG32	Gross Catastrophe Risk Charge - Total Concentration accident all countries before diversification	This is the total gross capital requirement, before diversification between countries, for the health sub-module concentration accident. OG32=SUM(OG1:OG31)
OG33	Gross Catastrophe Risk Charge – Diversification effect between countries	Diversification effect arising from the aggregation of the health sub-module concentration accident relating to the different countries. OG33=OG34-OG32

	ITEM	INSTRUCTIONS
OG34	Gross Catastrophe Risk Charge - Total Concentration accident all countries after diversification	This is the total gross capital requirement, after diversification between countries, for the health sub-module concentration accident.
OH1:OH31	Estimated Risk Mitigation - Countries	For each of the countries identified in Items NA1 to NI31, the estimated risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated reinstatement premiums.
OH32	Estimated Risk Mitigation - Total	OH32=SUM(OH1:OH31)
OI1:OI31	Estimated Reinstatement Premiums - Countries	For each of the countries identified in Items NA1 to NI31, the estimated reinstatement premiums as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril.
OI32	Estimated Reinstatement Premiums - Total	OI32=SUM(OI1:OI31)
OJ1:OJ31	Net Catastrophe Risk Charge - Countries	Net capital requirement, after the deduction of the risk mitigating effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, arising from the health sub-module concentration accident for each of the countries identified in Items NA1 to NI31.
OJ32	Net Catastrophe Risk Charge - Total Concentration accident all countries before diversification	The total net capital requirement, before diversification between countries, for the health sub-module concentration accident. OJ32=SUM(OJ1:OJ31)
OJ33	Net Catastrophe Risk Charge - Diversification effect between countries	Diversification effect arising from the aggregation of the net capital requirements for the health sub-module concentration accident risks relating to the different countries. OJ33=OJ34-OJ32
OJ34	Net Catastrophe Risk Charge - Total Concentration accident all countries after diversification	This is the total net capital requirement for the health sub-module concentration accident risk, taking into consideration the diversification effect given in OJ33.

Health catastrophe risk – Pandemic

PA32	Income protection - Number of insured persons - Total all countries	Total number of insured persons for all countries covered by the income protection insurance or reinsurance obligations other than workers' compensation insurance or reinsurance obligations.
PB32	Income protection - Total pandemic exposure - Total all countries	The total of all income protection pandemic exposure for all countries of insurance and reinsurance undertakings. The value of the benefits payable for the insured person shall be the sum insured or where the insurance contract provides for recurring benefit payments the best estimate of the benefit payments assuming that the insured person is permanently disabled and will not recover.
PC1:PC31	Medical expense - Number of insured persons - Countries	The number of insured persons of insurance and reinsurance undertakings, for each of the countries identified in Items NA1 to NI31, which meet the following conditions: <ul style="list-style-type: none"> · The insured persons are inhabitants of this particular country; · The insured persons are covered by medical expense insurance or reinsurance obligations, other than workers' compensation insurance or reinsurance obligations that cover medical expenses resulting from an infectious disease. <p>These insured persons may claim benefits for the following healthcare utilisation:</p> <ol style="list-style-type: none"> 1. Hospitalisation; 2. Consultation with a medical practitioner; 3. No formal medical care sought.
PD1:PD31, PF1:PF31, PH1:PH31	Medical expense - Unit claim cost per type of healthcare - Countries	Best estimate of the amounts payable, using the cash-flow projection, by insurance and reinsurance undertakings for an insured person in relation to medical expense insurance or reinsurance obligations, other than workers' compensation insurance or reinsurance obligations per healthcare utilisation type 1-3, as identified in item PC1 to PC31, in the event of a pandemic, for each of the countries identified in Items NA1 to NI31.

	ITEM	INSTRUCTIONS
PE1:PE31, PG1:PG31, PI1:PI31	Medical expense – Expected number of uses per type of healthcare – Countries	The ratio of insured persons with clinical symptoms utilising healthcare type 1-3, as identified in item PC1 to PC31, for each of the countries identified in Items NA1 to NI31.
PJ1:PJ31	Gross Catastrophe Risk Charge – Countries	Gross capital requirement, for each of the countries identified in Items NA1 to NI31, arising from the health sub-module pandemic.
PJ32	Gross Catastrophe Risk Charge – Total income protection - Total all countries	This is the total gross capital requirement for the income protection pandemic exposure for all countries of insurance and reinsurance undertakings based on the total income protection pandemic exposure multiplied with the ratio.
PJ33	Gross Catastrophe Risk Charge - Total Pandemic all countries	This is the total gross capital requirement for the health sub-module pandemic. $PJ33 = \text{SUM}(PJ1:PJ31) + PJ32$
PK33	Estimated Risk Mitigation	The total estimated risk mitigation effect of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril, excluding the estimated <u>reinstatement premiums</u> .
PL33	Estimated Reinstatement Premiums	The total estimated reinstatement premiums as a result of the undertaking's specific reinsurance contracts and special purpose vehicles relating to this peril.

Technical Annex II: List of quantitative reporting items

S.28.01

Minimum Capital Requirement (except for composite undertakings)

	ITEM	INSTRUCTIONS
A1	Linear Formula component for non-life insurance or reinsurance obligations	This is the linear formula component for non-life insurance or reinsurance obligations and is calculated in accordance with Solvency 2 requirements.
B2	Medical expense insurance and proportional reinsurance – net best estimate	This is the technical provisions for medical expense insurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero. See cross-templates checks tab CQS 45 See cross-templates checks tab CAS 59
C2	Medical expense insurance and proportional reinsurance – net written premiums	This is the premiums written for medical expense insurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B3	Income protection insurance and proportional reinsurance – net best estimate	This is the technical provisions for income protection insurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 46 See cross-templates checks tab CAS 60
C3	Income protection insurance and proportional reinsurance – net written premiums	This is the premiums written for income protections insurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B4	Workers' compensation insurance and proportional reinsurance – net best estimate	This is the technical provisions for workers' compensation insurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 47 See cross-templates checks tab CAS 61
C4	Workers' compensation insurance and proportional reinsurance – net written premiums	This is the premiums written for workers' compensations insurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B5	Motor vehicle liability insurance and proportional reinsurance – net best estimate	This is the technical provisions for motor vehicle liability insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 48 See cross-templates checks tab CAS 62
C5	Motor vehicle liability insurance and proportional reinsurance – net written premiums	This is the premiums written for motor vehicle liability insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B6	Other motor insurance and proportional reinsurance – net best estimate	This is the technical provisions for other motor insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 49 See cross-templates checks tab CAS 63
C6	Other motor insurance and proportional reinsurance – net written premiums	This is the premiums written for other motor insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B7	Marine, aviation and transport insurance and proportional reinsurance – net best estimate	This is the technical provisions for marine, aviation and transport insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 50 See cross-templates checks tab CAS 64

C7	Marine, aviation and transport insurance and proportional reinsurance – net written premiums	This is the premiums written for marine, aviation and transport insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B8	Fire and other damage to property insurance and proportional reinsurance – net best estimate	This is the technical provisions for fire and other damage to property insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 51 See cross-templates checks tab CAS 65
C8	Fire and other damage to property insurance and proportional reinsurance – net written premiums	This is the premiums written for fire and other damage to property insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B9	General liability insurance and proportional reinsurance – net best estimate	This is the technical provisions for general liability insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 52 See cross-templates checks tab CAS 66
C9	General liability insurance and proportional reinsurance – net written premiums	This is the premiums written for general liability insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B10	Credit and suretyship insurance and proportional reinsurance – net best estimate	This is the technical provisions for credit and suretyship insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 53 See cross-templates checks tab CAS 67
C10	Credit and suretyship insurance and proportional reinsurance – net written premiums	This is the premiums written for credit and suretyship insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B11	Legal expenses insurance and proportional reinsurance – net best estimate	This is the technical provisions for legal expenses insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 54 See cross-templates checks tab CAS 68
C11	Legal expenses insurance and proportional reinsurance – net written premiums	This is the premiums written for legal expenses insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B12	Assistance and its proportional reinsurance – net best estimate	This is the technical provisions for assistance and its proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 55 See cross-templates checks tab CAS 69
C12	Assistance and its proportional reinsurance – net written premiums	This is the premiums written for assistance and its proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B13	Miscellaneous financial loss insurance and proportional reinsurance – net best estimate	This is the technical provisions for miscellaneous financial loss insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 56 See cross-templates checks tab CAS 70

C13	Miscellaneous financial loss insurance and proportional reinsurance – net written premiums	This is the premiums written for miscellaneous financial loss insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B14	Non-proportional casualty reinsurance – net best estimate	This is the technical provisions for non-proportional casualty reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 57 See cross-templates checks tab CAS 71
C14	Non-proportional casualty reinsurance – net written premiums	This is the premiums written for non-proportional casualty reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B15	Non-proportional property reinsurance – net best estimate	This is the technical provisions for non-proportional property reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 60 See cross-templates checks tab CAS 74
C15	Non-proportional property reinsurance – net written premiums	This is the premiums written for non-proportional property reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B16	Non-proportional marine, aviation and transport reinsurance – net best estimate	This is the technical provisions for non-proportional marine, aviation and transport reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 59 See cross-templates checks tab CAS 73
C16	Non-proportional marine, aviation and transport reinsurance – net written premiums	This is the premiums written for non-proportional marine, aviation and transport reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
B17	Non-proportional health reinsurance – net best estimate	This is the technical provisions for non-proportional health reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 58 See cross-templates checks tab CAS 72
C17	Non-proportional health reinsurance – net written premiums	This is the premiums written for non-proportional health reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero
A18	MCR _L result	This is the result of the linear formula component for life insurance or reinsurance obligations in accordance with Solvency 2 requirements. 'A18=(0.05+B19)-(0.088*B20)+(0.005*B21)+(0.029*B22)+(0.001*C23)
B19	Net best estimate for obligations with profit participation – guaranteed benefits	This is the technical provisions without a risk margin in relation to guaranteed benefits for life insurance obligations with profit participation, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero and technical provisions without a risk margin for reinsurance obligations where the underlying life insurance obligations include profit participation, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 61 See cross-templates checks tab CAS 75
B20	Net best estimate for obligations with profit participation – future discretionary benefits	This is the technical provisions without a risk margin in relation to future discretionary benefits for life insurance obligations with profit participation, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero See cross-templates checks tab CQS 61 See cross-templates checks tab CAS 75

B21	Net best estimate for index-linked and unit-linked obligations	This is the technical provisions without a risk margin for index-linked and unit-linked life insurance obligations and reinsurance obligations relating to such insurance obligations, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero. See cross-templates checks tab CQS 62 See cross-templates checks tab CAS 76
B22	Net best estimate for other life (re)insurance obligations	This is the technical provisions without a risk margin for all other life insurance obligations and reinsurance obligations relating to such insurance obligations, after deduction of the amounts recoverable from reinsurance contracts and SPV, with a floor equal to zero Annuities related to non-life contracts should be reported here. See cross-templates checks tab CQS 63 See cross-templates checks tab CAS 77
C23	Capital at risk for all life (re)insurance obligations	This is the capital at risk, being the sum in relation to all contracts that give rise to life insurance or reinsurance obligations of the capital at risk of the contracts.
A24	Linear MCR	The linear Minimum Capital Requirement shall equal to the sum of the MCR linear formula component for non life insurance and reinsurance and the MCR the linear formula component for life insurance and reinsurance obligations. $A24=A1+A18$
A25	SCR	This is the latest SCR to be calculated, either the annual one or a more recent one in case the SCR has been recalculated (e.g. due to a change in risk profile) since the last value of the SCR was reported, including capital add on. Undertakings using internal models to calculate the SCR should refer to IM SCR, except where under L1 Article 129(3) the national supervisor requires standard formula reference.
A26	MCR cap	This is calculated as 45% of the SCR including any capital add-on in accordance with Art 129(3) of the Solvency II Directive
A27	MCR floor	This is calculated as 25% of the SCR including any capital add-on in accordance with Art 129(3) of the Solvency II Directive
A28	Combined MCR	This is calculated in accordance with Solvency 2 requirements. $A28=\min(\max(A24,A27),A26)$
A29	Absolute floor of the MCR	This is as defined in Art 129(1)d of the Solvency II Directive
A30	MCR	This is calculated in accordance with Solvency 2 requirements. $A31=\max(A29,A30)$

Technical Annex II: List of quantitative reporting items

S.28.02

Minimum capital Requirement - Composite undertakings

ITEM	INSTRUCTIONS	
B1	Linear Formula component for non-life insurance or reinsurance obligations – $MCR_{(NL,NL)}$ result	This is the linear formula component for non-life insurance or reinsurance obligations of non-life insurance activities, and is calculated in accordance with Solvency 2 requirements.
C1	Linear Formula component for non-life insurance or reinsurance obligations – $MCR_{(NL,L)}$ result	This is the linear formula component for non-life insurance or reinsurance obligations of life insurance activities, and is calculated in accordance with Solvency 2 requirements
D2	Medical expense insurance and proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for medical expense insurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 26 See cross-templates checks tab CAS 40
E2	Medical expense insurance and proportional reinsurance – net written premiums – non-life activities	This is the premiums written for medical expense insurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F2	Medical expense insurance – net best estimate – life activities	This is the technical provisions for medical expense insurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 26 See cross-templates checks tab CAS 40
G2	Medical expense insurance and proportional reinsurance – net written premiums – life activities	This is the premiums written for medical expense insurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D3	Income protection insurance and proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for income protection insurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 27 See cross-templates checks tab CAS 41
E3	Income protection insurance and proportional reinsurance – net written premiums – non-life activities	This is the premiums written for income protections insurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F3	Income protection insurance and proportional reinsurance – net best estimate – life activities	This is the technical provisions for income protection insurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 27 See cross-templates checks tab CAS 41
G3	Income protection insurance and proportional reinsurance – net written premiums – life activities	This is the premiums written for income protections insurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D4	Workers' compensation insurance and proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for workers' compensation insurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 28 See cross-templates checks tab CAS 42
E4	Workers' compensation insurance – net written premiums – non-life activities	This is the premiums written for workers' compensations insurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero , relating to non-life activities
F4	Workers' compensation insurance and proportional reinsurance – net best estimate – life activities	This is the technical provisions for workers' compensation insurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 28 See cross-templates checks tab CAS 42
G4	Workers' compensation insurance and proportional reinsurance – net written premiums – life activities	This is the premiums written for workers' compensations insurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero , relating to life activities

D5	Motor vehicle liability insurance and proportional reinsurance and proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for motor vehicle liability insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 29 See cross-templates checks tab CAS 43
E5	Motor vehicle liability insurance and proportional reinsurance – net written premiums – non-life activities	This is the premiums written for motor vehicle liability insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F5	Motor vehicle liability insurance and proportional reinsurance – net best estimate – life activities	This is the technical provisions for motor vehicle liability insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 29 See cross-templates checks tab CAS 43
G5	Motor vehicle liability insurance and proportional reinsurance – net written premiums – life activities	This is the premiums written for motor vehicle liability insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D6	Other motor insurance and proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for other motor insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 30 See cross-templates checks tab CAS 44
E6	Other motor insurance and proportional reinsurance – net written premiums – non-life activities	This is the premiums written for other motor insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F6	Other motor insurance and proportional reinsurance – net best estimate – life activities	This is the technical provisions for other motor insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 30 See cross-templates checks tab CAS 44
G6	Other motor insurance and proportional reinsurance – net written premiums – life activities	This is the premiums written for other motor insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D7	Marine, aviation and transport insurance and proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for marine, aviation and transport insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 31 See cross-templates checks tab CAS 45
E7	Marine, aviation and transport insurance and proportional reinsurance – net written premiums – non-life activities	This is the premiums written for marine, aviation and transport insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F7	Marine, aviation and transport insurance and proportional reinsurance – net best estimate – life activities	This is the technical provisions for marine, aviation and transport insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 31 See cross-templates checks tab CAS 45
G7	Marine, aviation and transport insurance and proportional reinsurance – net written premiums – life activities	This is the premiums written for marine, aviation and transport insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D8	Fire and other damage to property insurance and proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for fire and other damage to property insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 32 See cross-templates checks tab CAS 46

E8	Fire and other damage to property insurance and proportional reinsurance – net written premiums – non-life activities	This is the premiums written for fire and other damage to property insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F8	Fire and other damage to property insurance and proportional reinsurance – net best estimate – life activities	This is the technical provisions for fire and other damage to property insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 32 See cross-templates checks tab CAS 46
G8	Fire and other damage to property insurance and proportional reinsurance – net written premiums – life activities	This is the premiums written for fire and other damage to property insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D9	General liability insurance and proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for general liability insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 33 See cross-templates checks tab CAS 47
E9	General liability insurance and proportional reinsurance – net written premiums – non-life activities	This is the premiums written for general liability insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F9	General liability insurance and proportional reinsurance – net best estimate – life activities	This is the technical provisions for general liability insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 33 See cross-templates checks tab CAS 47
G9	General liability insurance and proportional reinsurance – net written premiums – life activities	This is the premiums written for general liability insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D10	Credit and suretyship insurance and proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for credit and suretyship insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 34 See cross-templates checks tab CAS 48
E10	Credit and suretyship insurance and proportional reinsurance – net written premiums – non-life activities	This is the premiums written for credit and suretyship insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F10	Credit and suretyship insurance and proportional reinsurance – net best estimate – life activities	This is the technical provisions for credit and suretyship insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 34 See cross-templates checks tab CAS 48
G10	Credit and suretyship insurance and proportional reinsurance – net written premiums – life activities	This is the premiums written for credit and suretyship insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D11	Legal expenses insurance and proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for legal expenses insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 35 See cross-templates checks tab CAS 49
E11	Legal expenses insurance and proportional reinsurance – net written premiums – non-life activities	This is the premiums written for legal expenses insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities

F11	Legal expenses insurance and proportional reinsurance – net best estimate – life activities	This is the technical provisions for legal expenses insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 35 See cross-templates checks tab CAS 49
G11	Legal expenses insurance and proportional reinsurance – net written premiums – life activities	This is the premiums written for legal expenses insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D12	Assistance and its proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for assistance and its proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 36 See cross-templates checks tab CAS 50
E12	Assistance and its proportional reinsurance – net written premiums – non-life activities	This is the premiums written for assistance and its proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F12	Assistance and its proportional reinsurance – net best estimate – life activities	This is the technical provisions for assistance and its proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 36 See cross-templates checks tab CAS 50
G12	Assistance and its proportional reinsurance – net written premiums – life activities	This is the premiums written for assistance and its proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D13	Miscellaneous financial loss insurance and proportional reinsurance – net best estimate – non-life activities	This is the technical provisions for miscellaneous financial loss insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 37 See cross-templates checks tab CAS 51
E13	Miscellaneous financial loss insurance and proportional reinsurance – net written premiums – non-life activities	This is the premiums written for miscellaneous financial loss insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F13	Miscellaneous financial loss insurance and proportional reinsurance – net best estimate – life activities	This is the technical provisions for miscellaneous financial loss insurance and proportional reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 37 See cross-templates checks tab CAS 51
G13	Miscellaneous financial loss insurance and proportional reinsurance – net written premiums – life activities	This is the premiums written for miscellaneous financial loss insurance and proportional reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D14	Non-proportional casualty reinsurance – net best estimate – non-life activities	This is the technical provisions for non-proportional casualty reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 38 See cross-templates checks tab CAS 52
E14	Non-proportional casualty reinsurance – net written premiums – non-life activities	This is the premiums written for non-proportional casualty reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F14	Non-proportional casualty reinsurance – net best estimate – life activities	This is the technical provisions for non-proportional casualty reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 38 See cross-templates checks tab CAS 52
G14	Non-proportional casualty reinsurance – net written premiums – life activities	This is the premiums written for non-proportional casualty reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities

D15	Non-proportional property reinsurance – net best estimate – non-life activities	This is the technical provisions for non-proportional property reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 41 See cross-templates checks tab CAS 55
E15	Non-proportional property reinsurance – net written premiums – non-life activities	This is the premiums written for non-proportional property reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F15	Non-proportional property reinsurance – net best estimate – life activities	This is the technical provisions for non-proportional property reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 41 See cross-templates checks tab CAS 55
G15	Non-proportional property reinsurance – net written premiums – life activities	This is the premiums written for non-proportional property reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D16	Non-proportional marine, aviation and transport reinsurance – net best estimate – non-life activities	This is the technical provisions for non-proportional marine, aviation and transport reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 40 See cross-templates checks tab CAS 54
E16	Non-proportional marine, aviation and transport reinsurance – net written premiums – non-life activities	This is the premiums written for non-proportional marine, aviation and transport reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F16	Non-proportional marine, aviation and transport reinsurance – net best estimate – life activities	This is the technical provisions for non-proportional marine, aviation and transport reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 40 See cross-templates checks tab CAS 54
G16	Non-proportional marine, aviation and transport reinsurance – net written premiums – life activities	This is the premiums written for non-proportional marine, aviation and transport reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
D17	Non-proportional health reinsurance – net best estimate – non-life activities	This is the technical provisions for non-proportional health reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 39 See cross-templates checks tab CAS 53
E17	Non-proportional health reinsurance – net written premiums – non-life activities	This is the premiums written for non-proportional health reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to non-life activities
F17	Non-proportional health reinsurance – net best estimate – life activities	This is the technical provisions for non-proportional health reinsurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 39 See cross-templates checks tab CAS 53
G17	Non-proportional health reinsurance – net written premiums – life activities	This is the premiums written for non-proportional health reinsurance during the (rolling) last 12 months, after deduction of premiums for reinsurance contracts, with a floor equal to zero, relating to life activities
B18	$MCR_{(L,NL)}$ result	This is the linear formula component for life insurance or reinsurance obligations of non-life insurance activities, and is calculated in accordance with Solvency 2 requirements $B18 = (0.05 + D19) - (0.088 * D20) + (0.005 * D21) + (0.029 * D22) + (0.001 * E23)$
C18	$MCR_{(L,L)}$ result	This is the linear formula component for life insurance or reinsurance obligations of life insurance activities, and is calculated in accordance with Solvency 2 requirements $C18 = (0.05 + F19) - (0.088 * F20) + (0.005 * F21) + (0.029 * F22) + (0.001 * G23)$

D19	Net best estimate for obligations with profit participation – guaranteed benefits – non-life activities	This is the technical provisions without a risk margin for guaranteed benefits in respect of life insurance obligations with profit participation, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities and technical provisions without a risk margin for reinsurance obligations where the underlying insurance obligations include profit participation, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 42 See cross-templates checks tab CAS 56
F19	Net best estimate provisions for obligations with profit participation – guaranteed benefits – life activities	This is the technical provisions without a risk margin for guaranteed benefits in respect of life insurance obligations with profit participation, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities and technical provisions without a risk margin for reinsurance obligations where the underlying insurance obligations include profit participation, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 42 See cross-templates checks tab CAS 56
D20	Net best estimate for obligations with profit participation – future discretionary benefits – non-life activities	This is the technical provisions without a risk margin for future discretionary benefits in respect of life insurance obligations with profit participation, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 42 See cross-templates checks tab CAS 56
F20	Net best estimate for obligations with profit participation – future discretionary benefits – life activities	This is the technical provisions without a risk margin for future discretionary benefits in respect of life insurance obligations with profit participation, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 42 See cross-templates checks tab CAS 56
D21	Net best estimate for index-linked and unit-linked obligations – non-life activities	This is the technical provisions without a risk margin for index-linked and unit-linked life insurance obligations and reinsurance obligations relating to such insurance obligations, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to non-life activities. See cross-templates checks tab CQS 43 See cross-templates checks tab CAS 57
F21	Net best estimate for index-linked and unit-linked obligations – life activities	This is the technical provisions without a risk margin for index-linked and unit-linked life insurance obligations and reinsurance obligations relating to such insurance obligations, after deduction of the amounts recoverable from reinsurance contracts and SPVs, with a floor equal to zero, relating to life activities. See cross-templates checks tab CQS 43 See cross-templates checks tab CAS 57
D22	Net best estimate for other life (re)insurance obligations – non-life activities	This is the technical provisions without a risk margin for other life insurance obligations and reinsurance obligations relating to such insurance obligations, after deduction of the amounts recoverable from reinsurance contracts and SPV, with a floor equal to zero, relating to non-life activities See cross-templates checks tab CQS 44 See cross-templates checks tab CAS 58
F22	Net best estimate for other life (re)insurance obligations – life activities	This is the technical provisions without a risk margin for other life insurance obligations and reinsurance obligations relating to such insurance obligations, after deduction of the amounts recoverable from reinsurance contracts and SPV, with a floor equal to zero, relating to life activities See cross-templates checks tab CQS 44 See cross-templates checks tab CAS 58
E23	Capital at risk for all life (re)insurance obligations – non-life activities	This is the capital at risk, being the sum over all contracts that give rise to life insurance or reinsurance obligations of the highest amounts that the insurance or reinsurance undertaking would pay in the event of the death or disability of the persons insured under the contract after deduction of the amounts recoverable from reinsurance contracts and special purpose vehicles in such event, and the expected present value of annuities payable on death or disability less the net best estimate, with a floor equal to zero, relating to non-life activities

G23	Capital at risk for all life (re)insurance obligations – life activities	This is the capital at risk, being the sum over all contracts that give rise to life insurance or reinsurance obligations of the highest amounts that the insurance or reinsurance undertaking would pay in the event of the death or disability of the persons insured under the contract after deduction of the amounts recoverable from reinsurance contracts and special purpose vehicles in such event, and the expected present value of annuities payable on death or disability less the net best estimate, with a floor equal to zero, relating to life activities
A24	Linear MCR	This is calculated in accordance Solvency II requirements.
A25	SCR	This is the latest SCR to be calculated, either the annual one or a more recent one in case the SCR has been recalculated (e.g. due to a change in risk profile) since the last value of the SCR was reported, including capital add on. Undertakings using internal models to calculate the SCR should refer to IM SCR, except where under L1 Article 129(3) the national supervisor requires standard formula reference.
A26	MCR cap	This is calculated as 45% of the SCR including any capital add-on in accordance with Art 129(3) of the Solvency II Directive
A27	MCR floor	This is calculated as 25% of the SCR including any capital add-on in accordance with Art 129(3) of the Solvency II Directive
A28	Combined MCR	This is calculated in accordance with Solvency 2 requirements
A29	Absolute floor of the MCR	This is as defined in Art 129(1)d of the Solvency II Directive
A30	MCR	This is calculated in accordance with Solvency 2 requirements
B32	Notional linear MCR – non-life activities	NOT APPLICABLE for the purpose of preparatory phase This is calculated in accordance with Solvency 2 requirements
C32	Notional linear MCR –life activities	NOT APPLICABLE for the purpose of preparatory phase This is calculated in accordance with Solvency 2 requirements
B33	Notional SCR with add-on – non-life activities (annual or latest calculation)	NOT APPLICABLE for the purpose of preparatory phase This is calculated in accordance with Solvency 2 requirements
C33	Notional SCR with add-on –life activities (annual or latest calculation)	NOT APPLICABLE for the purpose of preparatory phase This is calculated in accordance with Solvency 2 requirements
B34	Notional MCR cap – non-life activities	NOT APPLICABLE for the purpose of preparatory phase This is calculated as 45% of the notional non-life SCR including the non-life capital add-on in accordance with Solvency 2 requirements
C34	Notional MCR cap –life activities	NOT APPLICABLE for the purpose of preparatory phase This is calculated as 45% of the notional life SCR including the life capital add-on in accordance with Solvency 2 requirements
B35	Notional MCR floor – non-life activities	NOT APPLICABLE for the purpose of preparatory phase This is calculated as 25% of the notional non-life SCR including the non-life capital add-on in accordance with Solvency 2 requirements
C35	Notional MCR floor –life activities	NOT APPLICABLE for the purpose of preparatory phase This is calculated as 25% of the notional life SCR including the life capital add-on in accordance with Solvency 2 requirements
B36	Notional Combined MCR – non-life activities	NOT APPLICABLE for the purpose of preparatory phase This is calculated in accordance with Solvency 2 requirements
C36	Notional Combined MCR –life activities	NOT APPLICABLE for the purpose of preparatory phase This is calculated in accordance with Solvency 2 requirements
B37	Absolute floor of the notional MCR – non-life activities	NOT APPLICABLE for the purpose of preparatory phase This is either zero or the amount defined in Art 129(1)d(i) of the Solvency II Directive, in accordance with Solvency 2 requirements
C37	Absolute floor of the notional MCR – life activities	NOT APPLICABLE for the purpose of preparatory phase This is as defined in Art 129(1)d(ii) of the Solvency II Directive
B38	Notional MCR – non-life activities	NOT APPLICABLE for the purpose of preparatory phase This is the notional non-life MCR referred to in Art 74(2)b of the Solvency II Directive

C38	Notional MCR – life activities	NOT APPLICABLE for the purpose of preparatory phase This is the notional life MCR referred to in Art 74(2)a of the Solvency II Directive
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Technical Annex II: List of quantitative reporting items

S.32.01.g

Undertakings in the scope of the group

ITEM		INSTRUCTIONS
A1	Country	Country in which the registered head office of each undertaking within the group is located
B1	Identification code	<p>Identification code:</p> <ul style="list-style-type: none"> - Legal Entity Identifier (LEI); - Interim entity identifier (Pre-LEI); - Specific code <p>(by this order of priority)</p> <p>Specific code:</p> <ul style="list-style-type: none"> - For EEA (re) insurance undertakings within the group: identification code used in the local market, attributed by the undertaking's supervisory authority - For non-EEA undertakings and non-regulated undertakings within the group, identification code provided will be provided by the group. When allocating an identification code to each non-EEA or non-regulated undertaking, it should comply with the following format in a consistent manner: identification code of the parent undertaking + ISO 3166-1 alpha-2 code of the country of the undertaking + 5 digits
V1	Type of code	<p>Identification of the code used in B1:</p> <ul style="list-style-type: none"> - LEI - Pre-LEI - Specific code
C1	Legal name of the undertaking	Legal name of the undertaking
D1	Type of undertaking	<p>Type of undertaking should give information on the type of activity of the undertaking. The closed list is the following:</p> <ol style="list-style-type: none"> 1. Life insurance undertaking 2. Non life insurance undertaking 3. Composite undertaking 4. Insurance holding company as defined in Art. 212§ (f) of Directive 2009/138/EC 5. Mixed-activity insurance holding company as defined in Art. 212§1 (g) of Directive 2009/138/EC 6. Mixed financial holding company as defined in Art. 212§1(h) of Directive 2009/138/EC 7. Credit institution, investment firm and financial institution 8. Institution for occupational retirement provision 9. Ancillary services undertaking as defined in Art. 1bis (23) of Level 2 10. Non-regulated undertaking carrying out financial activities as defined in Art. 1bis (33) of Level 2 11. Special purpose vehicle authorized in accordance with Art. 211 of Directive 2009/138/EC 12. Special purpose vehicle other special purpose vehicle authorized in accordance with Art. 211 of Directive 2009/138/EC
E1	Legal form	Form of the undertaking consistent with Annex III of Directive 2009/138/EC
F1	Category of the undertaking	<p>High level information on the legal form, i.e. whether the undertaking is a mutual or not</p> <p>The closed list is the following:</p> <ol style="list-style-type: none"> 1. Mutual 2. Non-mutual
G1	Supervisory Authority	Name of the Supervisory Authority responsible for the supervision of the individual undertaking
H1a	Total Balance Sheet (for (re)insurance undertakings)	For (re)insurance undertakings, total amount of Solvency II balance sheet as reported in item A30 in BS-C1. The currency used should be the group currency
H1b	Total Balance Sheet (for other regulated undertakings)	For other regulated undertakings, total amount of balance sheet used for prudential purposes. The currency used should be the group currency
H1c	Total Balance Sheet (non-regulated undertakings)	For non-regulated undertakings, total amount of balance sheet used for accounting purposes. The currency used should be the group currency
I1a	Written premium or Turn Over (written premiums net of	For insurance and reinsurance undertakings: written premiums net of reinsurance ceded under IFRS or local GAAP.

	reinsurance ceded under IFRS or local GAAP for insurance undertakings)	The currency used should be the group currency
I1b	Written premium or Turn Over (turn over defined as the gross revenue under IFRS or local GAAP for other types of undertakings or insurance holding companies)	For other types of undertakings : turn over defined as the gross revenue under IFRS or local GAAP For insurance holding companies where appropriate turnover defined as the gross revenue under IFRS or local GAAP will be used as a ranking criteria. The currency used should be the group currency
J1	Underwriting performance if applicable	(Re)insurance undertakings should report their underwriting performance in accordance to financial statements. An absolute amount should be reported. The currency used should be the group currency.
K1	Investment performance	(Re)insurance undertakings should report their investment performance in accordance to financial statements. An absolute amount should be reported. The currency used should be the group currency. This value should not include any value already reported in 11.
L1	Total performance	All the related undertakings within the group should report their total performance. An absolute amount should be reported. The currency used should be the group currency.
M1	Criteria of influence - % capital share	Proportion of the subscribed capital that is held, directly or indirectly, by the participating undertaking in the undertaking (as referred to in article 221 of Directive 2009/138/EC)
N1	Criteria of influence - %used for establishment of statutory (GAAP/IFRS) consolidated accounts	Percentage as defined by the consolidated account directive for the integration of consolidated undertakings into the consolidation which may differ from item M1. For full integration, minority interests should also be reported in this item.
O1	Criteria of influence - %voting rights	Proportion of voting rights that is held, directly or indirectly, by the participating undertaking in the undertaking
P1	Criteria of influence - other criteria	Other criteria useful to assess type of influence exercised by the parent undertaking, e.g centralized risk management
Q1	Criteria of influence - level of influence	Influence can be either dominant or significant, depending on former criteria mentioned; the group is responsible for assessing the level of influence exercised by the parent undertaking over any undertaking but as stated in article 212-2 of Directive 2009/138/EC the group supervisor may have a differing view from the group's assessment and if so the group should take into account any decision made by the group supervisor The closed list is the following: 1. Dominant 2. Significant
R1	Criteria of influence - proportional share retained	Proportional share is the proportion that will be used to calculate the group solvency.
S1	Inclusion in the scope of group supervision - Y/N	Indicates if the undertaking is included or not in the scope of group supervision as referred in article 214 of Directive 2009/138/EC; if an undertaking on which a significant/dominant influence is exercised is not included in the scope of supervision as provided for in article 214, then it should be indicated which of a,b or c of article 214.2 is the reason The closed list is the following: 1. Yes 2. No (art. 214 a) 3. No (art. 214 b) 4. No (art. 214 c)
T1	Inclusion in the scope of group supervision - Date of decision of art.214 applied	NOT APPLICABLE for the purpose of preparatory phase Date where the decision of exclusion has been taken

U1	Group solvency assessment - Method used and, under method 1 treatment of the undertaking	<p>The item gathers information on the method used for group solvency assessment and the treatment of each undertaking.</p> <p>The closed list is the following:</p> <ol style="list-style-type: none"> 1.Consolidation/full integration 2.Consolidation/proportional integration 3.Consolidation/equity method 4.Deduction and Aggregation- Solvency II 5. Deduction and Aggregation- Other sectoral Rules 6. Deduction and Aggregation- Local rules 7. Deduction of the participation in relation to article 229 of Directive 2009/138/EC 8. No inclusion into the Solvency II consolidated data as defined in Art. 323bis SCG3 of Level 2 9. Other method
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Technical Annex II: List of quantitative reporting items

S.33.01.g

Insurance and reinsurance individual requirements

ITEM		INSTRUCTIONS
A1	Legal name of the undertaking	Legal name of each undertaking
A2	Identification code	<p>Identification code:</p> <ul style="list-style-type: none"> - Legal Entity Identifier (LEI); - Interim entity identifier (Pre-LEI); - Specific code <p>(by this order of priority)</p> <p>Specific code:</p> <ul style="list-style-type: none"> - For EEA (re) insurance undertakings within the group: identification code used in the local market, attributed by the undertaking's supervisory authority - For non-EEA undertakings and non-regulated undertakings within the group, identification code provided will be provided by the group. When allocating an identification code to each non-EEA or non-regulated undertaking, it should comply with the following format in a consistent manner: identification code of the parent undertaking + ISO 3166-1 alpha-2 code of the country of the undertaking + 5 digits
Q1	Type of code	<p>Identification of the code used in A2:</p> <ul style="list-style-type: none"> - LEI - Pre-LEI - Specific code
R1	Entity Level/RFF/ Remaining Part	<p>Identify if the information is related to:</p> <ul style="list-style-type: none"> - Entity level - RFF - Remaining part
S1	Fund Number	This number is attributed by the undertaking and must be consistent over time. It should be reported when cell R1 is "RFF"

EEA entities and non EEA entities (using SII rules) included only via D&A

B1	SCR Market Risk	Solo SCR Market Risk for each undertaking
B2	SCR Counterparty Default Risk	Solo SCR Counterparty Default Risk for each undertaking
B3	SCR Life Underwriting Risk	Solo SCR Life Underwriting Risk for each undertaking
B4	SCR Health Underwriting Risk	Solo SCR Health Underwriting Risk for each undertaking
B5	SCR Non-life Underwriting Risk	Solo SCR Non-life Underwriting Risk for each undertaking
B6	SCR Operational Risk	Solo SCR Operational Risk for each undertaking
B7	Solo SCR	Solo SCR for each undertaking
C1	Solo MCR	Solo MCR for each undertaking within EEA
D1	Eligible Solo Own Funds	Eligible Solo Own Funds to cover the SCR. Total own funds are to be reported in this item. No restrictions on availability for the group apply.
E1	If undertaking specific parameters used specify where	NOT APPLICABLE for the purpose of preparatory phase When an entity used undertaking specific parameters for calculating solo SCR, report the area(s) for which these parameters are used.
F1	If Simplifications used specify where	When an entity used simplifications for calculating solo SCR, report the area(s) for which these simplifications are used.
G1	if Partial Internal Model used specify where	When an entity used a partial internal model(s) for calculating solo SCR, report the area(s) for which this/these are used.
H1	Group or solo internal model	When an entity used a full internal model for calculating solo SCR, it has to be stated whether this regards a solo internal model or group internal model.

I1	Date of initial approval	NOT APPLICABLE for the purpose of preparatory phase In case a group or solo internal model is approved by solo supervisor, report the date of this approval.
J1	Date of approval of latest major change	NOT APPLICABLE for the purpose of preparatory phase In case a major change of group or solo internal model is approved by solo supervisor (Art.115), report the date of this approval.
K1	Date of decision	NOT APPLICABLE for the purpose of preparatory phase In case a capital add-on applies to any of the entities listed here (Art.37), report the date of the decision.
L1	Amount	NOT APPLICABLE for the purpose of preparatory phase In case a capital add-on applies to any of the entities listed here (Art.37), report the exact amount.
M1	Reason	NOT APPLICABLE for the purpose of preparatory phase In case a capital add-on applies to any of the entities listed here (Art.37), report the reason(s) stated by the supervisor in it's decision

Non EEA entities (both using SII rules and not using SII rules) regardless of the method used

N1	Local capital requirement	Local solo capital requirement that triggers first intervention by local supervisor.
O1	Local minimum capital requirement	Local solo minimum capital requirement that triggers final intervention - withdrawal of the authorisation- by local supervisor. This figure is needed to calculate the group SCR floor.
P1	Eligible own funds in accordance with local rules	Eligible Solo Own Funds to cover the local capital requirement, as calculated according to local rules, without applying restrictions on availability for the group.

Technical Annex II: List of quantitative reporting items

S.34.01.g

Other regulated and non-regulated financial undertakings including insurance holding companies individual requirements

ITEM		INSTRUCTIONS
A1	Legal name of the undertaking	Legal name of each undertaking
A2	Identification code	<p>Identification code:</p> <ul style="list-style-type: none"> - Legal Entity Identifier (LEI); - Interim entity identifier (Pre-LEI); - Specific code <p>(by this order of priority)</p> <p>Specific code:</p> <ul style="list-style-type: none"> - For EEA (re) insurance undertakings within the group: identification code used in the local market, attributed by the undertaking's supervisory authority - For non-EEA undertakings and non-regulated undertakings within the group, identification code provided will be provided by the group. When allocating an identification code to each non-EEA or non-regulated undertaking, it should comply with the following format in a consistent manner: identification code of the parent undertaking + ISO 3166-1 alpha-2 code of the country of the undertaking + 5 digits
F1	Type of code	<p>Identification of the code used in A2:</p> <ul style="list-style-type: none"> - LEI - Pre-LEI - Specific code
A3	Aggregated or not (Y/N)	<p>When the entities of other financial sectors form a group with a specific capital requirement, this consolidated capital requirement can be accepted instead of the list of each solo requirement. One of the options in the following closed list shall be used:</p> <p>If the capital requirement is then provided on aggregated basis under this specific case: Y; Otherwise: N.</p>
B1	Type of capital requirement	<p>One of the options in the following closed list shall be used:</p> <ul style="list-style-type: none"> For Insurance holding company, Mixed financial holding company, and non-regulated undertaking carrying out financial activities the requirement: Notional; For Mixed activity holding company: Non; For credit institution, investment firm and financial institution, institution for occupational retirement provision: Sectoral
C1	Notional SCR or Sectoral capital requirement	The capital requirement, either sectoral or notional, that triggers first intervention by solo supervisor, assuming a so-called intervention ladder.
D1	Notional MCR or Sectoral minimum capital requirement	Minimum capital requirement, either sectoral or notional, that triggers final intervention, assuming a so-called intervention ladder. This figure is needed to calculate the group SCR floor. This item is not reported for entities for which a final trigger level is not set.
E1	Eligible Own Funds	Total own funds to cover the (notional or sectoral) capital requirement. No restrictions on availability for the group apply.

Technical Annex II: List of quantitative reporting items

S.35.01.g

Contribution to group Technical Provisions

ITEM		INSTRUCTIONS
A1	Identification code	<p>Identification code:</p> <ul style="list-style-type: none"> - Legal Entity Identifier (LEI); - Interim entity identifier (Pre-LEI); - Specific code <p>(by this order of priority)</p> <p>Specific code:</p> <ul style="list-style-type: none"> - For EEA (re) insurance undertakings within the group: identification code used in the local market, attributed by the undertaking's supervisory authority - For non-EEA undertakings and non-regulated undertakings within the group, identification code provided will be provided by the group. When allocating an identification code to each non-EEA or non-regulated undertaking, it should comply with the following format in a consistent manner: identification code of the parent undertaking + ISO 3166-1 alpha-2 code of the country of the undertaking + 5 digits
S1	Type of code	<p>Identification of the code used in A1:</p> <ul style="list-style-type: none"> - LEI - Pre-LEI - Specific code
B1	Legal name of the undertaking	Legal name of each undertaking
S1	Method of group solvency calculation	<p>One of the options in the following closed list shall be used:</p> <ul style="list-style-type: none"> Method 1 Method 2
C1, F1, I1, L1, O1	Amount of gross TP	<p>Overall amount of technical provisions (TP calculated as a whole or the sum of the best estimate and the risk margin) of the EEA or non-EEA undertaking calculated according to Solvency II rules. The cell should be filled in gross figures, i. e. gross of IGT and before cession of reinsurance .</p> <p>The currency used should be the group currency.</p> <p>This item is reported for the (re)insurance undertakings under method 1 and method 2, except for the (re)insurance undertakings under method 2 situated in equivalent non-EEA countries.</p>
D1,G1,J1,M1,P1	Amount of net TP	<p>Overall amount of technical provisions (TP calculated as a whole or the sum of the best estimate and the risk margin) of the EEA or non-EEA undertaking calculated according to Solvency II rules. The cell should be filled in net of IGT but gross of reinsurance ceded outside the group. The currency used should be the group currency. This item is reported for the (re)insurance undertakings under method 1 and method 2, except for the (re)insurance undertakings under method 2 situated in equivalent non-EEA countries</p> <p>See cross-templates checks tab CGS 1 See cross-templates checks tab CGS 2 See cross-templates checks tab CGS 3 See cross-templates checks tab CGS 4 See cross-templates checks tab CGS 5</p>
E1, H1, K1, N1, Q1	Net Contribution to Group TP (%)	<p>The percentage share of TP (TP calculated as a whole or the sum of the best estimate and the risk margin) of the (re) insurance undertaking to the group TP under method 1 net of IGT but gross of reinsurance ceded outside the group , split by respective main categories (Life excluding health and unit linked index-linked, Unit-linked and index linked, Health – SLT and non-SLT, Non-life excluding health)</p> <p>This item is not reported for undertakings under method 2.</p>

R1	Total amount of TP (excluding IGT)	<p>This item equals to the sum of items D1+G1+J1+M1+P1, except for (re)insurance undertakings situated in equivalent non-EEA countries under method 2, because in this case items D1,G1,J1,M1 and P1 are not required to be reported for this type of undertakings, with only item R1 being reported.</p> <p>When method 1 as defined under Article 230 of the Solvency II Directive is used for the (re)insurance undertaking, the total amount of technical provisions in cell R1 accounts for its contribution net of reinsurance ceded within the group to the group technical provisions. The total amount of technical provisions in cell R1 for all (re)insurance undertakings under method 1 can be reconciled with the amount of group technical provisions in the group balance sheet (sum of the cells L1+L4+L6B+L7+L10)</p> <p>When method 2 is used for the (re)insurance undertaking, the total amount of technical provisions in cell R1 cannot be reconciled with the amount of group technical provisions in the group balance sheet.</p>
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S.01.02 - Basic Information (old BI)

Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
A1	The text was amended to allow for the use of LEI or pre-LEI if available	Identification code: - Legal Entity Identifier (LEI); - Interim entity identifier (Pre-LEI); - Identification code used in the local market, attributed by group supervisor. (by this order of priority if existent)
A9	The text was amended to allow for the use of LEI or pre-LEI if available	Identification code: - Legal Entity Identifier (LEI); - Interim entity identifier (Pre-LEI); - Identification code used in the local market, attributed by group supervisor. (by this order of priority if existent) This item is only reported when the report is made at group level
A11	A new item was added to identify the type of code	Identification of the code used in A1/A9: - LEI - Pre-LEI - Local code

S.02.01 - Balance Sheet (old BS-C1)
Identification of changes performed to the version published at July 2012 Final Report

Cell	Description	New text (when applicable)
A0	Add "Fund number" to identify the RFF when the template is reported by RFF	Fund number
LS0	Add "Technical Provisions - non life" for Statutory Accounts column	Technical Provisions - non life
LS6F	Add "Technical provisions - life (excluding index-linked and unit-linked)" for Statutory Accounts column	Technical provisions - life (excluding index-linked and unit-linked)
L15E	Add "Subordinated liabilities" as a sum of "Subordinated liabilities not in BOF" and "Subordinated liabilities in BOF"	Subordinated liabilities
A9, A10A, A10B, A11	Indentation was amended	Not applicable
A6	LOG file changed to clarify how "participations" should be reported by groups LOG changed to clarify that "Participations" don't include the ones related to assets held for Unit Linked	Participation as defined in article 13(20) of Directive 2009/138/EC. Corresponds to CIC category 3# when item "Participation" of Assets-D1 is not "N" and item "Asset held in unit linked and index linked funds (Y/N)" in Assets-D1 is equal to "N". Participations at group level will include: - holdings in related but not subsidiary insurance or reinsurance undertakings or insurance holding companies as described in Art 323bis 1. (d) - holdings in related undertakings in other financial sectors as described in Art 323bis 1. (e) - other related undertakings as described in Art 323bis 1. (f) - insurance or reinsurance undertakings or insurance holding companies included with the deduction and aggregation method (when combination of methods is used)
L16	Definition was aligned with the definition for cell A10A	Financial instruments that have values, based on the expected future price movements of the assets to which they are linked. SII value, only if negative, of the derivative as of the reporting date is reported here. Corresponds to CIC categories A to F. For the statutory accounts this item does not need to be filled for undertakings which do not value derivatives in their Local GAAP.

Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
A2, A26, A25B, A3, A4, A12, A14, A16, A13, A21, A20, A27, A29, A30, L1, L6B, L7, L23, L18, L22, L13, L16, L19, L20, L15A, L15B, L15C, L26, L25, L25A, L27	Data checks "CGS" between 6 and 20 were deleted and references to CGS 21 were replaced by CGS 6	Not applicable
AS1	LOG file changed to avoid the confusion between Solvency II valuation and Statutory Accounts valuation	Intangible asset that represents the economic value of assets that cannot be individually identified and separately recognised in a business combination.
AS24	LOG file changed to avoid the confusion between Solvency II valuation and Statutory Accounts valuation	The part of acquisition costs allocated to future reporting periods
A2	LOG file changed to avoid the confusion between Solvency II valuation and Statutory Accounts valuation	Intangible assets other than goodwill. An identifiable nonmonetary asset without physical substance.
A6	In the LOG it was clarified that it includes subordinated liabilities that are classified as "Participations"	Participation as defined in article 13(20) of Directive 2009/138/EC. It includes equity and subordinated liabilities. ...
A26	LOG file changed to avoid the confusion between Solvency II valuation and Statutory Accounts valuation	An asset that may be used to reduce any subsequent period's income tax expense.
A28A	LOG file changed to avoid the confusion between Solvency II valuation and Statutory Accounts valuation	Own shares held by the undertakings.

A30	Inclusion of AS1 + AS24 in the formula of the total assets of the statutory accounts column	"For statutory accounts column : A30=AS1+AS24+A2+A26+A25B+A3+A4+A12+A14+A16+A13+A20+A21+A23+A28A+A28B+A27+A29"
L23	LOG file changed to avoid the confusion between Solvency II valuation and Statutory Accounts valuation	A potential obligation that may be incurred depending on the outcome of a future event. A contingent liability is one where the outcome of an existing situation is uncertain, and this uncertainty will be resolved by a future event. A contingent liability is generally recognised only if the contingency is probable and the amount of the liability can be estimated
L17	LOG file changed to avoid the confusion between Solvency II valuation and Statutory Accounts valuation	A tax liability that a company owes and does not pay at that current point, although it will be responsible for paying it at some point in the future.
L27	LOG file changed to avoid the confusion between Solvency II valuation and Statutory Accounts valuation	Formula For Statutory accounts – amount of other items complementing the balance between Assets and Liabilities For Solvency II: L27=A30-L25A See cross-templates checks tab CQS 1 See cross-templates checks tab CGS 21 See cross-templates checks tab QCGS 1 See cross-templates checks tab CAS 78
LS0	Lines were putted in dotted "TP NL" for Statutory Accounts column and it was explained in the LOG that the cells are optional for the Statutory Accounts	These cells are dotted lines. Either you can split your technical provisions between life or non-life and their linked health business, either you cannot and you directly fill in cell LS6F with the correct total value.
LSF6	Lines were putted in dotted "TP L" for Statutory Accounts column and it was explained in the LOG that the cells are optional for the Statutory Accounts	These cells are dotted lines. Either you can split your technical provisions between life or non-life and their linked health business, either you cannot and you directly fill in cell LS6F with the correct total value. LS6F=L6B+L7

S.02.02 - Assets and liabilities by currency (old BS_C1D)
Identification of changes performed to the version published at July 2012 Final Report

Cell	Description	New text (when applicable)
A10	Name amended to "Deposits to cedants and insurance and intermediaries and reinsurance receivables" for alignment purposes	Deposits to cedants and insurance and intermediaries and reinsurance receivables

Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
General	It was added a General comment to the LOG annex	The BS items presented here are based on BS-C1 (for SII BS only).
A33 cells	References to "CGS" data-checks were deleted	Not applicable
A4	Inclusion of A14 in the formula of "Other assets within scope of Assets-D1 (other than index-linked and unit-linked funds)"	Same as items A3 + A14 + A27 in BS-C1, by currency

S.06.02 - List of Assets (old AS-D1)
Identification of changes performed to the version published at July 2012 Final Report

Cell	Description	New text (when applicable)
General	Improved instructions on how the template is reported at solo and at group level	Annex I, paragraph 6
A9	The LOG was changed requiring undertakings to use a closed list of sectors, based on the GICS (Global Industry Classification Standard) instead of NACE code	Identify the economic sector of issuer, based on the GICS (Global Industry Classification Standard). One of the options in the following closed list shall be used:
A11	The LOG was clarified: for "Other cases" it should be "XA" and for "European Union Institutions" it should be "EU"	Country of localization of the issuer. For investment funds, the country is relative to the fund manager. One of the options in the following closed list shall be used: - ISO 3166-1 alpha-2 code - Supranational issuers: XA - European Union Institutions: EU
A16	This cell was added to the group template. The LOG clarified how the reporting by groups should be done according to the methods of consolidation	Identify if a equity and other share is a participation as defined in article 13(20) of Directive 2009/138/EC, by using the following criteria: included in group supervision except if deducted under art. 212 and / or strategic. For solo reporting or group reporting where the Deduction and aggregation method is used, the following options shall be used: - Not a participation: N - Is a participation but not consolidated at group level and not strategic: YNGNS - Is a participation not consolidated at group level but strategic: YNGS - Is a participation, consolidated at group level and not strategic: YGNS - Is consolidated at group level and is strategic: YGS For group reporting and only where accounting consolidation-based or a combination of methods is used, the following options shall be used: - Not a participation: N - Non-controlled participations under method 1: NCP1 - Other Financial Sectors: OFS - Subsidiaries under method 2: SM2 - Non-controlled participations under method 2: NCP2
A23	The definition in the LOG was clarified	Amount in currency for asset categories 3 and 4, the percentage of par value (clean price consistent with IFRS definition), for asset categories 1, 2, 5 and 6.
A24	In the LOG the description of the valuation method used were clarified	Identify the valuation method used when valuing assets. One of the options in the following closed list shall be used: o Quoted market price in active markets for the same assets (QMP); o Alternative valuation methods: - Quoted market price in active markets for similar assets (QMPS); - Other alternative valuation methods (AVM); o Adjusted equity methods (applicable for the valuation of participations) (AEM); o IFRS equity methods (IEM) (applicable for the valuation of participations).
A28	The LOG was amended in relation to how to report a "perpetual date"	Only applicable for CIC categories 1, 2, 5, 6 and 8. Corresponds always to the maturity date, even for callable securities. For perpetual securities use "31/12/9999"
A50	The LOG was clarified in relation to the scope for group reporting	This item shall be filled in only when it relates to the line-by-line list of investments held by subsidiaries or to one line for each non-controlled participation under method 2

Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
A1	The LOG was amended to allow the option for stakeholders' funds	Distinction between life, non-life, stakeholder's funds, general (no split) and ring fenced funds. One of the options in the following closed list shall be used: Life: L Non-life: NL Shareholders' funds: SF General: G Ring fenced funds: RF
A6	The LOG was corrected regarding the reference to assets pledged regarding the closed list and the wrong reference to AS-D5, in AS-D1 item A6	Identify assets kept in the undertaking balance-sheet and that are in the scope of reporting in template AS-D6. For partially pledge assets two lines for each asset shall be reported, one for the pledged amount and other for the remaining part. One of the options in the following list shall be used for the pledged part of the asset: - Assets in the balance sheet that are collateral pledged: CP - Collateral for reinsurance accepted: CR - Collateral for securities borrowed: CB - Repos: R

A9	The code was changed to NACE	Identify the economic sector of issuer based on the NACE code. The letter reference of the NACE code must be used for identifying sectors (e.g. A: Agriculture, hunting and forestry; Section B: Fishing, etc) except for the NACE relating to Section J: Financial intermediation, for which the 4 digits code should be used. For investment funds the NACE code would be 6712 (Security broking and fund management). This item is not applicable for CIC category 8 – Mortgages and Loans (for mortgages and loans on individuals, as those assets are not required to be individualized), and to CIC = 95 – Plant and equipment (for own use)
A9	In the LOG it was clarified the applicability of this item	This item is not applicable for CIC category 8 – Mortgages and Loans (for mortgages and loans on individuals, as those assets are not required to be individualized), and to CIC = 95 – Plant and equipment (for own use)
A10	In the LOG it was clarified the applicability of this item	This item is not applicable for CIC category 8 – Mortgages and Loans (for mortgages and loans on individuals, as those assets are not required to be individualized), and to CIC = 95 – Plant and equipment (for own use)
A11	In the LOG it was clarified the applicability of this item	This item is not applicable for CIC category 8 – Mortgages and Loans (for mortgages and loans on individuals, as those assets are not required to be individualized), and to CIC = 95 – Plant and equipment (for own use)
A16	In the LOG it was added 1 option to identify controlled participation which is not consolidated and is not an OFS for method 1	... Other related undertaking under method 1: ORUT1
A20	In the LOG it was changed the definition of modified duration in AS-D1, by removing “in years”	Asset duration, defined as the ‘residual modified duration’. For assets without fixed maturity the first call date shall be used. The duration shall be calculated based on economic value.
A28	In the LOG it was clarified how to report maturity date for loans and mortgages to individuals	For CIC category 8, regarding loans and mortgages to individuals, the weighed (based on the loan amount) maturity is to be reported.
A31	A new item was added: "Issuer Code"	Legal Entity Identifier (LEI); interim entity identifier; if available
A32	A new item was added: "Issuer Group Code"	Legal Entity Identifier (LEI); interim entity identifier (pre-LEI); if available. If none is available this item should not be reported
A33	A new item was added to identify the type of code	Identification of the code used in A31/A32: - LEI - Pre-LEI
A15	A clarification was added	EIOPA Code used to classify securities, as set out in Annex CIC Table. When classifying an asset using the CIC table, undertakings shall take into consideration the most representative risk to which the asset is exposed to. For reporting at group level, if different CIC codes exist for the same asset, due to reporting regarding different entities in the group (because different stock exchanges), a line must be entered for each different CIC. This situation will only occur when reporting by groups using consolidation method 2, and in practice there will be only one CIC for each asset for the same entity in the scope of the group, also identifiable by item A50.
A16	LOG: Alignment of the options with Participations template	Identify if a equity and other share or subordinated liability is a participation by using the following criteria: included in group supervision except if deducted under art. 212 and / or strategic. For solo reporting or group reporting where the Deduction and aggregation method is used, the following options shall be used: ...

S.08.01 - Open derivatives (old AS-D20)
Identification of changes performed to the version published at July 2012 Final Report

Cell	Description	New text (when applicable)
General	Improved instructions on how the template is reported at solo and at group level	Annex I, paragraph 8
A17	Change "cost" by "amount" in the LOG	The payment received (if sold) or paid (if bought), for options and also up-front and periodical amounts paid / received for swaps, since inception
A1	By mistake did not include two options foreseen before at July Report. This have been re-introduced.	Not applicable

Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
A1	The LOG was amended to allow the option for stakeholders' funds and include the missing options	Distinction between life, non-life, stakeholder's funds, general (no split) and ring fenced funds. One of the options in the following closed list shall be used: Life: L Non-life: NL Shareholders' funds: SF General: G Ring fenced funds: RF Issued by the undertaking (I) Related to the undertakings' liabilities (U) The split is not mandatory, except for identifying ring fenced funds, but should be reported if the undertaking uses it internally. When an undertaking does not apply a split "general" must be used. For derivatives issued by the undertaking as an internal (group) derivative and derivatives related to the undertakings' liabilities, a split is also mandatory.
A6	The name of the item was changed to "Counterparty Name" in the LOG and template	Counterparty Name
A33	In the LOG the definition of modified duration in AS-D20 was changed, by removing "in years"	Derivative duration, defined as the 'residual modified duration', for derivatives for which a duration measure is applicable.
A36	A new item was added: "Counterparty Code"	Legal Entity Identifier (LEI); interim entity identifier (pre-LEI); if available. If none is available this item should not be reported
A37	A new item was added: "Counterparty Group Code"	Legal Entity Identifier (LEI); interim entity identifier (pre-LEI); if available. If none is available this item should not be reported

S.12.01 - Life and health SLT provisions (old TP-F1Q)
Identification of changes performed to the version published at July 2012 Final Report

Cell	Description	New text (when applicable)
A7A, A7B, A7C	Transposition of the 3 lines referred to "of which" and clarify that A7 is the sum	Transpose the 3 lines referred to "of which" and clarify that it is a sum
F1	A line was added for Total TP, equal to the one in TP-F1, aligning to TP-E1Q.	Technical provisions - total

S.12.01 - Life and health SLT provisions (old TP-F1)
Identification of changes performed to the version published at July 2012 Final Report

Cell	Description	New text (when applicable)
A7A, A7B, A7C	Transposition of the 3 lines referred to "of which" and clarify that A7 is the sum	Transpose the 3 lines referred to "of which" and clarify that it is a sum
J1, JA1, JE1, JF1	In the LOG it was added text "location of risk underwritten" instead of only "risk underwritten"	Amount of gross BE by country of the location of risk underwritten, when the country is the home country, for each of the following Life LoB and totals (Life other than health insurance, incl. Unit-Linked and Health similar to life insurance):
J1, JA1, JE1, JF1	Change in the template to clarify how the reporting by country should be made	Gross BE for different countries Home country For countries in the materiality threshold [one line for each country in the materiality threshold] For EEA countries outside the materiality threshold For non-EEA countries outside the materiality threshold
O1	In the cell "Amount of gross (simplified calculation)" it was deletes "amount" as it is a %	Percentage of Gross TP calculated using simplified methods
P1	Moved "Total amount of surrenders" to Cover-A1; in its place introduced "Surrender value" that was previously asked in TP-F3, by product (and indirectly by LoB, because it could be identified from aggregation products) – In TP-F3, with the new format of the template, the "Surrender value" is only asked by HRG	Surrender value

Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
J1, JA1, JE1, JF1	Addition in the LOG to clarify that home country always need to be reported regardless of the materiality	Regardless of the materiality threshold, the home country has to be reported

S.17.01 - Non-life technical provisions (old TP-F1)
Identification of changes performed to the version published at July 2012 Final Report

Cell	Description	New text (when applicable)
A43 - A46	Change in the template to clarify how the reporting by country should be made	Gross BE for different countries Home country For countries in the materiality threshold [one line for each country in the materiality threshold] For EEA countries outside the materiality threshold For non-EEA countries outside the materiality threshold
A42	In the cell "Amount of gross (simplified calculation)" it was deletes "amount" as it is a %	Percentage of Gross TP calculated using simplified methods

Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
A42	In the LOG it was made clear that the numerator should include the TP calculated as a whole	The percentage have to be calculated considering the total technical provisions, including the technical provisions calculated as a whole.
A5A-Q5A	A line with the sum was added. For the preparatory phase only the sum needs to be submitted	Gross - Total

S.23.01 - Own funds (old OF)
Identification of changes performed to the version published at July 2012 Final Report

Cell	Description	New text (when applicable)
B26	In the LOG the formulas were amended.	Solo formula B26= A1+A2+A3+A4 +A6+A8+A9+A15+A16 Group formula B26= A1+A2+A3+A4 +A6+A8+A9+A15+A16+A18
A45D (A45E)	The cell "A45D" is used twice (for "Own funds aggregated when using the D&A and combination of method" and for "Own funds of related undertakings when using the D&A and a combination of method without IGT"). Rename the "second" cell A45E, which is in line with the others to the right in the same table	Own funds of related undertakings when using the D&A and a combination of method without IGT - Total
O130	In the Template OF-B1 for groups (annual), table "Calculation of non available own funds at group level (such a calculation has to be done entity by entity)" was missing a column regarding "Non available share premium account related to preference shares". Added column with cells O130.1 to O130.n.	Non available share premium account related to preference shares
A77.1...G77.n	In the Template OF B1 for groups (annual) , table "Description of subordinated MMA (solo) " wrongly included in group's template - it was deleted from the template	
A100.1 ...F100.n	In the Template OF B1 for groups (annual) , table "Description of subordinated liabilities (solo) " wrongly included in group's template - it was deleted from the template	
A506.1.....D510	In the Template OF B1 for groups (annual) , the section "Adjustment for participations" wrongly included in group's template - now deleted	
A22, A22A	In the template and in the LOG: cells A22 and A22A deleted (validation checks)	
B30, B31, B32	In the template and in the LOG, cells deleted	

Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
B502, A503, A20, B24, B25, B27	References to data check CGS 21 were replaced by CGS 6	Not applicable
A17, B17, B17A, C17, D17	In the LOG and in the template: " Non - available own funds related to non - EEA entities at group level " required a better description	Non - available own funds related to non - EEA entities , due to local restrictions: regulatory or otherwise, at group level
B17A	In the LOG, the description of the cell B17A: " This is the amount of non-available own funds related to non-EEA entities at group level tier 1 unrestricted items" is incorrect as it referred to "tier 1 unrestricted ". The LOG was changed. In addition, the description was changed to align with description in cells A17, B17, C17 and D17.	This is the amount of own fund items related to non - EEA entities, which are deemed non-available (due to local restrictions: regulatory or otherwise) as defined in Article 222(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC) that meet the criteria for Tier 1 restricted items. This data item is only applicable when reporting at group level
B19A	In the LOG, the description of the cell B19A refers to "tier 1 unrestricted", which is incorrect; The LOG was changed	Non available minority interests at group level – tier 1 restricted
A607,B607,C607,D607,E607	In the LOG, the clarification added to explain that the "the total deductions" applies only when reporting at group level	This data item is only applicable when reporting at group level

B607,C607,D607	In the LOG, the formulae include reference to solo data item, which is incorrect ; the cells: B503, C503, D503 have been removed from the formulae in the respective cells	B607=B603+B604+B605+B606 C607=C603+C604+C605+C606 D607=D603+D604+D605+D606
A607	In the LOG the formula in A607 does not sum up horizontally.	A607= B607+ C607+D607+E607 or check formulae: A607 = A603+A604+A605+A606
A21	In the LOG the description of the cell A21: "Minimum consolidated group solvency capital requirement" is incorrect and was changed	Total basic own funds after adjustment (group)
B21	In the LOG the description of the cell B21: "Minimum consolidated group solvency capital requirement – tier 1 unrestricted items" is incorrect and was changed	Total basic own funds after adjustment (group) - tier 1 unrestricted
B21A	In the LOG the description of the cell B21A: "Minimum consolidated group solvency capital requirement – tier 1 restricted items" is incorrect and was changed	Total basic own funds after adjustment (group) - tier 1 restricted
C21	In the LOG the description of the cell C21: "Minimum consolidated group solvency capital requirement – tier 2" is incorrect and was changed	Total basic own funds after adjustment (group) - tier 2
D21	In the LOG the description of the cell D21: "Minimum consolidated group solvency capital requirement – tier 3" was changed	Total basic own funds after adjustment (group) - tier 3
A21	In the LOG the formula do not include cell A15 - "net deferred tax asset" and cell B502 " Own funds items from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency 2 own funds"	A21= A1+A2+A3+A4+A6+A8+A9+A12A+A13+ A15 + A16+A18 -A502 - A607
A52	In the LOG a typing error in the instructions to A52 data cell. Reference is made to template SCR B3C for the SCR of the full internal model, but it should be made to SCR B2C.	This is the total SCR of the undertaking and should correspond to SCR number disclosed on relevant SCR template: if the undertaking is using a full internal model (SCR B2C) or a partial internal model or the standard formula (SCR B2A).
A53	In the LOG a typing error in the instructions to A53 data cell. Reference is made to template MCR B2A, but it should be made to MCR B4A. The reference to MCR B4B template for composite undertakings was missing	This is the MCR of the undertaking and should correspond to the total MCR disclosed in MCR B4A or MCR B4B for composite undertakings (where relevant)
A52A	In the LOG the instructions to A52A data cell do not include full description of the cell and also the formula provided cover only reference to a partial internal model or standard formula.	This is the total group SCR calculated using method 1 (consolidated method) and it should correspond to SCR number disclosed on relevant SCR templates; If group is using internal model SCR B2C (A52A = SCR_B2C "B12")or if group is using a partial internal model or a standard formula SCR B2A (A52A = SCR_B2A "A20")
A53A	In the LOG the instructions to A53A data cell do not include full description of the cell and also the formula provided cover only reference to a partial internal model or standard formula.	This is the minimum group SCR calculated using method 1 (consolidated method) and it should correspond to SCR number disclosed on relevant SCR templates; If group is using internal model - SCR B2C (A53A = SCR_B2C "B13")or if group is using a partial internal model or a standard formula - SCR B2A (A53A = SCR_B2A "A21")
B10	In the LOG the reference to subordinated member accounts in the instruction to cell B10 is wrong. The instruction should refer to "preference shares".	This is the amount of preference shares which are deemed non - available as defined in Article 22(2)-(5) of the Solvency II Framework Directive (Directive 2009/138.EC) that meet the criteria for Tier 1 restricted items. This data item is only applicable when reporting at group level
B16A	In the LOG a typing error in the instruction, "unrestricted" should be 'restricted'.	This is the amount of any items of basic own funds not identified above which meet the criteria for Tier 1, restricted items.
B21	In the LOG the formula does not include cell B502.	This is the total of all items of basic own funds after adjustments which meet the criteria for Tier 1 unrestricted for a group. B21= B1+B2+B3+B6+B12A+B16+B18 -B502 - B607

A20	In the LOG the formula in A 20 does not sum up horizontally.	This is the total of all items of basic own funds after adjustments for a solo undertaking. A20 = B20 + B20A + C20 + D20 or check formula: A20= A1+A2+A3+A4+A6+A8+A9+A12+A13+A15+A16-B502-A503
D20	In the LOG an error in the formula, reference to the cell F502 to be deleted	D20= D4+D8+D9+D13+D15+D16
A21	In the LOG the formula in A 21 does not sum up horizontally.	This is the total of all items of basic own funds after adjustments for a group. A21 = B21 + B21A + C21 + D21 or check formula: A21= A1+A2+A3+A4+A6+A8+A9+A12A+A13+ A15 + A16+A18 -A502 - A607
B21	In the LOG the formula in B 21 does not include cell B502	This is the total of all items of basic own funds after adjustments which meet the criteria for Tier 1 unrestricted for a group. B21= B1+B2+B3+B6+B12A+B16+B18 -B502 - B607
B26	In the LOG the formula at solo level is missing	This is the total amount of other basic own funds items included in the reconciliation reserve. When this data item is applicable to groups, it is only applicable for consolidation method Solo formula- 'B26= A1+A2+A3+A4 +A6+A8+A9+A15+A16 Group formula - 'B26=A1+A2+A3+A4 +A6+A8+A9+A15+A16+A18
B48	In the LOG the formula should be simplified and cross referenced to cell B21	This is the total own funds of the undertaking, comprising basic own funds after adjustments, that are available to meet the SCR for a group and that meet the criteria to be included in Tier 1 unrestricted items. B48 = B21
C48	In the LOG the formula should be simplified and cross referenced to cell B21A	This is the total own funds of the undertaking, comprising basic own funds after adjustments, that are available to meet the SCR for a group and that meet the criteria to be included in Tier 1 restricted items. C48 = B21A
B49	In the LOG the formula is missing and should be added	This is the total own funds of the group, comprising basic own funds after adjustments, that are available to meet the minimum SCR for a group and that meet the criteria to be included in Tier 1 unrestricted items. B49 = B48
C49	In the LOG the formula is missing and should be added	This is the total own funds of the group, comprising basic own funds after adjustments, that are available to meet the minimum SCR for a group and that meet the criteria to be included in Tier 1 restricted items C49 = C48
B50	In the LOG the formula stated in the item instructions (B50=B46) of Annex II is not correct. The correct formula should be B50=max(B46,0).	This is the total own funds which are eligible under the limits set out to meet the SCR, that meet the criteria for Tier 1 unrestricted items. B50=max(B46,0)
E607	In the LOG E607 references E503 and E603, but these are blank cells (greyed out).	This is a total amount of deductions from tier 3 not included in the reconciliation reserves. E607=E604+E605+E606
C50A	In the LOG the formulae was incorrect; it stated: C50A=MAX(0,(MIN(A52A*0.25, C48)))	C50A=MAX(0,(MIN(B50A*0.25, C48)))
D45D, B45D, C45D, D45D,	In the LOG - to align the name of the cell with one provided on the template	Own funds aggregated when using the D&A and or a combination of method
A45E, B45E, C45E, D45E,E45E	In the LOG and in the template to amend the name of the cell from, " Own funds of related undertakings when using the D&A and a combination of method without IGT" to "Own funds aggregated when using the D&A and a combination of method without IGT"	Own funds aggregated when using the D&A and a combination of method without IGT
A45E, B45E, C45E, D45E,E45E	In the template to add "net" - as the own funds reported here should be net of total non - available own funds, for the part of a group that D & A method was used	Own funds aggregated when using the D&A and combination of method - Net
A45A	In the LOG - explanation added that the own funds reported should be net of non available own funds	"..... the own funds figure reported here should be net of non available own funds"
A603A, B603A, C603A, D603A	In the LOG and in the template - new cells added regarding deductions for participation - Article 228 , when D & A method is used	

A604A, B604A, C604A, D604A, E604A	In the LOG and in the template - new cells added regarding deductions for participation - Article 229 , when D & A method is used	
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S.25.01 - Solvency Capital Requirement - SF (old SCR-B2A)
Identification of changes performed to the version published at July 2012 Final Report

Cell	Description	New text (when applicable)
General	The template was redesigned to better reflect the interlink between elements of risk modules calculated using standard formula and partial internal model. Some minor drafting amendments were also performed	Not applicable
A01, A30, A0	In the template - new cells added: Information was added to identify the information reported when undertaking has RFF and is required to report solvency capital requirement for material ring fenced funds and solvency capital requirement for remaining part	Undertaking as a whole (Y/N) Ring fenced fund? (Y/N or N/A) Fund number ...
A001	In the template new cell added: Information was added in relation to the Internal Model: Identifies whether the reported figures have been requested under Article 112(7), to provide an estimate of the SCR using standard formula	Article 112? (Y/N)
A01-A013	In the template: new cells added: Information was added in relation to the Partial Internal Model	Elements of the risks covered by partial internal model (Y/N)
A01-A013	In the LOG: description for newly added cells: "Identifies whether some elements/or all of the risk within standard formula sub risk modules are calculated using partial internal model if Y, means that some elements/or all of the risks within standard fomula sub risk modules are calculated using partial internal model if N, means that all risks within standard fomula sub risk modules are covered by the standard formula"	Identifies whether some elements/or all of the risk within standard formula sub risk modules are calculated using partial internal model if Y, means that some elements/or all of the risks within standard fomula sub risk modules are calculated using partial internal model if N, means that all risks within standard fomula sub risk modules are covered by the standard formula
A1	In the LOG to add "...or the part of the undertaking's business for which market risk SCR is calculated using the standard formula" .	or the part of the undertaking's business for which market risk SCR is calculated using the standard formula.
A1 - A7 and B1 - B7, A11, A12, A13	In the LOG file to add explanation for the purpose of public consultation on order to clarify that at the time, no decision was reached as to the calculation > Without precluding the final design of reporting on SCR, in the case of undertakings with ring fenced funds, the data item reported in item A1 should equal to the sum of underlying results of market risk charges for each material ring fenced fund and the remaining part (sum of items A1 on SCR B2A RFF 1 ... SCR B2A RFF n and item A1 on SCR B2A Remaining Part). For the purpose of preparatory phase the submission of the items in Annex SCR-B2A for each material RFF and remaining part is not applicable. The value of the sum of underlying results should be reported. The reference to item C23 on SCR B3A is not applicable to undertakings with ring fenced funds, when reporting at entity level.	Without precluding the final design of reporting on SCR, in the case of undertakings with ring fenced funds, the data item reported in item A1 should equal to the sum of underlying results of market risk charges for each material ring fenced fund and the remaining part (sum of items A1 on SCR B2A RFF 1 ... SCR B2A RFF n and item A1 on SCR B2A Remaining Part).
A31	In the template - a new cell added: "Individual Notional Solvency Capital Requirement for the ring fenced fund/remaining part"	Individual Notional Solvency Capital Requirement for the ring fenced fund/remaining part
A31	In the LOG, a description added for a new cell A31	Amount of the notional SCR for the ring fenced fund or for the remaining part. This item has to be reported only when reporting SCR calculation for a ring fenced fund or when reporting SCR calculation for the remaining part.
A14	In the template cell A14: "Notional Solvency Capital Requirement for ring fenced funds (other than those referred to in cell A17) - the cell has been deleted and replaced by cell A14B	Not applicable
A14B	In the template - a new cell added: "Total amount of Notional Solvency Capital Requirements for ring fenced funds (other than those related to business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional))"	Total amount of Notional Solvency Capital Requirements for ring fenced funds (other than those related to business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional))

A14B	In the LOG a description added regarding newly added cell	Amount of the sum of notional SCRs of all ring-fenced funds (without precluding the final design of reporting on SCR, corresponds to the sum of items A31 on SCR B2A RFF 1 ... SCR B2A RFF n). For the purpose of preparatory phase the submission of the items in Annex SCR-B2A for each material RFF and remaining part is not applicable. This item has to be reported only when reporting SCR calculation for the undertaking as a whole. In case of partial internal model, this item will include notional SCR of ring fenced funds calculated by using the standard formula only. The particular ring-fenced funds relating to business operated in accordance with Art. 4 of Directive 2003/41/EC shall be excluded from this item.
A14	In the template, a new cell added: "Total amount of Notional Solvency Capital Requirements for remaining part"	Total amount of Notional Solvency Capital Requirements for remaining part
A14	In the LOG a description added regarding newly added cell	Amount of the notional SCRs of remaining part (A31 on SCR B2A Remaining Part). For the purpose of preparatory phase the submission of the items in Annex SCR-B2A for each material RFF and remaining part is not applicable. This item has to be reported only when reporting SCR calculation for the undertaking as a whole. In case of partial internal model, this item will include notional SCR of remaining part calculated by using the standard formula only.
A11A	In the template - a new cell added	Gross future discretionary benefits
A11B	In the template - a new cell added	Net future discretionary benefits
A11A	In the LOG a description added regarding newly added cell	Amount of technical provisions without risk margin in relation to future discretionary benefits gross of reinsurance. For the purpose of preparatory phase the submission of the items in Annex SCR-B2A for each material RFF and remaining part is not applicable. This item has to be reported only when reporting SCR calculation for the undertaking as a whole.
A11B	In the LOG a description added regarding newly added cell	Amount of technical provisions without risk margin in relation to future discretionary benefits net of reinsurance. For the purpose of preparatory phase the submission of the items in Annex SCR-B2A for each material RFF and remaining part is not applicable. This item has to be reported only when reporting SCR calculation for the undertaking as a whole.
B8, B9	In the template and in the LOG - cells deleted ; Cell A8 and A9 moved after cell A14C - the changed made to reflect correct integration of partial internal model SCR result	Not applicable
A10	In the LOG - to change formula A10 = sum (A1...A9), after moving partial internal model SCR result, cell A8 and cell A9	A10 = sum (A1...A7)
B10	In the LOG - to change formula B10 = sum(B1...B9) , after moving partial internal model SCR result and deleting cell B8 and B9	B10 = sum (B1...B7)
A11	In the LOG - to amend formula, A11 = max(min B10 - A10;FDB);0) following introduction of a new cell A11B: "Net future discretionary benefits"	A11=max (min(B10-A10;A11B);0)
A14C	In the template, a new cell added: A14C " Net Solvency Capital Requirement calculated using standard formula"	Net Solvency Capital Requirement calculated using standard formula
A14C	In the LOG, a description added for a new cell A14C	Amount of the capital requirements, including adjustment for the loss absorbing capacity of technical provisions, as calculated using the standard formula. If the undertaking does not use the standard formula, this item shall not be reported, otherwise it will only reflect either those elements calculated using the standard formula, or the part of the business for which SCR is calculated using the standard formula.
A21	In the template and in the LOG - to rename the cell from "Solvency capital requirement floor (groups only) to "Minimum consolidated group solvency capital requirement (groups only)"	Minimum consolidated group solvency capital requirement (groups only)

Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
General	Across the LOG file: "Undertaking as a whole" has been changed to "at undertaking level"	
A001	In the LOG, a description added for the cell A001,	NOT APPLICABLE for the purpose of preparatory reporting Identifies whether the reported figures have been requested under Article 112(7), to provide an estimate of the SCR using standard formula
A30	In the template - to remove N/A options: Ring Fenced Fund? (Y/N or N/A)	Ring Fenced Fund? (Y/N)

A30	In the LOG - to delete description for N/A option: " When undertaking is no RFF reporter: N/A"; Option no longer required, as there is a separate template for reporting of ring fenced funds and remaining part	Not applicable
A30	In the LOG - to delete reference "... whether there an underaking is not a RFF reporter".	Not applicable
A30	In the LOG to delete: NOT APPLICABLE for the purpose of preparatory phase	Not applicable
A13	In the LOG the reference was corrected to "operational risk"	Amount of the capital requirements for operational risk module as calculated using the standard formula. ...
AA01 - AA013 (old A01 - A013)	There were two cells named "A01". Cells names were amended an in the LOG it was clarified that the description applies to cells form AA01 to AA013	Not applicable
A1 - A7 and B1 - B7, A11, A12, A13	In the LOG delete: in each of the listed cells, the text has been deleted - below text is shown as an example, referes to cell A1 "Without precluding the final design of reporting on SCR, in the case of undertakings with ring fenced funds, the data item reported in item A1 should equal to the sum of underlying results of market risk charges for each material ring fenced fund and the remaining part (sum of items A1 on SCR B2A RFF 1 ... SCR B2A RFF n and item A1 on SCR B2A Remaining Part). For the purpose of preparatory phase the submission of the items in Annex SCR-B2A for each material RFF and remaining part is not applicable. The value of the sum of underlying results should be reported. The reference to item C23 on SCR B3A is not applicable to undertakings with ring fenced funds, when reporting at entity level.	Not applicable
A31	IN the LOG, delete: "NOT APPLICABLE for the purpose of preparatory phase" and insert "NOT APPLICABLE when reporting at undertaking level"	NOT APPLICABLE when reporting at undertaking level
A14A	In the LOG to clarify discription: " This item has to be reported only when reporting SCR calculation for the undertaking as a whole".	This item has to be reported only when reporting SCR calculation at undertaking level, for the undertaking with ring fenced funds
A14A, A14C, A8, A9, A17, A15, A15A, A15B, A15C, A16, A18, A19, A14B, A14, A11A, A11B	In the LOG files to add discription: " This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level" in order to distinguish between items that are not applicable when reporting SCR at RFF level and Remaining part level and the ones applicable only when reporting at undertaking level.	This item is ONLY APPLICABLE when reporting SCR calculation at undertaking level
A19, A21, A11A, A11B	In the LOG to delete : "... This item has to be reported only when reporting SCR calculation for the undertaking as a whole"	Not applicable
A14B	In the LOG, the following text has been deleted: "Amount of the sum of notional SCRs of all ring-fenced funds (without precluding the final design of reporting on SCR, corresponds to the sum of items A31 on SCR B2A RFF 1 ... SCR B2A RFF n). For the purpose of preparatory phase the submission of the items in Annex SCR-B2A for each material RFF and remaining part is not applicable." This item has to be reported only when reporting SCR calculation for the undertaking as a whole. In case of partial internal model, this item will include notional SCR of ring fenced funds calculated by using the standard formula only. The particular ring-fenced funds relating to business operated in accordance with Art. 4 of Directive 2003/41/EC shall be excluded from this item.	Not applicable
A14	In the LOG, the following text has been deleted: " Amount of the notional SCRs of remaining part (A31 on SCR B2A Remaining Part). For the purpose of preparatory phase the submission of the items in Annex SCR-B2A for each material RFF and remaining part is not applicable. This item has to be reported only when reporting SCR calculation for the undertaking as a whole. In case of partial internal model, this item will include notional SCR of remaining part calculated by using the standard formula only.	Not applicable

A11A	In the LOG to delete: "... For the purpose of preparatory phase the submission of the items in Annex SCR-B2A for each material RFF and remaining part is not applicable".	Not applicable
A11B	In the LOG to delete: "... For the purpose of preparatory phase the submission of the items in Annex SCR-B2A for each material RFF and remaining part is not applicable".	Not applicable

S.25.02 - Solvency Capital Requirement - SF (old SCR-B2B)
Identification of changes performed to the version published at July 2012 Final Report

Cell	Description	New text (when applicable)
General	The template was redesigned to better reflect the SCR calculation when using internal model, The template now allows for identification of modelling approach to calculate loss absorbing capacity of TP and modelling approach to calculation of loss absorbing capacity of deferred taxes; Depending on a method, the information reported will vary; Explanation has been provided in the LOG	Not applicable
A01, A30, A0	Information was added to identify the information reported when undertaking has RFF	Undertaking as a whole (Y/N) Ring fenced fund? (Y/N or N/A) Fund number ...
A1B, A1C, B5-B7,	Information was added in relation to the Internal Model, namely the identification of how LAC for TP and DT is calculated by component in internal models	Not applicable
A1B	In the template - a new cell added : A1B "Modelling approach to calculation of loss absorbing capacity of technical provisions"	Modelling approach to calculation of loss absorbing capacity of technical provisions
A1B	In the LOG - a description provided for cell A1B	To identify modelling approach to a calculation of the loss absorbing capacity of technical provisions . The following closed list of options shall be used: . Modelled and identifiable; . Modelled but not identifiable; . Not modelled. Depending on each case, the information reported in cell B1, C1 and B5 will vary: - if it is modelled and identifiable, B1 and C1 will be respectively reported for the capital charge including and excluding this loss absorbing capacity, and B5 will not be reported and an estimate of an adjustment will be reported for information only in C5 . if it is modelled but not identifiable, B1 and C1 will both be reported for the capital charge including this loss absorbing capacity,i.e. net basis; and B5 will not be reported and an estimate of an adjustment will be reported for information only in C5 - if it is not modelled, B1 and C1 will both be reported for the capital charge excluding this loss absorbing capacity, i.e. on gross basis and B5 will be reported.
A1C	In the template - a new cell added : A1C "Modelling approach to calculation of loss absorbing capacity of deferred taxes "	Modelling approach to calculation of loss absorbing capacity of deferred taxes
A1C	In the LOG - a description provided for cell A1C	To identify modelling approach to a calculation of the loss absorbing capacity of deferred taxes . The following closed list of options shall be used: . Modelled and identifiable; . Modelled but not identifiable; . Not modelled. Depending on each case, the information reported in cell B1, C1 and B6 will vary: - if it is modelled and identifiable, B1 and C1 will be respectively reported for the capital charge including/ and excluding loss absorbing capacity, and B6 will not be reported and an estimate of an adjustment will be reported for information only in C6 . if it is modelled but not identifiable, B1 and C1 will both be reported for the capital charge including this loss absorbing capacity,i.e. net basis; and B6 will not be reported and an estimate of an adjustment will be reported for information only in C6 - if it is not modelled, B1 and C1 will both be reported for the capital charge excluding this loss absorbing capacity, i.e. on gross basis and B6 will be reported.
C1	In the LOG - a new description provided for cell C1	Amount of the net capital charge for each component, including adjustments for loss absorbing capacity of technical provision or deferred taxes when applicable, calculated by the partial internal model on an undiversified basis, to the extent that these adjustments are modeled within components. The capital charges shall be reported in decreasing order of size (which may of course change from one reporting period to another). '- if modelled and identifiable or not identifiable, B1 represents net capital charge, including loss absorbing capacity, for each component: B5 and/ or B6 will not be reported: an estimate of an adjustment will be reported for information only in C5 and/or C6 '- if not modelled, B1 represents gross capital charge, excluding loss absorbing capacity, for each component; i.e. B5 and/or B6 will be reported.

B1	In in the LOG - a new description provided for cell B1	Amount of the gross capital charge for each component (gross of adjustments for loss absorbing capacity of technical provision or deferred taxes when applicable) calculated by the partial internal model on an undiversified basis, to the extent that these adjustments are modeled within components. '-if modelled and identifiable, C1 represents gross capital charge i.e. excluding this loss absorbing capacity, for each component; B5 and/or B6 will not be reported; an estimate of an adjustment will be reported for information only in C5 and/or C6 '- if modelled but not identifiable, C1 will be reported for the capital charge including this loss absorbing capacity, i.e. net basis; B5 and/or B6 will not be reported; an estimate of an adjustment will be reported for information only in C5 and/or C6 - if not modelled, C1 represents gross capital charge, i.e. excluding this loss absorbing capacity; B6 and/or B6 will be reported.
B4	In the LOG - an improved description added	The amount of the total solvency capital requirement calculated using partial internal model after diversification and including adjustments for loss absorbing capacity of technical provisions and deferred tax, to the extent that those adjustments are modelled within components and are identifiable or not identifiable (in such cases, B5 and B6 will not be reported and an estimate of an adjustment will be reported for information only in C5 and C6 respectively). In cases where those adjustments for loss absorbing capacity of technical provisions and deferred tax are not modelled within components, B4 represents the SCR on gross basis, excluding those adjustments, B4=C4.
C4	In the LOG - an improved description added	The amount of the total solvency capital requirement calculated using partial internal model after diversification and excluding adjustments for loss absorbing capacity of technical provisions and deferred tax, to the extent that those adjustments are modelled and identifiable within components. When adjustments are modelled and identifiable by component, the amounts in item C4 will differ from the corresponding amounts in item B4 to the extent of this loss absorbing capacity; An estimate of respective adjustments will be reported for information only in C5 and C6 as appropriate. When adjustments for loss absorbing capacity of technical provisions and deferred tax are modelled but non identifiable by component, both items B4 and C4 will be reported on net basis, i.e. including those adjustments. An estimate of the respective adjustments will be reported for information only in C5 and C6, as appropriate. When adjustment is not modelled within components, both items B4 and C4 will be reported on gross basis; the adjustments are to be reported in B5 and/or B5 as appropriate C4=C2+C3
C5	In the template and in the LOG - cell C5 " Loss absorbing capacity of technical provisions - gross" deleted	Not applicable
C6	In the template and in the LOG - cell C6 " Loss absorbing capacity of deferred taxes - gross" deleted	Not applicable
C5	In the template, a new cell added ;	Estimate of loss-absorbing capacity of technical provisions if modelled within components
C5	In the LOG, a description added for new cell C5	This item is only reported for information, in cases where adjustments for loss absorbing capacity of technical provision are modelled within components. $C5 = \text{if}(B5 < 0, 0, \max(\min(C4 - B4 - C6; A11B); 0))$
C6	In the template, a new cell added ;	Estimate of loss-absorbing capacity of deferred tax if modelled within components
C6	In the LOG, a description added for new cell C6	This item is only reported for information, in cases where adjustments for loss absorbing capacity of deferred taxes are modelled within components.
B8	In the template, a name of the cell amended ; in the LOG a description added	Total amount of Notional Solvency Capital Requirements for ring fenced funds (other than those related to business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional))
B8AA	In the template, a new cell added ; in the LOG a description added	Total amount of Notional Solvency Capital Requirements for remaining part
B8A	In the template, a name of the cell amended ; in the LOG a description added	Diversification between ring fenced funds and between ring fenced funds and remaining part
A11A	In the template, a new cell added ; in the LOG a description added	Gross future discretionary benefits
A11B	In the template, a new cell added ; in the LOG a description added	Net future discretionary benefits

Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
A01, A30, A0	Cells deleted	not applicable
B8	In the LOG - to correct description provided in the cell	An amount of the sum of notional SCRs of all ring-fenced funds calculated by partial internal model
B8AA	In the LOG - to correct description provided in the cell	An amount on notional SCR for remaining part calculated using partial internal model
B8A	In the LOG added: NOT APPLICABLE for the purpose of preparatory phase	NOT APPLICABLE for the purpose of preparatory phase

S.25.03 - Solvency Capital Requirement - SF (old SCR-B2C)
Identification of changes performed to the version published at July 2012 Final Report

Cell	Description	New text (when applicable)
General	The template was redesigned to better reflect the SCR calculation when using internal model, The template now allows for identification of modelling approach to calculate loss absorbing capacity of TP and modelling approach to calculation of loss absorbing capacity of deferred taxes; Depending on a method, the information reported will vary; Explanation has been provided in the LOG	Not applicable
A01, A30, A0	Information was added to identify the information reported when undertaking has RFF	Undertaking as a whole (Y/N) Ring fenced fund? (Y/N or N/A) Fund number ...
A1B, A1C, B5-B7,	Information was added in relation to the Internal Model, namely the identification of how LAC for TP and DT is calculated by component in internal models	Not applicable
A1B	In the template - a new cell added : A1B "Modelling approach to calculation of loss absorbing capacity of technical provisions"	Modelling approach to calculation of loss absorbing capacity of technical provisions
A1B	In the LOG - a description provided for cell A1B	To identify modelling approach to a calculation of the loss absorbing capacity of technical provisions . The following closed list of options shall be used: . Modelled and identifiable; . Modelled but not identifiable; . Not modelled. Depending on each case, the information reported in cell B1, C1 and B5 will vary: - if it is modelled and identifiable, B1 and C1 will be respectively reported for the capital charge including and excluding this loss absorbing capacity, and B5 will not be reported and an estimate of an adjustment will be reported for information only in C5 . if it is modelled but not identifiable, B1 and C1 will both be reported for the capital charge including this loss absorbing capacity,i.e. net basis; and B5 will not be reported and an estimate of an adjustment will be reported for information only in C5 - if it is not modelled, B1 and C1 will both be reported for the capital charge excluding this loss absorbing capacity, i.e. on gross basis and B5 will be reported.
A1C	In the template - a new cell added : A1C "Modelling approach to calculation of loss absorbing capacity of deferred taxes "	Modelling approach to calculation of loss absorbing capacity of deferred taxes
A1C	In the LOG - a description provided for cell A1C	To identify modelling approach to a calculation of the loss absorbing capacity of deferred taxes . The following closed list of options shall be used: . Modelled and identifiable; . Modelled but not identifiable; . Not modelled. Depending on each case, the information reported in cell B1, C1 and B6 will vary: - if it is modelled and identifiable, B1 and C1 will be respectively reported for the capital charge including/ and excluding loss absorbing capacity, and B6 will not be reported and an estimate of an adjustment will be reported for information only in C6 . if it is modelled but not identifiable, B1 and C1 will both be reported for the capital charge including this loss absorbing capacity,i.e. net basis; and B6 will not be reported and an estimate of an adjustment will be reported for information only in C6 - if it is not modelled, B1 and C1 will both be reported for the capital charge excluding this loss absorbing capacity, i.e. on gross basis and B6 will be reported.

C1	In in the LOG - a new description provided for cell C1	Amount of the net capital charge for each component, including adjustments for loss absorbing capacity of technical provision or deferred taxes when applicable, calculated by the partial internal model on an undiversified basis, to the extent that these adjustments are modeled within components. The capital charges shall be reported in decreasing order of size (which may of course change from one reporting period to another). '- if modelled and identifiable or not identifiable, B1 represents net capital charge, including loss absorbing capacity, for each component: B5 and/ or B6 will not be reported: an estimate of an adjustment will be reported for information only in C5 and/or C6 '- if not modelled, B1 represents gross capital charge, excluding loss absorbing capacity, for each component; i.e. B5 and/or B6 will be reported.
B1	In in the LOG - a new description provided for cell B1	Amount of the gross capital charge for each component (gross of adjustments for loss absorbing capacity of technical provision or deferred taxes when applicable) calculated by the partial internal model on an undiversified basis, to the extent that these adjustments are modeled within components. '-if modelled and identifiable,C1 represents gross capital charge i.e. excluding this loss absorbing capacity,for each component; B5 and or B6 will not be reported; an estimate of an adjustment will be reported for information only in C5 and/or C6 '- if modelled but not identifiable, C1 will be reported for the capital charge including this loss absorbing capacity,i.e. net basis; B5 and /or B6 will not be reported; an estimate of an adjustment will be reported for information only in C5 and/or C6 - if not modelled, C1 represents gross capital charge, i.e. excluding this loss absorbing capacity; B6 and/or B6 will be reported.
B4	In the LOG - an improved description added	The amount of the total solvency capital requirement calculated using partial internal model after diversification and including adjustments for loss absorbing capacity of technical provisions and deferred tax, to the extent that those adjustments are modelled within components and are identifiable or not identifiable (in such cases, B5 and B6 will not be reported and an estimate of an adjustment will be reported for information only in C5 and C6 respectively). In cases where those adjustments for loss absorbing capacity of technical provisions and deferred tax are not modelled within components, B4 represents the SCR on gross basis, excluding those adjustments, B4= C4.
C4	In the LOG - an improved description added	The amount of the total solvency capital requirement calculated using partial internal model after diversification and excluding adjustments for loss absorbing capacity of technical provisions and deferred tax, to the extent that those adjustments are modelled and identifiable within components. When adjustments are modelled and identifiable by component, the amounts in item C4 will differ from the corresponding amounts in item B4 to the extent of this loss absorbing capacity; An estimate of respective adjustments will be reported for information only in C5 and C6 as appropriate. When adjustments for loss absorbing capacity of technical provisions and deferred tax are modelled but non identifiable by component, both items B4 and C4 will be reported on net basis, i.e. including those adjustments. An estimate of the respective adjustments will be reported for information only in C5 and C6. as appropriate. When adjustment is not modelled within components , both items B4 and C4 will be reported on gross basis.; the adjustment are to be reported in B5 and/or B5 as appropriate C4=C2+C3
C5	In the template and in the LOG - cell C5 " Loss absorbing capacity of technical provisions - gross" deleted	Not applicable
C6	In the template and in the LOG - cell C6 " Loss absorbing capacity of deferred taxes - gross" deleted	Not applicable
C5	In the template, a new cell added ;	Estimate of loss-absorbing capacity of technical provisions if modelled within components
C5	In the LOG, a description added for new cell C5	This item is only reported for information, in cases where adjustments for loss absorbing capacity of technical provision are modelled within components. C5 = if(B5<>0,0,max (min(C4-B4-C6;A11B);0))
C6	In the template, a new cell added ;	Estimate of loss-absorbing capacity of deferred tax if modelled within components
C6	In the LOG, a description added for new cell C6	This item is only reported for information, in cases where adjustments for loss absorbing capacity of deferred taxes are modelled within components.
B14	In the template cell renamed ; in the LOG a description added	Total amount of Notional Solvency Capital Requirements for ring fenced funds (other than those related to business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional)
B14AA	In the template, a new cell added ; in the LOG a description added	Total amount of Notional Solvency Capital Requirements for remaining part
B14A	In the template, a new cell added ; in the LOG a description added	Diversification between ring fenced funds and between ring fenced funds and remaining part

A11A	In the template, a new cell added ; in the LOG a description added	Gross future discretionary benefits
A11B	In the template, a new cell added ; in the LOG a description added	Net future discretionary benefits
B13	In the template and in the LOG - to rename the cell from "Solvency capital requirement floor (groups only) to "Minimum consolidated group solvency capital requirement (groups only)"	Minimum consolidated group solvency capital requirement (groups only)

Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
A01, A30, A0	Cells deleted	not applicable
B8	In the LOG - to correct description provided in the cell	An amount of the sum of notional SCRs of all ring-fenced funds calculated by full internal model
B8AA	In the LOG - to correct description provided in the cell	An amount on notional SCR for remaining part calculated using full internal model
B8A	In the LOG added: NOT APPLICABLE for the purpose of preparatory phase	NOT APPLICABLE for the purpose of preparatory phase

S.26.01 - Solvency Capital Requirement - Market risk (old SCR-B3A)
Identification of changes performed to the version published at July 2012 Final Report

Cell	Description	New text (when applicable)
A00, AA01, AA02, AA03	Cells regarding information on the use of simplifications were added	Simplifications - spread risk - bonds and loans ? (Y/N) Captives simplifications - interest rate risk ?(Y/N) Captives simplifications -spread risk ?(Y/N) Captives simplifications - market concentration risk ?(Y/N)
A30, A0	Cells regarding information on RFF were added	Ring fenced fund? (Y/N or N/A) Fund number
C22	The LOG was amended to clarify that it refers to "(including loss absorbing capacity of technical provisions)"	This is the diversification effect within the market risk module as a result of the aggregation of the net capital requirements (including loss absorbing capacity of technical provisions) of the single risk sub-modules.
D22	The LOG was amended to clarify that it refers to "(excluding loss absorbing capacity of technical provisions)"	This is the diversification effect within the market risk module as a result of the aggregation of the gross capital requirements (excluding loss absorbing capacity of technical provisions) of the single risk sub-modules.
C0, D0	The LOG was amended to add information on the use of simplifications by captives	If AA01=Y, this item represents the net capital charge for interest rate risk calculated using simplified calculations for captive undertakings.
A1,A2	The description in the LOG "This is the asset value of the instruments sensitive to interest rate risk" has been changed to : " This is the total value of the assets sensitive to interest rate down shock risk, before shock	This is the total value of the assets sensitive to interest rate down shock risk, before shock
A1A	The description in the LOG: "This is the liabilities value of the instruments sensitive to interest rate risk" has been amended	This is the total value of the liabilities sensitive to interest rate down shock risk, before shock

Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
A30	In the template - to remove N/A options: Ring Fenced Fund? (Y/N or N/A)	Ring Fenced Fund? (Y/N)
A30	In the LOG - to delete description for N/A option: " When undertaking is no RFF reporter: N/A"; Option no longer required, as there is a separate template for reporting of ring fenced funds and remaining part	Not applicable
A30	In the LOG - to delete reference "... whether there an underaking is not a RFF reporter".	Not applicable
A30	In the LOG to delete: NOT APPLICABLE for the purpose of preparatory phase	Not applicable

S.26.02 - Solvency Capital Requirement - Counterparty default risk (old SCR-B3B)
Identification of changes performed to the version published at July 2012 Final Report

Cell	Description	New text (when applicable)
A00, A001	Cells regarding information on the use of simplifications were added	Simplifications? (Y/N) Captives simplifications? (Y/N)
A30, A0	Cells regarding information on RFF were added	Ring fenced fund? (Y/N or N/A) Fund number

Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
A30	In the template - to remove N/A options: Ring Fenced Fund? (Y/N or N/A)	Ring Fenced Fund? (Y/N)
A30	In the LOG - to delete description for N/A option: " When undertaking is no RFF reporter: N/A"; Option no longer required, as there is a separate template for reporting of ring fenced funds and remaining part	Not applicable
A30	In the LOG - to delete reference "... whether there an underaking is not a RFF reporter".	Not applicable
A30	In the LOG to delete: NOT APPLICABLE for the purpose of preparatory phase	Not applicable
AA10	A new item was added: "Counterparty Group Code"	Legal Entity Identifier (LEI); interim entity identifier (pre-LEI); if available. If none is available this item should not be reported
AB11	A new item was added to identify the type of code	Identification of the code used in AA10: - LEI - Pre-LEI
D4	In the LOG to delete: "For the purpose of preparatory phase, in case of undertakings with ring fenced funds, and when reporting the most material ring fence fund and the remaining part, the reference between item D4 and item A2 on SCR B2A is not applicable." the SCR B2A is to be completed for one RFF and remaining part during preparatory phase, therefore a reference is applicable	Not applicable
C4	In the LOG to delete "For the purpose of preparatory phase, in case of undertakings with ring fenced funds, and when reporting the most material ring fence fund and the remaining part, the reference between item C4 and item B2 on SCR B2A is not applicable" the SCR B2A is to be completed for one RFF and remaining part during preparatory phase, therefore a reference is applicable.	Not applicable
C4, D4	in the LOG deleted; " Without precluding the final design of reporting on SCR"	Not applicable

S.26.03 - Solvency Capital Requirement - Life underwriting risk (old SCR-B3C)
Identification of changes performed to the version published at July 2012 Final Report

Cell	Description	New text (when applicable)
A01, A02, A03, A04, A05, A06, A001	Cells regarding information on the use of simplifications were added if an answer to simplifications used is " Y" , the additional information has been provided in the relevant cells	Simplifications - mortality risk? (Y/N) Simplifications - longevity risk? (Y/N) Simplifications - disability-morbidity risk? (Y/N) Simplifications - lapse risk? (Y/N) Simplifications - life expense risk ? (Y/N) Simplifications - life catastrophe risk? (Y/N) Captives simplifications (Y/N)
A30, A0	Cells regarding information on RFF were added	Ring fenced fund? (Y/N or N/A) Fund number

Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
A30	In the template - to remove N/A options: Ring Fenced Fund? (Y/N or N/A)	Ring Fenced Fund? (Y/N)
A30	In the LOG - to delete description for N/A option: "When undertaking is no RFF reporter: N/A"; Option no longer required, as there is a separate template for reporting of ring fenced funds and remaining part	Not applicable
A30	In the LOG - to delete reference "... whether there an underaking is not a RFF reporter".	Not applicable
A30	In the LOG to delete: NOT APPLICABLE for the purpose of preparatory phase	Not applicable
C04	In the LOG, a formula added: C04 = Max (C4, C5, C6)	C04 = Max (C4, C5, C6)
C11	In the LOG deleted: "For the purpose of preparatory phase, in case of undertakings with ring fenced funds, and when reporting the most material ring fence fund and the remaining part, the reference between item C11 and item A3 on SCR B2A is not applicable ",the SCR B2A is to be completed for one RFF and remaining part during preparatory phase, therefore a reference is applicable.	Not applicable
C11, D11	In the LOG deleted: "Without precluding the final design of reporting on SCR"	Not applicable
D11	In the LOG deleted: "For the purpose of preparatory phase, in case of undertakings with ring fenced funds, and when reporting the most material ring fence fund and the remaining part, the reference between item D11 and item B3 on SCR B2A is not applicable ",the SCR B2A is to be completed for one RFF and remaining part during preparatory phase, therefore a reference is applicable.	

S.26.04 - Solvency Capital Requirement - Health underwriting risk (old SCR-B3D)
Identification of changes performed to the version published at July 2012 Final Report

Cell	Description	New text (when applicable)
A01, A02, A03, A04, A05, A001	Cells regarding information on the use of simplifications were added if an answer to simplifications used is " Y" , the additional information has been provided in the relevant cells	Simplifications - health mortality risk? (Y/N) Simplifications - health longevity risk? (Y/N) Simplifications - health disability-morbidity risk? (Y/N) Simplifications - SLT lapse risk? (Y/N) Simplifications - health expense risk ? (Y/N) Captives simplifications (Y/N)
A30, A0	Cells regarding information on RFF were added	Ring fenced fund? (Y/N or N/A) Fund number
B18A, C18, C19, C20	The items referred were deleted as NSLT health lapse is not in the ALAC2 list	Not applicable
B21 to B27	The cells were added in order to distinguish between "Net capital requirement (including the loss-absorbing capacity of technical provisions)" and "Gross capital requirement (excluding the loss-absorbing capacity of technical provisions)" in relation to Health catastrophic risk	Various

Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
A30	In the template - to remove N/A options: Ring Fenced Fund? (Y/N or N/A)	Ring Fenced Fund? (Y/N)
A30	In the LOG - to delete description for N/A option: "When undertaking is no RFF reporter: N/A"; Option no longer required, as there is a separate template for reporting of ring fenced funds and remaining part	Not applicable
A30	In the LOG - to delete reference "... whether there an underaking is not a RFF reporter".	Not applicable
A30	In the LOG to delete: NOT APPLICABLE for the purpose of preparatory phase	Not applicable
A21	Technical Annex SCR - B3D - L; A21 Cross reference should be to A23 of SCR - B3F	The gross solvency capital requirement for the mass risk sub-module, calculated excluding loss absorbing capacity of technical provisions. It should be equal to the item A23 of SCR – B3F.
A22	Technical Annex SCR - B3D - L; A22 Cross reference should be to A24 of SCR - B3F	The gross solvency capital requirement for the accident concentration risk sub-module calculated excluding loss absorbing capacity of technical provisions. It should be equal to the item A24 of SCR – B3F.
A23	Technical Annex SCR - B3D - L; A23 Cross reference should be to A25 of SCR - B3F	The gross solvency capital requirement for the pandemic risk sub-module is calculated excluding loss absorbing capacity of technical provisions. It should be equal to the item A25 of SCR – B3F.
B27	In the LOG deleted: "For the purpose of preparatory phase, in case of undertakings with ring fenced funds, and when reporting the most material ring fence fund and the remaining part, the reference between item B27 and item A4 on SCR B2A is not applicable" ,the SCR B2A is to be completed for one RFF and remaining part during preparatory phase, therefore a reference is applicable.	Not applicable
A27	In the LOG deleted: "For the purpose of preparatory phase, in case of undertakings with ring fenced funds, and when reporting the most material ring fence fund and the remaining part, the reference between item A27 and item B4 on SCR B2A is not applicable", the SCR B2A is to be completed for one RFF and remaining part during preparatory phase, therefore a reference is applicable.	Not applicable
B27, A27	In the LOG deleted: "Without precluding the final design of reporting on SCR"	Not applicable

S.26.04 - Solvency Capital Requirement - Non-life underwriting risk (old SCR-B3E)
Identification of changes performed to the version published at July 2012 Final Report

Cell	Description	New text (when applicable)
A001	Cells regarding information on the use of simplifications were added If A001 = Y , then additional information has been provided in the relevant cells	Captives simplifications - premium and reserve risk? (Y/N)
A30, A0	Cells regarding information on RFF were added	Ring fenced fund? (Y/N or N/A) Fund number
C1,C2	In the LOG file, a description regarding calculation method was deleted; this should form part of Technical specifications/or final rules	

Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
A30	In the template - to remove N/A options: Ring Fenced Fund? (Y/N or N/A)	Ring Fenced Fund? (Y/N)
A30	In the LOG - to delete description for N/A option: "When undertaking is no RFF reporter: N/A"; Option no longer required, as there is a separate template for reporting of ring fenced funds and remaining part	Not applicable
A30	In the LOG - to delete reference "... whether there an undertaking is not a RFF reporter".	Not applicable
A30	In the LOG to delete: NOT APPLICABLE for the purpose of preparatory phase	Not applicable
A18	In the LOG deleted: "For the purpose of preparatory phase, in case of undertakings with ring fenced funds, and when reporting the most material ring fence fund and the remaining part, the reference between item A18 and item A5 on SCR B2A is not applicable ", the SCR B2A is to be completed for one RFF and remaining part during preparatory phase, therefore a reference is applicable.	Not applicable
A18	In the LOG deleted: "Without precluding the final design of reporting on SCR"	Not applicable
F1	In the LOG , formula added: $F1 = (C1 + D1) \times (0.75 + 0.25E1)$	$F1 = (C1 + D1) \times (0.75 + 0.25E1)$
F2	In the LOG, formula added $F2 = (C2 + D2) \times (0.75 + 0.25E2)$	$F2 = (C2 + D2) \times (0.75 + 0.25E2)$
F3	In the LOG, formula added $F3 = (C3 + D3) \times (0.75 + 0.25E3)$	$F3 = (C3 + D3) \times (0.75 + 0.25E3)$
F4	In the LOG, formula added $F4 = (C4 + D4) \times (0.75 + 0.25E4)$	$F4 = (C4 + D4) \times (0.75 + 0.25E4)$
F5	In the LOG, formula added $F5 = (C5 + D5) \times (0.75 + 0.25E5)$	$F5 = (C5 + D5) \times (0.75 + 0.25E5)$
F6	In the LOG, formula added $F6 = (C6 + D6) \times (0.75 + 0.25E6)$	$F6 = (C6 + D6) \times (0.75 + 0.25E6)$
F7	In the LOG, formula added $F7 = (C7 + D7) \times (0.75 + 0.25E7)$	$F7 = (C7 + D7) \times (0.75 + 0.25E7)$
F8	In the LOG, formula added $F8 = (C8 + D8) \times (0.75 + 0.25E8)$	$F8 = (C8 + D8) \times (0.75 + 0.25E8)$
F9	In the LOG, formula added $F9 = (C9 + D9) \times (0.75 + 0.25E9)$	$F9 = (C9 + D9) \times (0.75 + 0.25E9)$
F10	In the LOG, formula added $F10 = (C10 + D10) \times (0.75 + 0.25E10)$	$F10 = (C10 + D10) \times (0.75 + 0.25E10)$
F11	In the LOG, formula added $F11 = (C11 + D11) \times (0.75 + 0.25E11)$	$F11 = (C11 + D11) \times (0.75 + 0.25E11)$
F12	In the LOG, formula added $F12 = (C12 + D12) \times (0.75 + 0.25E12)$	$F12 = (C12 + D12) \times (0.75 + 0.25E12)$

S.26.05 - Solvency Capital Requirement - Operational risk (old SCR-B3G)
Identification of changes performed to the version published at July 2012 Final Report

Cell	Description	New text (when applicable)
A30, A0	Cells regarding information on RFF were added	Ring fenced fund? (Y/N or N/A) Fund number
A2, A3	It was clarified that is excluding risk margin	Life gross technical provisions (excluding risk margin) Life gross technical provisions unit-linked (excluding risk margin)

Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
A30	In the template - to remove N/A options: Ring Fenced Fund? (Y/N or N/A)	Ring Fenced Fund? (Y/N)
A30	In the LOG - to delete description for N/A option: "When undertaking is no RFF reporter: N/A"; Option no longer required, as there is a separate template for reporting of ring fenced funds and remaining part	Not applicable
A30	In the LOG - to delete reference "... whether there an underaking is not a RFF reporter".	Not applicable
A30	In the LOG to delete: NOT APPLICABLE for the purpose of preparatory phase	Not applicable
A4	In the LOG to add formula $A4 = 0.0045 * \max(0, (A1 - A2)) + 0.03 * \max(0, A3)$	$A4 = 0.0045 * \max(0, (A1 - A2)) + 0.03 * \max(0, A3)$
A12	In the LOG to add formula $A12 = \text{Max}(A4, A13)$	$A12 = \text{Max}(A4, A13)$
A14	In the LOG to add formula $A14 = \text{min}(A12, A13)$	$A14 = \text{min}(A12, A13)$
A16	In the LOG to delte: "For the purpose of preparatory phase, in case of undertakings with ring fenced funds, and when reporting the most material ring fence fund and the remaining part, the reference between item A16 and item A13 on SCR B2A is not applicable", the SCR B2A is to be completed for one RFF and remaining part during preparatory phase, therefore a reference is applicable	Not applicable

S.27.01 - Solvency Capital Requirement - Non-life catastrophe risk (old SCR-B3F)
Identification of changes performed to the version published at July 2012 Final Report

Cell	Description	New text (when applicable)
A30, A0	Cells regarding information on RFF were added	Ring fenced fund? (Y/N or N/A) Fund number
GA1 to GA6	The table on "Man made cat risk – motor vehicle liability" was transposed	Not applicable
HA3 to HC5	The table on "Man made cat risk – marine" was transposed	Not applicable
JA1 to JA4	The table on "Man made cat risk – fire" was transposed	Not applicable
LA7 to LA11	The table on "Man made catastrophe risk - Credit & Suretyship" was transposed	Not applicable
OA1 to OJ1	It was amended from 20 to 31 countries	Not applicable

Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
A30	In the template - to remove N/A options: Ring Fenced Fund? (Y/N or N/A)	Ring Fenced Fund? (Y/N)
A30	In the LOG - to delete description for N/A option: "When undertaking is no RFF reporter: N/A"; Option no longer required, as there is a separate template for reporting of ring fenced funds and remaining part	Not applicable
A30	In the LOG - to delete reference "... whether there an underaking is not a RFF reporter".	Not applicable
A30	In the LOG to delete: NOT APPLICABLE for the purpose of preparatory phase	Not applicable
General approach to LOG-files of all SCR Health Catastrophe risks	Cells related to the 31 countries mentioned in item NA1 are specified per country.	Example for the mass accident: all cells named NA1 covering 31 countries has been changed in NA1 to NA31.
NB1 to NJ31	Value of the benefits per type of event related to the mass accident.	Introduction of "using the cash-flow projection".
PA32	Number of insured persons for all countries with a income protection cover related to a pandemic event.	Total number of insured persons for all countries covered by the income protection insurance or reinsurance obligations other than workers' compensation insurance or reinsurance obligations.
PB32	Total pandemic exposure for all countries with a income protection cover related to a pandemic event.	The total of all income protection pandemic exposure for all countries of insurance and reinsurance undertakings.
PD1 to PH31	Amount payable for all types of medical expenses related to the pandemic event.	Introduction of "using the cash-flow projection".
PJ32	Introduction of the Gross Catastrophe Risk Charge for the total income protection of all countries related to the pandemic event	This is the total gross capital requirement for the income protection pandemic exposure for all countries of insurance and reinsurance undertakings based on the total income protection pandemic exposure multiplied with the ratio.
PJ33	Adaption of the description of the Gross Catastrophe Risk Charge related to the pandemic event due to the introduction of cell PJ33.	$PJ33 = \text{SUM}(PJ1: PJ31) + PJ32$
C23 - C25	The cross references for cell C24 and cell C25 are incorrect in the LOG: "Per Health catastrophe risk sub-module this amount is equal to the Net Catastrophe Risk Charge: C23=NN34 C24=OJ18 C25=PM21"	C24=OJ34 C25=PM33
PA21	In the LOG and in the template - change of cell reference from PA21 to PA32	PA32
PB21	In the LOG and in the template - change of cell reference from PB21 to PB32; Added to the name of the cell: "income protection Total pandemic exposure" - Total all countries	PB32 Income protection - Total pandemic exposure - Total all countries
PC1	In the LOG and in the template - change of cell reference from PC1 to PC1:PC31	PC1:PC31 The number of insured persons of insurance and reinsurance undertakings, for each of the countries identified in Items NA1 to NI31, which meet the following conditions:

PD1, PF1, PH1	In the LOG and in the template - change of cell reference from PD1, PF1, PH1 to PD1:PD31, PF1:PF31, PH1:PH31	PD1:PD31, PF1:PF31, PH1:PH31 Best estimate of the amounts payable, using the cash-flow projection, by insurance and reinsurance undertakings for an insured person in relation to medical expense insurance or reinsurance obligations, other than workers' compensation insurance or reinsurance obligations per healthcare utilisation type 1-3, as identified in item PC1 to PC31, in the event of a pandemic, for each of the countries identified in Items NA1 to NI31.
PE1, PG1, PI1	In the LOG and in the template - change of cell reference from PE1, PG1, PI1 to PE1:PE31, PG1:PG31, PI1:PI31	PE1:PE31, PG1:PG31, PI1:PI31 The ratio of insured persons with clinical symptoms utilising healthcare type 1-3, as identified in item PC1 to PC31, for each of the countries identified in Items NA1 to NI31.
PJ1	In the LOG and in the template - change of cell reference from PJ1 to PJ1:PJ31	PJ1:PJ31 Gross capital requirement, for each of the countries identified in Items NA1 to NI31, arising from the health sub-module pandemic.
PJ21	In the LOG and in the template - change of cell reference from PJ21 to PJ33; updating formula : PJ21 = SUM (PJ1 for each country) to reflect changed cell referencing	PJ33 This is the total gross capital requirement for the health sub-module pandemic. PJ33=SUM(PJ1:PJ31) + PJ32
PK21	In the LOG and in the template - change of cell reference from PK21 to PK33	PK33
PL21	In the LOG and in the template - change of cell reference from PL21 to PL33	
PM21	In the LOG and in the template - change of cell reference from PM21 to PM33; updating formula : PM21 = PJ21 - PK21 +PL21 to reflect changed cell referencing	PM33 The total net capital requirement for the health sub-module pandemic. PM33=PJ33-PK33+PL33

S.28.01 and S.28.02 - Minimum Capital Requirement (old MCR-B4A and B4B)

Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
A25	The item name "SCR with add-on" was changed to SCR. The LOG already clarified that should include the add-on if existent	SCR

S.32.01- Undertakings in the scope of the group (old G01)
Identification of changes performed to the version published at July 2012 Final Report

Cell	Description	New text (when applicable)
H1a, H1b, H1c (old H1)	The item "Total Balance Sheet" was divided into 3 items to clearly identify insurance undertakings, other regulated undertakings and non-regulated undertakings	Total Balance Sheet (for (re)insurance undertakings) Total Balance Sheet (for other regulated undertakings) Total Balance Sheet (non-regulated undertakings)
I1a, I1b (old I1)	The item "Written premium or Turn Over" was divided into 2 items	Written premium or Turn Over (written premiums net of reinsurance ceded under IFRS or local GAAP for insurance undertakings) Written premium or Turn Over (turn over defined as the gross revenue under IFRS or local GAAP for other types of undertakings or insurance holding companies)

Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
D1	The closed list was added, was slightly amended and renumbered (insertion of mixed financial holding company, No. 6 and insertion of other, No. 13)	Type of undertaking should give information on the type of activity of the undertaking. The closed list is the following: 1. Life insurance undertaking 2. Non life insurance undertaking 3. Composite undertaking 4. Insurance holding company as defined in Art. 212§ (f) of Directive 2009/138/EC 5. Mixed-activity insurance holding company as defined in Art. 212§1 (g) of Directive 2009/138/EC 6. Mixed financial holding company as defined in Art. 212§1(h) of Directive 2009/138/EC 7. Credit institution, investment firm and financial institution 8. Institution for occupational retirement provision 9. Ancillary services undertaking as defined in Art. 1bis (23) of Level 2 10. Non-regulated undertaking carrying out financial activities as defined in Art. 1bis (33) of Level 2 11. Special purpose vehicle authorized in accordance with Art. 211 of Directive 2009/138/EC 12. Special purpose vehicle other special purpose vehicle authorized in accordance with Art. 211 of Directive 2009/138/EC 13. Other
F1	The close list was added	High level information on the legal form, i.e. whether the undertaking is a mutual or not The closed list is the following: 1. Mutual 2. Non-mutual
I1a	The LOG was amended to refer also to reinsurance undertakings	For insurance and reinsurance undertakings: written premiums net of reinsurance ceded under IFRS or local GAAP.
I1a, I1b	The item names were clarified	Written premiums net of reinsurance ceded under IFRS or local GAAP for insurance undertakings Turn over defined as the gross revenue under IFRS or local GAAP for other types of undertakings or insurance holding companies
K1	It was clarified that if the investment performance is included in the underwriting performance in accordance to financial statements, then that value should not be reported under K1 again	(Re)insurance undertakings should report their investment performance in accordance to financial statements. An absolute amount should be reported. The currency used should be the group currency. This value should not include any value already reported in J1.
N1	Drafting was amended (last sentence)	Percentage as defined by the consolidated account directive for the integration of consolidated undertakings into the consolidation which may differ from item M1. For full integration, minority interests should also be reported in this item.
Q1	The close list was added	Influence can be either dominant or significant, depending on former criteria mentioned; the group is responsible for assessing the level of influence exercised by the parent undertaking over any undertaking but as stated in article 212-2 of Directive 2009/138/EC the group supervisor may have a differing view from the group's assessment and if so the group should take into account any decision made by the group supervisor The closed list is the following: 1. Dominant 2. Significant
R1	The last sentence was removed	Proportional share is the proportion that will be used to calculate the group solvency.

S1	The close list was added	<p>Indicates if the undertaking is included or not in the scope of group supervision as referred in article 214 of Directive 2009/138/EC; if an undertaking on which a significant/dominant influence is exercised is not included in the scope of supervision as provided for in article 214, then it should be indicated which of a,b or c of article 214.2 is the reason</p> <p>The closed list is the following:</p> <ol style="list-style-type: none"> 1. Yes 2. No (art. 214 a) 3. No (art. 214 b) 4. No (art. 214 c)
T1	The cell was made not applicable for the preparatory phase	<p>NOT APPLICABLE for the purpose of preparatory phase</p> <p>Date where the decision of exclusion has been taken</p>
U1	The close list was added	<p>The item gathers information on the method used for group solvency assessment and the treatment of each undertaking.</p> <p>The closed list is the following:</p> <ol style="list-style-type: none"> 1. Consolidation/full integration 2. Consolidation/proportional integration 3. Consolidation/equity method 4. Deduction and Aggregation- Solvency II 5. Deduction and Aggregation- Other sectoral Rules 6. Deduction and Aggregation- Local rules 7. Deduction of the participation in relation to article 229 of Directive 2009/138/EC 8. No inclusion into the Solvency II consolidated data as defined in Art. 323bis SCG3 of Level 2 9. Other method
B1	The text was amended to allow for the use of LEI or pre-LEI if available	<p>Identification code:</p> <ul style="list-style-type: none"> - Legal Entity Identifier (LEI); - Interim entity identifier (Pre-LEI); - Specific code <p>(by this order of priority)</p> <p>Specific code:</p> <ul style="list-style-type: none"> - For EEA (re) insurance undertakings within the group: identification code used in the local market, attributed by the undertaking's supervisory authority - For non-EEA undertakings and non-regulated undertakings within the group, identification code provided will be provided by the group. When allocating an identification code to each non-EEA or non-regulated undertaking, it should comply with the following format in a consistent manner: <p>identification code of the parent undertaking + ISO 3166-1 alpha-2 code of the country of the undertaking + 5 digits</p>
V1	A new item was added to identify the type of code	<p>Identification of the code used in B1:</p> <ul style="list-style-type: none"> - LEI - Pre-LEI - Specific code

S.33.01- (Re)insurance individual requirements (old G03)

Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
A2	The text was amended to allow for the use of LEI or pre-LEI if available	<p>Identification code:</p> <ul style="list-style-type: none"> - Legal Entity Identifier (LEI); - Interim entity identifier (Pre-LEI); - Specific code <p>(by this order of priority)</p> <p>Specific code:</p> <ul style="list-style-type: none"> - For EEA (re) insurance undertakings within the group: identification code used in the local market, attributed by the undertaking's supervisory authority - For non-EEA undertakings and non-regulated undertakings within the group, identification code provided will be provided by the group. When allocating an identification code to each non-EEA or non-regulated undertaking, it should comply with the following format in a consistent manner: identification code of the parent undertaking + ISO 3166-1 alpha-2 code of the country of the undertaking + 5 digits
Q1	A new item was added to identify the type of code	<p>Identification of the code used in A2:</p> <ul style="list-style-type: none"> - LEI - Pre-LEI - Specific code
R1	New item added for the purposes of reporting by RFF when method 2 is used	Entity Level/RFF/ Remaining Part
S1	New item added for the purposes of reporting by RFF when method 2 is used	Fund Number

S.34.01 - Non-(re)insurance individual requirements (old G04)
Identification of changes performed to the version published at July 2012 Final Report

Cell	Description	New text (when applicable)
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Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
A2	The text was amended to allow for the use of LEI or pre-LEI if available	<p>Identification code:</p> <ul style="list-style-type: none"> - Legal Entity Identifier (LEI); - Interim entity identifier (Pre-LEI); - Specific code <p>(by this order of priority)</p> <p>Specific code:</p> <ul style="list-style-type: none"> - For EEA (re) insurance undertakings within the group: identification code used in the local market, attributed by the undertaking's supervisory authority - For non-EEA undertakings and non-regulated undertakings within the group, identification code provided will be provided by the group. When allocating an identification code to each non-EEA or non-regulated undertaking, it should comply with the following format in a consistent manner: identification code of the parent undertaking + ISO 3166-1 alpha-2 code of the country of the undertaking + 5 digits
F1	A new item was added to identify the type of code	<p>Identification of the code used in A2:</p> <ul style="list-style-type: none"> - LEI - Pre-LEI - Specific code

S.35.01- Group - contribution of TP (old G14)
Identification of changes performed to the version published at July 2012 Final Report

Cell	Description	New text (when applicable)
S1	The Item "Method of group solvency calculation used" was introduced by undertaking	Method of group solvency calculation used

Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
S1	The methods were amended	One of the options in the following closed list shall be used: - Method 1 - Method 2
C1, F1, I1, L1, O1	The LOG was clarified	Overall amount of technical provisions (TP calculated as a whole or the sum of the best estimate and the risk margin) of the EEA or non-EEA undertaking calculated according to Solvency II rules. The cell should be filled in gross figures, i. e. gross of IGT and before cession of reinsurance . The currency used should be the group currency. This item is reported for the (re)insurance undertakings under method 1 and method 2, except for the (re)insurance undertakings under method 2 situated in equivalent non-EEA countries.
C1, F1, I1, L1, O1	The name of the cell was amended and aligned between Technical I and II (LOG)	Amount of gross TP (gross of IGT)
D1,G1,J1,M1,P1	The LOG was clarified	Overall amount of technical provisions (TP calculated as a whole or the sum of the best estimate and the risk margin) of the EEA or non-EEA undertaking calculated according to Solvency II rules. The cell should be filled in net of IGT but gross of reinsurance ceded outside the group. The currency used should be the group currency. This item is reported for the (re)insurance undertakings under method 1 and method 2, except for the (re)insurance undertakings under method 2 situated in equivalent non-EEA countries.
D1,G1,J1,M1,P1	The name of the cell was amended and aligned between Technical I and II (LOG)	Amount of gross TP (net of IGT)
E1, H1, K1, N1, Q1	The LOG was clarified	The percentage share of TP (TP calculated as a whole or the sum of the best estimate and the risk margin) of the (re) insurance undertaking to the group TP under method 1 net of IGT but gross of reinsurance ceded outside the group , split by respective main categories (Life excluding health and unit linked index-linked, Unit-linked and index linked, Health – SLT and non-SLT, Non-life excluding health) This item is not reported for undertakings under method 2.
R1	Change of the name in Technical Annex I to align with the LOG	Total amount of TP (excluding IGT)
R1	The LOG was clarified	This item equals to the sum of items D1+G1+J1+M1+P1, except for (re)insurance undertakings situated in equivalent non-EEA countries under method 2, because in this case items D1,G1,J1,M1 and P1 are not required to be reported for this type of undertakings, with only item R1 being reported. When method 1 as defined under Article 230 of the Solvency II Directive is used for the (re)insurance undertaking, the total amount of technical provisions in cell R1 accounts for its contribution net of reinsurance ceded within the group to the group technical provisions. The total amount of technical provisions in cell R1 for all (re)insurance undertakings under method 1 can be reconciled with the amount of group technical provisions in the group balance sheet (sum of the cells L1+L4+L6B+L7+L10) When method 2 is used for the (re)insurance undertaking, the total amount of technical provisions in cell R1 cannot be reconciled with the amount of group technical provisions in the group balance sheet.

A1	The text was amended to allow for the use of LEI or pre-LEI if available	<p>Identification code:</p> <ul style="list-style-type: none"> - Legal Entity Identifier (LEI); - Interim entity identifier (Pre-LEI); - Specific code <p>(by this order of priority)</p> <p>Specific code:</p> <ul style="list-style-type: none"> - For EEA (re) insurance undertakings within the group: identification code used in the local market, attributed by the undertaking's supervisory authority - For non-EEA undertakings and non-regulated undertakings within the group, identification code provided will be provided by the group. When allocating an identification code to each non-EEA or non-regulated undertaking, it should comply with the following format in a consistent manner: identification code of the parent undertaking + ISO 3166-1 alpha-2 code of the country of the undertaking + 5 digits
S1	A new item was added to identify the type of code	<p>Identification of the code used in A1:</p> <ul style="list-style-type: none"> - LEI - Pre-LEI - Specific code

CIC Table
Identification of changes performed to the version published at July 2012 Final Report

Cell	Description	New text (when applicable)
General	Replace the CIC Table in the final report by an updated one. In the one published CIC for Loans on policies was missing (CIC ##86).	

Identification of changes performed to the version published in the preparatory Guidelines

Cell	Description	New text (when applicable)
ISO 3166-1-alpha-2 country code	Improved definitions of CIC codes	Identify the country ISO code where the asset is listed in. An asset is considered as being listed if it is negotiated on a regulated market or on a multilateral trading facility, as defined by Directive 2004/39/EC. If the asset is listed in more than one country, the country should be the one used as the reference for valuation purposes
Assets that are not listed in a stock exchange	Improved definitions of CIC codes	Identify assets that are not negotiated on a regulated market or on a multilateral trading facility, as defined by Directive 2004/39/EC
Assets that are not exchange tradable	Improved definitions of CIC codes	Identify assets that by their nature are not subject to negotiation on a regulated market or on a multilateral trading facility, as defined by Directive 2004/39/CE. This applies to asset categories 7, 8 and 9
CIC##16	Improved definitions of CIC codes	Government bonds which have a pool of assets that secures or "covers" the bond. Those assets remain on the issuer balance sheet.
CIC##21	Improved definitions of CIC codes	Bonds issued by corporations, with simple characteristics, usually covering the ones referred to as "plain vanilla", and that don't have any special feature described in the categories 22 to 28
CIC ##21	Changed CIC ##21 name to "Corporate bonds", replacing "Common bonds"	Corporate bonds
CIC##23	Improved definitions of CIC codes	Unsecured, short-term debt instrument issued by a corporation, typically for the financing of accounts receivable, inventories and meeting short-term liabilities, usually with original maturity lesser than 270 days.
CIC##24	Improved definitions of CIC codes	Very short term debt securities (usually with maturities ranging from 1 day up to 1 year), consisting mainly of negotiable certificates of deposit (CDs), bankers acceptances, repurchase agreements (repos) and other highly liquid instruments. Commercial Paper is excluded from this category
CIC##26	Improved definitions of CIC codes	Corporate bonds which have a pool of assets that secures or "covers" the bond. Those assets remain on the issuer balance sheet. Covered bonds subject to specific law are excluded from this category
CIC##27	Improved definitions of CIC codes	Corporate bonds which have a pool of assets that secures or "covers" the bond if the originator becomes insolvent and are subject by law to special public supervision designed to protect bond-holders, as defined in Article 22(4) of Directive 85/611/EEC. An example of this category is Pfandbrief: "Covered bonds which are issued on the basis of the Pfandbrief Act. They are used to refinance loans for which collateral is furnished in the form of loans secured by real estate liens (Mortgage Pfandbriefe), public-sector loans (Public Pfandbriefe), ship mortgages (Ship Pfandbriefe) or aircraft mortgages (Aircraft Pfandbriefe). Thus, the distinction made between these Pfandbrief types refers to the cover pool created for each type of Pfandbrief."
CIC##29	Improved definitions of CIC codes	Other corporate bonds, with other characteristics than the ones identified in the above categories
CIC##3	Improved definitions of CIC codes	Shares and other securities equivalent to shares representing corporations' capital, i.e., representing ownership in a corporation
CIC##31	Improved definitions of CIC codes	Equity that represents basic property rights on corporations
CIC##34	Improved definitions of CIC codes	Equity security that is senior to common equity, having a higher claim on the assets and earnings than common equity, but is subordinate to bonds
CIC##44	Improved definitions of CIC codes	Fund which invests its assets pursuing a specific asset allocation objective, e.g. primarily investing in the securities of companies in countries with nascent stock markets or small economies, specific sectors or group of sectors, specific countries or other specific investment objective
CIC##46	Improved definitions of CIC codes	Funds whose investment strategies include such as hedging, event driven, fixed income directional and relative value, managed futures, commodities etc.
CIC##5	Improved definitions of CIC codes	Hybrid securities, combining a fixed income instrument with a series of derivative components. Excluded from this category are fixed income securities that are issued by sovereign governments. Concerns securities that have embedded one or a combination of categories of derivatives, including Credit Default Swaps (CDS), Constant Maturity Swaps (CMS), Credit Default Options (CDOp). Assets under this category are not subject to unbundling
CIC##84	Improved definitions of CIC codes	Loans made with collateral in the form of real estate
CIC##86	Improved definitions of CIC codes	Loans made with insurance policies as collateral

CIC##95	Changed CIC ##95 name to "Plant and equipment"	Plant and equipment (for own use)
CIC##95	Improved definitions of CIC codes	Plant and equipment for the own use of the undertaking
CIC##E1	Improved definitions of CIC codes	Forward contract in which typically one party pays a fixed interest rate, and receives a variable interest rate usually based on an underlying index rate, at the predefined forward date

Cross-templates checks
Identification of changes performed to the version published for CP10

Cell	Description	New text (when applicable)
All	Abolition of the "Global Filters"	
All	Changes of the codes/names of the templates	"S.XX.XX", where X always is a number.
CGS 6 to CGS 20	Abolition	CSG 21, linked to S.23.01 (old OF_B1), becomes CGS 6.
CAS 4		$S.02.01.b.A3+S.02.01.b.A27 + S.02.01.b.A14A + S.02.01.b.A14B + S.02.01.b.A14BC =$ $sum(S.02.02.b.A4[CUR])$ $(BS_C1.A3+BS_C1.A27 + BS_C1.A14A + BS_C1.A14B + BS_C1.A14BC = sum(BS_C1D.A4[CUR]))$
CAS 34		$S.02.01.b.L6B+S.02.01.b.L7+S.02.01.b.L10 = S.14.01.b.A1[LOB:LB29] + S.14.01.b.B1[LOB:LB29]$ $[CBK:CB02] + S.14.01.b.B1[LOB:LB29] [CBK:CB03] + S.14.01.b.E1[LOB:LB29] +$ $S.14.01.b.A1[LOB:LB33] + S.14.01.b.B1[LOB:LB33] + S.14.01.b.E1[LOB:LB33]+$ $S.14.01.b.A1[LOB:LB35] + S.14.01.b.B1[LOB:LB35] + S.14.01.b.E1[LOB:LB35] +$ $S.14.01.b.A1[LOB:LB30] + S.14.01.b.B1[LOB:LB30] + S.14.01.b.E1[LOB:LB30] +$ $S.14.01.b.A1[LOB:LB31] + S.14.01.b.B1[LOB:LB31] [CBK:CB02] + S.14.01.b.B1[LOB:LB31]$ $[CBK:CB03] + S.14.01.b.E1[LOB:LB31] + S.14.01.b.A1[LOB:LB32] + S.14.01.b.B1[LOB:LB32]$ $[CBK:CB02] + S.14.01.b.B1[LOB:LB32] [CBK:CB03] + S.14.01.b.E1[LOB:LB32] +$ $S.14.01.b.A1[LOB:LB34] + S.14.01.b.B1[LOB:LB34] + S.14.01.b.E1[LOB:LB34] +$ $S.14.01.b.A1[LOB:LB36] + S.14.01.b.B1[LOB:LB36] + S.14.01.b.E1[LOB:LB36]$ $(BS_C1.L6B+BS_C1.L7+BS_C1.L10 = TP_F1Q.A1[LOB:LB29] + TP_F1Q.B1[LOB:LB29] [CBK:CB02] +$ $TP_F1Q.B1[LOB:LB29] [CBK:CB03] + TP_F1Q.E1[LOB:LB29] + TP_F1Q.A1[LOB:LB33] +$ $TP_F1Q.B1[LOB:LB33] + TP_F1Q.E1[LOB:LB33]+ TP_F1Q.A1[LOB:LB35] + TP_F1Q.B1[LOB:LB35] +$ $TP_F1Q.E1[LOB:LB35] + TP_F1Q.A1[LOB:LB30] + TP_F1Q.B1[LOB:LB30] + TP_F1Q.E1[LOB:LB30] +$ $TP_F1Q.A1[LOB:LB31] + TP_F1Q.B1[LOB:LB31] [CBK:CB02] + TP_F1Q.B1[LOB:LB31] [CBK:CB03] +$ $TP_F1Q.E1[LOB:LB31] + TP_F1Q.A1[LOB:LB32] + TP_F1Q.B1[LOB:LB32] [CBK:CB02] +$ $TP_F1Q.B1[LOB:LB32] [CBK:CB03] + TP_F1Q.E1[LOB:LB32] + TP_F1Q.A1[LOB:LB34] +$ $TP_F1Q.B1[LOB:LB34] + TP_F1Q.E1[LOB:LB34] + TP_F1Q.A1[LOB:LB36] + TP_F1Q.B1[LOB:LB36] +$ $TP_F1Q.E1[LOB:LB36])$
CAS 35		$S.02.01.b.L6C+S.02.01.b.L7A+S.02.01.b.L10A =$ $S.14.01.b.A1[LOB:LB29]+S.14.01.b.A1[LOB:LB33]+S.14.01.b.A1[LOB:LB35]+S.14.01.b.A1[LOB:LB30]$ $+S.14.01.b.A1[LOB:LB31]+S.14.01.b.A1[LOB:LB32]+S.14.01.b.A1[LOB:LB34]+S.14.01.b.A1[LOB:LB3$ $6]$ $(BS_C1.L6C+BS_C1.L7A+BS_C1.L10A =$ $TP_F1Q.A1[LOB:LB29]+TP_F1Q.A1[LOB:LB33]+TP_F1Q.A1[LOB:LB35]+TP_F1Q.A1[LOB:LB30]+TP_$ $F1Q.A1[LOB:LB31]+TP_F1Q.A1[LOB:LB32]+TP_F1Q.A1[LOB:LB34]+TP_F1Q.A1[LOB:LB36])$
CAS 36		$S.02.01.b.L6D+S.02.01.b.L8+S.02.01.b.L11 = S.14.01.b.B1[LOB:LB29] [CBK:CB02] +$ $S.14.01.b.B1[LOB:LB29] [CBK:CB03]$ $+S.14.01.b.B1[LOB:LB33]+S.14.01.b.B1[LOB:LB35]+S.14.01.b.B1[LOB:LB30]+S.14.01.b.B1[LOB:LB31]$ $][CBK:CB02]+S.14.01.b.B1[LOB:LB31][CBK:CB03] + S.14.01.b.B1[LOB:LB32][CBK:CB02] +$ $S.14.01.b.B1[LOB:LB32][CBK:CB03] + S.14.01.b.B1[LOB:LB34]+S.14.01.b.B1[LOB:LB36]$ $(BS_C1.L6D+BS_C1.L8+BS_C1.L11 = TP_F1Q.B1[LOB:LB29] [CBK:CB02] + TP_F1Q.B1[LOB:LB29]$ $[CBK:CB03]$ $+TP_F1Q.B1[LOB:LB33]+TP_F1Q.B1[LOB:LB35]+TP_F1Q.B1[LOB:LB30]+TP_F1Q.B1[LOB:LB31][CBK$ $:CB02]+TP_F1Q.B1[LOB:LB31][CBK:CB03] + TP_F1Q.B1[LOB:LB32][CBK:CB02] +$ $TP_F1Q.B1[LOB:LB32][CBK:CB03] + TP_F1Q.B1[LOB:LB34]+TP_F1Q.B1[LOB:LB36])$
CAS 37		$S.02.01.b.L6E+S.02.01.b.L9+S.02.01.b.L12 =$ $S.14.01.b.E1[LOB:LB29]+S.14.01.b.E1[LOB:LB33]+S.14.01.b.E1[LOB:LB35]+S.14.01.b.E1[LOB:LB30]+$ $S.14.01.b.E1[LOB:LB31]+S.14.01.b.E1[LOB:LB32]+S.14.01.b.E1[LOB:LB34]+S.14.01.b.E1[LOB:LB36]$ $(BS_C1.L6E+BS_C1.L9+BS_C1.L12 =$ $TP_F1Q.E1[LOB:LB29]+TP_F1Q.E1[LOB:LB33]+TP_F1Q.E1[LOB:LB35]+TP_F1Q.E1[LOB:LB30]+TP_F$ $1Q.E1[LOB:LB31]+TP_F1Q.E1[LOB:LB32]+TP_F1Q.E1[LOB:LB34]+TP_F1Q.E1[LOB:LB36])$

CAS 38		$S.02.01.b.A16 = S.14.01.b.C1[LOB:LB29] [CBK:CB02] + S.14.01.b.C1[LOB:LB29] [CBK:CB03]$ $+S.14.01.b.C1[LOB:LB33]+S.14.01.b.C1[LOB:LB35]+S.14.01.b.C1[LOB:LB30]+$ $S.14.01.b.C1[LOB:LB31] [CBK:CB02]+ S.14.01.b.C1[LOB:LB31] [CBK:CB03] + S.14.01.b.C1[LOB:LB32]$ $[CBK:CB02] + S.14.01.b.C1[LOB:LB32] [CBK:CB03] +$ $S.14.01.b.C1[LOB:LB34]+S.14.01.b.C1[LOB:LB36] + S.17.01.b.Q27$ $(BS_C1.A16 = TP_F1Q.C1[LOB:LB29] [CBK:CB02] + TP_F1Q.C1[LOB:LB29] [CBK:CB03]$ $+TP_F1Q.C1[LOB:LB33]+TP_F1Q.C1[LOB:LB35]+TP_F1Q.C1[LOB:LB30]+ TP_F1Q.C1[LOB:LB31]$ $[CBK:CB02]+ TP_F1Q.C1[LOB:LB31] [CBK:CB03] + TP_F1Q.C1[LOB:LB32] [CBK:CB02] +$ $TP_F1Q.C1[LOB:LB32] [CBK:CB03] + TP_F1Q.C1[LOB:LB34]+TP_F1Q.C1[LOB:LB36] + TP_E1Q.Q27)$
CAS 56		$S.28.02.b.D19 + S.28.02.b.F19 + S.28.02.b.D20 + S.28.02.b.F20 >= (S.14.01.b.B1 [LOB:LB30] - S.14.01.b.C1$ $[LOB:LB30])$ $(MCR_B4B.D19 + MCR_B4B.F19 + MCR_B4B.D20 + MCR_B4B.F20 >= (TP_F1Q.B1 [LOB:LB30] - TP_F1Q.C1$ $[LOB:LB30]))$
CAS 57		$S.28.02.b.D21 + S.28.02.b.F21 >= (S.14.01.b.B1[LOB:LB31][CBK:CB02] -$ $S.14.01.b.C1[LOB:LB31][CBK:CB02]) + (S.14.01.b.B1[LOB:LB31][CBK:CB03] -$ $S.14.01.b.C1[LOB:LB31][CBK:CB03])$ $(MCR_B4B.D21 + MCR_B4B.F21 >= (TP_F1Q.B1[LOB:LB31][CBK:CB02] -$ $TP_F1Q.C1[LOB:LB31][CBK:CB02]) + (TP_F1Q.B1[LOB:LB31][CBK:CB03] -$ $TP_F1Q.C1[LOB:LB31][CBK:CB03]))$
CAS 58		$S.28.02.b.D22 + S.28.02.b.F22 >= (S.14.01.b.B1[LOB:LB33] - S.14.01.b.C1[LOB:LB33]) +$ $(S.14.01.b.B1[LOB:LB36] - S.14.01.b.C1[LOB:LB36]) + (S.14.01.b.B1[LOB:LB29][CBK:CB02] -$ $S.14.01.b.C1[LOB:LB29][CBK:CB02]) + (S.14.01.b.B1[LOB:LB29][CBK:CB03] -$ $S.14.01.b.C1[LOB:LB29][CBK:CB03]) + (S.14.01.b.B1[LOB:LB34] - S.14.01.b.C1 [LOB:LB34]) +$ $(S.14.01.b.B1[LOB:LB35] - S.14.01.b.C1[LOB:LB35])$ $(MCR_B4B.D22 + MCR_B4B.F22 >= (TP_F1Q.B1[LOB:LB33] - TP_F1Q.C1[LOB:LB33]) +$ $(TP_F1Q.B1[LOB:LB36] - TP_F1Q.C1[LOB:LB36]) + (TP_F1Q.B1[LOB:LB29][CBK:CB02] -$ $TP_F1Q.C1[LOB:LB29][CBK:CB02]) + (TP_F1Q.B1[LOB:LB29][CBK:CB03] -$ $TP_F1Q.C1[LOB:LB29][CBK:CB03]) + (TP_F1Q.B1[LOB:LB34] - TP_F1Q.C1 [LOB:LB34]) +$ $(TP_F1Q.B1[LOB:LB35] - TP_F1Q.C1[LOB:LB35]))$
CAS 75		$S.28.01.b.B19 + S.28.01.b.B20 >= (S.14.01.b.B1 [LOB:LB30] - S.14.01.b.C1 [LOB:LB30])$ $(MCR_B4A.B19 + MCR_B4A.B20 >= (TP_F1Q.B1 [LOB:LB30] - TP_F1Q.C1 [LOB:LB30]))$
CAS 76		$S.28.01.b.B21 >= (S.14.01.b.B1[LOB:LB31][CBK:CB02] - S.14.01.b.C1[LOB:LB31][CBK:CB02]) +$ $(S.14.01.b.B1[LOB:LB31][CBK:CB03] - S.14.01.b.C1[LOB:LB31][CBK:CB03])$ $(MCR_B4A.B21 >= (TP_F1Q.B1[LOB:LB31][CBK:CB02] - TP_F1Q.C1[LOB:LB31][CBK:CB02]) +$ $(TP_F1Q.B1[LOB:LB31][CBK:CB03] - TP_F1Q.C1[LOB:LB31][CBK:CB03]))$
CAS 77		$S.28.01.b.B22 >= (S.14.01.b.B1[LOB:LB33] - S.14.01.b.C1[LOB:LB33]) + (S.14.01.b.B1[LOB:LB36] -$ $S.14.01.b.C1[LOB:LB36]) + (S.14.01.b.B1[LOB:LB29][CBK:CB02] -$ $S.14.01.b.C1[LOB:LB29][CBK:CB02]) + (S.14.01.b.B1[LOB:LB29][CBK:CB03] -$ $S.14.01.b.C1[LOB:LB29][CBK:CB03]) + (S.14.01.b.B1[LOB:LB34] - S.14.01.b.C1 [LOB:LB34]) +$ $(S.14.01.b.B1[LOB:LB35] - S.14.01.b.C1[LOB:LB35])$ $(MCR_B4A.B22 >= (TP_F1Q.B1[LOB:LB33] - TP_F1Q.C1[LOB:LB33]) + (TP_F1Q.B1[LOB:LB36] -$ $TP_F1Q.C1[LOB:LB36]) + (TP_F1Q.B1[LOB:LB29][CBK:CB02] - TP_F1Q.C1[LOB:LB29][CBK:CB02]) +$ $(TP_F1Q.B1[LOB:LB29][CBK:CB03] - TP_F1Q.C1[LOB:LB29][CBK:CB03]) + (TP_F1Q.B1[LOB:LB34] -$ $TP_F1Q.C1 [LOB:LB34]) + (TP_F1Q.B1[LOB:LB35] - TP_F1Q.C1[LOB:LB35]))$
CAS 78		$S.23.01.b.A20 = S.02.01.b.L27-S.23.01.b.B24-S.23.01.b.B25-S.23.01.b.B26-S.23.01.b.B27-$ $S.23.01.b.B502-S.23.01.b.A503+ S.02.01.b.L26$ $(OF_B1Q.A20 = BS_C1.L27-OF_B1Q.B24-OF_B1Q.B25-OF_B1Q.B26-OF_B1Q.B27-OF_B1Q.B502-$ $OF_B1Q.A503+ BS_C1.L26)$

APPENDIX 4: Mapping table for the re-naming of the templates

OLD NAME in Annotated templates	Template number	Template code	Template name	Short name
Content (QRS)	01	S.01.01.a	Content of the submission	-
Content (ARS)	01	S.01.01.b	Content of the submission	-
Content (QRG)	01	S.01.01.f	Content of the submission	-
Content (ARG)	01	S.01.01.g	Content of the submission	-
BI (QRS)	01	S.01.02.a	Basic information	BI
BI (ARS)	01	S.01.02.b	Basic information	BI
BI (QRG)	01	S.01.02.f	Basic information	BI
BI (ARG)	01	S.01.02.g	Basic information	BI
BS-C1 (QRS)	02	S.02.01.a	Balance Sheet	BS-C1
BS-C1 (ARS)	02	S.02.01.b	Balance Sheet	BS-C1
BS-C1 (QRG)	02	S.02.01.f	Balance Sheet	BS-C1
BS-C1 (ARG)	02	S.02.01.g	Balance Sheet	BS-C1
BS-C1D (ARS)	02	S.02.02.b	Assets and liabilities by currency	BS-C1D
Assets-D1 (QRS)	06	S.06.02.a	List of Assets	Assets D1
Assets-D1 (ARS)	06	S.06.02.b	List of Assets	Assets D1
Assets-D1 (QRG)	06	S.06.02.f	List of Assets	Assets D1
Assets-D1 (ARG)	06	S.06.02.g	List of Assets	Assets D1
Assets-D2O (QRS)	08	S.08.01.a	Open Derivatives	Assets D2O
Assets-D2O (ARS)	08	S.08.01.b	Open Derivatives	Assets D2O
Assets-D2O (QRG)	08	S.08.01.f	Open Derivatives	Assets D2O
Assets-D2O (ARG)	08	S.08.01.g	Open Derivatives	Assets D2O
TP-F1Q (QRS)	12	S.12.01.a	Life and Health SLT Technical Provisions	TP-F1Q
TP-F1 (ARS)	12	S.12.01.b	Life and Health SLT Technical Provisions	TP-F1
TP-E1Q (QRS)	17	S.17.01.a	Non-Life Technical Provisions	TP-E1Q
TP-E1 (ARS)	17	S.17.01.b	Non-Life Technical Provisions	TP-E1
OF-B1Q (QRS)	23	S.23.01.a	Own Funds	OF-B1Q
OF-B1A (ARS)	23	S.23.01.b	Own Funds	OF-B1A
OF-B1Q (QRG)	23	S.23.01.f	Own Funds	OF-B1Q
OF-B1A (ARG)	23	S.23.01.g	Own Funds	OF-B1A
SCR-B2A (ARS)	25	S.25.01.b	Solvency Capital Requirement - Standard formula or Partial Internal Models	SCR-B2A
SCR-B2A (ARS)	28	S.25.01.l	Solvency Capital Requirement - Standard formula or Partial Internal Models	SCR-B2A
SCR-B2A (ARG)	25	S.25.01.g	Solvency Capital Requirement - Standard formula or Partial Internal Models	SCR-B2A
SCR-B2A (ARG)	25	S.25.01.n	Solvency Capital Requirement - Standard formula or Partial Internal Models	SCR-B2A
SCR-B2B (ARS)	25	S.25.02.b	Solvency Capital Requirement - Partial Internal Models	SCR-B2B
SCR-B2B (ARG)	25	S.25.02.g	Solvency Capital Requirement - Partial Internal Models	SCR-B2B
SCR-B2C (ARS)	25	S.25.03.b	Solvency Capital Requirement - Full Internal Models	SCR-B2C
SCR-B2C (ARG)	25	S.25.03.g	Solvency Capital Requirement - Full Internal Models	SCR-B2C
SCR-B3A R (ARS)	26	S.26.01.b	Solvency Capital Requirement - Market risk	SCR-B3A
SCR-B3A R (ARS)	26	S.26.01.l	Solvency Capital Requirement - Market risk	SCR-B3A
SCR-B3A R (ARG)	26	S.26.01.g	Solvency Capital Requirement - Market risk	SCR-B3A
SCR-B3A R (ARG)	26	S.26.01.n	Solvency Capital Requirement - Market risk	SCR-B3A
SCR-B3B R (ARS)	26	S.26.02.b	Solvency Capital Requirement - Counterparty default risk	SCR-B3B
SCR-B3B R (ARS)	26	S.26.02.l	Solvency Capital Requirement - Counterparty default risk	SCR-B3B
SCR-B3B R (ARG)	26	S.26.02.g	Solvency Capital Requirement - Counterparty default risk	SCR-B3B
SCR-B3B R (ARG)	26	S.26.02.n	Solvency Capital Requirement - Counterparty default risk	SCR-B3B
SCR-B3C R (ARS)	26	S.26.03.b	Solvency Capital Requirement - Life underwriting risk	SCR-B3C

SCR-B3C R (ARS)	26	S.26.03.l	Solvency Capital Requirement - Life underwriting risk	SCR-B3C
SCR-B3C R (ARG)	26	S.26.03.g	Solvency Capital Requirement - Life underwriting risk	SCR-B3C
SCR-B3C R (ARG)	26	S.26.03.n	Solvency Capital Requirement - Life underwriting risk	SCR-B3C
SCR-B3D R (ARS)	26	S.26.04.b	Solvency Capital Requirement - Health underwriting risk	SCR-B3D
SCR-B3D R (ARS)	26	S.26.04.l	Solvency Capital Requirement - Health underwriting risk	SCR-B3D
SCR-B3D R (ARG)	26	S.26.04.g	Solvency Capital Requirement - Health underwriting risk	SCR-B3D
SCR-B3D R (ARG)	26	S.26.04.n	Solvency Capital Requirement - Health underwriting risk	SCR-B3D
SCR-B3E R (ARS)	26	S.26.05.b	Solvency Capital Requirement - Non-Life underwriting risk	SCR-B3E
SCR-B3E R (ARS)	26	S.26.05.l	Solvency Capital Requirement - Non-Life underwriting risk	SCR-B3E
SCR-B3E R (ARG)	26	S.26.05.g	Solvency Capital Requirement - Non-Life underwriting risk	SCR-B3E
SCR-B3E R (ARG)	26	S.26.05.n	Solvency Capital Requirement - Non-Life underwriting risk	SCR-B3E
SCR-B3G R (ARS)	26	S.26.06.b	Solvency Capital Requirement - Operational risk	SCR-B3G
SCR-B3G R (ARS)	26	S.26.06.l	Solvency Capital Requirement - Operational risk	SCR-B3G
SCR-B3G R (ARG)	26	S.26.06.g	Solvency Capital Requirement - Operational risk	SCR-B3G
SCR-B3G R (ARG)	26	S.26.06.n	Solvency Capital Requirement - Operational risk	SCR-B3G
SCR-B3F R (ARS)	27	S.27.01.b	Solvency Capital Requirement - Non-Life Catastrophe risk	SCR-B3F
SCR-B3F R (ARS)	27	S.27.01.l	Solvency Capital Requirement - Non-Life Catastrophe risk	SCR-B3F
SCR-B3F R (ARG)	27	S.27.01.g	Solvency Capital Requirement - Non-Life Catastrophe risk	SCR-B3F
SCR-B3F R (ARG)	27	S.27.01.n	Solvency Capital Requirement - Non-Life Catastrophe risk	SCR-B3F
MCR-B4A (QRS)	28	S.28.01.a	Minimum Capital Requirement - Non-composite undertaking	MCR-B4A
MCR-B4A (ARS)	28	S.28.01.b	Minimum Capital Requirement - Non-composite undertaking	MCR-B4A
MCR-B4B (QRS)	28	S.28.02.a	Minimum Capital Requirement - Composite undertakings	MCR-B4B
MCR-B4B (ARS)	28	S.28.02.b	Minimum Capital Requirement - Composite undertakings	MCR-B4B
G01 (ARG)	32	S.32.01.g	Undertakings in the scope of the group	G01
G03 (ARG)	33	S.33.01.g	Insurance and reinsurance individual requirements	G03
G04 (ARG)	34	S.34.01.g	Other regulated and non-regulated financial undertakings including insurance holding companies individual requirements	G04
G14 (ARG)	35	S.35.01.g	Contribution to group technical provisions	G14

APPENDIX 4: Mapping table for the re-naming of the templates

Business variants*	Scope	Time	Purpose if specific
.a	Individual	Quarterly	
.b	Individual	Annual	
.c	Individual	Quarterly	Financial Stability
.d	Individual	Annual	Financial Stability
.e	Individual	Annual	Disclosure
.f	Group	Quarterly	
.g	Group	Annual	
.h	Group	Quarterly	Financial Stability
.i	Group	Annual	Financial Stability
.j	Group	Annual	Disclosure
.k	Individual	Quarterly	RFF
.l	Individual	Annual	RFF
.m	Group	Quarterly	RFF
.n	Group	Annual	RFF

* All variants are foreseen regardless of the envisaged future requirements

6.5. Appendix V: Impact Assessment

1: Problem definition

- 1.1. Exchange of information, both quantitative and qualitative is an elementary component of the dialogue between insurance and reinsurance undertakings and national competent authorities on the level of preparedness for Solvency II Directive. Guidelines are developed to ensure that the submission of information is consistent with the final information transmissions as foreseen in Solvency II Directive and to avoid lack of harmonisation in the information to be submitted to supervisors among Member States, during the preparatory phase. The information to be submitted is based on a limited subset of the reporting package EIOPA proposed in the *EIOPA Final Report on Public Consultations No.11/009 and 11/011 On the Proposal for the Reporting and Disclosure Requirements*, published in July 2012.
- 1.2. For the purpose of preparation a reduced set of information and narrative reporting is envisaged. The information is selected under the assumption that the final pillar I requirements will be available in time for national competent authorities and undertakings to prepare for the quantitative and qualitative information in 2015. In which case, at that stage, EIOPA would prepare technical specifications and provide guidance on the assumptions underlying the calculation of technical provisions and the standard formula calculation, which reflect the decision on OMDII and the available implementing measures.

Proportionality

- 1.3. National competent authorities are expected to ensure that the provisions described in the EIOPA's Opinion 12-388 of 20 December 2012 on interim measures regarding Solvency II are applied in a manner which is proportionate to the nature, scale, and complexity inherent in the business of the insurance and reinsurance undertaking. The approach taken aims to ensure that this expectation can be met, and this is reflected in the drafting of the Guidelines in two principal ways:
 - a. In most cases, the Guidelines are principle based or drafted with a view to the outcome or supervisory objective that should be met, and;
 - b. The level of detail and scope of the Guidelines reflects the fact that the Guidelines are issued in order to prepare for Solvency II Directive and not for its full application.

- 1.4. For the overall approach to proportionality on the Guidelines under consultation, please see the "Cover note for the Consultation Paper on Guidelines on preparing for Solvency II Directive".

Approach to small and medium-sized undertakings – the use of thresholds

- 1.5. The submission of information to supervisors is an area where there is a significant change between the existing regulatory requirements and those under Solvency II Directive. EIOPA, therefore, believes that it is not appropriate for national competent authorities to expect that all the provisions in this area are met in the same way by all insurance and reinsurance undertakings during the preparatory phase, and a number of thresholds are proposed in the Guidelines.
- 1.6. It is important to underline that the thresholds have been designed for use during the preparatory phase. It does not indicate that requirements in these areas will not be in place for all insurance and reinsurance undertakings within the scope of the Directive once Solvency II Directive is fully applied. Consequently, for those insurance and reinsurance undertakings that are not within the thresholds National Competent Authorities are still expected to ensure that these insurance and reinsurance undertakings begin to prepare and develop appropriate plans.
- 1.7. EIOPA intends for a high proportion of the market to be subject to the provisions in these areas within each member state. This is in order to ensure that the benefits of consistent preparation set out above are met. EIOPA has also taken into consideration the latest discussions on Omnibus II with regard to reporting and seeks to ensure that the thresholds for the preparatory phase do not apply to a greater share of the market than can be expected when Solvency II Directive is applied.
- 1.8. Policy Option 4 deals specifically with the question of if thresholds should be proposed or not.

Baseline Scenario

- 1.9. When analysing the impact of regulatory provisions, the impact assessment methodology foresees that a baseline scenario is applied as the basis for comparing policy options. This helps to identify the incremental impact of each policy option considered. The aim of the baseline scenario is to explain how the current situation would evolve without additional regulatory intervention.
- 1.10. For the analysis of the potential related costs and benefits of the proposed Guidelines on the submission of information to supervisors, EIOPA has applied as a baseline the current practice for regulatory

reporting including any preparation that has been made for implementing Solvency II Directive.

2: Objective pursued

1.11. The main objective of the Guidelines is to actively prepare insurance and reinsurance undertakings and national competent authorities for receiving information and reporting according to Article 35 of Solvency II Directive. The EIOPA Opinion cited above states at paragraph 9 that “insurance and reinsurance undertakings which will be well-governed and which, in particular measure correctly, mitigate and report the risks which they face will be more likely to be prepared for the new regulatory framework and act in the interests of policyholders”.

3: Policy Options

1.12. During the policy development process the focus was on the main policy questions listed below. For each of these questions, a number of policy options were considered:

1.13. When assessing the pros and cons of issuing or not issuing a Guideline for a preparatory phase it needs to be taken into account that the content of reporting has been being discussed for the last years already, resulting in a Final Report¹ from CP9 and CP11 published by EIOPA last year.

1.14. On that Report EIOPA strongly advises the industry to start preparing for Solvency II Directive implementation based on the content of that report even though it recognised that some issues would have to be reviewed when Omnibus II Directive final agreement and level 2 implementing measures are known. It is known that the industry has already invested heavily in the preparation for reporting, based on the Final Report of CP9 and CP11, published by EIOPA last year.

1.15. This strong steering towards preparation accommodated the fact that all stakeholders are aware that in order to fully comply with the reporting requirements an early preparation of at least 18 months is needed.

1.16. When considering the approach for the submission of information for the preparation phase before Solvency II Directive is in place, EIOPA analysed the following two options, whether to wait for Solvency II

¹ <https://eiopa.europa.eu/?id=1962>

Directive (or in other words to follow the “one big approach”, or to propose Guidelines for the preparation phase. The expected advantages and disadvantages for both of these options are stated below.

1. Should EIOPA issue Guidelines for preparation of submission of information to NCAs?

Option 1: To wait for Solvency II Directive, i.e. “one big approach”.

Option 2: To issue Guidelines for a preparatory phase

2. What should be the scope of the information submitted in the preparatory phase?

Option 1: use the subset of templates as defined in Appendix 1 as well as relevant narrative information.

Option 2: use the subset of templates as defined in Appendix 1 as well as relevant narrative information but excluding financial stability specific templates, Cover A1Q and certain group-specific templates i.e. Intra Group Transactions and Risk Concentration (as identified in Appendix 2).

Option 3: use the subset of templates as defined in Appendix 1 as well as relevant narrative information but excluding SCR-B3 risk modules (as identified in Appendix 3).

Option 4: use the subset of templates as defined in Appendix 1 as well as relevant narrative information but excluding financial stability specific templates, Cover A1Q and certain group-specific templates i.e. Intra Group Transactions and Risk Concentration, and for quarterly reporting only include Minimum Capital Requirements, Own Funds and the balance sheet.

3. What should be the information frequency during the preparatory phase?

Option 1: annual information submission with quarterly information submission beginning in Quarter 1 2015.

Option 2: annual information submission with quarterly information submission beginning in Quarter 3 2015.

Option 3: annual information submission only for the preparatory phase.

Option 4: annual information submission with quarterly information submission only in Quarter 3 2015 (option considered during the consultation period).

4. Should application thresholds be used in the preparatory phase?

Option 1: no information submission thresholds, no national competent authorities’ discretion.

Option 2: fixed threshold at European level based on the Solvency I balance sheet.

Option 3: minimum thresholds based on national market share coverage (gross technical provisions for life undertakings, gross written premiums for non-life undertakings). For individual annual information submission this should be at least 80% market share, for individual quarterly information submission this should be at least 50% market share. For group information submission it should be €12billion or an equivalent in another national currency of total assets in the consolidated accounting balance-sheet. If in a Member State no group reaches the threshold the national competent authority should decide whether a group is subject to group information submission.

Option 4: minimum thresholds based on national market share coverage (gross technical provisions for life undertakings, gross written premiums for non-life undertakings) for individual. For group, both annual and quarterly information submission would remain the same as in Option 3.

Option 5: allow national competent authorities' discretion to decide application thresholds.

5. What level of information submission should be required for insurance and reinsurance undertakings in the pre-application process for internal models regarding the Solvency Capital Requirement component of the risks categories/sub-categories/major business units calculated using an internal model during the preparatory phase up to Solvency II Directive implementation?

Option 1: For the periodical submission of information insurance and reinsurance undertakings under pre-application will be required to provide figures to the most granular level as calculated by their internal model and at the same time they will need to provide an estimate of the calculation as per the standard formula but without the same level a granularity as the calculation using the model. This will be done through both harmonised set of information and ad-hoc templates agreed with National Competent Authorities.

Option 2: For the periodical submission of information, both internal models and standard formula calculations at the most granular level should be provided by each undertaking that has been allowed by National Competent Authorities to enter a pre-application process. This will be done through both harmonised set of information and ad-hoc templates agreed with National Competent Authorities.

Option 3: For the periodical submission of information only internal models calculations at the most granular level deem appropriate should be provided by each undertaking that has been allowed by National Competent Authorities to enter a pre-application process. This will be done through both harmonised set of information and ad-hoc templates agreed with National Competent Authorities. Insurance and reinsurance undertakings engaged in a pre-application process for internal models should also submit information on the

Solvency Capital Requirement calculated with the standard formula as defined under the "Guidelines on Pre-Application of Internal Models".

6. What should be the approach with group information submission and third country equivalence?

Option 1: Use accounting consolidation or Solvency II Directive accounting rules when the deduction and aggregation method is applied.

Option 2: Group supervisors may allow groups to use calculations under local rules for their third country undertakings, as necessary, where the deduction and aggregation method is applied.

Option 3: Assume certain countries will be deemed equivalent or included in the transitional regime and allow the use of local calculations under the deduction and aggregation method, but only in respect of group undertakings in those specified countries.

Option 4: Allow groups to use local calculations, but require parallel calculations using Solvency II Directive rules.

7. What should be the approach on items requiring approval i.e. ancillary own funds, undertaking specific parameters and diversification between ring-fenced funds?

Option 1: Allow the inclusion of items in the preparatory phase, which are subject to approval under Solvency II Directive, assuming approval has been given.

Option 2: Allow the inclusion of items in the preparatory phase which are subject to approval under Solvency II Directive but only in case they are already permitted under Solvency I (some of which are subject to approval under Solvency I).

Option 3: Do not allow the inclusion of any items in the preparatory phase which are subject to approval under Solvency II Directive.

4: Analysis and Comparison of impacts

1.17. In this section we aim to describe the expected positive and negative effects from the policy options considered in relation to the main groups of stakeholders. The analysis considers the expected effect on insurance and reinsurance undertakings and groups, national competent authorities and policyholders.

1.18. EIOPA recognises that the qualitative and quantitative information referred to in the Guidelines and in the options described in section 3 above will represent an additional burden to both insurance and reinsurance undertakings and National Competent Authorities. This burden would include the additional resources and the cost of IT systems needed to meet the requirements of the preparatory phase.

This preparatory phase aims at minimising that effect later on. In order to reduce the burden on smaller insurance and reinsurance undertakings, EIOPA has considered the use of application thresholds as described in question 4.

- 1.19. Regarding the expected impact on policyholders, "The present solvency rules are outdated. They are not risk sensitive, they leave too much scope to Member States for national variations, they do not properly deal with group supervision and they have meanwhile been superseded by industry, international and cross-sectorial developments. This is the reason why a new solvency regime, called Solvency II Directive, which fully reflects the latest developments in prudential supervision, actuarial science and risk management and which allows for updates in the future is necessary."² Therefore EIOPA considers that the effective preparation for the implementation of the Solvency II Directive framework will enhance policyholder protection.

1. Should EIOPA issue Guidelines for preparation of submission of information to NCAs?

- 1.20. Evidence was produced during previous consultations in the field of reporting that insurance and reinsurance undertakings expect to need 18 months for the implementation of Solvency II Directive. Furthermore some national competent authorities may launch a preparatory phase, with or without Guidelines. Issuing Guidelines will therefore reduce the risk of divergent approaches, reducing also the cost and facilitating the future application of Solvency II Directive.

Option 1: To wait for Solvency II Directive, i.e. "one big approach".

- 1.21. The population of insurance and reinsurance undertakings, which may be affected by the proposed Guidelines, can be classified in two groups: insurance and reinsurance undertakings over the proposed threshold and insurance and reinsurance undertakings below the proposed threshold for submitting information. The benefits and costs need to be assessed for these two different groups.
- 1.22. For insurance and reinsurance undertakings the following positive effects of this option can be expected:
- a. Less short-term costs for the insurance and reinsurance undertakings that have not started the preparation yet and need more time to be prepared for the whole target Solvency II Directive requirements, and;
 - b. For insurance and reinsurance undertakings that already started preparation and have already invested in it, there can be a small

² Explanatory memorandum to the Proposal for the Solvency II Directive the European Commission

reduction of the cost as they do not have to submit reports to national competent authorities even if they have the required data and necessary staff and/or systems.

1.23. This option, however has negative effects that need to be taken into consideration:

- a. Increase of the risk of non-convergence due to the potential divergence of different preparation phases at national level. This will affect mostly cross-border groups in the short term. Once Solvency II Directive is applicable this will also have an impact on non-cross-border undertakings, depending on the level of divergence;
- b. Risk of losing the momentum on the implementation of Solvency II when they have already invested big efforts and money, and;
- c. Potential scarcity of resources as all participants will require similar services at the same time, making also those services more expensive;
- d. Risk of not being ready to apply Solvency II Directive requirements in due time.

1.24. From a national competent authority perspective having to cope with around 3500 insurance and reinsurance undertakings and groups reporting for the first time at the same period later on may be considered as a general negative effect of this option for National Competent Authorities across Europe. Also, in particular:

- a. National Competent Authorities would have to deal on a case-by-case situation with the insurance and reinsurance undertakings that would request to start preparing their own systems;
- b. Not issuing Guidelines for a preparatory phase would also mean that the tool for reporting and the taxonomy which would be created for the insurance and reinsurance undertakings would be delayed and would not be available for different preparation packages developed at national level, and;
- c. Any lack of consistency in the development of taxonomies for example would create higher costs in future, namely when a system for transmitting data from national competent authorities to EIOPA is developed.

1.25. For insurance and reinsurance undertakings below the threshold proposed, our analysis has not shown any benefits flowing from this alternative.

1.26. No immediate significant advantages or disadvantages for policyholders are foreseen as any costs that may be reflected on policyholders would also be incurred under normal preparation for Solvency II Directive.

Option 2: To issue Guidelines for a preparatory phase

1.27. The following positive effects of this option can be expected for insurance and reinsurance undertakings over the threshold proposed:

- a. More gradual implementation for the insurance and reinsurance undertakings and groups as participants will have to report only about 30% of the target Solvency II Directive templates and also with less mandatory information in the templates. This will allow insurance and reinsurance undertakings to take lessons from the first step and facilitate the next steps;
 - b. Keeping part of the forecasted/assigned resources appointed to Solvency II Directive implementation will reduce future costs and mitigate the risk of scarcity of resources in the future, as there will be less participants requiring similar service at the same time;
 - c. Insurance and reinsurance undertakings would have better information during the preparatory phase gaining experience and reputation in the future Solvency II Directive regime;
 - d. Promotion of reporting standards technologies and reduction of the risk of having less harmonisation. The use of reporting standards brings benefits of economies of scale incrementing the quality and reducing the costs. EIOPA will make available a XBRL (Extensible Reporting Business Language) taxonomy with these Guidelines. EIOPA also will develop a free a reporting tool for insurance and reinsurance undertakings in order to help them with the preparatory reporting and the XBRL technology. The use of standards especially useful for cross-border undertakings and those undertakings that choose to contract reporting systems with third party specialists (e.g. consultants). The consultants will be able to use this tool and develop their own tools for undertaking-specific needs, facilitating the implementation now and in the future, and;
 - e. Insurance and reinsurance undertakings may benefit from better support from the national competent authorities as there will be a limited number of participants during the preparatory phase.
- 1.28. The above mentioned positive effects need to be taken into consideration to supplement the negative effects of this option for insurance and reinsurance undertakings over the threshold proposed:
- a. Additional costs that would result from a step-by-step implementation of the systems cannot be avoided. However due to the fact that preparation has in fact already started, it may be expected that these costs are outweighed by the benefits that flow from it;
 - b. Also potential compliance costs may arise in case insurance and reinsurance undertakings purchase systems and implement processes based on the current version of draft implementing measures, which may need to be changed later due to changes in the negotiations, and;
 - c. Potential duplication of submission of information. In fact part of the information required for submission is already received by some national competent authorities. If the reports already received are not replaced by those envisaged in the preparatory phase there will in fact be certain double reporting.
- 1.29. On the issue of double reporting the following has been considered:

- a. To implement such a new system preparation and testing will always be needed to ensure quality, which means that either now or when Solvency II Directive implementation starts double reporting will need to happen in order to guarantee that the new system works properly without undermining the on-going supervision;
 - b. Double reporting does not necessarily represent additional costs as the systems need to be prepared to report the new set of information. The act of "submission" itself does not imply significant costs, and;
 - c. Also, the purpose of the information is different. For the submission of information for the preparatory phase, the aim of the supervisor is to review and evaluate the quality of the information and not to take supervisory action.
- 1.30. The issue of these Guidelines will allow a formal process to be set up within the undertaking and between the undertaking and the national competent authority. Not only will the undertaking need to start implementation but it will be possible to prepare its own systems regarding generation, validation and transmission of data. This will in fact constitute a proper preparation.
- 1.31. As the preparatory phase will be more demanding for the insurance and reinsurance undertakings and groups above the threshold, in the future the insurance and reinsurance undertakings below the proposed threshold will be able to benefit from the learning process those insurance and reinsurance undertakings, national competent authorities and stakeholders in general, e.g. consultants, will go through. This learning process will make the future solutions and services more sophisticated, less time consuming and as a consequence less costly.
- 1.32. Finally, if national competent authorities (and insurance and reinsurance undertakings) become familiar with the model at an earlier stage that would make the future application process smoother and more efficient, in particular in the context of group internal models and colleges.
- 1.33. Even for the insurance and reinsurance undertakings below the threshold a clear benefit from the Guidelines can be identified: at the time of the application of Solvency II Directive there will be more experienced and less costly services available. Both national competent authorities and consultants will be better prepared.
- 1.34. From a national competent authority perspective the following benefits can be expected:
- a. Keeping the momentum of the Solvency II Directive timeline and use of the already invested efforts partially reducing planned costs as there will be less participants and less data to process and analyse;

- b. Gaining experience for Solvency II Directive, staff and IT systems will have less workload than with the target solution, and;
 - c. The experience with the preparatory phase will result in a better target Solvency II Directive design and implementation.
- 1.35. For national competent authorities this preparatory phase may represent in fact several opportunities:
- a. To enter into a dialogue and streamline the relation with insurance and reinsurance undertakings in relation to preparation for Solvency II Directive;
 - b. To analyse in advance the capacity of the systems being developed by insurance and reinsurance undertakings to generate, validate and transmit data;
 - c. To prepare their own systems to receive, validate and process data.
- 1.36. From a cost perspective, given the specific budget rules that some national competent authorities have to comply with, this may represent an opportunity to use budget lines that were foreseen for Solvency II Directive implementation immediately and to spread during the following years the SII implementation cost.
- 1.37. Also from a human resources perspective this formal preparatory phase will allow national competent authorities to concentrate efforts in the defined sub-set of information which may allow them to use more or only internal resources rather than consultants.
- 1.38. Policyholders will in general benefit from better prepared insurance and reinsurance undertakings and national competent authorities. Although some costs may impact policyholders, these would affect them anyway as insurance and reinsurance undertakings will need to prepare for Solvency II Directive even without any Guidelines in the preparatory period. Also, policyholders will benefit from proper preparation of the systems as this will mean that SII principles, namely the risk-based supervision, will be able to be implemented from day 1.

EIOPA believes option 2 is the best approach.

2. What should be the scope of the information submitted in the preparatory phase?

- 1.39. EIOPA has identified four options that were considered in the development of the Guidelines in respect of scope of the information to be submitted. The identified options are based on what EIOPA believes could have the most significant impact on insurance and reinsurance undertakings, groups, National Competent Authorities and the level of protection of policyholders as well as beneficiaries. The departure point

(Appendix 1) was a subset of the reporting package EIOPA proposed in the EIOPA Final Report on Public Consultations No.11/009 and 11/011 On the Proposal for the Reporting and Disclosure Requirements, published in July 2012. The focal point is how to achieve a proper balance between appropriate preparation for Solvency II Directive and the burden imposed.

Option 1: use the subset of templates as defined in Appendix 1 as well as relevant narrative information.

- 1.40. This option may be expected to be burdensome on insurance and reinsurance undertakings as it would include some detailed information and also information specifically for the purposes of Financial Stability, and hence not required for prudential reasons.
- 1.41. The information included in this option would enable a high level of preparedness for Solvency II Directive, which would benefit both insurance and reinsurance undertakings and national competent authorities and would allow a smooth transition to the Solvency II Directive framework. The expected added value of having a preparatory phase more similar to the Solvency II Directive requirements does not outweigh the expected costs.

Option 2: use the subset of templates as defined in Appendix 1 as well as relevant narrative information but excluding financial stability specific templates, Cover A1Q and certain group-specific templates i.e. Intra Group Transactions and Risk Concentration (as identified in Appendix 2).

- 1.42. This option reduces the amount of information for both individual and groups and reduces the exchange of data between individual insurance and reinsurance undertakings within the scope of the group, on both annual and quarterly basis. The proposed reduction focuses on the most detailed information that was considered to be more burdensome. It also does not include the information specific for financial stability during the preparatory phase. However, the information kept under this option is still considered appropriate for preparation purposes, although groups and colleges in particular would be less prepared for Solvency II Directive implementation.
- 1.43. This option implies not only the deletion of the specific financial stability templates but also the deletion of the consideration of a shorter deadline for submission of information.

Option 3: use the subset of templates as defined in Appendix 1 as well as relevant narrative information but excluding SCR-B3 risk modules (as identified in Appendix 3).

- 1.44. This option would keep some detailed information and financial stability specific information but would not require the submission of

information on the Solvency Capital Requirement calculation, therefore reducing the amount of information to be submitted annually. However, the ability of insurance and reinsurance undertakings to calculate and submit information on the Solvency Capital Requirement calculation is considered as crucial for preparation of Solvency II Directive.

- 1.45. In addition to this, insurance and reinsurance undertakings are already familiar with these calculation requirements and therefore it should not be too burdensome for them as some procedures should already be set-up. This option has no impact on the quarterly submission of information.

Option 4: use the subset of templates as defined in Appendix 1 as well as relevant narrative information but excluding financial stability specific templates, Cover A1Q and certain group-specific templates i.e. Intra Group Transactions and Risk Concentration (as identified in Appendix 2) and for quarterly reporting only include Minimum Capital Requirement, Own Funds and the balance sheet.

- 1.46. This option reduces the amount of information to be submitted for both individual and groups and reduces the exchange of data between individual insurance and reinsurance undertakings within the scope of the group, on both an annual and quarterly basis. However, groups and colleges would be less prepared for Solvency II Directive implementation. However, the submission of the list of assets and derivatives as envisaged in the Solvency II Directive regime is crucial for a proper risk management of investments by the insurance and reinsurance undertakings and proper risk-based supervision. As such, the preparation for the submission of this information on a quarterly basis and within the deadlines envisaged is considered as necessary in the preparatory phase. Also this option would additionally not have the benefit that insurance and reinsurance undertakings would be prepared to comply with eventual European Central Bank requirements.
- 1.47. For all the options the benefits and costs for policyholders are considered to be indirect as policyholders would in general benefit in future from better prepared insurance and reinsurance undertakings and national competent authorities. As for the expected costs please refer to question 1 of this impact assessment.

EIOPA believes option 2 is the best option.

3. What should be the information frequency during the preparatory phase?

- 1.48. EIOPA has identified three options that were considered in the development of the Guidelines in respect of frequency of submission of

information. The identified options are based on what EIOPA expects could have the most significant impact on insurance and reinsurance undertakings, groups, national competent authorities and the level of protection of policyholders as well as beneficiaries. The focal point is whether quarterly submission of information is needed for the preparatory phase and if yes, when it should begin.

Option 1: annual information submission with quarterly information submission beginning in Quarter 1 2015.

- 1.49. With the annual submission of information starting with reference to the end of 2014 (or the financial year ending after that date) a quarterly submission of the information starting with reference to the first quarter of 2015 would be burdensome on insurance and reinsurance undertakings, and the first annual and quarterly submissions would take place at a similar time (annual information would be submitted around the 20th of May 2015 (20 weeks after end of 2014) and the quarterly information would be received around the 26th of May 2015 (8 weeks after end of Quarter 1).
- 1.50. This would also mean an administrative burden to national competent authorities due to the additional information flow to be received by national competent authorities. As the purpose is to prepare the systems and not to actually base supervision on the information received it was considered that to start quarterly submission at the first quarter of 2015 would be burdensome for both insurance and reinsurance undertakings and supervisors.
- 1.51. However, this option would allow insurance and reinsurance undertakings to prepare the reporting systems and the production of data in a more systematic way so that they can produce the necessary data when Solvency II Directive is fully implemented. Quarterly information submission from Quarter 1 2015 would probably enable insurance and reinsurance undertakings to be prepared to eventual European Central Bank requirements.

Option 2: annual information submission with quarterly information submission beginning in Quarter 3 2015.

- 1.52. This option would allow for the phasing-in of quarterly information submission and would reduce the flow of information burden on insurance and reinsurance undertakings for the first half of 2015 while still allowing them to prepare the reporting systems and the production of data on both a quarterly and annual basis.
- 1.53. To start the quarterly submission of information with reference to Quarter 3 of 2015 (meaning submission by 25 of November 2015) was considered a good approach that would guarantee a proper preparation for quarterly submission and receipt of information by insurance and

reinsurance undertakings and supervisors respectively, while being less burdensome than starting immediately in Quarter 1. Quarterly information submission from Quarter 3 2015 would also probably be sufficient for insurance and reinsurance undertakings to be prepared to eventual ECB requirements.

Option 3: annual information submission only for the preparatory phase.

- 1.54. This approach is expected to limit the additional flow of information burden on insurance and reinsurance undertakings to the annual submission while still allowing them to partially prepare the reporting systems and the production of Solvency II Directive data. Annual Solvency II Directive information submission would still allow national competent authorities to consider an undertaking's system of governance, risk management system, assessment of own risks and valuation for solvency purposes in advance of full Solvency II Directive implementation.
- 1.55. However, the submission of quarterly information as envisaged in the Solvency II Directive regime is crucial for a proper preparation, which is not provided for in this Option 3. In addition, this option would not have the benefit that insurance and reinsurance undertakings would be prepared for eventual European Central Bank requirements.
- 1.56. For all the options the benefits and costs for policyholders are considered to be indirect as policyholders would in general benefit in future from better prepared insurance and reinsurance undertakings and national competent authorities. As for the expected costs please refer to question 1 of this impact assessment.

Option 4: annual information submission with quarterly information submission only in Quarter 3 2015 (option considered during the consultation period).

- 1.57. During the consultation phase EIOPA considered all comments received, discussed all arguments put forward and agreed to consider this fourth option.
- 1.58. This fourth option would, in fact, have approximately the same benefits from Option 2, previously considered the best one by EIOPA, and allow undertakings to prepare to quarterly reporting at the same time.
- 1.59. Taken all pros and cons into consideration and in particular the fact that Solvency II framework will include a day-1 reporting EIOPA has decided to amend the option proposed.

EIOPA believes that option 4 is the best approach for monitoring Solvency II Directive preparation during the preparatory phase.

4. Should application thresholds be used in the preparatory phase?

1.1. EIOPA has identified five options that were considered in the development of the Guidelines in respect of insurance and reinsurance undertakings covered by them. The identified options are based on what EIOPA believes could have the most significant impact on insurance and reinsurance undertakings, groups, national competent authorities and the level of protection of policyholders as well as beneficiaries. The focal point is how to address the burden on smaller insurance and reinsurance undertakings. The policy options described below are proposed as different market coverage and different levels of national competent authorities discretion.

Option 1: no information submission thresholds, no NCAs discretion.

- 1.2. This option would require all insurance and reinsurance undertakings to submit the information foreseen in the Guidelines with no possibility for each national competent authority to waive this requirement. While this option would allow the national competent authorities to see the 'full picture' of Solvency II Directive preparation, it may not be in line with the final Solvency II Directive, after the political agreement on Omnibus II, as the proportionality principle applied to reporting requirements is one of the issues under discussion and expected to be changed by the Omnibus II Directive. Therefore, this option encompasses the risk that national competent authorities would require information from some insurance and reinsurance undertakings which would not be obliged to report the same information under Solvency II Directive, depending on the scope of the information to be submitted.
- 1.3. The volume of data received by national competent authorities would also make it difficult to consider all information received, especially those of smaller insurance and reinsurance undertakings and may lead to increased resource requirement within the national competent authority.

Option 2: fixed threshold at European level based on the Solvency I balance sheet.

- 1.4. This option would set a fixed monetary threshold above which all insurance and reinsurance would need to submit information. However, due to the different sizes of markets and sizes on insurance and reinsurance within the markets, there is a risk with this option that the desired coverage at national and European level would not be met from simply using a balance sheet threshold.

Option 3: minimum thresholds based on national market share coverage (gross technical provisions for life undertakings, gross

written premiums for non-life undertakings). For individual annual information submission this should be at least 80% market share, for individual quarterly information submission this should be at least 50% market share. For group information submission it should be €12 billion or an equivalent in another national currency of total assets in the consolidated accounting balance-sheet. If in a Member State no group reaches the threshold the national competent authority should decide whether a group is subject to group information submission.

- 1.5. A minimum threshold defined would allow a minimum level of market coverage through the European Union and allow national competent authorities to go beyond the provisions in the Guidelines, if that is appropriate for their local circumstances, and to the extent that it is consistent with Union law. This would enable the national competent authority to monitor Solvency II Directive preparedness for the most important share of the market.
- 1.6. However, the benefits of a convergent approach should not be overlooked as there is the risk that if national competent authorities include additional criteria to include more insurance and reinsurance within the scope of submitting Solvency II Directive information during the preparatory phase, for some of these insurance and reinsurance it could be overly burdensome.

Option 4: minimum thresholds based on national market share coverage (gross technical provisions for life undertakings, gross written premiums for non-life undertakings). For group, both annual and quarterly information submission would remain the same as in Option 3.

- 1.7. This alignment of the quarterly and annual market coverage would capture more insurance and reinsurance under the quarterly submission of information. The annual threshold for individual and group information submission as well as quarterly group information submission would remain the same as would the group thresholds. The use of the same market coverage for annual and quarterly submission of information was considered burdensome.

Option 5: allow national competent authority discretion to decide application thresholds.

- 1.8. This may be expected to lead to diverging national solutions for Solvency II Directive preparation in the preparatory phase and in some countries it could be the case that a significant share of the market would not be covered, which could undermine the objective of preparation for Solvency II Directive. .
- 1.9. For all the options the benefits and costs for policyholders are only considered to be indirect as policyholders would in general benefit in the future from better prepared insurance and reinsurance and national

competent authorities. As for the policyholders of the insurance and reinsurance below the threshold the cost of requiring information from insurance and reinsurance, which would not be obliged to report the same information under Solvency II Directive would in fact impact policyholders of those insurance and reinsurance. For further considerations on the expected costs please refer to question 1 of this impact assessment.

EIOPA believes that option 3 is the best approach for reaching a satisfying coverage at European level, while being proportionate during the preparatory phase.

5. What level of information submission should be required for insurance and reinsurance in the pre-application process for internal models regarding the Solvency Capital Requirement component of the risks categories/sub-categories/major business units calculated using an internal model during the preparatory phase up to Solvency II Directive implementation?

1.10. EIOPA has identified two options that were considered in the development of the Guidelines in respect of submission of information by insurance and reinsurance in the pre-application process for internal models regarding the Solvency Capital Requirement component of the risks categories/sub-categories/major business units calculated using an internal model. The identified options are based on what EIOPA believes could have the most significant impact on insurance and reinsurance, groups, national competent authorities and the level of protection of policyholders as well as beneficiaries. The focal point is how to address the level of information based on standard formula calculation to be submitted. During the consultation phase a third option was considered.

Option 1: For the periodical submission of information, insurance and reinsurance under pre-application will be required to provide figures for reporting to the most granular level as calculated by their internal model and at the same time they will need to provide an estimate of the calculation as per the standard formula but without the same level a granularity as the calculation using the model. This will be done through both harmonised set of information and ad-hoc templates agreed with national competent authorities.

Option 2: For the periodical submission of information, both internal models and standard formula calculations at the most granular level should be provided by each undertaking that has been allowed by national competent authorities to enter a pre-application process. This will be done through both harmonised set of information and ad-hoc templates agreed with national competent authorities.

Option 3: For the periodical submission of information only internal models calculations at the most granular level deem appropriate should be provided by each undertaking that has been allowed by National Competent Authorities to enter a pre-application process. This will be done through both harmonised set of information and ad-hoc templates agreed with National Competent Authorities. Insurance and reinsurance undertakings engaged in a pre-application process for internal models should also submit information on the Solvency Capital Requirement calculated with the standard formula as defined under the “Guidelines on Pre-Application of Internal Models”.

- 1.11. As pre-application is not a pre-approval process insurance and reinsurance need to prepare for the eventuality that their internal model as applied for, may not be approved and they need to set up processes to calculate the standard formula Solvency Capital Requirement, as well as to consider the capital planning implications of the result. Being able to have granularity of the results at standard formula and internal model level in pre-application will help insurance and reinsurance to be prepared to face this eventuality. All the three options are beneficial for this purpose. However the two initial options could be considered burdensome as they imply using the harmonized templates for the standard formula calculation. Agreeing on specific templates with national competent authorities is a way to liaise with their national competent authorities as insurance and reinsurance develop their internal models and prepare their future application for approval. However during the preparatory phase insurance and reinsurance will need to dedicate time and resources to fulfill all the templates at the most granular level and agree specific internal model templates with the relevant national competent authorities.
- 1.12. Being able to receive figures from both standard formula and internal models at the most granular level provides very useful information to supervisors in order to form a view on how ready the undertaking under pre-application is to submit an application.. It will also help supervisors to prepare for the future approval process once Solvency II Directive is applicable. Supervisors will have to dedicate resources to analyse standard formula and internal model results on a granular level but this is part of the pre-application process itself. Supervisors will also need to dedicate resources to agree the specific internal model template with insurance and reinsurance. In particular, colleges will also need time and resources to agree within the college the template(s) for group internal models under pre-application with the group.
- 1.13. For all the options the benefits and costs for policyholders are only considered to be indirect as policyholders would in general benefit in

the future from better prepared insurance and reinsurance and national competent authorities. As for an assessment about the costs please refer to question 1 of this impact assessment.

EIOPA believes that option 3 is the best approach as it will contribute at the same time and more efficiently for the purposes of both preparatory phase and preparing National Competent Authorities and insurance and reinsurance during pre-application for the use of internal models for Solvency Capital Requirement calculation once Solvency II Directive is applicable.

6. What should be the approach with group information submission and third country equivalence?

1.14. EIOPA has identified four options that were considered in the development of the Guidelines in respect of equivalence. The identified options are based on what EIOPA believes could have the most significant impact on insurance and reinsurance, groups and the level of protection of policyholders as well as beneficiaries. The focus here is on how to address equivalence for third country undertakings belonging to a group in reporting. The policy options described below are proposed as a solution to a different treatment of undertakings in third countries due to the lack of a decision on equivalence during the preparatory phase.

Option 1: the use of accounting consolidation or of Solvency II Directive accounting rules when the deduction and aggregation method is applied.

1.15. Under this option groups are not allowed to use local rules for their third country undertakings when using the deduction and aggregation method. As a result, for option 1 only Solvency II Directive rules would be applicable. This approach is consistent with Solvency II Directive for the majority of third country undertakings where no decision on equivalence has been made (except for transitional arrangements on level 2 which are under discussion). However, this option may be seen as unnecessary burdensome for those third country undertakings where equivalence will be given. It may also have as a consequence higher capital requirements than those when Solvency II Directive is applicable.

Option 2: Group supervisors may allow groups to use calculations under local rules for their third country undertakings, as necessary, where the deduction and aggregation method is applied.

1.16. It should be made clear that this is without prejudice to any future Commission equivalence determinations and to any future decisions

made by group supervisors. Calculations under option 2 may therefore not be consistent with Solvency II Directive when in force.

1.17. However, during the preparatory phase option 2 allows a flexible approach and ensures that it is less burdensome for industry. Also it makes sure that there is no prejudice to any future Commission equivalence determinations and to any future decisions made by group supervisors. It does not therefore pre-empt any decision by the European Commission.

Option 3: Assume certain countries will be deemed equivalent or included in the transitional regime. Allow the use of local calculations under the deduction and aggregation method, but only in respect of group undertakings in those specified countries.

1.18. This option is quite a flexible approach that predefines well in advance which countries should be considered equivalent without any decision on equivalence by the Commission. On the other hand by specifying those countries in advance there is a serious prejudice to future determinations and decisions by the European Commission on equivalence.

Option 4: Allow groups to use local calculations, but require parallel calculations using Solvency II Directive rules.

1.19. In This option the group supervisor would receive two calculations, one under local rules if applicable and one using Solvency II Directive rules. This allows a good comparison of both calculations and provides a clear understanding of different capital requirements under different accounting regimes. The major disadvantage of this approach is that it is very burdensome for groups to provide two calculations under the preparatory phase.

1.20. For policyholders these options are not relevant from an impact assessment perspective.

EIOPA believes that option 2 is the best approach for the purposes of dealing with third country equivalence issues and allows groups to use calculations under local rules.

7. What should be the approach on items requiring approval i.e. ancillary own funds, undertaking specific parameters and diversification between ring-fenced funds?

Option 1: Allow the inclusion of items in the preparatory phase, which are subject to approval under Solvency II Directive, assuming approval has been given.

1.21. While inclusion of such items may provide insurance and reinsurance with a better picture of their possible solvency position and may allow them to prepare on reporting such items, approval of ancillary own funds, undertaking specific parameters and diversification between ring-fenced funds should not be pre-empted by preparatory information submission. There is a risk that these items may not ultimately receive approval to be used by the supervisory authority and therefore the undertaking's preparation for Solvency II Directive would have been on an unsound basis.

Option 2: Allow the inclusion of items in the preparatory phase, which are subject to approval under Solvency II Directive but only in cases where they are already permitted under Solvency I (some of which are subject to approval under Solvency I).

1.22. Regarding ancillary own funds, this was the approach taken in QIS5 and in the Long Term Guarantee Assessment and as such this option would provide continuity for insurance and reinsurance, however no new items would be introduced. Regarding undertaking specific parameters and diversification between ring-fenced funds, these would not be included in the information since they are not part of the Solvency I regime.

1.23. This option does not prevent insurance and reinsurance from entering into early dialogue with their supervisors and showing them the effect of any future approval on the undertakings' numbers. However, this would be on a case specific basis.

Option 3: Do not allow the inclusion of any items in the preparatory phase which are subject to approval under Solvency II Directive.

1.24. This option would not pre-empt any approval by national competent authorities of ancillary own funds, undertaking specific parameters or diversification of ring-fenced funds and as with option 2 above this doesn't prevent insurance and reinsurance entering into early dialogue with their supervisors and showing them the effect of any future approval on their numbers. However, this would be on a case specific basis.

1.25. For policyholders these options are not relevant from an impact assessment perspective.

EIOPA believes that option 2 is the best approach for the preparatory phase submission.

Appendix 1

Template	Content	Frequency	Individual	Group
BI	Basic Information	Q, A	X	X
BS-C1	Balance Sheet	Q, A	X	X
BS-C1D	Assets & liabilities by currency	A	X	
Cover-A1Q	Premiums, claims & expenses ³	Q	X	X
AS-D1	Detailed list of assets ⁴	Q, A	X	X
AS-D20	Detailed list of derivatives - open positions	Q, A	X	X
OF-B1Q	Own funds	Q, A	X	X
TP-F1Q	Life & health Similar to Life Techniques Technical Provisions - Best Estimate by country	Q, A	X	
TP-E1Q	Non-life Technical Provisions - Best Estimate by country	Q, A	X	
TP-F1	Life & health Similar to Life Techniques Technical Provisions ⁵	A	X	
TP-E1	Non-life Technical Provisions ⁶	A	X	
SCR - B2A	SCR – for undertakings on Standard Formula or Partial Internal Models	A	X	X
SCR - B2B	SCR – for undertakings on Partial Internal Models	A	X	X
SCR - B2C	SCR – for undertakings on full Internal Models	A	X	X
SCR - B3A	SCR - Market risk	A	X	X
SCR - B3B	SCR - Counterparty default risk	A	X	X
SCR - B3C	SCR - Life underwriting risk	A	X	X
SCR- B3D	SCR - Health underwriting risk	A	X	X
SCR - B3E	SCR - Non-life underwriting risk	A	X	X
SCR - B3F	SCR - non-life catastrophe risk	A	X	X
SCR B3G	SCR - Operational risk	A	X	X
MCR- B4A	MCR – Undertakings under than composites	Q, A	X	
MCR- B4B	MCR – Composite undertakings	Q, A	X	
DL	Duration of liabilities ⁷	A	X	X
PLS	P&L sharing	A	X	X
PL	Profit & loss	Q	X	X
SCR- B2A_B2C	Summary Solvency Capital Requirement	Q	X	X
Lapses	Lapses & surrender rates	Q	X	X
G01	Undertakings in scope of group	A		X
G03	Insurance and reinsurance individual requirements	A		X
G04	Other regulated and non-regulated financial undertakings including insurance holding companies individual requirements	A		X
G14	Contribution to group Technical Provisions	A		X
IGT1	Intra Group Transactions - equity-type transactions, debt & asset transfer ⁸	A		X
IGT2	Intra Group Transactions - derivatives	A		X
IGT3	Intra Group Transactions - Internal reinsurance	A		X
IGT4	Intra Group Transactions - cost sharing, contingent liabilities, off balance-sheet items	A		X
RC	Risk concentration	A		X

³ Cover-A1Q would be excluded if options 2 or 4 were chosen by EIOPA Board of Supervisors.

⁴ In relation to AS-D1, AS-D20, OF-B1Q, TP-F1Q, TP-E1Q, these will be required for the annual submission relating to 2014 data.

⁵ Only Best Estimate by country

⁶ Only Best Estimate by country

⁷ DL, PLS, PL, SCR-B2A_B2C, Lapses would be excluded if options 2 or 4 were chosen by EIOPA Board of Supervisors (AS-D1 & AS-D20 would also be excluded if option 4 were chosen).

⁸ IGT1, IGT2, IGT3, IGT4 & RC would be excluded if options 2 or 4 were chosen by EIOPA Board of Supervisors.

Appendix 2

Template	Content	Frequency	Individual	Group
BI	Basic Information	Q, A	X	X
BS-C1	Balance Sheet	Q, A	X	X
BS-C1D	Assets & liabilities by currency	A	X	
AS-D1	Detailed list of assets ⁹	Q, A	X	X
AS-D20	Detailed list of derivatives - open positions	Q, A	X	X
OF-B1Q	Own funds	Q, A	X	X
TP-F1Q	Life & health Similar to Life Techniques Technical Provisions - Best Estimate by country	Q, A	X	
TP-E1Q	Non-life Technical Provisions - Best Estimate by country	Q, A	X	
TP-F1	Life & health Similar to Life Techniques Technical Provisions ¹⁰	A	X	
TP-E1	Non-life Technical Provisions ¹¹	A	X	
SCR - B2A	SCR – for undertakings on Standard Formula or Partial Internal Models	A	X	X
SCR - B2B	SCR – for undertakings on Partial Internal Models	A	X	X
SCR - B2C	SCR – for undertakings on full Internal Models	A	X	X
SCR - B3A	SCR - Market risk	A	X	X
SCR - B3B	SCR - Counterparty default risk	A	X	X
SCR - B3C	SCR - Life underwriting risk	A	X	X
SCR- B3D	SCR - Health underwriting risk	A	X	X
SCR - B3E	SCR - Non-life underwriting risk	A	X	X
SCR - B3F	SCR - non-life catastrophe risk	A	X	X
SCR B3G	SCR - Operational risk	A	X	X
MCR- B4A	MCR – Undertakings under than composites	Q, A	X	
MCR- B4B	MCR – Composite undertakings	Q, A	X	
G01	Undertakings in scope of group	A		X
G03	Insurance and reinsurance individual requirements	A		X
G04	Other regulated and non-regulated financial undertakings including insurance holding companies individual requirements	A		X
G14	Contribution to group Technical Provisions	A		X

⁹ In relation to AS-D1, AS-D20, OF-B1Q, TP-F1Q, TP-E1Q, these will be required for the annual submission relating to 2014 data.

¹⁰ Only Best Estimate by country

¹¹ Only Best Estimate by country

Appendix 3

Template	Content	Frequency	Individual	Group
BI	Basic Information	Q, A	X	X
BS-C1	Balance Sheet	Q, A	X	X
BS-C1D	Assets & liabilities by currency	A	X	
Cover-A1Q	Premiums, claims & expenses ¹²	Q	X	X
AS-D1	Detailed list of assets ¹³	Q, A	X	X
AS-D20	Detailed list of derivatives - open positions	Q, A	X	X
OF-B1Q	Own funds	Q, A	X	X
TP-F1Q	Life & health Similar to Life Techniques Technical Provisions - Best Estimate by country	Q, A	X	
TP-E1Q	Non-life Technical Provisions - Best Estimate by country	Q, A	X	
TP-F1	Life & health Similar to Life Techniques Technical Provisions ¹⁴	A	X	
TP-E1	Non-life Technical Provisions ¹⁵	A	X	
SCR - B2A	SCR – for undertakings on Standard Formula or Partial Internal Models	A	X	X
SCR - B2B	SCR – for undertakings on Partial Internal Models	A	X	X
SCR - B2C	SCR – for undertakings on full Internal Models	A	X	X
MCR- B4A	MCR – Undertakings under than composites	Q, A	X	
MCR- B4B	MCR – Composite undertakings	Q, A	X	
DL	Duration of liabilities ¹⁶	A	X	X
PLS	P&L sharing	A	X	X
PL	Profit & loss	Q	X	X
SCR-B2A_B2C	Summary Solvency Capital Requirement	Q	X	X
Lapses	Lapses & surrender rates	Q	X	X
G01	Undertakings in scope of group	A		X
G03	Insurance and reinsurance individual requirements	A		X
G04	Other regulated and non-regulated financial undertakings including insurance holding companies individual requirements	A		X
G14	Contribution to group Technical Provisions	A		X
IGT1	Intra Group Transactions - equity-type transactions, debt & asset transfer ¹⁷	A		X
IGT2	Intra Group Transactions – derivatives	A		X
IGT3	Intra Group Transactions - Internal reinsurance	A		X
IGT4	Intra Group Transactions - cost sharing, contingent liabilities, off balance-sheet items	A		X
RC	Risk concentration	A		X

¹² Cover-A1Q would be excluded if options 2 or 4 were chosen by EIOPA Board of Supervisors.

¹³ In relation to AS-D1, AS-D20, OF-B1Q, TP-F1Q, TP-E1Q, these will be required for the annual submission relating to 2014 data.

¹⁴ Only Best Estimate by country

¹⁵ Only Best Estimate by country

¹⁶ DL, PLS, PL, SCR-B2A_B2C, Lapses would be excluded if options 2 or 4 were chosen by EIOPA Board of Supervisors (AS-D1 & AS-D20 would also be excluded if option 4 were chosen).

¹⁷ IGT1, IGT2, IGT3, IGT4 & RC would be excluded if options 2 or 4 were chosen by EIOPA Board of Supervisors.

6.5. Appendix VI : Comments template

Summary of comments on Consultation Paper 10 - EIOPA-CP-2013-010
CP No. 010 - Guidelines on submission of information to national competent authorities

27 September 2013

EIOPA would like to thank Association of Bermuda Insurers and Reinsurers (ABIR), ACORD, Association of Financial Mutuals (AFM), AMICE, AON Ltd., Assuralia, Bloomberg LP, Bundesverband Investment und Asset Management eV (BVI), CFO Forum and CRO Forum, Deloitte & Touche, DIMA (Dublin International Insurance & Management Association), ECIInternal Audit, ECIROA, Ernst & Young, FEE, Groupe Consultatif Actuariel Européen (GC), German Insurance Association (GDV), General Insurance Corporation of India, Gard Group, Insurance Association of Cyprus, Institut des actuaires, Insurance Europe, Investment & Life Assurance Group Limited (ILAG), Investment Management Association (IMA), International Underwriting Association of London (IUA London), If P&C, Insurance Ireland, Lloyds, Metlife, Munich Re, Nordea, Powszechny Zakład Ubezpieczeń Spółka Akcyjna Powszechny Zakład Ubezpieczeń na Życie Spółka Akcyjna (PZU), Polish Chamber of Insurance, ROAM-Réunion des organismes d'assurance mutuelle-Paris-France, RSA Insurance Group plc, The Royal London Mutual Insurance Society Limited and Steptoe Jonshon LLP.

The numbering of the paragraphs refers to Consultation Paper No. 010 (EIOPA-CP-13/010)

No.	Name	Reference	Comment	Resolution
1	IRSG	General	<p>General IRSG observations regarding reporting during the interim period</p> <p>In March 2013, IRSG adopted an opinion about the question of reporting during the interim period before Solvency II. The main conclusions regarding the reporting were the following:</p> <ul style="list-style-type: none"> - IRSG are supportive of maintaining momentum towards Solvency II - IRSG agreed harmonisation was important, a proliferation of national requirements should be avoided and a consistent approach adopted across all jurisdictions if at all possible. - However IRSG have strong reservations as regards the introduction of quantitative aspects particularly formal pillar 3 regulatory reporting (as well as within ORSA), raising significant concerns in this area. - IRSG members support a 'principles based' approach. Documents ought to be proportionate, overall guidelines should avoid granularity and not be lengthy (short understandable documents). <p>Main comments arising:</p> <ul style="list-style-type: none"> - The interaction with the overall Solvency II negotiation process and current 1 January 2014 timing was queried, particularly the proposed 'plan A' (which assumes that the Omnibus 2 negotiations are concluded in October) and the relationship with the anticipated quick fix directive discussions which should provide clarity on timing of implementation. 'Plan B' and associated timing ought to be spelled out in different scenarios if Omnibus 2 is not agreed by end 2013 - IRSG Members did not support quantitative aspects including early Pillar 3 reporting for a number of reasons, including: <ul style="list-style-type: none"> o political discussions still on-going on key elements of Pillar 1 within Omnibus 2 o costs to be borne by the firms (due to early introduction of Solvency II like reporting standards) when companies are re-planning their projects - de-facto early implementation of Solvency II before it comes into force. o significant difficulties of managing and reporting under multiple bases o important to avoid the flourishing of national requirements <p>The concerns on interim reporting of figures also come from amongst the following:</p> <ul style="list-style-type: none"> - Legal basis for interim reporting and that EIOPA might require reporting templates from the industry when there is not an approved regime to report on. 	<p>Noted and welcomed.</p> <p>EIOPA does not intend to introduce reporting requirements before the end of the Omnibus II approval process. EIOPA understands this point and therefore includes a review clause in the guidelines.</p> <p>EIOPA will give information about Plan A or B in due time depending on the development in regards to the Omnibus II process. Please refer also to the EIOPA final report on this CP.</p> <p>EIOPA acknowledges on the costs. However this is in fact a reality that would have to occur during the preparation for Solvency II. Both undertakings and supervisory authorities would need to switch from SI to SII reporting from one day to the other. A preparation phase would always be needed in order to guarantee that a disruption in the daily management of the undertaking, in the activities of the supervisory authority and as a consequence in the protection of the policyholders would not occur.</p> <p>Noted.</p> <p>EIOPA confirms that the requirements under the final preparatory guidelines are a sub-set of the ones envisaged for the final reporting package. This sub-set is considered stable.</p> <p>EIOPA's cooperation with the ECB has ensured that the reporting package proposed by the Guidelines is sufficient to meet ECB's initial requirements. EIOPA will continue to engage in a dialogue with the ECB aiming as much as possible to avoid undue costs to the undertakings arising from different requirements. However, the set of the Solvency II reporting requirements aim the information needed for the supervisory review process.</p> <p>Noted.</p> <p>Noted. XBRL tool will be available by the end of this year.</p>

No.	Name	Reference	Comment	Resolution
1	IRSG	Comments	<p>- IRSG members questioned whether this pre-empted the legislative process and sought clarity on whether there were any limits for any guidelines whilst Solvency I continues to remain in force.</p> <p>- Due consideration to the consumer agenda within the on-going EIOPA deliberations was considered important. Additional transitional costs are of concern to consumers, as ultimately costs will be passed on to consumers. This will have implications in terms of pricing, affordability and access which EIOPA needs to take into account in terms of its consumer protection agenda. IRSG members would hope that the risks to, and implications for consumers are clearly articulated.</p> <p>- IRSG questioned the extent to which any guidelines would be 'mandatory' or whether national supervisors could go beyond them, i.e. is 'minimum' or 'maximum' harmonisation being sought. It is understood that National Supervisors could choose to go further than any guidelines issued by EIOPA which may not be desirable or practical.</p> <p>- IRSG also consider that reporting electronically is an excessive burden, if companies have to report under a concrete taxonomy (e.g. XBRL). Undertakings should be able to report using Excel files, or a tool for undertakings should be provided to them in order to capture the data. NCAs should make this issue as easy as possible for the undertakings.</p> <p>Minority opinion (Three IRSG members, Marcin Kawinski, Mads Molgaard Brauner and Professor Alexander Sadovski)</p> <p>Due to the continuing challenging and demanding situation in financial markets the Solvency I framework is no longer adequate and present circumstances require common and adequate response of financial supervisors. It is clear that the insurance business model is not free of systemic risk. Interim measures of Solvency II designed by EIOPA for pillars 2 and 3 should cover both qualitative and quantitative aspects. The actual aim of EIOPA guidelines is to avoid the need for action by national regulators which would undermine the principles of the single market and create regulatory arbitrage. It is highly recommended that we should strive to achieve a standardized approach, which is common in all Member States so as to assure the same level of safety and protection and to lower costs of cross border activity.</p> <p>The proposed scope of the interim measures will provide a great benefit from a consumer and risk control perspective. As Solvency I does not currently meet standards for supervising insurance companies it is vital to implement immediately both, new quantitative and qualitative approaches from already accepted Solvency II (including early Pillar 3 reporting). Only this approach provides a standardised and comparable package of information to supervisors, shareholders and to stakeholders (pillar 2 and pillar 3). Although political discussions are still on-going on key elements of pillar 1 within Omnibus 2, it would be unwise and irresponsible to deny supervisory authorities adequate information until such time as a consensus is reached. Potential changes in pillar 1 now being discussed are not going to undermine the fundamental idea behind Solvency II. The cost issues connected with interim measures are important but it should not delay the aim of Solvency II. Furthermore these costs would have to</p>	<p>The reporting of Excel files is possible according to the guidelines. However, it is in the discretion of each NCA to decide upon the means of transmission.</p> <p>Noted and welcomed.</p> <p>EIOPA does not intend to introduce reporting requirements before the end of the Omnibus II approval process. EIOPA understands this point and therefore includes a review clause in the guidelines.</p> <p>EIOPA will give information about Plan A and B in due time depending on the development in regards to the Omnibus II process.</p> <p>EIOPA acknowledges on the costs that this is in fact a reality that would have to occur during the preparation for Solvency II. Both undertakings and supervisory authorities would need to switch from SI to SII reporting from one day to the other. A preparation phase would always be needed in order to guarantee that a disruption in the daily management of the undertaking, in the activities of the supervisory authority and as a consequence in the protection of the policyholders would not occur.</p> <p>Noted</p> <p>EIOPA confirms that the requirements under the final preparatory guidelines are the ones envisaged for the final reporting package.</p>
2	IRSG	General Comments	<p>Requirements in addition to EIOPA's July 2012 stable platform</p> <p>In a few notable areas the interim reporting measures have requirements which extend beyond EIOPA's July 2012 stable platform. This requirement is not in line with what should be a basic principle, that to assess preparedness companies should not be having to undertake any activity that will not be required to meet the end state requirements. It will necessitate building one-off reporting processes not required in end state, and therefore be a waste of resource and be a distraction from preparing for S2 Pillar reporting. There are two areas IRSG particularly wish to highlight:</p> <p><u>Standard formula SCR templates for internal model companies</u></p> <p>Companies should not need to submit both internal model and standard formula forms. If standard formula forms are required as part of the pre-application process for Internal model approval, it should be part of these guidelines, noting the timelines may be different and not all the information gathered the full suite of SF SCR templates is relevant.</p> <p><u>Ring-fenced funds ('RFF')</u></p> <p>The interim reporting measures require group reporting of consolidated ring-fenced funds, which was not required by the EIOPA July 2012 QRTs. These only required solo reporting. To implement this in companies' systems would require the creation of a separate consolidation hierarchy from the group legal entity consolidation hierarchy as a one-off.</p> <p>For solo reporting, firms are required to report the largest RFF plus all other RFFs in aggregate. This requires the creation in IT systems of a consolidation hierarchy to consolidate all the "other" RFFs as a one-off.</p> <p>Need for stable Level 2 Implementing measures</p> <p>IRSG would expect Omnibus II to have been passed and stable Level 2 implementing measures at least one year before the first reporting date required for interim reporting. Companies cannot implement Pillar 3 reporting requirements when rules and guidance are uncertain, without increased costs and expensive temporary workarounds and if they are not given sufficient lead time to implement.</p>	<p>EIOPA acknowledges that changes might have been better highlighted.</p> <p>EIOPA is publishing a "change LOG" with the final report, as an Annex of the Final Report</p> <p>On IMAP EIOPA highlights that insurance and reinsurance undertakings engaged in a pre-application process for Internal models should submit information on the Solvency Capital Requirement calculated both with the standard formula and with the full/partial internal model. However, the submission related to the standard formula is defined under the "Guidelines on Pre-Application of Internal Models" while the submission related to the full/partial internal model, for the purpose of submission of information, is defined under the "Guidelines on submission of information to national competent authorities" as proposed by the stakeholders</p> <p>On RFF 1.110. EIOPA believes that it is very important that undertakings prepare for the calculation and submission of information by Ring Fenced Funds, both at individual and group level, as this will be an important part of the Solvency II. Therefore the requirement of the submission of information for the major material RFF and the remaining part was kept both at individual and group level and further clarifications have been provided. Regarding the calculation of the SCR at an entity or group level when undertakings have RFFs EIOPA will engage in a dialogue with stakeholders to ensure that an appropriate solution is incorporated in the technical specifications. EIOPA considers important to clarify that in future the information to be submitted by RFF include also the Balance sheet, information on own funds, SCR calculation and technical provisions, as identified in the July 2012 Final Report.</p> <p>Noted. EIOPA will be prepared to issue draft TS and guidelines as soon as possible after OMD II approval and publication of implementing measures.</p>

No.	Name	Reference	Comment	Resolution
3	IRSG	General Comments	<p>Annex 2: Quarterly reporting IRSG Opinion 2012 Part I Annex 2 Quarterly reporting Extract of general comments “Regarding quarterly reporting, IRSG supports the proposed requirements to provide quarterly reporting information to the regulators albeit in a significantly reduced extent to that required on an annual basis. IRSG also supports the option 3 (no full balance sheet) within the EIOPA consultation paper, since the information already required will explain the largest elements of the reconciliation reserves. Furthermore, the cost impact of quarterly reporting on smaller undertakings with simple risks has to be taken into consideration.” EIOPA answer 2012 “17.Frequency and timeliness of reporting is crucial for the adequate supervision of insurance undertakings. In this regard, quarterly reporting is crucial for the supervisory process which is why it already exists under Solvency I. Under Solvency II, quarterly reporting is kept to a minimum of the information needed. “ Guidelines 2013 Information will be submitted on a quarterly basis for a narrowed scope but with a balance sheet and detailed list of assets.</p> <p>IRSG opinion on quarterly reporting, expressed the 27 January 2012, still applies. For the same reasons as annual reporting, IRSG do not support quarterly reporting in advance of the Solvency II effective date. If quarterly reporting is required to assess preparedness then only one quarter is necessary, and this should be Q3 2015.</p>	<p>Noted.</p> <p>On the quarterly reporting EIOPA has carefully considered all arguments put forward by stakeholders and agreed that the submission of one quarter (Q3) should be enough for the preparation for Solvency II, especially taking into consideration the day-1 reporting. As for the deadlines EIOPA believe it is crucial that undertakings and groups prepare for the quarterly submission of information considering the deadlines that they will have to comply with.</p> <p>Please see EIOPA answer on this issue in the July 2012 final report.</p>
4	IRSG	General Comments	<p>Annex 3: Disclosure IRSG Opinion 2012 Part I Annex 3 Disclosure Extract of general comments “Consistently with the Framework Directive (Article 51 para 1), IRSG agrees that an appropriate level of public information, in an understandable format, should be made available on an annual basis. Public disclosure of Solvency II information should be set at the right level so as not to mislead and confuse the various audience. As at present certain companies may choose to publicly disclose some information on a more frequent basis but this should be permitted and not required.” Guidelines 2013 Information will not be disclosed. IRSG is supportive that the interim reporting measures require the submission of interim templates to NCA's only, and are not for public disclosure.</p>	<p>There is no public disclosure of information envisaged during the preparatory phase.</p>
5	IRSG	General Comments	<p>Annex 4: Local requirements IRSG Opinion 2012 Part I Annex 4 local requirements Extract of general comments “Regarding the local requirements, they should be limited to specificity of the local market if the information is not covered by any Solvency II reporting. IRSG would welcome a harmonization among the supervisors for similar types of local specificities. IRSG believes that an approval by EIOPA of this requirement could help achieving a real harmonization of reporting. “ Guidelines 2013 “1.19. When the deduction and aggregation method is applied, insurance and reinsurance groups are allowed to use solvency capital requirements and eligible own funds of related third country undertakings calculated according to their local rules for the purposes of these Guidelines only, and without prejudice to any future European Commission equivalence determinations and any future decisions of group supervisors.” “39. Additionally, for non- European Economic Area insurance and reinsurance undertakings all local capital requirements, minimum capital requirements and eligible own funds in accordance with local rules, regardless of the method of calculation.” “Identification of the accounting standard used for reporting items in BS-C1, Statutory account valuation. The following closed list of options shall be used: If the undertaking is using IFRS: IFRS; If the undertaking is not using IFRS: Local GAAP” EIOPA answer 2012 “84. As for local requirements, EIOPA stresses that they will exist only where specificities of the local market justify their existence and where it is considered that a harmonisation of the information to be reported has not been adequate. “ IRSG opinion on local requirements expressed the 27 January 2012 still applies. IRSG still highlights the local reporting requirements. IRSG supports the fact that non-EEA undertakings (using Solvency II requirements or not) will be included in the preparatory phase, in accordance with local rules under the deduction and aggregation method.</p>	<p>Noted</p> <p>Please see EIOPA answer on this issue in the July 2012 final report.</p> <p>Having considered all comments received, EIOPA incorporated in the Guidelines a possibility for the group, after engaging in a dialogue with the group supervisor on the method of the group solvency calculation for the preparatory phase in relation to the third country undertakings, to decide which method to apply after having considered the outcome of the dialogue with the group supervisor. As part of the dialogue the group should explain to the group supervisor why the exclusive application of method 1 would not be considered appropriate.</p> <p>In the case the group intends to apply during the preparatory phase the method 2 as defined in Article 233 of Solvency II or the combination of method 1 as defined in Article 230 of Solvency II and method 2 as defined in Article 233 of Solvency II, and this is not in line with the outcome of the dialogue, the insurance or reinsurance group will have to communicate the rationale for deviating from the outcome of the dialogue before commencing their solvency calculations for the preparatory phase.</p>

No.	Name	Reference	Comment	Resolution
6	IRSG	General Comments	<p>Annex 5: Proportionality and materiality IRSG Opinion 2012 Part I Annex 5 Proportionality and materiality Extract of general comments “In cases where proxies are used to produce quarterly reporting (particularly important for information which derives from technical provisions), it should be assessed if those proxies could give rise to a material error, the materiality remaining a key judgment. IRSG agrees with the definition of materiality in the level 2 implementing measures (the information is material if its omission or misstatement could influence the decision-making or the judgement of the users of that document, including the supervisory authorities) and believe that threshold should be limited to specific requirements. IRSG also notes that the size or the nature of the insurer and risk to the policyholder are not well correlated and that thus threshold based on the size of the entity may not be appropriate in all cases (for example, captive insurers of non insurance undertakings). “ EIOPA answer 2012 “The principle of proportionality is considered in the reporting requirements in three different dimensions. Firstly it is naturally embedded, meaning that a company with less complexity in their business will consequently have a minor reporting, e.g. less Lines of Business, less currencies, no derivatives, etc. Secondly, to some templates such as the detailed list of assets thresholds based primarily on size were defined. Thirdly, to take all measures of the risk-based approach other thresholds and materiality principles were considered in several templates, both annual and quarterly. When considered adequate the exemptions and application of thresholds and materiality principles were revised and made clearer in the current package. “ Guidelines 2013 “1.20. National competent authorities are expected to ensure that these Guidelines are applied in a manner which is proportionate to the nature, scale and complexity of the risks inherent in the business of the insurance and reinsurance undertaking. The Guidelines already reflect the application of the principles of proportionality by having the principle embedded and also by introducing</p>	<p>See also EIOPA's Final Report. EIOPA sees the proportionality principle as crucial for the implementation of the Solvency II Framework and therefore EIOPA have continued the work on this area and some clarification has been provided in the introduction to the GIs.</p>
7	IRSG	General Comments	<p>Annex 6: Ring Fenced Fund IRSG Opinion 2012 Part II Annex 6 RFF Extract of general comments “IRSG believes that the Article 69 of the Level 2 delegated acts defining the ring-fenced fund should be clarified especially to confirm that conventional unit linked and reinsurance business do not fall within the scope of ring-fenced funds and that ring fencing of insurance obligations without a designation of own funds doesn't constitute ring fenced funds. IRSG also believes that the level of information that shall be required should depend on a level of materiality consistent with the level that will be proposed to avoid calculating a notional SCR. In that sense, IRSG supports a high threshold that would assure consistency between the Pillar 1 and Pillar 3 requirements. “ EIOPA answer 2012 “For the purpose of preparatory phase the submission of the items in Annex SCR-B2A for each material RFF and remaining part is not applicable. The value of the sum of underlying results should be reported.” “For the purpose of preparatory phase the submission of the items in Annex SCRB2B for each material RFF and remaining part is not applicable. This item has to be reported only when reporting SCR calculation for the undertaking as a whole.” IRSG is questioning about the impact on RFF treatment in case of the use of matching adjustment, which is subject to approval under Solvency II. “1.16. As for reporting at a Ring Fenced Fund level it was decided that during the preparatory phase, although it is required a calculation of the Solvency Capital Requirement taking Ring Fenced Funds into consideration, the reporting should not be applied at the level of each Ring Fenced Fund. The solution adopted in these Guidelines do not pre-empt any materiality threshold to be/or not introduced when Solvency II is applicable regarding reporting of Solvency Capital Requirement templates.” Guidelines 2013 The interim reporting measures require group reporting of consolidated ring-fenced funds, which was not required by the EIOPA July 2012 QRTs. These only required solo reporting. To implement this in companies' systems would require the creation of a separate consolidation hierarchy from the group legal entity consolidation hierarchy as a one-off. For solo reporting, firms are required to report the largest RFF plus all other RFFs in aggregate. This requires the creation in IT systems of a consolidation hierarchy to consolidate all the “other” RFFs as a one-off.</p>	<p>The 2012 final report stated that information about RFF will be specified in the future. As part of the preparation for Solvency II parts of these envisaged reporting requirements are already part of these guidelines. For RFF please see comment 2.</p>

No.	Name	Reference	Comment	Resolution
8	IRSG	General Comments	<p>Annex 7: Other topics In January and February 2012, IRSG delivered also detailed opinions on the following topics :</p> <ul style="list-style-type: none"> - Audit – quality assurance - Underwriting versus accident year triangles and triangles size - Variation analysis - Narrative guidelines - Overview on SCR/MCR templates - Overview on TP/Reinsurance/Variation analysis templates - Overview on Group/Risk concentration templates <p>Guidelines 2013 Requirements regarding external scrutiny of prudential reporting, detailed disclosures about reinsurance contracts, or technical provisions at product level for life insurance, claim triangles for general insurance, and variation analysis templates are not applicable for the preparatory phase. IRSG would prefer no interim reporting of Technical Provisions beyond the balance sheet. In the same way, the number of group templates has been reduced even though there is still a lot of information to provide. Especially, the templates G20 (Contribution to Group SCR with deduction and Aggregation), RC (Risk Concentration) and all the ICT templates are not applicable. The main issue is that for certain Line of Business the country analysis is determined by localisation of risk rather than country of underwriting. IRSG would wish country of underwriting to be the basis to be applied consistently to all Line of Business. Another issue is the capacity to follow the different variations that may concern the templates between the two consultations from EIOPA. We would advise to add a sheet per quantitative template which would give the information about the evolution of the template. IRSG supports the reduction of scope provided by EIOPA for the Interim measures regarding technical provision, reinsurance, group templates and variation analysis templates. IRSG would wish country of underwriting to be the basis to be applied consistently to all Line of Business. IRSG would suggest EIOPA would provide information about the evolution of the templates IRSG opinions on other topics and about the absence of external scrutiny remain applicable.</p>	<p>Noted.</p> <p>Please see EIOPA answer on this issue in the July 2012 final report.</p> <p>EIOPA acknowledges that changes might have been better highlighted.</p> <p>EIOPA is publishing a "change LOG" with the final report, as an Appendix of the Explanatory Text.</p>
9	ABermudaIR	General Comments	<p>The Association of Bermuda Insurers and Reinsurers (ABIR) is grateful for the opportunity to provide comments on the Consultation Paper. ABIR is a professional trade association representing Bermuda's Class 4 insurers and reinsurers. Our 21 members write a significant amount of insurance and reinsurance from both subsidiary corporations in Europe and from cross border export sales from Europe to our Bermuda underwriting headquarters. Eighteen of our 21 member companies have European subsidiary corporations. 1 ABIR fully understands why EIOPA considers that European firms and groups need now to undertake active preparations for the Solvency II regime. It is unlikely to come into force until 2016, but its success requires an active preparation process and for that process to be managed in a reasonably consistent way across Europe.</p> <p>2 On the other hand care needs to be taken in the application of any interim regime to ensure that it is not unduly burdensome. It should take account of the fact that the level 1 text is not fully settled. The level 2 rules and much of the level 3 and 3.5 material is yet to be settled and published.</p> <p>3. In particular the full details of the equivalence and interim equivalence regimes is yet to be settled. That said, so far as Bermuda is concerned, the preparatory work of EIOPA strongly suggests that Bermuda will be recognised as equivalent.</p> <p>4. The Solvency II regime may ultimately have some degree of extra-territorial effect, depending on which non European regimes are recognised as equivalent. It is wholly inappropriate for that extra-territoriality to be applied on an interim basis, especially in jurisdictions such as Bermuda which are likely to achieve recognition as equivalent. Only European firms should be subjected, directly or indirectly, to requirements at this stage which require any degree of adaptation to the Solvency II regime.</p> <p>5. The preparations which European firms and groups may be required to make for Solvency II require them to provide information concerning non European operations. At this interim stage it is disproportionate to do anything other than accept information by reference to relevant non EEA rules and in such format as non EEA firms are able to generate from their existing systems. This should be clearly recognised in the EIOPA guidelines. Otherwise non EEA firms may be subject to a patchwork of different requirements depending on how each national supervisor chooses to apply EIOPA's interim guidelines.</p>	<p>Noted and welcomed.</p> <p>EIOPA does not expect that supervisory authorities in third countries apply the preparatory Guidelines. The Guidelines are not subject to equivalence analysis nor do they pre-empt any decision taken in past or future by the European Commission regarding equivalence.</p> <p>In the CP No. 13/010 and in the revised preparatory Guidelines it was clarified that "When the deduction and aggregation method is applied, insurance and reinsurance groups are allowed to use solvency capital requirements and eligible own funds of related third country undertakings calculated according to their local rules for the purposes of these Guidelines only, and without prejudice to any future European Commission equivalence determinations and any future decisions of group supervisors", meaning that all third countries would be considered equivalent during the preparatory phase regardless of any equivalence analysis conducted or applied for.</p> <p>When referring to group structures or group level the preparatory Guidelines apply to EEA groups only. They do not apply to branches of third country (re)insurance companies set up in the EEA.</p> <p>See also comment 5.</p>
10	AFM	General Comments	<p>The Association of Financial Mutuals represent financial mutual insurers within the UK, with 53 member companies and assets approach £100 billion. We welcome the chance to comment on this consultation paper.</p>	<p>Noted.</p>
12	AMICE	General Comments	<p>AMICE members oppose any requirement to implement any element of these guidelines which may need to be changed as a result of the outcome of the political negotiations. It would not be proportionate to oblige undertakings to incur costs to implement a regulation which might be subject to changes.</p> <p>AMICE members disagree with the request that firms should provide reporting to national competent authorities during the interim phase should there be no agreement on Omnibus II. Additionally, we are concerned that the proposed requirements are too detailed and will constitute an unreasonable burden on the industry. The costs will not only be the immediate ones of changing IT-systems etc. There will also be a permanent increase in costs for reporting because extra additional human resources will be required in all company functions involved in reporting.</p>	<p>EIOPA acknowledges undertakings concerns about uncertainties as to Omnibus 2 negotiations and their impact on Pillar 1 requirements and as a consequence, a possible impact on Pillar 3 requirements. . 1.64. However it believes that the preparation for the submission of information under Solvency II is crucial. In fact undertakings claimed during previous consultations that they would need at least 18 months for the preparation. Assuming that Solvency II will be applicable as from 1 January 2016 that would mean that they would need to start implementation as from 1 June 2014. This timing is consistent with the approach taken in the Guideline publicly consulted. EIOPA has minimised the possibilities of changes, in particular with the use of only a sub-set of the information to be submitted in future.</p>

No.	Name	Reference	Comment	Resolution
			<p>It is absolutely necessary to avoid overburdening undertakings in general, particularly smaller and medium-sized insurers, with unnecessary obligations. Requesting processes for the establishment of quarterly templates to be closer in terms of the level of accuracy and granularity to those for annual reporting at both solo and group levels is clearly going too far. It is clearly neither proportionate nor consistent with the aim of the preparatory guidelines to request such far-reaching reporting processes on an infra-annual basis.</p>	<p>The threshold on the market share should solve the issue of the small and medium size companies.</p>
13	AON	General Comments	<p>Requesting annual and quarterly reporting on S2 valuations and SCR calculations seem to us premature even if limited to 80/50% market share. Companies need time to upgrade their IT systems and can't really do that until all requirements are finalised. Therefore limiting P3 requirements to narrative parts of RSR as a first step seems better to us. That would exclude SFCR and QRTs for the time being. National regulators are also not currently equipped to issue/collect/consolidate QRTs, anyway.</p>	<p>EIOPA highlights that the current working assumption for the preparatory Guidelines is that Solvency II will be applicable from 1 January 2016. Under this assumption, starting the preparatory phase from 2015, as requested by some stakeholders, would be too late, especially for the System of Governance including the Forward Looking Assessment of Own Risks and submission of information processes. The final Solvency II Directive requirements will be determined by the OMDII, and the delegated acts. EIOPA is working under the assumption that these measures will be available in time for NCAs and undertakings to prepare for the submission of the forward looking assessment during 2014 and 2015 and the quantitative and qualitative information in 2015. In which case, at that stage, EIOPA would prepare technical specifications on Pillar I quantitative issues, including on the valuation of technical provisions, valuation of assets and liabilities other than technical provisions, the calculation of the Solvency Capital Requirement and provide guidance on the assumptions underlying the calculation of the standard formula calculation, which reflect the decision on OMDII.</p>
14	Assuralia	General Comments	<p>Assuralia welcomes the opportunity to comment on the Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities.</p> <p>In general, the proposed reporting requirements to National Competent Authorities (NCA's) before Solvency II starts, are burdensome. In order to reduce the reporting burden, the narrative reporting requirements should be lowered if not abolished.</p> <p>If EIOPA decides to take this reporting requirements further, certainty is in that case needed that the templates will be robust and not altered once the Guidelines have been published and that there will be no changes thereafter, not even after the preparatory phase. The fact that EIOPA intends to revisit the reporting requirements during 2013 creates a huge uncertainty and possible extra costs as undertakings have to start preparing now.</p> <p>On the connection to Pillar I Solvency requirements, the Guidelines are very ambitious. Guidelines require Pillar I calculations to be carried out reflecting the final Solvency II position. In our view it is critical requiring the complete Pillar I calculation while the legislative process is not completed.</p> <p>Implementing a new solvency framework is a demanding and time-consuming task requiring a lot of resources, especially for smaller undertakings. Also, if only 50 % of the market share has to submit quarterly information, the other 50% is not gradually preparing for the quarterly reporting. This may cause additional problems when Solvency II effectively enters into force. From a cost perspective, the combined implementation of quarterly reporting and interim reporting processes may be more efficient.</p> <p>We also question the benefits of group reporting at this stage. Different approaches to solo reporting between countries and the fact that not all solo entities are required to report will complicate the group consolidation.</p> <p>In order for undertakings to prepare them properly for the reporting requirements, it is key that EIOPA publishes as soon as possible the relevant or basic risk-free interest rate term structure.</p>	<p>The objective of introducing narrative reporting during preparatory phase is for undertakings to prepare for the narrative reporting (i.e to set up systems and procedures in order to gather necessary information and to prepare reports) and for supervisors to assess undertakings preparedness (for example, whether the narrative reporting is sufficient in terms of a scope and details). In addition, supervisors may use this information contained in the narrative reporting, for example, with regard to SoG, to assist them in assessing progress made by undertakings in preparation for Solvency 2 SoG requirements.</p> <p>The review referred is on the deadlines not on the content of the templates.</p> <p>Noted. See review clause.</p> <p>Therefore the need for preparation but also the threshold on the market share applied.</p> <p>EIOPA message is still that all participants should be preparing for SII, the difference is that it was not considered proportionate to have the same expectations, therefore the threshold on the market share.</p> <p>EIOPA believes that in cases where undertakings fall below thresholds on solo level, they should be reported on group level when they are part of a group which is subject to reporting under the preparatory Guidelines. The purpose is to prepare groups for SII which should include all solo undertaking which are subject to SII.</p> <p>Noted.</p>

No.	Name	Reference	Comment	Resolution
15	BVI	General Comments	<p>BVI represents the interests of the German investment fund and asset management industry. Its 78 members currently handle assets of EUR 2.0 trillion in both investment funds and mandates. BVI enforces improvements for fund-investors and promotes equal treatment for all investors in the financial markets. BVI's members directly and indirectly manage the capital of 50 million private clients in 21 million households. BVI's ID number in the EU register of interest representatives is 96816064173-47. For more information, please visit www.bvi.de.</p> <p>In order to support insurance undertakings which invest in investment funds in fulfilling their reporting and notification obligations vis-à-vis the authority, investment management companies inform the insurance undertakings on the portfolio composition of the funds managed by them. For the purpose of aggregation of the fund's data with data of the direct portfolio of the insurance undertakings, investment management companies may need to report data under Templates AS D1, AS D4 and SCR-B3A to the insurance undertakings. This approach is based on EIOPA's Final Report on Public Consultations No. 11/009 and 11/011 on the Proposal for the Reporting an Disclosure Requirements (EIOPA-260-2012, 9 July 2012).</p> <p>However, Report on Template AS D4 (look through to the fund's assets) is not addressed in the proposed Guidelines. Therefore, we assume that the proposed information about fund's data to the competent authority, which should be seen as preparatory work for Solvency II, comprises only the Report on AS D1 and the Report on SCR-B3A. Against this background, we understand the Proposal in such a way that the Report on AS D4 should be realised later and should not be part of the preparatory work for Solvency II. Therefore, it should be stipulated that the Report on AS D4 has not been cancelled.</p> <p>Moreover, we request clarification to reporting requirements under Template AS D1 (see our comments to Technical Annex II - List of quantitative reporting items AS-D1-L) and under Template SCR-B3A (see our comments to Technical Annex 1 - SCR-B3A-20).</p>	EIOPA confirms that Assets D4 <u>has not</u> been cancelled but was not considered proportionate to include it in the preparatory phase.
		General	<p>1) In some cases the references in the EIOPA Comments Template do not correspond to the Consultation Paper. For example, section VIII in the Comments Templates encompasses 1.82-1.86 whereas in the Consultation Paper it encompasses 1.79-1.82. We therefore would like to point out that our comments will refer to the numbering in the Consultation Paper. For example, a comment for 1.83 refers to 1.83 in the Consultation Paper, which is part of Section IX, even though it belongs to Section VIII in the Comments Templates.</p> <p>2) During the last consultation phase EIOPA mentioned it was considering a Q&A process to assist in reporting (refer to comment 11 in Comments_Template_General_Final). Does EIOPA still plan to set up a Q&A process? This would be of great help as there are still a lot of open issues on quantitative and narrative reporting in many undertakings.</p> <p>3) We understand and sympathize with the ambition of EIOPA to provide Guidelines on some key topics such as submission of information to national competent authorities from the perspective of avoiding divergence of national standards before the introduction of Solvency II. We also understand the complexity of such a task, given that neither Level 1 nor Level 2 texts have reached a final state, leading to e.g. an ill-defined Technical Provisions and consequently ill-defined Own Funds and SCR to be reported on. Another major issue exists for those companies with (partial) internal models, for the IMAF has likely not been completed for most of them, leading inevitably to (partial) double implementing and reporting efforts. And yet EIOPA aims to deal with these complications by providing Guidelines.</p>	<p>1) Noted.</p> <p>2) EIOPA confirms that it is still planning to have a Q&A process.</p> <p>3) EIOPA highlights that the current working assumption for the preparatory Guidelines is that Solvency II will be applicable from 1 January 2016. Under this assumption, starting the preparatory phase from 2015, as requested by some stakeholders, would be too late, especially for the System of Governance including the Forward Looking Assessment of Own Risks and submission of information processes.</p> <p>The final Solvency II Directive requirements will be determined by the OMDII, and the delegated acts. EIOPA is working under the assumption that these measures will be available in time for NCAs and undertakings to prepare for the submission of the forward looking assessment during 2014 and 2015 and the quantitative and qualitative information in 2015. In which case, at that stage, EIOPA would prepare technical specifications on Pillar I quantitative issues, including on the valuation of technical provisions, valuation of assets and liabilities other than technical provisions, the calculation of the Solvency Capital Requirement and provide guidance on the assumptions underlying the calculation of the standard formula calculation, which reflect the decision on OMDII.</p> <p>Preparation for the submission of information under Solvency II is crucial. In fact undertakings claimed during previous consultations that they would need at least 18 months for the preparation. Assuming that Solvency II will be applicable as from 1 January 2016 that would mean that they would need to start implementation as from 1 June 2014. This timing is consistent with the approach taken in the Guideline publicly consulted. EIOPA has minimised the possibilities of changes, in particular with the use of only a sub-set of the information to be submitted in future</p>

No.	Name	Reference	Comment	Resolution
17	Deloitte	Comments	<p>For companies and competent national authorities alike these Guidelines could lead not only to preparedness of the industry, but also to implementations of systems and processes that likely have to be corrected at a later stage when current uncertainties are resolved. We perceive that it depends heavily on the precise position of any given insurance company or national competent authority, what would be the optimal choices when it comes to (partial) implementation of what will once become Solvency II. We fear that (strict and far-reaching implementation of such Guidelines) that will not necessarily be supported by all national competent authorities, may diminish movements towards a level playing field (as is one of the main aims of Solvency II), because more elaborate attempts to implement early on will likely lead to graver corrections and thus higher costs at a later stage. Be it because of double implementation (first a tactical and later a strategic solution, where later solutions will tend to be more easily made compliant and implemented), implementation of these Guidelines would also lead to "double" reporting for some firms with presence in multiple nations and hence double analysis and reconciliation efforts.</p> <p>Therefore, in order to ensure that the cost of providing the information during the preparatory phase do not overrun the benefits, we welcome the minimisation of possible deviations for same parts of narrative reporting and QRTs between the preparatory phase guidelines and final Solvency II regulations and ask EIOPA for clear guidance with regard to the "transition" period between the preparatory phase and final Solvency II, in particular:</p> <ul style="list-style-type: none"> • which exactly L1, 2 and 3 regulations / guidelines are valid or going to be valid (if not available yet in time of publishing the guidelines) for which phase (for ex. do July 2012 Final Report guidelines to Narrative Reporting apply in the preparation phase to selected sections of RSR or will the L2 Text be available and valid for the preparation phase etc.?) • where EIOPA is expecting some changes due to changes in negotiations • how to deal with deviations between the Pillar 3 documents with regard to same QRTs (Assets, Balance Sheet etc.) and sections to Narrative Reporting published in July 2012 and March 2013. <p>4) Does EIOPA plan to amend the final Solvency II QRTs and Narrative Reporting guidelines on the basis of "Lessons learned" from the preparation phase? If yes, would this amendment take place before the official enforce of Solvency II or later during the first years of the Solvency II regime?</p>	<p>4) EIOPA expects that the submission of information required for the preparatory phase is stable.</p>
			<p>We do not support additional Solvency 2 reporting on an interim basis in advance of Solvency 2 entering into force. In our view, it is an unwelcome burden for firms to report under the new regime while Solvency I would still be used as the basis for regulatory supervision. This would be particularly problematic for companies seeking internal model approval and would already be required to run their internal model in parallel with the standard formula as part of the approval process. It would effectively mean having to adhere to three solvency reporting regimes at one time. We believe that assessing implementation plans would be a more effective way for National Competent Authorities (NCAs) to determine a firm's level of preparedness for Solvency 2 reporting requirements. Introducing a sub-set of narrative and quantitative reporting templates (QRTs) during an interim period risks detracting attention from implementation of the package as a whole. Without prejudice to our overall position as outlined above, we would like to raise the following key points to supplement our detailed comments.</p> <ol style="list-style-type: none"> 1. Interim measures exist solely to enable NCA's to assess preparedness and should not result in any supervisory action; this should be explicitly dealt with in a guideline rather than in introductory text. EIOPA should consider an explicit guideline outlining the "intent" in which they have been issued and that it will not drive supervisory action. It is the understanding of our members that the intention of the guidelines is to enable NCA's to assess preparedness of firms to comply with Pillar 3 reporting requirements when Solvency 2 goes live. We recognise paragraph 1.10 of the introduction goes some way to deal with this issue however we believe this should be explicitly included as a guideline. 2. There should be a maximum of one cycle of annual reporting before Solvency 2 entry into force; this should be explicitly dealt with in a guideline rather than in introductory text. If the Solvency 2 effective date is 1/1/2016, annual templates would therefore be prepared for the year ending 2014 and delivered according to annual reporting deadlines during 2015. Any delay in the Solvency 2 effective date would result in a matching delay in the implementation dates for interim reporting. Text to this effect is included in EIOPA's introductory paragraph 1.11 however this is an important point which should be dealt with in the guideline itself. 3. We do not support any form of interim quarterly reporting. However, should it be required, it should be limited to a maximum of one cycle for the September 2015 quarter, with a deadline of 12 weeks. We note that paragraph 1.11 proposes there should be two cycles of quarterly reporting before Solvency 2 enters into force. During the first quarter of 2016, companies would have to prepare their financial year-end report for statutory accounting and their final reports under Solvency I (quarter 4 and annual). Adding Solvency 2 reporting to this is unduly burdensome in comparison with the objective of assessing industry preparedness. Also, we propose that EIOPA consider a longer reporting deadline than those set out in draft legal texts, we believe that 12 weeks better reflects the costs and challenges to the industry from any simultaneous reporting under the Solvency I and II regimes. 	<p>EIOPA acknowledges undertakings concerns about uncertainties as to Omnibus 2 negotiations and their impact on Pillar 1 requirements and as a consequence, a possible impact on Pillar 3 requirements. However it believes that the preparation for the submission of information under Solvency II is crucial. EIOPA has minimised the possibilities of changes with the use of only a sub-set of the information to be submitted in future.</p> <ol style="list-style-type: none"> 1. Please refer to the Final Report on CP10/13 2. EIOPA confirms that there will be one annual submission for the year ended 31 December 2014 required under preparatory Guidelines; 3. Following the consultation process, EIOPA took on board concerns raised by stakeholders and decided to request reporting of the quarter ended 30 September 2015 ONLY during preparatory phase. <p>EIOPA will review the deadlines for the submission of information and the report on the forward looking assessment at the end of 2013 based on the latest developments. Following the stakeholders comments, a revision clause was introduced in the Guidelines.</p>

No.	Name	Reference	Comment	Resolution
18	CFOF_CROF	General Comments	<p>4. Industry should be adequately consulted before making any changes to the QRTs from EIOPA's Solvency 2 reporting requirements issued in July 2012. Whilst we acknowledge that some of the changes may be of benefit to the Industry, it should be noted that companies were already developing their systems based on the QRTs issued in July 2012. There are implications on timing and resources in making additional changes which will reduce the 18 months which our members estimate would be the minimum period required to collect data and build the necessary reporting process and IT infrastructures. For example, EIOPA have made changes to the Assets-D1 replacing NACE codes with Global Industry Classification Standard (GICS) codes. This would impact on data sourcing and systems developments. It is the understanding of our members that EIOPA are required to perform a public consultation on the content of any proposals, on reporting this was concluded in summer 2012. Future engagement of the industry is crucial in this respect.</p> <p>It would also be helpful if EIOPA could publish an official 'change LOG' (comparing with the version issued in July 2012) with the final interim QRTs later this year. We also note that "Instructions" per this guidance should replace the "Definitions" per EIOPA's July 2012 "LOG". To avoid wasted expenditure in implementation, it is important that EIOPA clarify that this is in fact EIOPA's latest thinking on Pillar 3 QRTs.</p> <p>5. Interim solo and group QRTs should only be requested if they will form part of the final QRT set (in form and content) and should not exceed the requirements that will be in place when Solvency 2 commences. Reporting data in a format that will not be required in the final QRTs will potentially require incurring costs that will not add value in the long run and is not in line with the intention of interim measures. Notable additional requirements not included in the final QRTs set are:</p> <p>a. Standard Formula Templates for Internal Model Users: Insurers should not be required to submit both internal model and standard formula templates if they are sufficiently progressed in their internal model approval process (IMAP). Building systems to capture data on both methods in the prescribed format, which must be submitted electronically, involves building reporting processes and submission templates that will not be required longer term, if the application is successful. For firms in IMAP any standard formula data should be sourced through the IMAP application process, not through the submission of QRTs, which will be subject to different timelines. To present this information multiple times in different forms would be very burdensome for companies.</p> <p>b. Ring-fenced funds reporting requirements should not be more than or different to the final requirements: i) requesting companies to report separately the largest ring fenced fund and separately consolidate the other ring fenced funds creates a sub-consolidation step for the latter that will not be required in the final QRTs; and ii) reporting of ring-fenced funds should not be extended to group reporting as proposed by the current consultation as it exceeds the final reporting requirements.</p> <p>6. All third countries should be automatically consolidated on an equivalent basis using the deduction & aggregation methodology. The guidelines allow third countries to be reported on an equivalent basis, if the group supervisor agrees that the Accounting Consolidation method is inappropriate and that the use of the Deduction and Aggregation (D&A) method is preferable. Given the expectation that has been set by the European Commission and supervisors in achieving third country equivalence, and the general uncertainty around as to when this issue will be resolved, we believe it would be more coherent for all third countries to be automatically consolidated on an equivalent basis using the D&A method.</p> <p>7. EIOPA and the NCAs should acknowledge that reporting would be on a best effort basis and that (re)insurers have made some working assumptions in developing the processes to generate Solvency 2 reports. This may include granting exemptions or simplifications for the purposes of the exercise. Companies have made assumptions about the application of certain rules where formal regulatory approval would be required for example, the treatment of insurance subsidiaries where there is negligible interest, or valuation of overseas insurance undertakings at nil where there is a lack of available data.</p> <p>8. Unit linked asset reporting should be excluded from the scope of detailed asset reporting. Asset template D1 for interim reporting requires information on unit linked assets. Collection of line by line asset data of unit linked business appears to be driven primarily by Pillar 3 interim reporting. We believe this aspect should be deferred until full adoption of Solvency 2 as it will be particularly burdensome for limited benefit.</p> <p>9. QRTs reporting should be completed in thousands. In certain member states, the current Solvency I reports are only required to rounded to thousands and IFRS financial statements are produced in millions. We propose that the QRTs are completed in thousands rather than at the lower level of granularity currently proposed (units).</p> <p>10. The requirement of reporting using XBRL should be deferred until full implementation of Solvency 2. Insurers intend to manage the process of building capability as the final stage of implementation for all the templates as opposed to just a subset. Having to perform it twice will cause undue time and resource constraints.</p> <p>We would like to reiterate that preparatory actions for Solvency 2 should focus on ensuring a sufficient level of preparedness on the side of industry. This does not have to be in the form of early implementation of certain requirements before Solvency 2 goes live. We would be happy to discuss further alternative ways of assessing preparedness for Solvency 2 reporting.</p>	<p>4. EIOPA acknowledges that changes might have been better highlighted. However we don't understand the comment as the templates were part of the current Public Consultation.</p> <p>EIOPA is publishing a 'change LOG' with the Final Report.</p> <p>5. EIOPA confirms that the requirements under the final preparatory guidelines are the ones envisaged for the final reporting package.</p> <p>a. See comment 2.</p> <p>b. 1.109. EIOPA would like to clarify that the requirements do not cover the aggregation of the "other" material RFFs. The requirement is to report in relation to the major material RFFs and the remaining part, being the remaining part the "non-RFFs" business and the non-material RFFs of the undertaking. See also comment 2.</p> <p>6. See previous comment 5.</p> <p>7. Best effort is implied by the preparatory nature.</p> <p>8. We don't see any reason to exclude unit linked from Asset D1 for the preparatory phase. See also comment 652.</p> <p>9. The report was kept in units for IT purposes and EIOPA believes that the reporting in units instead of thousand or millions does not impact the costs of reporting.</p> <p>10. Guidelines do not require reporting in XBRL. However it makes all documentation available for the companies that want to do it also for the preparatory phase.</p>

No.	Name	Reference	Comment	Resolution
19	DublinIMA	General Comments	<p>Only when the outcome of Omnibus II is known can the focus turn to what, if any, interim measures should be applied to reporting, as this will depend on when Omnibus II is finalised, what is decided, and the timetable for implementation. Even then, the implementation ought to be done in accordance with the proportionality principle and over a reasonable period of time to allow firms to make the necessary change to their reporting processes and systems.</p> <p>It is important to acknowledge that interim measures are not a phasing in of Solvency II and that additional information collected during this period should not lead to rules other than Solvency I being used to determine capital requirements. Interim measures should not lead to a de facto implementation of Solvency II before it becomes legally enforceable.</p> <p>It is a major industry concern that the suggested reporting requirements under these proposals will require dual annual reporting for all entities, triple annual reporting for those using internal models, and quarterly triple annual reporting for a number. This means that for at least one quarter during the implementation phase, certain entities will be required to submit six different reporting bundles simultaneously with relatively short timeframes for submission. Areas of overlap between the different reports required should be identified to reduce the resource pressure on both entities and national competent authorities, and the benefits of such onerous requirements fully assessed before a decision is made whether to implement them. To this end, it is vital to avoid multiple sets of reporting basis and in particular to avoid reporting requirements based on the standard formula for internal model users. In addition, timelines should be reviewed and extended to accommodate the multiple reporting bases proposed, and the appropriateness of this level of disclosure to competitors. For long-term business, quarterly fluctuations are not material, and therefore it is questionable whether quarterly reporting provides any real benefits.</p>	<p>Noted.</p> <p>On Internal models see comment 2.</p> <p>EIOPA has carefully considered all arguments put forward on the deadlines and decided to incorporate a delay of 2 weeks in the annual submission deadline. However it considers that the deadline for the quarterly submissions should be kept as it is important that undertakings prepare for the deadlines that they will have to comply with.</p> <p>On quarterly reporting EIOPA believes it is important for companies to prepare also for the quarterly reporting as they have to be prepared to report information on a higher frequency and within shorter deadlines. However has carefully considered all arguments put forward by stakeholders and agreed that the submission of one quarter (Q3) should be enough for the preparation for Solvency II, especially taking into consideration the day-1 reporting.</p>
20	ECInternal Audit	General Comments	<p>The ECIIA (The European Confederation of Institutes of Internal Auditing) would like to thank EIOPA for the opportunity to comment on the Consultation paper 13-010. As the representative of the profession of internal auditors in Europe ECIIA very much appreciates the important role Solvency II and EIOPA allows to Internal Audit in the system of governance. ECIIA is happy to support EIOPA in this task to any extent.</p> <p>ECIIA's comments are focused on Internal Audit. As stated in the Solvency II Directive Internal Audit is a key function in the system of governance. Therefore ECIIA is astonished, that it is not mentioned at all in this Guidelines, whereas other functions or systems of the system of governance are explicitly mentioned such as the risk management system, the risk management function, the internal control system and the compliance function. This may give the impression, that EIOPA does consider some functions or systems in the system of governance more important than others. We propose to include a guideline related to Internal Audit. This guideline could follow the guideline 22 for the risk management system and function and guideline 25 for groups. request 1) a description how the function is organised in the undertaking: outsourcing or insourcing; existence or not an Audit Commission 2) The structure of the internal audit function on the system of government (charts organisation) and reporting lines to the AMSB 3)How the independence and objectivity of the audit function is ensured. 4) Add an additional line e) on the guideline 25. This line should ask for a description of how the internal audit function is implemented into the group structure.</p>	<p>It was decided to focus on systems rather than on key functions, specifically for the preparatory phase so that the compliance function as an explicit part of the internal control function is covered but not the internal audit function or the actuarial function.</p>
21	Ernst & Young	General Comments	<p>We welcome the opportunity to comment on the Consultation on the Proposal for Guidelines on submission of information to National Competent Authorities ('the Guidelines').</p> <p>We are supportive of EIOPA's objective of encouraging a consistent and convergent approach to preparations for Solvency II. We believe that the Guidelines will enable National Competent Authorities (NCAs) and insurance/reinsurance undertakings to prepare for full implementation by providing an opportunity to test systems and processes in place to deliver both the quantitative and qualitative information required to be reported to NCAs.</p> <p>In view of the additional burden that the reporting requirements set out in the Guidelines will impose on both undertakings and NCAs, we support the use of market share thresholds to restrict the requirements to the largest firms, whilst allowing NCAs the flexibility to establish other ways of ensuring that all other firms demonstrate progress towards full implementation. The revision clause set out in the cover note, which allows EIOPA to review the timing of the submission dates at the end of 2013 based on the progress of the Omnibus II directive, will ensure that parallel running of the current and SII reporting is restricted to one year.</p> <p>Submission of information to NCAs is dependent on completion of valuation of assets and liabilities, technical provisions, own funds, solvency capital requirements and minimum capital requirements under Pillar 1. The Pillar 1 rules are yet to be finalised and it is necessary to allow sufficient lead time between finalisation of the rules and implementation of the interim requirements.</p> <p>Whilst it is not clear how and when the European Central Bank's (ECB's) reporting requirements will impact insurers, EIOPA's cooperation with the ECB to ensure that the reporting package proposed by the Guidelines is sufficient to meet ECB's initial requirements is helpful to the industry. It would be useful to have more clarity on how the two sets of requirements will interact during the preparatory phase as well as after full implementation as soon as possible</p>	<p>Noted.</p> <p>EIOPA acknowledges these concerns. However it believes that the preparation for the submission of information under Solvency II is crucial. In fact undertakings claimed during previous consultations that they would need at least 18 months for the preparation. Assuming that Solvency II will be applicable as from 1 January 2016 that would mean that they would need to start implementation as from 1 June 2014. This timing is consistent with the approach taken in the Guideline publicly consulted. EIOPA has minimised the possibilities of changes, in particular with the use of only a subset of the information to be submitted in future.</p> <p>EIOPA's cooperation with the ECB has ensured that the reporting package proposed by the Guidelines is sufficient to meet ECB's initial requirements. EIOPA will continue to engage in a dialogue with the ECB aiming as much as possible to avoid undue costs to the undertakings arising from different requirements. However, the set of the Solvency II reporting requirements aim the information needed for the supervisory review process.</p>
22	FEE	General Comments	<p>FEE welcomes this paper as useful guidance to national competent authorities. The requirement that internal model companies submit the capital requirements using both the standard formula and internal model will lead to significantly more work for these firms.</p>	<p>Noted.</p> <p>On IM see comment 2.</p>
			The Gard Group	

No.	Name	Reference	Comment	Resolution
24	Gard Group	General Comments	<p>Gard was founded on 9 October 1907 as a P&I club, and is today the world's second largest marine insurer. As per 20 February 2013 Gard had a 16% market share in P&I, with a tonnage in excess of 230 m gt. Gard's marine and energy businesses have roots back to the mid-19th century, and has been continually in the offshore energy sector for 40 years. On 20 February 2013 the marine book insured more than 7000 vessels, and Gard accounted for 31% of the nordic hull premium. Gard has today 13 offices around the world employing more than 400 people.</p> <p>General comments on the Consultation</p> <p>This document sets out the comments of the Gard Group on the EIOPA call to comments on CP 13/010 - Consultation Paper on the Proposal for Guidelines on submission of information to national competent authorities. The response is submitted by the Regulatory Reporting Team of the Gard Group.</p> <p>We strongly support the overall approach taken by EIOPA of emphasising the need for insurance and reinsurance undertakings, as well as national competent authorities, to start early with the preparatory work towards Solvency II compliance.</p> <p>In this preparatory phase we have chosen not to comment on the detailed list of quantitative reporting items as set out in Technical Annex II, but rather to focus on providing our comments to the Impact Assessment part of the consultation.</p>	Noted and welcomed.
25	GC	General Comments	<p>We welcome the preparatory guidelines on reporting as a contribution to ensuring suitable and harmonised preparation by the insurance industry for the new Solvency II regime. However, we have concerns about the additional burden that this preparatory phase will place upon undertakings and actuaries, given the ongoing continual requirement to report to NCA's under existing regulatory regimes.</p> <p>Our main concerns are:</p> <p>(i) The randomness of the impact on actuaries due to the "all or nothing" requirement to participate in the preparatory phase. Actuaries working in insurers not participating will be 'outside' of a gradual and phased upskilling process. Instead we would suggest a graduated scale of participation with smaller/lower risk companies submitting fewer templates and perhaps only annual templates.</p> <p>(ii) The selection based on market share is ambiguous, leaving room for different interpretations by NCAs and possibly difficult to implement. From our viewpoint this will mean that actuaries (and similarly other professionals / managers) in otherwise similar insurers may or may not be participating depending on the relevant NCA.</p> <p>(iii) The timeframes proposed for the submission of the annual and quarterly information are short specially as parallel compliance with Solvency I is still required. We would suggest an expanded timeframe in the preparatory phase.</p> <p>(iv) On going uncertainty about the final shape of Pillar 1. It could be advantageous to focus more preparatory activity on those elements where reported financials will not be impacted in a major way by the uncertainties within the LTGA debate as well as other open issues on the Pillar I requirements. Actuaries working with long-term guarantees and involved in the debates around the risk free rates have some reluctance to prioritise detailed reporting preparations.</p> <p>(v) Double burden on reporting requirements for companies applying for an internal model. The workloads are potentially higher in 2014 – 2015 than they will become when an insurer has Solvency II in full force and a model approved. The workload question is particularly acute where actuarial teams are involved in all of technical provisions restatements, standard formula calculations and dynamic capital models.</p> <p>(vi) Timely availability of the proposed XBRL reporting tools in the preparatory phase to avoid insurers needing to re-engineer the process in 2016. We have concentrated on the guidelines around reporting rather than the content and structure of the reporting templates themselves.</p>	<p>Noted.</p> <p>(i) and (ii) See previous comments on EIOPA expectations from all market</p> <p>(iii) See previous comments (comment 19)</p> <p>(iv) Noted, review clause should deal with this concern.</p> <p>(v) See previous comments</p> <p>(vi) Noted. XBRL tool will be available in time for preparatory phase</p>
			<p>1. In principle, GDV welcomes EIOPA's intention of setting a harmonized path for the preparation of Solvency II. However, aspects that are still subject of the political discussion (Trilogue or Level 2), should not be included. This especially applies to the Level 1 requirements concerning the valuation of technical provisions (Cover Note, recital 4.12). At the moment, key aspects of the according methodology are subject to an impact assessment (LTGA). It is indispensable to consider the results and findings of this study when developing the future rules. The reporting requirements are also still under discussion. As these aspects are rather controversial on political level, they should not be pre-empted in the context of the Guidelines.</p> <p>Therefore we oppose reporting requirements during the preparatory phase. Because in our view it is critical requiring the complete Pillar I calculation while the legislative process is not completed.</p> <p>Furthermore only a final and stable version of QRTs should be implemented. If EIOPA decides to take this further, certainty is in that case needed that the templates will be robust and not altered once the Guidelines have been published and that there will be no changes thereafter, not even after the preparatory phase. The fact that EIOPA intends to revisit the reporting requirements during 2013 creates a huge uncertainty and possible extra costs as undertakings have to start preparing now.</p> <p>However, the application of formal reporting to National Competent Authorities (NCAs) before Solvency II starts should take care not to put an undue burden on the undertakings. This is particularly the case as undertakings would be expected to develop proper reporting processes, collect and submit Solvency II information to NCAs while existing Solvency I and member state's reporting requirements will continue to apply during the interim period. As such, we do not think the aim justifies the costs and administrative burden put on the undertakings. It can be achieved by other means. Also, since the preparatory reporting does not mirror the intended final reporting requirements, NCAs would not get the full picture of the preparedness anyway.</p>	<p>See previous comments comment 14 and 17.</p> <p>EIOPA acknowledges the situation. Please see comment 14 and 17.</p> <p>See previous comments 14 and 17. The revision is only on deadlines, not on the content.</p> <p>See previous comments 14 and 17. EIOPA disagrees on the need to prepare for the submission of information.</p>

No.	Name	Reference	Comment	Resolution
26	GDV	General Comments	<p>2. The latest developments of the ECB request data form (re-)insurance undertakings should be taken into consideration. If the ECB reporting requirements cannot be averted, we argue for accepting the EIOPA guidelines on submission of information to NCA <u>on</u> following conditions that:</p> <ul style="list-style-type: none"> · It has to be ensured that insurance undertakings just have one single point of entry. This means that it should be avoided that undertakings have to report to different authorities. Thereby national circumstances should be taken into consideration. · The scope of data which EIOPA and ECB require has to be identical (or the ECB reporting requirement should be equal or less than EIOPA's). But it should be avoided EIOPA and ECB require a different granularity in the set of data. · Reporting deadlines and the reporting frequency from EIOPA and ECB have to be the same in order to avoid a separated reporting process in the insurance undertakings. · The market coverage required from ECB and EIOPA have to be the same. <p>3. Focus on solo level: The Preparatory Measures should focus on solo undertakings, only. The current Guidelines also call for an early application of the quantitative re-orting requirements for groups (recital 1.21 of the Reporting Guideline). Given the preparatory character of the measures, this is to be considered as questionable. The practicability and appropriateness of the proposed rules should be reviewed based on the solo level. The implementation on group level should follow once Solvency II has entered into force.</p> <p>Further comments:</p> <ul style="list-style-type: none"> - Reporting deadlines and the reporting frequency should be adjusted appropriately. As the preparatory exercise to be conducted in addition to the current system requires more resources, thus more flexibility on regulatory deadlines should be taken into account. The use of proxies should be allowed without predefined closed list of simplifications made by NCAs. Undertakings should be allowed to use their own proxies as long as material risks are well captured. <p>It should not be required to report a 4th quarter report (during the interim phase and also when Solvency II is into force). During the closing period which follows a financial year end, undertakings will have to prepare, validate and submit Solvency II and financial reporting annual statements. To meet quarterly requirements, undertakings will have to rely on simplification techniques therefore the additional benefit of a quarterly report, within the same quarter as an annual report, is not clear to us.</p> <ul style="list-style-type: none"> - The narrative information should be excluded during the preparatory phase. It will require substantial resources to produce and coordinate the narrative information (please see also our comments on Section IV-VI). - The volume of QRT reporting that EIOPA is proposing is excessive, particularly for internal model undertakings where forms intended only for companies using standard formula under EIOPA's stabilized QRT package are also within scope. Undertakings in the pre-application of the internal model should be able to use their own models, even during the approval period for the quantitative reporting. - We also suggest that EIOPA takes into account all detailed comments on the QRTs during the public consultation. The current version of QRTs still contains mistakes. Therefore undertakings cannot continue implementing the reporting process. - Whilst this is mentioned by EIOPA, we wish to stress the importance of not basing any supervisory enforcement action on the outcome of the Guidelines. Since the intention is not early implementation, it is important that any reporting is not used to provide comparative information for any reporting submissions made after the Solvency II go-live date: for instance, assuming day-one reporting is required as at 1/1/2016, comparative information as at 31/12/2014 ought not to be taken from any reporting produced as at that date under these Guidelines. 	<p>EIOPA's cooperation with the ECB has ensured that the reporting package proposed by the Guidelines is sufficient to meet ECB's initial requirements. EIOPA will continue to engage in a dialogue with the ECB aiming as much as possible to avoid undue costs to the undertakings arising from different requirements. However, the set of the Solvency II reporting requirements aim the information needed for the supervisory review process.</p> <p>Noted. EIOPA will continue to engage in a dialogue with the ECB aiming as much as possible to avoid undue costs to the undertakings arising from different requirements.</p> <p>See previous comments on group reporting. EIOPA considers important that also groups prepare for the submission of information on Solvency II.</p> <p>EIOPA considers application of proportionality principle as a crucial part of Solvency II framework. After taking into consideration stakeholders comments, EIOPA has clarified that for the purposes of quarterly reporting, proportionality and materiality have to be recognised. The quarterly measurements may rely on estimates and estimation methods to a greater extent than measurements of annual financial data. The measurement procedures for the quarterly reporting have to be designed to ensure that the resulting information is reliable and comply with the Solvency II standards and that all material information that is relevant for the understanding of the data is reported. EIOPA has also clarified that with regard to the calculation of technical provisions during the year, in particular the ones for the purpose of quarterly reporting, undertakings may rely on simplified methods in the calculation of the risk margin and best estimate, as elaborated at EIOPA Guidelines.</p> <p>The reporting deadlines for annual submission have been extended by 2 weeks, following consultation process. See also EIOPA Final Report on CP13/10</p> <p>Following the consultation process, EIOPA took on board concerns raised by stakeholders and decided to request reporting of the quarter ended 30 September 2015 ONLY during preparatory phase. See comment above about the application of proportionality and materiality.</p> <p>The objective of introducing narrative reporting during preparatory phase is for undertakings to prepare for the narrative reporting (i.e to set up systems and procedures in order to gather necessary information and to prepare reports) and for supervisors to assess undertakings preparedness (for example, whether the narrative reporting is sufficient in terms of a scope and details). In addition, supervisors may use this information contained in the narrative reporting, for example, with regard to SoG, to assist them in assessing progress made by undertakings in preparation for Solvency 2 SoG requirements.</p> <p>See comment 2.</p> <p>EIOPA took all comments into account to improve the templates and eliminate the mistakes identified. EIOPA will publish a "change LOG" with the final report, as an annex of the Final Report.</p> <p>This is EIOPA assumption and it was clearly stated.</p>

No.	Name	Reference	Comment	Resolution
			<p>- We also consider that it is very problematic at this stage NCAs' discretion on requiring reporting electronically according to set taxonomy. Undertakings should be able to report using excel files or similar. If not, a uniform approach from NCAs is of utmost importance since it would be both costly and burdensome to file reports in different ways to different supervisors. This is even more problematic if reporting at group level would be required.</p> <p>- We further believe the impact assessment sections are not fully adequate and do not properly assess the costs to the industry of the proposals.</p>	<p>The reporting of excel files is possible according with the Guideines. However it is up to each NCA to decide on the means of transmission.</p> <p>Noted. All comments received on the IA were duly considered.</p>
27	I Actuares	General Comments	<p>The Institut des Actuares welcomes this CP. The Institut des Actuares will not comment upon the templates as they were covered by a previous consultation, and we are happy that our remarks were taken into account. As the pillar 1 is still not fixed (LTGA), any reporting is subject in terms of content and timetable to the parameters finally to be adopted, and the date of adoption. Because of the burden of the scheduled reporting, finally to be paid by the clients, the principle of proportionality regarding simplifications should be stressed. We are happy that complicated templates as variation analyses and reinsurance are not part of the interim exercise. The Institut des Actuares is available for any further works regarding these templates. In order to get an homogeneous supervision, national specific templates should be restricted to the minimum. The interim reportings should be covered by this CP and harmonised between countries. The legal framework of what goes beyond the directive (interim reports,...) should be established.</p>	Noted.
28	IA Cyprus	General Comments	<p>1. We believe it is not legally sound to require insurance companies to comply with guidelines which are not in line with the current national legal framework. In Cyprus the existing insurance regulatory framework (Solvency 1) is significantly different from Solvency II and in fact the national law transposing Solvency II would result in a complete new legal framework. Introducing a major part of Solvency II via EIOPA's Guidelines necessitates a major overhaul of the existing regulatory framework. This will prove an extremely burdensome, complicated and lengthy legal process which will distract the industry' focus away from the implementation of a phase-in approach and towards the legal process for amending the laws. We favor a voluntary approach during this preparatory phase, with supervisory authorities seeking a commitment from the insurance industry to comply with guidelines. If this would not be the case then it is most important that sufficient time is allowed for the necessary amendments to the law to accommodate the guidelines.</p> <p>2. We do not support a requirement for undertakings to also comply with the contents of relevant draft Level 2 text. Clarification is requested on whether undertakings will, apart from the guidelines, also have to comply with the contents of the relevant Level 1 and Level 2 text.</p> <p>3. We do not support any requirements in the guidelines relating to Solvency II pillar 1. Hence, we are not in favor of the inclusion of quantitative reporting requirements that require pillar 1 calculations. This would be too burdensome and not appropriate for a preparatory stage, during which Solvency I calculations should be accepted. Solvency II pillar 1 should only apply when Solvency II is introduced in 2016.</p> <p>4. Although we do not object to the aim pursued by narrative reporting, we do not agree with the formal reporting approach taken in the guidelines as this would require substantial resources to coordinate and produce that would come on top of the resources already needed to produce the reporting for Solvency 1. Especially for Cyprus, being a small country with small-sized insurers, double reporting would represent a huge and disproportional burden and local insurers would lack sufficient resources for carrying it out. It would moreover not be cost effective since reporting systems/processes/manuals will again have to be changed once the full Solvency II regime is introduced in 2016. Hence we consider that a framework for monitoring progress in respect of the Governance requirements should better be left to national supervisors to decide in tandem with their markets, taking into account national specificities. We believe that it would be very beneficial if EIOPA requests national supervisors to engage in a dialogue with insurers in their respective markets with an aim to agree on a clear timetable concerning what they concretely expect from undertakings to have in place at different stages during the preparatory stage until 2016 and when/what information should be submitted.</p> <p>5. We strongly support the inclusion in the Guidelines of a provision allowing insurance undertakings to report using excel format or similar. A potential requirement to switch to a different reporting format (i.e XBRL) that has never been used before would be extremely onerous for insurers in Cyprus.</p>	<p>1. Noted. Legal issues will be dealt at a national level. EIOPA recognises different situations.</p> <p>2. The Guidelines provide direct references to the corresponding provisions set out in the Solvency II Directive. EIOPA acknowledges that certain parts of the Solvency II Directive are to be revised by the OMDII and that delegated acts proposal have not yet been finalised by the European Commission. These direct references to Solvency II are made using the expression "In accordance with..." indicating the legal basis of the topic, without prejudice to the current revision of the Solvency II Directive by OMDII. Although the comply-or-explain replies are provided to the preparatory Guidelines only, it is anticipated that during the preparatory phase NCAs and undertakings are preparing for the implementation of all areas covered by Solvency II Directive and not only those covered by the preparatory Guidelines.</p> <p>3. Noted.</p> <p>4. Noted. The objective of introducing narrative reporting during preparatory phase is for undertakings to prepare for the narrative reporting (i.e to set up systems and procedures in order to gather necessary information and to prepare reports) and for supervisors to assess undertakings preparedness (for example, whether the narrative reporting is sufficient in terms of a scope and details). In addition, supervisors may use this information contained in the narrative reporting, for example, with regard to SoG, to assist them in assessing progress made by undertakings in preparation for Solvency 2 SoG requirements.</p> <p>5. This decision is left to each NCA.</p>
			<p>Insurance Europe supports efforts to encourage undertakings' preparation for the planning and building of systems to meet Pillar III requirements in readiness for Solvency II.</p> <p>We however believe that the current Proposal for Guidelines on submission of information to national competent authorities may result in costly dual reporting requirements being placed on undertakings and their national competent authorities.</p> <p>As we referred in our letter dated the 11th March, we are opposed to the introduction of compulsory quantitative reporting based on Solvency II Pillar I requirements as this could pre-empt the outcome of the Omnibus II process and create potentially unnecessary costs.</p> <p>Only when the outcome of the political process is known can the focus turn to what, if any, interim measures should be applied to reporting, as this will depend on when the political process is finalised, what is decided, and the time-table for implementation.</p> <p>Interim measures should not drive supervisory action. The guidance should make clear as an explicit guideline rather than introductory text the "intent" in which they have been issued and that it will not drive supervisory action.</p> <p>If EIOPA nevertheless, takes this further, and without prejudice to our overall position, we believe that the following - the comments apply to both individual and group level except where explicitly stated otherwise- should be taken into consideration:</p>	<p>Noted.</p> <p>On cost issue: This is in fact a reality that would have to occur during the preparation for Solvency II. Both undertakings and supervisory authorities would need to switch from SI to SII reporting from one day to the other. A preparation phase would always be needed in order to guarantee that a disruption in the daily management of the undertaking, in the activities of the supervisory authority and as a consequence in the protection of the policyholders would not occur.</p> <p>The final Solvency II Directive requirements will be determined by the OMDII and the delegated acts. EIOPA is working under the assumption that these measures will be available in time for NCAs and undertakings to prepare for the submission of the forward looking assessment during the years of 2014 and 2015 and of quantitative and qualitative</p> <p>See response to the comment above</p> <p>EIOPA disagrees that this should be included in the guidelines text. The Introduction are part of the Guidelines. The message is also clarified in the Final Report.</p> <p>Noted</p>

No.	Name	Reference	Comment	Resolution
			<p>- Any interim measures to be applied once the political process is finalised, should not require more than one cycle of annual reporting and one cycle of quarterly reporting before Solvency II entry into force.</p> <p>Once the political process is finalised, any interim measures to be applied to reporting should just require a maximum of one cycle of annual and quarterly reporting before the Solvency II effective date.</p> <p>If the Solvency II effective date is delayed further the timetable for interim reporting requirements will be pushed back accordingly. We recognise that this is in paragraph 1.11 in the introductory text, however, to be truly effective it should be included as a guideline.</p> <p>Therefore if the Solvency II effective date is 1 January 2016, annual templates would be required for the year ended 2014, and quarterly templates would be required for Q3 2015 only.</p> <p>We believe that the reporting of the September 2015 (Q3) quarter will be sufficient to assess undertakings preparedness to report high quality data on a quarterly basis once Solvency II is applicable. Moreover, considering the additional effort and costs involved in meeting the interim reporting requirements while complying with existing Solvency I requirements, the deadline for the September 2015 quarterly reporting should be 12 weeks after the quarter end.</p> <p>We add that even when Solvency II is in force, it should not be required any quarterly reporting for Q4. During the closing period which follows a financial year end, undertakings will have to prepare, validate and submit Solvency II and financial reporting annual statements. To meet quarterly reporting, undertakings will have to rely on simplification techniques, therefore the additional benefit of a quarterly report within the same quarter as an annual report, is not clear.</p> <p>We further believe this to be consistent with the latest European developments that abolished the requirement to publish quarterly financial information in the revised Transparency Directive in order to reduce the undertakings' administrative burden.</p> <p>- Any interim measures to be applied once the political process is finalised, need to assure that undertakings will have enough time to establish the appropriate internal processes and IT systems.</p> <p>We believe that the political process time-table will not provide enough time for undertakings to prepare the internal processes and IT systems for reporting the proposed Quantitative Reporting Templates (QRTs) package for the year ending 2014, moreover considering that accordingly with EIOPA's Cover note and annex I (Impact Assessment), after the political process is finalised, EIOPA will have to prepare technical specifications and provide guidance on the assumptions underlying the calculation of technical provisions and the standard formula calculation, reflecting the decision on Omnibus II and the available delegated acts, for the purpose of the quantitative Pillar I Solvency II information to be submitted to national competent authorities.</p> <p>- Any interim measures to be applied once the political process is finalised should exclude narrative reporting.</p> <p>If the purpose of these Guidelines is to assess progress towards achieving compliance with Solvency II requirements, spending time and resources producing narrative information that describes a temporary situation (temporary, because undertakings will be in the course of making progress towards achieving compliance) seems unduly burdensome.</p> <p>We believe that national competent authorities will be able to assess progress towards Pillar II compliance via the means proposed for the System of Governance. We therefore do not believe that the Guidelines proposed on the narrative reporting are necessary.</p> <p>- Any interim measures to be applied once the political process is finalised should exclude group reporting.</p> <p>It should be sufficient with the solo reporting to test the data flows in the templates. Group reporting will merely test the consolidation.</p> <p>It occurs that different approaches to solo reporting between countries and the fact that not all solo entities are required to report, will mean that information may not be available for the group consolidation.</p>	<p>On the quarterly see comment 19.</p> <p>EIOPA confirms that there will be one annual submission for the year ended 31 December 2014 required under preparatory Guidelines; Following the consultation process, EIOPA took on board concerns raised by stakeholders and decided to request reporting of the quarter ended 30 September 2015 ONLY during preparatory phase. EIOPA will review the deadlines for the submission of information and the report on the forward looking assessment at the end of 2013 based on the latest developments. Following the stakeholders comments, a revision clause was introduced in the Guidelines.</p> <p>EIOPA disagrees that this should be included in the guidelines text. The Introduction are part of the Guidelines. The message is also clarified in the Final Report.</p> <p>See response to the comment above</p> <p>On the quarterly see comment 19.</p> <p>Please see EIOPA answer on this issue in the July 2012 final report.</p> <p>Please see EIOPA answer on this issue in the July 2012 final report. The purpose of the referred Directive is quite different from the supervisory purposes.</p> <p>EIOPA acknowledges these concerns. However it believes that the preparation for the submission of information under Solvency II is crucial. In fact undertakings claimed that they would need at least 18 months for the preparation. Assuming that Solvency II will be applicable as from 1 January 2016, that would mean that they would need to start implementation as from 1 June 2014. This timing is consistent with the approach taken in the Guideline publicly consulted. EIOPA has minimised the possibilities of changes with the use of only a sub-set of the information to be submitted in future.</p> <p>Noted. EIOPA is working under the assumption that Omnibus II and final delegated acts will be available in time for NCAs and undertakings to prepare for the submission of quantitative and qualitative information in 2015. In which case, at that stage, EIOPA would prepare technical specifications and provide guidance on the assumptions underlying the calculation of technical provisions and the standard formula calculation, which reflect the decision on OMDII and the available delegated acts.</p> <p>The objective of introducing narrative reporting during preparatory phase is for undertakings to prepare for the narrative reporting (i.e to set up systems and procedures in order to gather necessary information and to prepare reports) and for supervisors to assess undertakings preparedness (for example, whether the narrative reporting is sufficient in terms of a scope and details). In addition, supervisors may use this information contained in the narrative reporting, for example, with regard to SoG, to assist them in assessing progress made by undertakings in preparation for Solvency 2 SoG requirements.</p> <p>Noted. See previous explanation on the purpose of the Narrative report.</p> <p>Noted. See previous explanation on the purpose of the Narrative report.</p> <p>On group reporting see comment 26.</p> <p>On group reporting see comment 26.</p> <p>EIOPA confirms that in cases where undertakings fall below thresholds on solo level, they should be reported on group level when they are part of a group which is subject to reporting under the preparatory Guidelines. The purpose is to prepare groups for SII which should include all solo undertaking which are subject to SII.</p>

No.	Name	Reference	Comment	Resolution
29	IE	General Comments	<p>We believe that during the preparatory phase, the Guidelines should be limited to the solo perspective.</p> <p>- Any interim measures to be applied once the political process is finalised should consider that the QRTs need to be robust and stabilised once the Guidelines have been published.</p> <p>Interim QRTs should only be requested if they will form part of the final QRT set (in form and content) that will be used when Solvency II commences. Reporting data in a format that will not be required in the final QRTs, or that exceed the requirements of the final QRTs, will potentially require incurring costs that will not add value in the long run and is not in line with the intention of interim measures. For example requesting undertakings to report separately the largest ring fenced fund and separately consolidate the other ring fenced funds creates a sub-consolidation step for the latter that will not be required in the final template. Also the reporting of ring-fenced funds should not be extended to group reporting as proposed by the current consultation.</p> <p>In line with this rationale, QRTs should also not include changes not subjected to public consultation as that entails potential new changes. We add that the current version of QRTs still contains mistakes which compromise the implementation of the reporting process.</p> <p>Any changes from previous QRTs should be clearly identified. Publishing a revised set of templates without indicating any changes creates the task of having to compare the templates with previous versions for each entity within the scope of Solvency II. We urge EIOPA to issue a proper change log (comparing with the version issued in July 2012) with the final interim QRTs later this year.</p> <p>- Any interim measures to be applied once the political process is finalised should not impose an excessive volume of QRT reporting for internal model users.</p> <p>Undertakings should not be required to submit both internal model and standard formula forms if they are sufficiently progressed in their internal model approval process.</p> <p>Building systems to capture data on both in the prescribed format, which must be submitted electronically, involves building reporting processes and submission templates that may not be required longer term. For undertakings in the internal model approval process any standard formula data should be sourced through the internal model application process, not through the submission of QRTs.</p> <p>- Any interim measures to be applied once the political process is finalised should be applied on a best effort basis and allow the use of simplifications and proxies.</p> <p>Reporting should be on a best efforts basis. As this is a preparatory exercise, we expect EIOPA and national competent authorities to allow reporting on a best efforts basis with the focus being on the process of generating the returns. This may include granting exemptions or simplifications for the purposes of the exercise. Further, these measures will require parallel running of present Solvency I reporting and the reporting required under the interim measures. As such, having to report exact numbers will create an undue burden on undertakings.</p> <p>EIOPA and the national competent authorities should acknowledge that undertakings will make implementation assumptions. Undertakings will need to make assumptions about the application of certain rules where formal regulatory approval is required, e.g. the treatment of insurance subsidiaries where there is negligible interest, or valuation of overseas insurance undertakings at nil where there is a lack of available data.</p> <p>We believe that EIOPA and the national competent authorities should take a pragmatic approach to the treatment of these issues prior to the implementation of Solvency II to avoid late surprises when the regime goes live.</p> <p>- Any interim measures to be applied once the political process is finalised should allow undertakings to report using excel files or similar.</p> <p>It is very problematic at this stage the national competent authorities' discretion on requiring reporting electronically according to XBRL taxonomy.</p> <p>The lack of an uniform approach from national competent authorities would be both costly and burdensome as undertakings would have to file reports in different ways to different supervisors. This is even more problematic if reporting at group level would be required.</p> <p>- Any interim measures to be applied once the political process is finalised should allow undertakings to consider all third countries equivalent and to use the Deduction and Aggregation method.</p> <p>The guidelines allow third countries to be reported on an equivalent basis, if the group supervisor agrees that the Accounting Consolidation method is inappropriate and that the use of the Deduction and Aggregation method is preferable.</p> <p>Given the expectation that has been set by the European Commission and supervisors that major third countries like the USA and Canada will be equivalent, and the general uncertainty around when this issue will finally be resolved, we feel it would make most sense if undertakings were allowed during the preparatory phase to consider all third countries equivalent and to use the Deduction and Aggregation method.</p>	<p>On group reporting see comment 26.</p> <p>Noted. See previous comments.</p> <p>See previous comment 1.</p> <p>See previous comments 18 and 26.</p> <p>See previous comments 18 and 26.</p> <p>See previous comments.</p> <p>On IMAP see comment 2.</p> <p>On IMAP see comment 2.</p> <p>See previous comments 6 and 18.</p> <p>See previous comments 6 and 18.</p> <p>See previous comments 6 and 18.</p> <p>See previous comments.</p> <p>See previous comments.</p> <p>The method to be used to transmit the information is left to the NSA to decide</p> <p>See previous comments.</p> <p>See previous comment 18.</p> <p>See previous comment 9. On D&A see comment 5.</p> <p>See comment 5.</p> <p>a) For the purpose of the preparatory phase all third countries are considered to be equivalent, without pre-empting any future decision; b) The default method for consolidation is the consolidation method; c) The use of D&A does not depend on the equivalence classification. There might be cases where the third country regime is considered to be equivalent but it is not considered adequate to use the D&A method.</p>

No.	Name	Reference	Comment	Resolution
			<p>- EIOPA should ensure a single-point-of-entry for all reporting requirements.</p> <p>It is necessary that all different provisions on reporting are taken into account, including the European Central Bank (ECB) data requirements.</p> <p>If the ECB reporting requirements cannot be averted, Solvency II reporting requirements including in the preparatory phase should assure that:</p> <p>-Insurance undertakings just have one single point of entry. It should be avoided that undertakings have to report to different authorities. Thereby national circumstances should be taken into consideration.</p> <p>-The scope of data which EIOPA and the ECB require has to be aligned. ECB reporting requirements should require the same or less data than EIOPA reporting requirements. Granularity and form of data should be identical.</p> <p>-The reporting deadlines and the reporting frequency from EIOPA and ECB should be the same.</p> <p>-The market coverage required from ECB and EIOPA should be the same.</p>	<p>EIOPA's cooperation with the ECB has ensured that the reporting package proposed by the Guidelines is sufficient to meet ECB's initial requirements. EIOPA will continue to engage in a dialogue with the ECB aiming as much as possible to avoid undue costs to the undertakings arising from different requirements. However, the set of the Solvency II reporting requirements aim the information needed for the supervisory review process.</p> <p>See previous comment.</p> <p>See previous comment.</p> <p>See previous comment.</p> <p>See previous comment.</p> <p>See previous comment.</p> <p>See previous comment.</p>
30	If P&C	General Comments	The numbering of the "Template for Comments" is off and not correct. Comments on guidelines below run to 1.96. The guidelines run to 1.92. Further concerning the QRT it would be preferable to be able to submit the whole of the developed report, i.e. any deduction of information not required during phasing-in would be done by the recipient(s). Another procedure may lead to that already developed solutions may have to be rebuilt just for the phasing-in period, which would be costly and require significant resources.	Noted.
31	ILAG	General Comments	ILAG is a trade body representing members from the Life Assurance and Wealth Management industries. ILAG members share and develop their practical experiences and expertise, applying this practitioner knowledge to the development of their businesses, both individually and collectively, for the benefit of members. The requirements are very detailed and prescriptive although they are presented as being Guidelines.	Noted.
32	IMA	General Comments	<p>The Investment Management Association (IMA) thanks you for the opportunity to comment on the above paper.</p> <p>The IMA represents the asset management industry operating in the UK. Our Members include independent fund managers, the investment arms of retail banks, life insurers and investment banks, and the managers of occupational pension schemes. They are responsible for the management of 4.9 trillion Euros of assets, which are invested on behalf of clients globally. These include authorised investment funds, institutional funds (e.g. pensions and life funds), private client accounts and a wide range of pooled investment vehicles.</p> <p>Comments are shown in line 159</p>	Noted.
33	Insurance Ireland	General Comments	Insurance Ireland broadly welcomes the draft Guidelines and their aim of promoting a consistent structure across Europe in advance of the implementation of Solvency II. This consistency is particularly important for insurers operating on a cross border basis. In relation to the parallel running of Solvency I and Solvency II in the period April/May 2015 it may not be feasible to process year-end, Q1 and Solvency II figures by the relevant deadlines. The position will be further complicated where there is an internal model. We would request that there should be flexibility from NCAs in relation to the submission date for Solvency II figures under Pillar 3./Please clarify, for the avoidance of potential confusion, that it is intended that the Guidelines and the Directive will apply on a stand-alone basis and that draft Level 2 and Level 3 guidance which may have been circulated previously are not relevant under the interim regime. It would also be helpful if it could be confirmed that Level 2 and Level 3 guidance finalised during the interim phase would not impact on the interim regime. /Some (re)insurance entities may be planning a revised organisational structure with effect from the full implementation of Solvency II to optimise capital efficiency. Local NCAs should have the flexibility to anticipate these changes when applying the guidelines.	<p>Noted.</p> <p>On the deadlines see previous comment 3.</p> <p>On the Q4 see previous comment 3.</p> <p>On the Internal model see previous comment 2.</p> <p>On the Level 1 and Level 2 please see Final Report on the Guidelines.</p> <p>See also comment 13.</p>
34	IUA London	General Comments	We very much agree that consistency is necessary to avert confusion and that it is necessary to ensure convergence rather than divergence. However, we are concerned that too much information may be required of insurance and reinsurance firms during the preparatory phase. At a time when all will be very busy, heavy reporting requirements for data and narrative will not be helpful to the supervisors or the firms, when much of the underlying data will not be available, the narrative will not have been thought through, requirements will still be changing and templates will not be finalized. In particular, it appears to us that Pillar 1 data will not be ready for use. The production of appropriate and useful information for groups will also be especially difficult to achieve. We suggest, therefore, that it will be more practical to require informed estimates and other alternatives forms of information and calculation. Provided that such information is treated as approximative and not used for future comparisons, we believe it would prove more useful and easier to digest.	<p>Noted.</p> <p>See previous comments.</p>

No.	Name	Reference	Comment	Resolution
35	Lloyds	General Comments	<p>Lloyd's supports EIOPA's efforts to harmonise progress towards the implementation of Solvency II in the European Union. Lloyd's welcomes the opportunity to comment on this consultation paper.</p> <p>However, Lloyd's does not support mandatory quantitative reporting to National Competent Authorities (NCAs) before Solvency II implementation, particularly as existing Solvency I and member state reporting requirements will continue to apply during the interim period. These Guidelines will therefore mean that firms are subject to dual reporting requirements in the preparatory period, increasing costs and the burden of regulatory compliance.</p> <p>Notwithstanding our general opposition to the introduction of these Guidelines, our detailed comments are set out below. We would like to highlight the following comments in this section:</p> <ul style="list-style-type: none"> · Completion on a "best efforts" basis: Paragraph 1.10 says that NCAs would not be expected to take any enforcement or regulatory action in response to information submitted under these measures. As during this period, firms will be expected to comply with the existing regulatory reporting framework, we would welcome EIOPA's explicit confirmation in the guidelines that these measures may be complied with on a 'best efforts' basis. · Number of reports submitted: There should be no more than one set of annual and one set of quarterly interim reporting requirements before Solvency II starts. To ease the burden on firms and avoid a clash with current year-end reporting requirements, quarterly reporting should only be required at 30 September 2015. No quarterly or annual reporting should be required as at 31 December 2015, given the reporting required by the current regulatory regime. · Deadline for quarterly reporting: As this exercise is intended to help firms prepare for Solvency II, the deadline for quarterly reporting should be 12 weeks rather than 8 weeks. This will give firms greater opportunities to produce meaningful data and to benefit from what is effectively a 'dry run' for the reporting requirements. · Firms seeking internal model approval: If approval is granted, these firms will not calculate the SCR using the standard formula. They should not therefore be required to complete the detailed SCR standard formula templates proposed at SCR-B3A to SCR-B3G. Completion of these will require such firms to build systems to report this data, which would be obsolescent under Solvency II. The SCR standard formula numbers should be reported to NCAs via the IMAP process instead. Alternatively summary SCR standard formula numbers could be reported on SCR-B2B and SCR-B2C. 	<p>See previous comment 1.</p> <p>See previous comment 18.</p> <p>See previous comment 3.</p> <p>See previous comment 3.</p> <p>See previous comment 2.</p>
36	MetLife	General Comments	<p>The Insurance Industry is incurring significant expense due to Solvency II. During the period up to Solvency II implementation, insurers will be developing their end state Solvency II solutions as well as undertaking the existing Solvency I reporting. The requirement to report the additional information required by the consultation paper will lead to significant additional costs and burden on the staff.</p>	<p>EIOPA considers some period of parallel reporting is unavoidable when introducing a new set of regulatory reporting that differs significantly from the existing one; EIOPA recognises the burden of undertakings that this is why a revisions clause has been included in the Guidelines, limiting period of parallel running of reporting</p> <p>See also previous comment 1.</p>
37	Munich Re	General Comments	<p>As specific Solvency II requirements have not yet been finalised, in particular with regard to pillar I, and are subject to the ongoing political process (Trilogue, Level 2), an early application of related pillar III reporting requirements is critical. We therefore disagree with a pre-application of Solvency II for reporting issues before the first official application date of Solvency II.</p>	<p>Undertakings are to set up systems and processes that will enable them to report all relevant information as required by Solvency 2 reporting requirements;</p> <p>EIOPA acknowledges undertakings concerns about uncertainties as to Omnibus 2 negotiations and their impact on Pillar 1 requirements and as a consequence, a possible impact on Pillar 3 requirements. However it believes that the preparation for the submission of information under Solvency II is crucial.</p> <p>The final Solvency II Directive requirements will be determined by the OMDII and the delegated acts. EIOPA is working under the assumption that these measures will be available in time for NCAs and undertakings to prepare for the submission of quantitative and qualitative information in 2015. In which case, at that stage, EIOPA would prepare technical specifications on Pillar I quantitative issues and provide guidance on the assumptions underlying the calculation of the standard formula calculation, which reflect the decision on OMDII.</p> <p>However, as this assumption is based on the OMDII negotiations and the availability of the delegated acts, EIOPA will review the deadlines for the submission of information at the end of 2013 based on the latest developments.</p>
38	Nordea	General Comments	<p>Nordea Life & Pensions supports the need for a consistent and convergent legal framework across Groups and in all countries involved to ensure the wanted effect from implementing Solvency II. Consistency and coherence should also apply for the Guidelines. Previously we have experienced material differences in the way Solvency II related issues are implemented locally in each country. If this will be the case also this time, it will be difficult to implement consistent reporting solutions prior to the SII implementation date. Some NCA's seems to prioritise local reporting (to e.g. National Banks) higher than reporting to EIOPA according to guidelines.</p>	<p>Noted</p>

No.	Name	Reference	Comment	Resolution
39	Polish Chamber of Insurance	General Comments	<p>There are fundamental concerns regarding the implementing of the regulatory framework which is neither entirely defined on an European level nor implemented into local national legislation. The pillar one which is a basis for the regulatory framework is still not defined and the core conceptual piece, economic evaluation of the balance sheet, is still under discussion as the adjustment mechanisms are still in the phase of testing. The quantitative part of the framework (pillar one) is the base for two other pillars. Without deciding upon the final shape of pillar one two remaining pillars could be hardly implemented, especially in the context of calculation solvency position in ORSA and building the reporting tools for the supervisory reporting. Forcing insurers to comply with regulations which are not legally binding and may be significantly changed may lead to huge investments both in money terms and human resources which in the end could be a waste of money.</p> <p>Without deciding upon the final shape of the solvency framework the phasing in should be limited to implementing soft elements, like corporate governance, limited reporting similar to QIS exercises if necessary. All the Stakeholders should seriously consider the costs and organizational/regulatory risks which would be certainly associated with partial implementation as in the end it will jeopardize confidence for the insurance sector creating systemic risk and transferring additional costs for consumers.</p> <p>As long as Pillar I is not implemented there should ne no requirements for Pillar 3. Too much information is included in the reporting. One of the assumptions of Pillar 3 was more market transparency..Too much info does not give a clear view of the market. Cost of prepatng the repors (IT costs) are very high. NCA should do a test on reporting . There should be an alternative proposal in case Omnibus II is not voted at the latest in October 2013.</p>	See previous comment 37.
			<p><u>1. Timeline for the Guidelines Implementation</u></p> <p>The time table for guidelines implementation should to greater degree incorporate proportionality principle. Requirements of “step-by-step” implementation should not be too burdensome and cannot generate costs not proportionate to the aim of the regulations. Moreover the time table and guidelines should not force implicitly (indirectly) earlier, de facto implementation of Solvency II requirements. In other words the information collected by NCAs during implementation phase should not trigger or influence any regulatory action – otherwise there will be no difference between implementation phase and the formal introduction of Solvency II.</p> <p>Additionally, as we understand, EIOPA intends to publish the guidelines in the areas covered by this consultation in the autumn of this year. According to Article 16(3) of the EIOPA Regulation NCAs ‘shall make every effort to comply’ with the guidelines. This means in practice, that NCA and insurance undertakings will have limited time of two months, following issuance of the guidelines (the date of issuance of the guidelines is the date on which the guidelines are published in each of the official EU languages) to confirm whether they comply or intend to comply with the guidelines. It is clear that such confirmation should not be automatic but result from a solid analysis of the proposed requirements vis a vis existing capacities (people, IT, infrastructure, budgets) both in NCA and insurance undertakings. And even if in some cases the answer might be positively confirming readiness to comply in other cases, requiring technical preparation, budgets, project, and people, this will not be possible to implement on proposed date. Hence, taking these arguments into account, we have doubt if it is possible for insurance undertakings to prepare for implement the guidelines from 1 January 2014. In our opinion it would be advisable to spend 2014 for local consultations (i.e. based on intensive, technical dialogue between local regulators and local insurance industry) to better prepare for the implementation of the guidelines. Then, it is more realistic that the guidelines could go live starting January 2015.</p> <p><u>2. Basis for Guidelines Implementation</u></p> <p>We welcome the view, that EIOPA recognises that in a significant number of member states, the NCA does not have the legal competence to enact the relevant financial legislation and is dependent on the powers bestowed upon it. Additionally, special attention should be paid by NCAs to determine how to comply with EIOPA guidelines by incorporating them into their regulatory or supervisory framework in an appropriate manner, especially if they are less stringent or less precise than local legally binding regulations (e.g. in case of outsourcing; fit & proper requirements). Moreover we support the EIOPA view that the guidelines do not require NCAs to take supervisory action, and in our opinion – it should be clearly stated that no such regulatory actions should be taken (e.g.: imposing restriction on dividend payment), as a result of a failure by undertakings to comply with Solvency II requirements, including the pillar one, two and/or three requirements.</p> <p><u>3. Reporting Requirements</u></p> <p>A. Burdensome Requirements:</p> <p>In general the level of data disaggregation and the number of details required to be reported during implementation phase (through quantitative reporting templates) is very extensive. Due to the high cost of reporting requirement's implementation (at the level of single undertaking) the regulator is expected to prove that the data in such disaggregation are indeed necessary to report and that each reported position shall be used by the regulator. This is especially the case of data requirements in the assets templates (AS-D1-L, AS-D2O-L) in which for each separate asset unit 26 positions must be reported (33 positions in terms of derivatives – open positions). It is questionable to what extend the requested data are supported by Pillar I requirements and what the purpose is of reporting it to NCA. The reporting burden is not proportionate to the goals assumed for transition (implementation) phase.</p> <p>Based on the above we would like to propose to exclude reporting templates used of the purpose of financial stability reporting and templates covering detailed list of assets and derivatives (i.e. Assets and liabilities by currency, Life and Health SLT Technical Provisions – Best Estimate by country, Non-life Technical Provisions – Best Estimate by country, Detailed list of assets, Detailed list of derivatives – open positions)</p>	<p>Noted.</p> <p>Noted.</p> <p>For a transparent approach, EIOPA would like to inform stakeholders that the progress report will comprise a follow up of the comply and explain mechanism which will be made publicly available.</p> <p>Noted.</p> <p>The purpose of reporting of all templates was already consulted and discussed in previous consultations. The "Summary docs" from the Final Report of July 2012 explain the purpose of each template.</p> <p>The Solvency II reporting requirements (the final pacakge) will include information that is required for the purpose of supervision .</p> <p>It is not clear if this proposal is for preparatory phase or SII in general. The preparatory phase will not include Financial Stability reporting.</p>

No.	Name	Reference	Comment	Resolution
40	PZU	General Comments	<p>B. Pillar I vs. Pillar III:</p> <p>We would like to point out our considerations relating to potential inconsistencies between Pillar I and Pillar III. In our opinion the main role of Pillar III is reporting based on data (analysis, calculations) provided by Pillar I. Any additional reporting requirements which cannot be easily supported by Pillar I should be excluded from the final reporting requirements.</p> <p>C. Data availability:</p> <p>In many areas of reporting the required data are not readily available. Especially in the areas of assets some of the required data can be obtained only through the third-party (data/information vendor). In case of some areas the data are available through different IT systems hence the current reporting requirements will probably lead to the need of setting up a special Solvency II data warehouse which will be both costly and time consuming. In some cases the reporting of information (such as for example information obtained from other company based on the agreement) may be treated as braking the property rights and lead to serious legal problems.</p> <p>D. Cost of implementation:</p> <p>The application of current shape of reporting requirements would result in high implementation costs especially in the area of IT systems. Solvency II, especially during the implementation phase, is going to be the additional reporting framework apart from IFRS framework and Local GAAP framework. Due to this fact the application phase should be divided into sup-phases during which the separate parts of final reporting requirements would be implemented. Expanding the duration of application phase would, in our opinion, allow to split the implementation costs and to minimize the risk of implementation errors.</p> <p><u>4. Implementation Timing</u></p> <p>A. Implementation Timing:</p> <p>The reporting requirements and instructions are not yet finalized. The real implementation process should be started as soon as the final requirements are settled so the undertaking will not overinvest in the IT systems, setting processes etc. The starting point of the overall implementation should be than perceived as the date of final acceptance of reporting requirements (based on current implementation timelines the 1st January 2014 is the deadline for local NCAs to put in place the official local guidelines hence the implementation process should immediately start after the guidelines announcement). In our opinion the preparation and introduction of appropriately precise local guidelines within given deadlines is challenging especially due to the fact that in some areas of guidelines the local consultations of NCA and undertakings are necessary. We would like to propose to dedicate the year 2014 to local pre-application discussions between NCA and undertakings which would lead to preparation of detailed and precise local guidelines and local implementation timeline. Based on our proposal we believe that the real implementation process should take place in 2015 and as a result the first reporting should be performed in 2016.</p> <p>Moreover in our opinion reporting is the main area in which the changes in local law and regulations are necessary so the local NCAs will be able to fulfil the tasks defined by Solvency II guidelines. As the change of local law does not depend on NCA there is a risk that necessary changes won't be introduced before the deadline for introduction of local guidelines. We believe that timeline of implementation phase should take into account the potential duration of the process of introduction of changes in local law. Due to this fact we would like to propose to dedicate year 2014 for introduction of necessary changes in local regulations and to move the deadline for introduction of local guidelines from 1st of January 2014 to 1st of January 2015.</p> <p>B. Duration of implementation process:</p> <p>Setting up the appropriate processes, agreements with external data vendors, IT systems etc. is expected to take more than 1 year. Based on the current application deadlines the final implementation of interim requirements should be finalized till 2014.12.31 (based on current implementation timelines the first reporting period is 2014.01.01 – 2014.12.31 and the reporting templates and narratives must be submitted within 20 weeks after the end of financial year) while the start of implementation process is expected to be on the day of final reporting requirements announcement (2014.01.01). In our opinion 1 year is not enough for the proper implementation of all reporting requirements.</p> <p>C. Parallel reporting:</p> <p>During the interim implementation phase (and probably beyond should Solvency II not be fully implemented in due time again) there is a risk that both SI and Solvency II results shall be reported. In the interim phase Solvency I will remain the legally binding regulatory and supervisory regime, especially with respect to quantitative requirements, as EIOPA was kind to notice. Undertakings will be obliged to continue submitting reports based on Solvency I methodology. Any interim reporting would become an additional/parallel reporting obligation based on a very different valuation and calculation methodology.</p> <p><u>5. Impact of Reported Information</u></p> <p>A. Solvency II results impact in application phase:</p> <p>During the application phase of the process there is a risk of double reporting (under SI regime and under partial Solvency II regime). Although during the application phase the results of Solvency II partial reporting cannot be treated as binding (as according to current timeline the Solvency II will be fully applicable starting from 2016.01.01) there is a risk that the information obtained by local NCA during application phase will have an impact on actions and decisions taken by NCA.</p>	<p>The Article 35 of the Solvency II Directive sets out the bases for Solvency II reporting requirements for the purpose of supervision</p> <p>The data will need to be available when SII is implemented, therefore the need for the preparatory phase.</p> <p>Noted.</p> <p>Noted.</p> <p>EIOPA is aware of differences regarding the national implementation. However it believes that the proposed timeline is the most adequate one and is the one that will allow companies to be ready by 1 January 2016.</p> <p>EIOPA acknowledges these concerns. However it believes that the preparation for the submission of information under Solvency II is crucial. In fact undertakings claimed that they would need at least 18 months for the preparation. Assuming that Solvency II will be applicable as from 1 January 2016, that would mean that they would need to start implementation as from 1 June 2014. This timing is consistent with the approach taken in the Guideline publicly consulted. EIOPA has minimised the possibilities of changes with the use of only a sub-set of the information to be submitted in future.</p> <p>On double reporting: This is in fact a reality that would have to occur during the preparation for Solvency II. Both undertakings and supervisory authorities would need to switch from SI to SII reporting from one day to the other. A preparation phase would always be needed in order to guarantee that a disruption in the daily management of the undertaking, in the activities of the supervisory authority and as a consequence in the protection of the policyholders would not occur</p> <p>The purpose of the reporting is clear. Information should be used to assess level of preparedness and not to assess compliance with SII.</p>

No.	Name	Reference	Comment	Resolution
			<p>B. Internal/Partially-Internal Model vs. Standard Formula:</p> <p>Based on the current requirements the users of Internal/Partially-Internal Model are required to report both SCR based on Internal/Partially-Internal Model and based on Standard Formula. There is a risk that local NCA will take an action based on the fact that reported SCR based on Standard Formula is higher than SCR based on Internal/Partially-Internal Model. After the pre-application process and IMAP the Internal/Partially-Internal Model users should not be required to report SCR on the basis of Standard Formula.</p> <p><u>6. Internal Model Reporting Requirements</u></p> <p>A. SCR reporting templates:</p> <p>The presented SCR templates are mainly applicable for Standard Formula users only. The lack of appropriately flexible templates for Internal/Partially-Internal Model users is an issue which should be solved before the final acceptance of reporting requirements.</p> <p>B. Scope of reporting:</p> <p>Based on current reporting requirements the undertaking is expected to calculate and report both SCR on the basis of Internal/Partially-Internal Model and SCR based on Standard Formula. In many cases this means a double reporting which is connected with additional process implementation cost.</p> <p><u>7. Annual Progress report</u></p> <p>In our opinion the annual progress report prepared by local NCA should not be supplemented by any kind of comply or explain procedure (e.g. local peer review report etc.). Such report would require the analysis of compliance of each undertaking with the interim measures requirements. We believe that the compliance should be tested on the basis of final requirements after the official introduction of Solvency II.</p> <p><u>8. XBRL Taxonomy</u></p> <p>In our opinion the introduction of XBRL taxonomy should be excluded from implementation phase. The application of XBRL taxonomy will result in additional costs of implementation and, as the reporting in XBRL format is required only in terms of local NCAs, the undertakings should not be required to use XBRL during implementation phase.</p>	<p>See comment 2.</p> <p>In relation to the SCR templates, internal model undertakings should report only the SCR - B2B for partial internal model or the SCR - B2C for full internal models. The way the risks within an internal model are categorised vary from undertaking to undertaking. As a result, the design/ component elements of the templates are to be agreed with the NCAs. This flexibility is required in order to fit to the specificities of the undertaking and the categorization it makes to its risks in the internal model.</p> <p>See comment 2.</p> <p>The progress report is a measure of communication between EIOPA and the NCAs but it is not part of the requirements for preparation towards Solvency II.</p> <p>EIOPA clarifies that in accordance with the EIOPA's preparatory Guidelines, undertakings are required to submit information requested in electronic format both for quantitative and narrative information. However it is up to each NCA to make a decision as to the use of XBRL. However, EIOPA will make available a tool for undertakings to use XBRL in time for preparatory phase.</p>
41	ROAM	General Comments	<p>Les membres de la ROAM mettent en exergue les points suivants :</p> <ul style="list-style-type: none"> - Il est indispensable de disposer d'une traduction officielle en français des « guidelines » fournies par le superviseur. - Les coûts informatiques et humains pour se préparer à Solvabilité 2 sont déjà très importants. Il est inacceptable d'engager des coûts supplémentaires tant que les textes définitifs ne sont pas votés. - Il n'est pas envisageable d'avoir à gérer deux jeux de reporting et deux référentiels (Solvabilité 1 et Solvabilité 2) pendant une période transitoire à durée indéterminée. - Les modalités d'application du principe de proportionnalité devraient être clarifiées pour permettre aux membres de la ROAM de mieux anticiper les futures exigences réglementaires liées à la période transitoire et la mise en application de Solvabilité 2. Ce principe est fondamental pour les membres de la ROAM. - La ROAM s'oppose à l'établissement d'états trimestriels pendant la période transitoire qui conduirait à augmenter encore de manière considérable les coûts. De plus, il n'est pas acceptable que le niveau de détail de ces états soit proche de celui demandé pour les états annuels. - Enfin, les membres souhaitent avoir l'assurance qu'un convertisseur au format XBRL sera fourni par l'EIOPA. Par défaut, la taxonomie ne doit pas pouvoir être imposée. 	<p>Noted.</p> <p>The guidelines will be published in all EU languages</p> <p>On double reporting: This is in fact a reality that would have to occur during the preparation for Solvency II. Both undertakings and supervisory authorities would need to switch from SI to SII reporting from one day to the other. A preparation phase would always be needed in order to guarantee that a disruption in the daily management of the undertaking, in the activities of the supervisory authority and as a consequence in the protection of the policyholders would not occur.</p> <p>EIOPA considers setting up systems and processes and procedures for quarterly reporting, as well as submitting quarterly information as defined in the guidelines, as an important part of the preparation process</p> <p>EIOPA clarifies that in accordance with the EIOPA's preparatory Guidelines, undertakings are required to submit information requested in electronic format both for quantitative and narrative information. However it is up to each NCA to make a decision as to the use of XBRL.</p> <p>However, EIOPA will make available a tool for undertakings to use XBRL in time for preparatory phase.</p>
			<p>We support this effort by EIOPA to prevent individual national supervisors from introducing parts of the Solvency II legislation piecemeal and in a way which introduces unnecessary differences between jurisdictions.</p> <p>We are, however, opposed to any early introduction of regulatory reporting. This would inevitably be in addition to existing Solvency I reporting, so would involve double reporting and additional costs for firms.</p> <p>In any event, the volume of reporting that EIOPA is proposing is excessive, particularly for internal model firms where forms intended only for companies using standard formula under EIOPA's stabilised QRT package are also within scope.</p>	<p>Noted</p> <p>On double reporting: This is in fact a reality that would have to occur during the preparation for Solvency II. Both undertakings and supervisory authorities would need to switch from SI to SII reporting from one day to the other. A preparation phase would always be needed in order to guarantee that a disruption in the daily management of the undertaking, in the activities of the supervisory authority and as a consequence in the protection of the policyholders would not occur</p> <p>See comment 2.</p>

No.	Name	Reference	Comment	Resolution
42	RSA	General Comments	<p>It is unhelpful for the guidelines to replicate (with different wording) the provisions contained in the draft Level 2 text; it would be better for the guidelines to reference the October 2011 draft of the level 2 rules. Whilst the eventual wording of such texts are dependent on the outcome of Omnibus II negotiations, such negotiations will very likely result in the detail of these proposals being altered anyway. In any event, the guidelines ought not to prescribe any requirements which go beyond the draft Level 2 text.</p> <p>If the purpose of these Guidelines is to enable early preparation, then they ought to apply to all insurance and reinsurance companies within the scope of Solvency II. We consider it unfair that certain undertakings would be exempted from some of the requirements and oppose the proposed use of thresholds. In any case, we believe that such thresholds go against the principles of the single market, by creating an uneven playing field for firms.</p> <p>Whilst this is mentioned by EIOPA, we wish to stress the importance of not basing any supervisory enforcement action on the outcome of the Guidelines. Since the intention is not early implementation, it is important that any reporting is not used to provide comparative information for any reporting submissions made after the Solvency II go-live date: for instance, assuming day-one reporting is required as at 1/1/2016, comparative information as at 31/12/2014 ought not to be taken from any reporting produced as at that date under these Guidelines.</p> <p>It is also important to consider that the proposed ECB requirements apply only to Euro-area member states; whereas these preparatory Guidelines apply to NCAs in the whole Union. We do not believe it is appropriate for SII policy to be formulated based on developments that do not affect all member states.</p> <p>Our comments are on the basis that the guidelines are being put in place as preparation for the implementation of Solvency II (as stated in paragraph 1.6), rather than actual implementation; and that what is required is for undertakings "to progress in their preparedness for Solvency II over time during the course of the preparatory phase" (as stated in paragraph 4.3 of the Cover note for the Consultation on Guidelines on preparing for Solvency II), rather than to achieve full compliance ahead of the implementation date.</p>	<p>Until Level 2 is publically available, it can not be used and referred to in EIOPA's publications</p> <p>EIOPA believes that all companies need to prepare for SII but considered disproportionate to have the same expectations from all companies during the preparatory phase</p> <p>The purpose of the Guidelines is for undertkaing to prepare for reporting when Solvenyc II is in place , therefore information received is for supervisors to assess undertakings' preparedness.</p> <p>EIOPA's cooperation with the ECB has ensured that the reporting package proposed by the Guidelines is sufficient to meet ECB's initial requirements. EIOPA will continue to engage in a dialogue with the ECB aiming as much as possible to avoid undue costs to the undertakings arising from different requirements. However, the set of the Solvency II reporting requirements aim the information needed for the supervisory review process.</p> <p>Noted</p>
44	IRSG	Introduction General Comments	<p>Interim Reporting Guidelines & Measures - Timelines</p> <p>Additional reporting on a Solvency II Basis on an interim basis in advance of Solvency II would be in the IRSG view an unwelcome burden while firms still have to report on Solvency I and will be in the process of seeking internal model approval and hence is not supported.</p> <p>If National Competent Authorities wish to assess the preparedness of firms systems and processes to comply with Solvency II reporting requirements, then this can be achieved by review and inspection of firms implementation activity. It is unnecessary to try and achieve this through the reporting of certain specific quantitative templates, indeed it may act as a distraction from work to implement reporting of the remaining quantitative templates, as focus will be on those templates required for interim reporting.</p> <p>However, in the event EIOPA does issue information guidelines, EIOPA should focus its measures to address the two following points:</p> <p>1) There should be one cycle of annual reporting before the S2 effective date. Therefore if the Solvency II effective date is 1/1/2016, annual templates will be required for FY14. If the S2 effective date is delayed further the timetable for interim reporting requirements will be pushed back accordingly.</p> <p>2) The guidelines should make clear the "intent" in which they have been issued. The intent of the guidelines is to enable NCAs to assess preparedness of firms to comply with Pillar 3 reporting requirements when Solvency II goes live, as NCAs would expect one year before the S2 effective date firms to have taken active steps towards building, developing and testing IT systems and reporting processes and will be undertaking dry-runs of Pillar 3 deliverables. It will not drive supervisory action and will necessarily be undertaken on a best endeavours basis.</p> <p>IRSG recognise that points (1) and (2) above are reflected in paragraphs 1.10 and 1.11 in the introductory text. However, to be truly effective they should be included as guidelines.</p> <p>For example, guideline 2 could be completed by:</p> <p>"1.28bis Guidelines 3 to 38 should be executed on a best effort basis.</p> <p>- As a principle, best effort is intended to provide a limited room for individual optimisation in data-provision for reporting undertakings, while requiring a certain level of internal governance (not necessary the same level as governance as for regular reporting) to ensure the necessary quality. While data provided needs to be exact enough to serve as an indicator on aggregate, there needs to be a clear distinction from the exactness of data for supervisory use.</p>	<p>1) EIOPA confirms that the intention is to have one annual submission for the preparatory phase.</p> <p>2) Regardless of how NCAs incorporate the Guidelines at national level, EIOPA expects as an active step a dialogue to take place between NCAs and undertakings during the preparatory phase in order to prepare for Solvency II.</p> <p>The preparatory Guidelines in itself do not require supervisory actions, in particular regarding failures by undertakings to comply with Solvency II Pillar I requirements as a result of the information provided during the preparatory phase. Nevertheless, the following two examples on supervisory action would be expected:</p> <p>a) It is expected that undertakings take into consideration any information arising from the implementation of the system of governance or from the performance of the FLAOR in the performance of their business or future business planning. It is also expected that a dialogue between NCAs and undertakings would take place, when appropriate. Although the dialogue could take this arising information into consideration, the preparatory Guidelines do not require NCAs to require an increase of capital, if the received information suggests a failure with Solvency II Directive requirements.</p> <p>b) When NCAs receive information on the calculation of the Solvency Capital Requirements and the determination of</p>

No.	Name	Reference	Comment	Resolution
			<p>- Best effort is also considered to respond to a preparation perspective. Undertakings should use the preparation period to adapt their processes and their IT system and be ready at the end of the interim period to fulfil the reporting requirements. The transitional period shall not be interpreted as a full application of Solvency II.</p> <p>- National Competent Authorities are not expected to request all narrative and Quantitative information from undertakings during the interim period but should monitor undertakings on their progress towards Solvency II.”</p> <p>For the same reasons as annual reporting above, IRSG do not support quarterly reporting in advance of the S2 effective date. If quarterly reporting is required to assess preparedness then only 1 quarter is necessary, and this should be Q3 2015.</p> <p>In particular, IRSG do not support any Q4 2015 reporting, as this will be particularly onerous given that during Q1 2016 firms will be undertaking: (1) YE15 Statutory reporting, (2) YE15 & Q4 2015 Solvency 1 reporting and (3) Solvency II Opening balance sheet reporting (potentially under Omnibus 2 directive). Q4 2015 in parallel would therefore be unduly burdensome.</p> <p>Given that the purpose of the guidelines is to assess preparedness and that interim reporting will have to take place in parallel with Solvency I reporting, IRSG believe that the deadlines for submission of interim reporting templates should be extended (i.e. plus 4 weeks) beyond the dates proposed in EIOPA’s consultation, which adopts the deadlines applicable in the first year Solvency II is effective.</p>	<p>Own Funds it is expected that NCAs review the quality of the information received and that they may take supervisory actions if the quality of the information raises concerns. But it is not expected from the preparatory Guidelines that NCAs would take any supervisory action if the Own Funds are lower than the Solvency Capital Requirement.</p> <p>EIOPA has decided to not require Q4 but only Q3 as proposed.</p>
45	ABermudaIR	Introduction General Comments	<p>EIOPA will already be aware that Bermuda has already undergone a detailed assessment in consideration for granting equivalence under Solvency II. This assessment was carried out in 2011 and we note that EIOPA’s published advice that Bermuda meets the criteria set out in EIOPA’s methodology for equivalence assessments under Solvency II for group supervision (Article 260) with certain caveats. In the interim, the Bermuda Monetary Authority (the BMA) has by way of legislation implemented its group regime and our member groups who have been statutorily designated Bermuda groups are required to comply with Bermuda legal regulatory obligations relating to group solvency, financial and solvency reporting, group ORSA, systems of governance, internal audit, risk management and key functions. In this regard, we recognize that EIOPA in this Consultation Paper (EIOPA-CP-13/010) proposes that “group supervisors may allow groups to use calculations under local rules for their third country undertakings as necessary, where the deduction and aggregation method is applied” (option 2). We note with interest that EIOPA did consider another option to “assume certain countries will be deemed equivalent or included in the transitional regime. Allow the use of local calculations under the deduction and aggregation method, but only in respect of group undertakings in those specified countries” but this option was rejected on the basis that by specifying those countries in advance “there is serious prejudice to future determinations and decisions by the European Commission on equivalence”. ABIR is of the opinion that EIOPA in conjunction with the Commission made a preliminary determination already by selecting three countries for assessment for equivalence and in lieu of a concluded assessment due to delays, should “assume certain countries will be deemed equivalent or included in the transitional regime”. The “certain” countries being those that have undergone a detailed assessment by EIOPA for equivalence. Whilst the above discussion relates to the Consultation Paper on Reporting, ABIR notes with serious concern the absence of any discussion relating to recognition or treatment of “equivalent” third countries in this Consultation Paper. ABIR is concerned that the expectation of national authorities would be for Bermuda groups to comply with Bermuda group rules and those being proposed in the various guidelines therefore having two sets of requirements.</p> <p>Paragraph 2.75 of EIOPA-CP-13/010 acknowledges the “major disadvantage of this approach (“allow groups to use local calculations, but require parallel calculations using Solvency II rules”) is that it is very burdensome for groups to provide two calculations under the preparatory phase”. ABIR would argue that this would be the same case for requiring groups, i.e. Bermuda groups to prepare for meeting two sets of supervisory requirements for an interim period. We note that EIOPA has described the Guidelines as “preparatory in nature” given that certain parts of the Solvency II Directive are to be revised by Omnibus II (OMBII) and the delegated acts have not yet been proposed by the EU Commission. In the absence of delegated acts and an equivalent designation, ABIR is of the opinion that EIOPA should be consistent in its approach across all of the Guidelines and allow groups to use the local group statutory requirements in order to avoid a burdensome approach. We understand why EIOPA may be hesitant to preempt the decision of the Commission relative to equivalence but believe there is an opportunity to recognize and acknowledge those jurisdictions that have already been approved by the Commission for equivalent assessment and in this regard, have already undertaken a detailed assessment by EIOPA. However, since EIOPA considered the option of the assumption of equivalence for third countries we would propose that those countries already approved by the Commission for assessment of equivalence and already undertaken an EIOPA assessment be granted “conditional equivalence” for the purposes of the guidelines given they are preparatory in nature and not for the full application of Solvency II. We would respectfully request at a minimum that General Guidelines be issued relative to a proposed approach that recognizes and acknowledges third country group supervisors and in particular those third country group supervisors that have already been approved by the Commission for equivalence assessment. Without a common approach, national competent authorities will be left to decide how they will apply the guidelines relative to third country groups and the inconsistencies will prove both burdensome and inefficient.</p>	<p>EIOPA does not expect that supervisory authorities in third countries apply the preparatory Guidelines. The Guidelines are not subject to equivalence analysis nor do they pre-empt any decision taken in past or future by the European Commission regarding equivalence.</p> <p>In the CP No. 13/010 and in the revised preparatory Guidelines it was clarified that “When the deduction and aggregation method is applied, insurance and reinsurance groups are allowed to use solvency capital requirements and eligible own funds of related third country undertakings calculated according to their local rules for the purposes of these Guidelines only, and without prejudice to any future European Commission equivalence determinations and any future decisions of group supervisors”, meaning that all third countries would be considered equivalent during the preparatory phase regardless of any equivalence analysis conducted or applied for.</p> <p>Notwithstanding this, with regard to pillar II requirements as the preparatory System of Governance and the Forward Looking Assessment of Own Risks EIOPA assumes that third country supervisors have similar parts of risk management in their national requirements where the preparatory Guidelines follow international standards.</p> <p>When referring to group structures or group level the preparatory Guidelines apply to EEA groups only. They do not apply to branches of third country (re)insurance companies set up in the EEA.</p>

No.	Name	Reference	Comment	Resolution
47	GC	Introduction General Comments	<p>Additional remarks:</p> <p>1) The preparatory Reporting is not only on an annual basis but also (partially) on a quarterly basis. Given that the aim is to support and catalyze implementation, and that current Solvency I reporting requirements are still in place, the question is whether the added value of quarterly reporting is such that it should be added to the annual reporting. We could imagine that until the full and formal implementation of Solvency II a more stepwise approach could be taken.</p> <p>2) It is appreciated that EIOPA has constructed the set of report templates in such a way that it is supposed to meet the requirements of the ECB. In the cover note, this is described as an intention, which gives still ample space for additional data requests from the ECB. Is the requested information based on either ECB or EIOPA requirements? How will ECB and EIOPA requirements be aligned in the future?</p> <p>3) It is clear that for the moment it is not possible to prepare the full technical specifications, since important issues have still not been decided. However, there should be a clear and early announced moment in time, at which EIOPA publishes the specifications, to allow timely implementation by insurance companies.</p>	<p>1) EIOPA considers setting up systems and processes ready for quarterly reporting as important element of the preparation process</p> <p>2) EIOPA preparatory reporting is not driven by ECB data requirements; EIOPA's cooperation with the ECB has ensured that the reporting package proposed by the Guidelines is sufficient to meet ECB's initial requirements. EIOPA will continue to engage in a dialogue with the ECB aiming as much as possible to avoid undue costs to the undertakings arising from different requirements.</p> <p>3) The final Solvency II Directive requirements will be determined by the OMDII and the delegated acts. EIOPA is working under the assumption that these measures will be available in time for NCAs and undertakings to prepare for the submission of the forward looking assessment during the years of 2014 and 2015 and of quantitative and qualitative information in 2015. In which case, at that stage, EIOPA would prepare technical specifications on Pillar I quantitative issues and provide guidance on the assumptions underlying the calculation of the standard formula calculation, which reflect the decision on OMDII.</p> <p>However, as this assumption is based on the OMDII negotiations, EIOPA will review the deadlines for the submission of information at the end of 2013 based on the latest developments. For legal certainty a revision clause was introduced in the Guidelines.</p> <p>See also EIOPA Final Report on CP13/10</p>
48	GDV	Introduction General Comments	See general comments.	See response to the comment 26
49	IE	Introduction General Comments	See general comments.	See response to the comment 29
50	Polish Chamber of Insurance	Introduction General Comments	Which use would the NCA and EIOPA do with the reported figures ?	The figures reported will be used to assess firms readiness for Solvency 2 reporting in terms of data quality and readiness of systems and reporting procedures and processes
51	RSA	Introduction General Comments	<p>It is important to consider that, as currently proposed, there will be "day-1" reporting as at 1/1/16. Should this proceed as proposed, undertakings will have to report the following in early 2016, all with the same balance sheet date:</p> <ul style="list-style-type: none"> · Q4 2015 SII numbers under these proposed interim Guidelines; · day-1 reporting; · Solvency I returns; and · statutory annual accounts. <p>We disagree with the proposals for day-1 reporting. The proposals for Q4 2015 interim reporting ought therefore to be contingent upon the eventual outcome of this matter: if there is to be day-1 reporting, Q4 2015 reporting ought to be reduced accordingly (there would otherwise be a direct overlap); if there is to be no day-1 reporting, the Q4 2015 submission may be prepared unhindered.</p> <p>The short length of time that would exist between publication by EIOPA of its Technical Specification in Q2 2014 and the first set of interim reporting as at 31 December 2014, leaves firms with insufficient preparation time. We believe there ought to be no interim reporting as at this date.</p>	<p>EIOPA is aware of day 1 reporting and has considered its implication on preparatory reporting</p> <p>Following stakeholders comments, it has been decided to request submission of information for quarter ended 30 September 2015 ONLY; The Guidelines have been updated accordingly</p>
52	GC	1,1	A reference is made to the EIOPA regulation article 16 of Regulation 1094/2010. It is not clear to what extent this regulation requires the amount of information to be disclosed as described in this consultation document. Is there a legal basis for the information (in the proposed level of detail) asked for in this document? This is not clear from the references made in the first paragraphs of this document.	The referred Article 16 forms a legal basis for EIOPA to issue Guidelines; it does not preclude the level of details of any guidelines to be issued by EIOPA
54	Polish Chamber of Insurance	1,1	Reporting if any should be limited to figures which bring some added value to the NCA knowledge and understanding on the company	The main purpose of preparatory reporting submissions to NCAs is for NCAs to assess firms preparedness towards complying with Solvency 2 reporting requirements
55	PZU	1,1	<p>We have noted that EIOPA intention of preparation phase is to "set up of foster a dialogue around implementation of reporting requirements" between NCA and undertakings. Moreover we welcome the EIOPA remark that NCAs "are expected to consider information provided" but will "not be expected to take enforcement of regulatory action".</p> <p>However during the application phase of the process there is a risk of double reporting (under Solvency I regime and under interim partial Solvency II regime). Although during the application phase the results of Solvency II partial reporting cannot be treated as binding (as according to currently foreseen timeline the Solvency II will be fully applicable starting from 2016.01.01) there is a risk that the information obtained by local NCA during application phase will have an indirect impact on actions and decisions taken by NCA.</p>	<p>Noted . See also the EIOPA Final Report on Public Consultation No.13/10</p> <p>EIOPA considers some period of parallel reporting is unavoidable when introducing a new set of regulatory reporting that differs significantly from the existing one; EIOPA recognises the burden of firms that this is why a revisions clause has been included in the Guidelines, limiting period of parallel running of reporting</p>

No.	Name	Reference	Comment	Resolution
			Our concern is based on the example of Danish NCA which declared that would take into account the information of not meeting the SCR by any of undertaking and that in such case the NCA will take appropriate regulatory actions. Due to this fact we would like to request for change of wording from "not be expected to take enforcement or regulatory action" to "must not take enforcement or regulatory action" - otherwise this would mean de facto the implementation of Solvency II.	See the EIOPA Final Report on Public Consultation No. 13/10
56	GC	1,3	We will emphasize the important issue that national competent authorities should not develop different national solutions at this stage of implementing Solvency II. There is still a lot of uncertainty regarding different principles in the framework and there is a danger that national solutions could lead to inconsistencies in different markets which might need to be revised later, creating unnecessary double work.	EIOPA is aware that NCAs can adopt different solutions towards preparation for Solvency 2. NCAs are able to go beyond the provisions in the Guidelines, if that is appropriate for their local circumstances, and to the extent that it is consistent with Union law.
58	DublinIMA	1,4	This paragraph explains that "these guidelines should be seen as preparatory work for Solvency II". Given this preparatory nature, it is therefore imperative that a level of flexibility be adopted which is greater than that would be permitted under fully implemented Solvency II. As an example greater use of proxies and a higher level of materiality / proportionality should be allowed during the preparatory phase.	EIOPA considers application of proportionality principle as a crucial part of Solvency II framework. After taking into consideration stakeholders comments, EIOPA has clarified that for the purposes of quarterly reporting, proportionality and materiality have to be recognised. The quarterly measurements may rely on estimates and estimation methods to a greater extent than measurements of annual financial data. The measurement procedures for the quarterly reporting have to be designed to ensure that the resulting information is reliable and comply with the Solvency II standards and that all material information that is relevant for the understanding of the data is reported. EIOPA has also clarified that with regard to the calculation of technical provisions during the year, in particular the ones for the purpose of quarterly reporting, undertakings may rely on simplified methods in the calculation of the risk margin and best estimate, as elaborated at EIOPA Guidelines. See also EIOPA Final Report on CP13/10
59	ECIROA	1,4	This paragraph explains that "these guidelines should be seen as preparatory work for Solvency II". Given this preparatory nature, it is therefore imperative that a level of flexibility be adopted which is greater than that would be permitted under fully implemented Solvency II. As an example greater use of proxies and a higher level of materiality / proportionality should be allowed during the preparatory phase.	See response to the comment 58
60	IE	1,4	This paragraph explains that "these guidelines should be seen as preparatory work for solvency II". Given this preparatory nature, it is therefore imperative that a level of flexibility be adopted which is greater than that would be permitted under fully implemented Solvency II. As an example greater use of proxies and a higher level of materiality / proportionality should be allowed during the preparatory phase. See 1.35. The same notification date should apply also to 1.38	See response to the comment 58 Notification requirements at group level (para 1.40 of Guideline 9) have been now included as a new/separate Guideline
61	Nordea	1,4	Nordea Life & Pensions supports the need for a consistent and convergent legal framework across Groups and in all countries involved to ensure the wanted effect of implementing Solvency II. Consistency and coherence should also apply for the Guidelines.	Noted
62	FEE	1,5	National competent authorities will be receiving a lot of information from undertakings and will have to process it. This extra knowledge brings its own additional burden on national competent authorities and they will need to demonstrate how all this additional information enhances supervision effectiveness.	Noted
63	GC	1,5	We agree with the EIOPA view that early preparation is key if firms are to comply with the Solvency II disclosure requirements when they come into force. Given the statement from EIOPA in July 2012 that the set of reporting templates released at that time represented "a stable view of the level of granularity of the information that supervisory authorities will need to receive" we are disappointed to see a number of changes in the templates now being proposed e.g. OF – B1Q and TP – F1. Whilst the changes in their own right are not contentious, changes arising without clear notification to firms increases the risk that firms will decide to put implementation measures in place only once the requirements are finalised. We would request that any changes from the July 2012 templates are flagged and a rationale for the change provided.	EIOPA will publish " Log Changes" listing all changes made to the templates and technical annexes since July 2012 publication and the consulted version of the Preparatory Guidelines as well as the final version of the Preparatory Guidelines
64	IE	1,5	We agree that early preparation is key, but we feel that this should start with a robust and finalised set of reporting requirements defined by EIOPA for undertakings to implement. A non-uniform application of the rules at the European level on ring fenced funds would be counterproductive and lead to a lack of harmonization, especially for groups. This issue on ring fenced funds criteria is still part of the pillar 1 OMDII negotiations.	EIOPA acknowledges undertakings concerns about uncertainties as to Omnibus 2 negotiations and their impact on Pillar 1 requirements and as a consequence, a possible impact on Pillar 3 requirements. However it believes that the preparation for the submission of information under Solvency II is crucial. EIOPA has minimised the possibilities of changes with the use of only a sub-set of the information to be submitted in
68	MetLife	1,6	We understand and endorse the view that undertakings should take steps towards implementing aspects of Solvency II so they can be fully compliant when it comes into effect. We would note however that application of the Interim Measures is tied to the Solvency II implementation date, a date that remains unclear. In the absence of such clarity, certain requirements within the Guidelines pose significant challenges. -Our preparatory work in compliance with these Guidelines may persist for longer than initially expected, thus putting further strain on expenses and resources. We recommend avoiding swift or overly onerous demands in the early part of the preparatory phase and recommend instead a phased-in approach allowing undertakings to ensure they are moving in the right direction without placing undue stress on the business.	EIOPA will review the deadlines for the submission of information and the report on the forward looking assessment at the end of 2013 based on the latest developments. Following the stakeholders comments, a revision clause was introduced in the Guidelines.
70	AON	1,7	The appropriateness of a progress report from national competent authorities from February 2015 is questionable since at that stage those authorities will not have received submissions from regulated entities. It is, therefore, assumed that these reports are to comprise updates on readiness.	The progress report is not part of the requirements for preparation by undertakings towards Solvency II, but a measure of communication between EIOPA and its members, the NCAs. EIOPA consider it important to receive an update from NCAs on progress made towards preparing for Solvency 2 by NCAs and their markets in February 2015.

No.	Name	Reference	Comment	Resolution
71	DublinIMA	1,7	The appropriate of a progress report from national competent authorities from February 2015 is questionable since at that stage those authorities will not have received submissions from regulated entities. It is, therefore, assumed that these reports are to comprise updates on readiness.	However, as this assumption is based on the OMDII negotiations and the availability of the delegated acts, EIOPA will review the deadlines for the submission of information at the end of 2013 based on the latest developments.
72	ECIROA	1,7	The appropriate of a progress report from national competent authorities from February 2015 is questionable since at that stage those authorities will not have received submissions from regulated entities. It is, therefore, assumed that these reports are to comprise updates on readiness.	Following the consultation process, The revision clause was introduced in the Guidelines.
74	GC	1,7	We note that NCA's are due to report to EIOPA by 28 February on progress in the implementation of the guidelines. The usefulness of this reporting may be limited to the extent that no information will have been submitted by undertakings at that point.	see above response to comment 70
75	IE	1,7	The first progress report from National Competent Authorities (NCAs) will be due to EIOPA on 28 February 2014 based on year end 31 December 2014 data. The date falls before the submissions are due from undertakings.	see above response to comment 70
78	PZU	1,7	In our opinion the annual progress report prepared by local NCA should not be supplemented by any kind of comply or explain procedure (e.g. local peer review report etc.). Such report would require the analysis of compliance of each undertaking with the interim measures requirements. We believe that the compliance should be tested on the basis of final requirements after the official introduction of Solvency II. This point is in Section VI, not Section IV.	The progress report is not part of the requirements for preparation by undertakings towards Solvency II, but a measure of communication between EIOPA and its members, the NCAs. The content of progress report is to be agreed between NCAs and EIOPA and it is not subject to this consultation
81	PZU	1,8	The NCAs are "expected to ensure that insurance and reinsurance undertakings prepare for having appropriate systems and structures in place that would allow an adequate exchange of information with the" NCAs. Are there going to be any specific requirements or restrictions regarding such systems? Sophisticated requirements may result in additional costs of implementation which will be against the proportionality rule (costs vs. benefits). Moreover, these costs may further increase if changes stemming from Omnibus II Directive (e.g. relating to calculation of technical provisions) are introduced to reporting spread sheets at the later stage. This point is in Section VIII, not Section VI. In our opinion the 1st quarterly reporting may cover period 2015Q3 but it should not be introduced more than a year ahead of the date of introduction of Solvency II. In case of change of the date of Solvency II introduction the first quarterly reporting period during implementation phase should be also changed.	Undertakings are to set up systems and processes that will enable them to report all relevant information as required by Solvency 2 reporting requirements; EIOPA acknowledges undertakings concerns about uncertainties as to Omnibus 2 negotiations and their impact on Pillar 1 requirements and as a consequence, a possible impact on Pillar 3 requirements. However it believes that the preparation for the submission of information under Solvency II is crucial. EIOPA has minimised the possibilities of changes with the use of only a sub-set of the information to be submitted in future. Following stakeholders comments, it has been decided to request submission of information for quarter ended 30 September 2015 ONLY; The Guidelines have been updated accordingly
82	AON	1,9	Transitional arrangements will still require current local regulatory reporting, effectively doubling the workload for entities during the transition.	EIOPA considers some period of parallel reporting is unavoidable when introducing a new set of regulatory reporting that differs significantly from the existing one; EIOPA recognises the burden of firms that this is why a revisions clause has been included in the Guidelines, limiting period of parallel running of reporting
83	DublinIMA	1,9	Transitional arrangements will still require current local regulatory reporting, effectively doubling the workload for entities during the transition.	See response to the comment 82
84	ECIROA	1,9	Transitional arrangements will still require current local regulatory reporting, effectively doubling the workload for entities during the transition.	See response to the comment 82
86	GC	1,9	The requirement that only a significant share (and thus not all insurance entities) need to be included in this preparatory phase makes a distinction between insurers that are required to participate and companies that are not. This does not lead to a level playing field as would be desired. How do EIOPA and the NCA's assure that actuaries of companies that are not required to participate will be sufficiently prepared for Solvency II? In our view all insurance companies that will be regulated by Solvency II should, to a certain degree, participate in this preparatory phase. However, we can envisage that the requirements differ by company depending on their size or risk profile. For example we would suggest a graduated scale of participation with smaller/lower risk companies submitting fewer templates and perhaps only annual templates.	Noted. However, EIOPA has taken on board a proportionality principle when introducing the Guidelines and aimed at 80 % market coverage for annual and 50% for quarterly. It is expected that small undertakings will continue preparing for Solvency II.
87	IE	1,9	Transitional arrangements will still require current local regulatory reporting, effectively doubling the workload for entities during the transition.	See response to the comment 82
88	ILAG	1,9	We note that this information outlined in the guidelines is additional to existing supervisory requirements. This is inconsistent with the statement that there will be no additional costs.	See response to the comment 82

No.	Name	Reference	Comment	Resolution
90	MetLife	1,9	<p>We are concerned about the level of simultaneous disclosure required of us in the absence of clear dates for transition to Solvency II. Generating the quantitative and qualitative disclosures set out in the Interim Measures, in parallel with existing requirements under Solvency I, will have a substantial financial impact and cause significant resource constraints during peak reporting periods. They could even undermine existing Solvency I reporting, particularly in the absence of a final implementation date for Solvency II. Instead, we propose that during the interim period, each undertaking is required to project and stress test capital requirements on a Solvency I basis until such time as Omnibus II has been agreed.</p> <p>We believe it may be more practical if undertakings were asked to report under the Interim Measures during off-cycle periods. This would demonstrate that undertakings were making progress towards Solvency II while minimising disruption to the existing reporting cycle. Greater flexibility around submission deadlines could also prove helpful.</p> <p>We further believe the implementation of group reporting should be deferred until Solvency II comes into force. First, NCAs may adopt different approaches to solo reporting, given their ability to introduce differing or additional requirements from those proposed in the Guidelines. Second, it is highly likely that some solo entities will not come within scope of these measures. As a result, the group consolidation process could become extremely complicated, which would be unhelpful during this preparatory phase.</p>	<p>EIOPA considers some period of parallel reporting is unavoidable when introducing a new set of regulatory reporting that differs significantly from the existing one; EIOPA recognises the burden of firms that this is why a revisions clause has been included in the Guidelines, limiting period of parallel running of reporting</p> <p>EIOPA has taken on board undertakings proposal regarding flexibility of deadlines and the deadline for annual submission has been extended by 2 weeks , i.e. to 22 weeks for solo reporters and 28 weeks for groups.</p> <p>The preparation for reporting at group level is considered crucial, therefore Guidelines cover requirements for groups as well.</p>
92	PZU	1,9	This point is in Section "Compliance and Reporting Rules General Comments", not Section IX.	Noted
93	AFM	1.10	We welcome the clarity around the protection of firms against regulatory action in the preparatory stage. The effectiveness of this statement will depend upon whether individual supervisors use these guidelines to inform them on how a well-run insurer acts, and penalises firms for not complying by stating that they have problems with their systems and controls as this infers they are not well run.	Noted See also EIOPA's Final Report on CP13/10
94	IE	1.10	We agree that on a preparatory phase national competent authorities should not take enforcement or regulatory actions. It should be covered in the guidelines.	Noted
95	Lloyds	1.10	<p>The statement that NCAs "will not be expected to take enforcement or regulatory action" with respect to data submitted in the dry run is helpful. In line with this statement and in view of firms' obligations to comply with existing regulatory reporting frameworks, we would welcome EIOPA's explicit confirmation in the guidelines that NCAs should permit firms to comply with these measures on a 'best efforts' basis.</p> <p>Furthermore, firms would appreciate feedback from NCAs during the preparatory period, based on their reviews of information submitted, to help firms refine their procedures/outputs as they move towards Solvency II compliance.</p>	Noted
96	DublinIMA	1.10	It is important that any data reported is clearly understood to be "preparatory" in nature.	The figures reported will be used to assess firms readiness for Solvency 2 reporting in terms of data quality and readiness of systems and reporting procedures and processes
97	FEE	1.10	It is stated here that NCAs - in case they choose to comply with the guidelines - will not be expected to take enforcement or regulatory action as a consequence of the reporting in the preparatory phase. So, obviously regulatory action is not required. However, there is a lack of clarity on the NCA's ability to enforce the guidelines if they want to do that.	See response to comment 93
99	GC	1.10	The guideline says NCAs will "not be expected to take enforcement or regulatory action". However this doesn't exclude the possibility that they will do so. In our view NCA's should not take actions related to capital requirements based on results of the preparatory phase as pillar I requirements are not yet finalised or inforce. Further we expect that allaying this concern this would lead to a better buy-in and open communication of results.	See response to comment 93
102	Nordea	1.10	Numbers should exclusively be used for information and preparatory purposes. No enforcement of regulatory actions should be allowed, exceding monitoting and discussions of the entities preparations	See response to comment 93
103	AFM	1,11	<p>Firms would like some certainty as to how the 31/12/2014 calculation will interact with the opening balance sheet as at 31/12/2015 if Solvency II starts on 1/1/2016. Three sets of numbers may be seen as unhelpful by firms.</p> <p>The guidelines ask for annual reporting as at 31/12/14 and then quarterly reporting for Q3 and Q4 2015. It is then unclear if they are also expecting 31/12 /15 annual reporting. It is also unclear how this interacts with the draft Omnibus II requirement for an opening balance sheet at 1/1/16.</p>	<p>EIOPA is aware of day 1 reporting and has considered its implication on preparatory reporting</p> <p>Annual reporting for 31 December 2015 is not being considered for the purpose of preparatory reporting</p> <p>Following the consulation process , EIOPA took on board concerns raised by stakeholders and decided to request reporting of the quarter ended 30 September 2015 ONLY during preparatory phase.</p>
104	AMICE	1,11	AMICE members oppose any requirement to submit quarterly information during the interim period.	EIOPA considers setting up systems and processes and procedures for quarterly reporting, as well as submitting quarterly information as defined in the guidelines, as and important part of the preparation process

No.	Name	Reference	Comment	Resolution
105	CFOF_CROF	1,11	<p>There should be a maximum of one cycle of reporting before Solvency II entry into force. If the Solvency II effective date is 1/1/2016, annual templates would therefore be prepared for the year ending 2014 and delivered according to annual reporting deadlines during 2015.</p> <p>We do not support any form of quarterly reporting. However, should it be required, it should be limited to a maximum of one cycle for the September 2015 quarter, with a deadline of 12 weeks. We note that paragraph 1.11 proposes there should be two cycles of quarterly reporting before Solvency II enters into force. During the first quarter of 2016, companies would have to prepare their financial year-end report for statutory accounting and their final reports under Solvency I (quarter 4 and annual). Adding Solvency II reporting to this is unduly burdensome in comparison with the objective of assessing industry preparedness.</p> <p>Also, we propose that EIOPA consider a longer reporting deadline than those set out in draft legal texts, we believe that 12 weeks better reflects the costs and challenges to the industry from any simultaneous reporting under the Solvency I and II regimes. Any delay in the Solvency II effective date would result in a matching delay in the implementation dates for interim reporting. Text to this effect is included in EIOPA's introductory paragraph 1.11 however this is an important point which should be dealt with in the guideline itself.</p>	<p>EIOPA considers setting up systems and processes and procedures for quarterly reporting, as well as submitting quarterly information as defined in the guidelines, as an important part of the preparation process. However, following the consultation process, EIOPA took on board concerns raised by stakeholders and decided to request reporting of the quarter ended 30 September 2015 ONLY during preparatory phase. The submission reporting deadline for quarterly reporting is to remain as proposed in the Guidelines, at 8 weeks. The reporting deadline for submission of annual reporting for the year ended 31 December 2014 is to be extended by 2 weeks, i.e. now to be 22 weeks during preparatory phase. The revision clause has been now included within the Guidelines.</p>
107	GC	1,11	<p>At the end of 2013 a decision will be made whether (based on expected implementation of SII as per 1-1-2016), submissions will need to be made in 2015 over accounting year 2014 as well as two quarterly reports. It is not clear from the document which two quarters are actually foreseen. See also our remarks at 1.28 and 1.79.</p>	<p>The consultation paper on preparatory guidelines required undertakings to report for two quarters ended 30 September 2015 and 31 December 2015 respectively. However, please note that following the consultation process, EIOPA took on board concerns raised by stakeholders and decided to request reporting of the quarter ended 30 September 2015 ONLY during preparatory phase.</p>
108	GDV	1,11	<p>We welcome the inclusion of this revision clause; however, it is not clear what would happen if, as is possible, the approval of OMDII does not happen as hoped to facilitate Solvency II implementation on 1 January 2016. EIOPA refers to a "review", but we should like it to be made explicitly clear that any OMDII delay will result in a corresponding delay to the preparatory-phase reporting submission dates. Should such a delay to early reporting not occur, there would be a real risk of increased costs on undertakings as they attempt to report using rules that might still change.</p> <p>We also would welcome explicit confirmation that the annual quantitative and qualitative data would not be required at 31 December 2015, given the quarterly reporting requirements which would apply at that date. That means we oppose in general a 4th quarter report.</p>	<p>The final Solvency II Directive requirements will be determined by the OMDII and the delegated acts. EIOPA is working under the assumption that these measures will be available in time for NCAs and undertakings to prepare for the submission of the forward looking assessment during the years of 2014 and 2015 and of quantitative and qualitative information in 2015. In which case, at that stage, EIOPA would prepare technical specifications on Pillar I quantitative issues and provide guidance on the assumptions underlying the calculation of the standard formula calculation, which reflect the decision on OMDII. However, as this assumption is based on the OMDII negotiations, EIOPA will review the deadlines for the submission of information at the end of 2013 based on the latest developments. For legal certainty a revision clause was introduced in the Guidelines. See also EIOPA Final Report on CP13/10</p>
109	IE	1,11	<p>We welcome the inclusion of this revision clause; however, it is not clear what would happen if, as is possible, the approval of OMDII does not happen as hoped to facilitate Solvency II implementation on 1 January 2016. EIOPA refers to a "review", but we should like it to be made explicitly clear that any OMDII delay will result in a corresponding delay to the preparatory phase reporting submission dates. Should such a delay to early reporting not occur, there would be a real risk of increased costs on undertakings as they attempt to report using rules that might still change.</p> <p>We also would welcome explicit confirmation that the annual quantitative and qualitative data would not be required at 31 December 2015, given the quarterly reporting requirements which would apply at that date.</p> <p>See also our comments in the general comments section on the cycles of reporting and on need to assure that undertakings will have enough to establish the appropriate internal processes and IT systems.</p>	<p>See response to the comment 108</p> <p>Annual reporting for 31 December 2015 is not being considered for the purpose of preparatory reporting</p> <p>EIOPA has taken on board undertakings proposal regarding flexibility of deadlines and the deadline for annual submission has been extended by 2 weeks, i.e. to 22 weeks for solo reporters and to 28 weeks for groups</p>
110	IUA London	1,11	<p>It is not clear to us whether it will be required to submit the annual qualitative and quantitative data on 31 December 2015, since the quarterly submissions will be required at that time.</p>	<p>Annual reporting for 31 December 2015 is not being considered for the purpose of preparatory reporting</p>
112	Lloyds	1,11	<p>In this paragraph, EIOPA states its intention that: '...the annual information is submitted once before Solvency II is applicable and the quarterly information is submitted in relation to the two quarters prior to the application of Solvency II'.</p> <p>Lloyd's considers that there should be no more than one set of annual and one set of quarterly interim reporting requirements before Solvency II starts. To ease the burden on firms and avoid clashes with existing year-end reporting requirements, quarterly reporting should only be required at 30 September 2015. No quarterly or annual reporting should be required under these measures at 31 December 2015, given the reporting which will be required under the current regulatory regime.</p> <p>In addition, we would welcome confirmation that, should Solvency II's start date be delayed beyond 1 January 2016, then the reporting dates under '...the annual information is submitted once before Solvency II is applicable and the quarterly information is submitted in relation to the two quarters prior to the application of Solvency II'.</p> <p>Lloyd's considers that there should be no more than one set of annual and one set of quarterly interim reporting requirements before Solvency II starts. To ease the burden on firms and avoid clashes with existing year-end reporting requirements, quarterly reporting should only be required at 30 September 2015. No quarterly or annual reporting should be required under these measures at 31 December 2015, given the reporting which will be required under the current regulatory regime.</p> <p>In addition, we would welcome confirmation that, should Solvency II's start date be delayed beyond 1 January 2016, then the reporting dates under the interim measures will be correspondingly revised.</p>	<p>EIOPA confirms that there will be one annual submission for the year ended 31 December 2014 required under preparatory Guidelines; Following the consultation process, EIOPA took on board concerns raised by stakeholders and decided to request reporting of the quarter ended 30 September 2015 ONLY during preparatory phase. EIOPA will review the deadlines for the submission of information at the end of 2013 based on the latest developments. Following the stakeholders comments, a revision clause was introduced in the Guidelines. See also EIOPA Final Report on CP13/10</p>

No.	Name	Reference	Comment	Resolution
113	MetLife	1,11	<p>To support the development, it is critical that detailed regulations including the measures for long term guarantees and other elements of the directive, Level 2 and Level 3 text are fully agreed in a timely fashion long before the first reporting on the interim measures. These should be concluded at least 12 months before the first set of interim reporting is required, (i.e. by end of 2013).</p> <p>The proposal should be explicit regarding whether the interim measures annual reporting will be required for the 31 December 2015 year end.</p>	Annual reporting for 31 December 2015 is not being considered for the purpose of preparatory reporting also refer to the feedback statement
115	PZU	1,11	<p>The reporting requirements and instructions are not yet finalized. The real implementation process should be started as soon as the final requirements are settled so the undertaking will not overinvest in the IT systems, setting processes etc. The starting point of the overall implementation should be than perceived as the date of final acceptance of reporting requirements (based on current implementation timelines the 1st January 2014 is the deadline for local NCAs to put in place the official local guidelines hence the implementation process should start immediately after the guidelines announcement).</p> <p>Setting up the appropriate processes, agreements with external data vendors, IT systems etc. is expected to take more than 1 year. Based on the current application deadlines the final implementation of pre-application requirements should be finalized till 2014.12.31 (based on current implementation timelines the first reporting period is 2014.01.01 – 2014.12.31 and the reporting templates and narratives must be submitted within 20 weeks after the end of financial year) while the start of implementation process is expected to be on the day of final reporting requirements announcement (2014.01.01). In our opinion 1 year is not enough for the proper implementation of all reporting requirements. We would treat 2014 as the preparation period and implement reporting requirements starting from 2015.</p> <p>Moreover in our opinion the 1st annual reporting period for the implementation phase should refer to period one year ahead of the date of introduction of Solvency II (based on current deadlines this is the date of 1st of January 2016 hence the first reporting period should cover year 2014). In case of change of the date of Solvency II introduction the first annual reporting period during implementation phase should be also changed (moved according to the change of date of introduction of Solvency II). The same approach should be used in case of quarterly reporting - the first quarterly reporting may cover period 2015Q3 but it should not be introduced more than a year ahead of the date of introduction of Solvency II. In case of change of the date of Solvency II introduction the first quarterly reporting period during implementation phase should be also changed.</p>	<p>EIOPA believes that the preparation for the submission of information under Solvency II is crucial. In prior responses to consultations with regard to Solvency 2 reporting package, undertakings claimed that they would need at least 18 months for the preparation. Assuming that Solvency II will be applicable as from 1 January 2016, that would mean that they would need to start implementation as from 1 June 2014. This timing is consistent with the approach taken in the Guideline publicly consulted. EIOPA has minimised the possibilities of changes with the use of only a sub-set of the information to be submitted in future.</p> <p>The preparatory guidelines set out the requirement for the first annual reporting in respect of the year ended 31 December 2014; the inclusion of revision clause ensures that there will be just one annual reporting submission required prior to the start of Solvency 2, even if the starting date of Solvency 2 moves to later than 1 January 2016 .</p>
116	ROAM	1,11	Les membres de la ROAM s'opposent aux exigences de mise en place de reporting trimestriel durant la phase transitoire.	EIOPA considers setting up systems and processes and procedures for quarterly reporting, as well as submitting quarterly information as defined in the guidelines, as an important part of the preparation process
117	Royal London Mutual	1,11	The guidelines ask for annual reporting as at 31/12/14 and then quarterly reporting for Q3 and Q4 2015. It is then unclear if they are also expecting 31/12 /15 annual reporting. It is also unclear how this interacts with the draft Omnibus II requirement for an opening balance sheet at 1/1/16.	Annual reporting for 31 December 2015 is not being considered for the purpose of preparatory reporting
118	RSA	1,11	<p>We welcome the inclusion of this revision clause; however, it is not clear what would happen if, as is possible, the approval of OMDII does not happen as hoped to facilitate Solvency II implementation on 1 January 2016. EIOPA refers to a "review", but we should like it to be made explicitly clear that any OMDII delay will result in a corresponding delay to the preparatory-phase reporting submission dates. Should such a delay to early reporting not occur, there would be a real risk of increased costs on firms as they attempt to report using rules that might still change.</p> <p>We are concerned about the short length of time that would exist between the foreseen publication of EIOPA's Technical Specifications in Q2 2014 (assuming OMDII is approved) and the first set of reporting under these Guidelines as at 31 December 2014. There would appear to be little time for firms to prepare. We therefore believe EIOPA ought to reconsider the need for interim reporting for year-end 2014.</p>	<p>The final Solvency II Directive requirements will be determined by the OMDII and the delegated acts. EIOPA is working under the assumption that these measures will be available in time for NCAs and undertakings to prepare for the submission of the forward looking assessment during the years of 2014 and 2015 and of quantitative and qualitative information in 2015. In which case, at that stage, EIOPA would prepare technical specifications on Pillar I quantitative issues and provide guidance on the assumptions underlying the calculation of the standard formula calculation, which reflect the decision on OMDII.</p> <p>However, as this assumption is based on the OMDII negotiations, EIOPA will review the deadlines for the submission of information at the end of 2013 based on the latest developments. For legal certainty a revision clause was introduced in the Guidelines.</p> <p>See also EIOPA Final Report on CP13/10</p>
120	Lloyds	1,12	Lloyd's disagrees with the approach set out in this paragraph and considers that firms should be able to report ancillary items in respect of which prior supervisory approval will be required, on the basis that such approval has been granted, if the firm considers it reasonable to take such an approach.	Disagree. Ancillary own fund items which are available to count towards capital requirements under Solvency I are recognised as ancillary own funds during the interim period. However, those anticipated to count as ancillary own funds (ie not approved) and are not available to count towards capital requirements under Solvency I should not be counted as available during the interim period.
122	CFOF_CROF	1,13	Insurers should not be required to submit both internal model and standard formula forms if they are sufficiently progressed in their internal model approval process (IMAP). Building systems to capture data both in the prescribed format, which must be submitted electronically, involves building reporting processes and submission templates that may not be required longer term. For firms in IMAP any standard formula data should be sourced through the IMAP application process, not through the submission of QRTs. We are therefore not in favour of building systems just to meet the interim reporting requirements.	EIOPA have taken on board comments received from stakeholders and decided to not to include reporting of standard formula in the preparatory reporting GIs. See comment 2.
123	GC	1,13	<p>For companies applying for an IM reporting on both the Standard Formula and IM bases will be very burdensome for actuaries and requires more effort than would apply under Solvency II itself. The report for internal model calculations could be postponed and taken care of in the pre-application dialogue with the supervisory authorities.</p> <p>This states explicitly that the aim of reporting in the preparatory phase is different to that post Solvency II implementation. The paragraph then explains how it is different, however, there is no explanation as to the intent behind this difference. This difference potentially will lead actuaries to develop systems and processes which may well be obsolete following implementation of Solvency II.</p> <p>It is not clear from the wording in this paragraph whether those companies that are in the pre-application process of an internal model by definition should be included in the group of insurance companies for the preparatory phase and what the requirements are for companies applying for a partial internal model.</p>	See response to the comment 122

No.	Name	Reference	Comment	Resolution
124	GDV	1,13	<p>Although undertakings applying for internal model approval do indeed have to provide data relating to both their models and the standard formula, they will not necessarily be geared up to report standard formula data using the specific templates. Preparing systems to populate such templates when good progress is being made with the internal model application process would be an extra and unnecessary burden.</p> <p>Further, the requirement to complete such templates goes against what has been set out in the stabilised package, i.e. that these QRTs (SCR-B3 series) are intended for standard formula undertakings only.</p> <p>If the intention of the Guidelines is early preparation, there is little benefit to be gained from asking undertakings to complete these. We note EIOPA's argument that model approval will not have been given as at the time of implementing these Guidelines and that such approval may never be given, meaning undertakings will need to prepare for the worst scenario. This approach is however inconsistent with the approach taken in regard third-country equivalence where EIOPA allows a flexible approach and less burdensome for industry having in mind the preparatory nature of this phase. Similarly, internal model applicants ought to be able to report on the basis that their models will be approved.</p>	See response to the comment 122
125	IE	1,13	<p>Although undertakings applying for internal model approval do indeed have to provide data relating to both their models and the standard formula, they will not necessarily be geared up to report standard formula data using the specific templates. Preparing systems to populate such templates when good progress is being made with the internal model application process would be an extra and unnecessary burden.</p> <p>The requirement to complete such templates goes against what has been set out in the stabilised package, i.e. that these QRTs (SCR-B3 series) are intended for standard formula undertakings only.</p> <p>If the intention of the Guidelines is early preparation, there is little benefit to be gained from asking undertakings to complete these. We note EIOPA's argument that model approval will not have been given as at the time of implementing these Guidelines and that such approval may never be given, meaning undertakings will need to prepare for the worst scenario. This approach is however inconsistent with the approach taken in regard third-country equivalence where EIOPA allows a flexible approach and less burdensome for industry having in mind the preparatory nature of this phase. Similarly, internal model applicants ought to be able to report on the basis that their models will be approved.</p> <p>For undertakings in the internal model application process any standard formula data should be sourced through the internal model application process, not through the submission of QRTs. We are therefore not in favour of building systems just to meet the interim reporting requirements. Internal model undertakings are not in favour of reporting SCR calculated by standard formula in the preparatory phase or after implementation of SII (also applicable to 1.48, 1.55).</p>	See response to the comment 122
126	IUA London	1,13	<p>Given that in the preparatory period: internal model information will not yet be complete; companies engaged in the internal model process will not have the standard formula data; companies preparing the standard formula will not have all the relevant information to complete it; and the relevant templates will not have been finalised; we suggest that granular information should not be required and that good estimates should be considered acceptable substitutes during the preparatory period.</p>	See response to the comment 122
128	Lloyds	1,13	<p>We oppose the proposal that, for firms seeking internal model approval, the quantitative data will include the SCR calculated by the standard formula as well as by the internal model.</p> <p>Completing the detailed SCR standard formula templates proposed at SCR-B3A to SCR-B3G will require these firms to build appropriate reporting systems. However, if their internal models are approved, these firms will not calculate the SCR using the standard formula once Solvency II is in force and these systems will therefore rapidly become obsolete. Consequently, these firms should not be required to complete the detailed SCR standard formula templates proposed.</p> <p>Preferable alternative approaches are that the SCR standard formula numbers are reported to NCAs via the IMAP process, or that summary SCR standard formula numbers are reported on SCR-B2B and SCR-B2C.</p> <p>Without prejudice to the above recommendation, if this proposal goes ahead, EIOPA's should confirm that, assuming a 1 January 2016 Solvency II start date, no further calculation of the SCR using the standard formula shall be required other than as at 31 December 2014, as proposed in these measures.</p>	See response to the comment 122
129	MetLife	1,13	<p>The requirement to report additional standard formula figures for risks that are proposed to be valued using an internal model will increase costs for insurers. However we have developed this capability and will be able to provide this information if it is required.</p>	See response to the comment 122
131	PZU	1,13	<p>Also with reference to point 1.10: Based on the current requirements the users of Internal/Partially-Internal Model are required to report both SCR based on Internal/Partially-Internal Model and based on Standard Formula. There is a risk that local NCA will take an action based on the fact that reported SCR based on Standard Formula is higher than SCR based on Internal/Partially-Internal Model. In our opinion after the pre-application process and IMAP the Internal/Partially-Internal Model users should not be required to report SCR on the basis of Standard Formula. However according to wording of point 1.13 "when Solvency II is applicable the reporting requirements should include figures provided at the most granular level for the approved internal models". There is no clear statement that the undertakings with approved Internal Model are not going to report SCR on the basis of Standard Formula at all; based on the current wording one can only deduct that SCR on the basis of Standard Formula might be required but on less granular level than SCR on the basis of Internal Model.</p>	See response to the comment 122

No.	Name	Reference	Comment	Resolution
132	RSA	1,13	<p>Although firms applying for internal model approval do indeed have to provide data relating to both their models and the standard formula, they will not necessarily be geared up to report standard formula data using the specific templates. As a group that has actually undertaken a number of dry-run exercises with the QRTs, we can say with certainty that preparing systems etc to populate such templates when good progress is being made with the internal model application process would be an extra and unnecessary burden.</p> <p>Further, the requirement to complete such templates goes against what has been set out in the stabilised package, i.e. that these QRTs (SCR-B3 series) are intended for standard formula firms only.</p> <p>If the intention of the Guidelines is early preparation, there is little benefit to be gained from asking firms to complete these. We note EIOPA's argument that model approval will not have been given as at the time of implementing these Guidelines and that such approval may never be given, meaning firms will need to have contingency plans for operating on a standard formula basis. We believe our stance is justified based on the Guidelines EIOPA proposes regarding third-country equivalence: such equivalence may not eventually be granted in respect of certain countries, yet undertakings are not being asked to assume this and to report using the 'best-case' scenario whereby equivalence is granted. Similarly, internal model applicants ought to be able to report on the basis that their models will be approved.</p>	See response to the comment 122
133	Assuralia	1,13	<p>Although undertakings applying for internal model approval do indeed have to provide data relating to both their models and the standard formula, they will not be geared up to report standard formula data using the specific templates.</p> <p>Preparing systems to populate such templates when good progress is being made with the internal model application process would be an extra and unnecessary burden.</p> <p>Further, the requirement to complete such templates goes against what has been set out in the stabilised package, i.e. that these QRTs (SCR-B3 series) are intended for standard formula undertakings only.</p>	See response to the comment 122
134	GC	1,14	We welcome the recognition of the additional burden created by dual reporting in the preparatory phase and concur that this partial approach will allow for some preparations, which will smooth any transition to full Solvency II.	Noted
135	GDV	1,14	See general comments. The narrative report is too extensive.	<p>The objective of introducing narrative reporting during preparatory phase is for firms to prepare for the narrative reporting (i.e. to set up systems and procedures in order to gather necessary information and to prepare reports) and for supervisors to assess firms preparedness (for example, whether the narrative reporting is sufficient in terms of a scope and details).</p> <p>In addition, supervisors may use this information contained in the narrative reporting, for example, with regard to SoG, to assist them in assessing progress made by firms in preparation for Solvency 2 SoG requirements.</p>
136	IE	1,14	See general comments. The narrative report should be excluded from the preparatory phase.	See response to the comment 436
137	IUA London	1,14	We believe that it will not be feasible for firms to provide useful narrative reports during the preparatory report as the information provided will have a limited shelf-life and key data will be lacking.	See response to the comment 436
140	Assuralia	1,14	<p>(See general comments) The narrative reporting should be excluded from the preparatory phase. It is not only overly burdensome; it also risks to double the workload. Since Solvency I still applies during the interim period, undertakings will have to submit information on Solvency I reporting as well as Solvency II reporting</p> <p>(See general comments) The narrative reporting should be excluded from the preparatory phase. It is not only overly burdensome; it also risks to double the workload. Since Solvency I still applies during the interim period, undertakings will have to submit information on Solvency I reporting as well as Solvency II reporting.</p>	See response to the comment 436
141	GDV	1,15	We support EIOPA's proposal that the information to be reported be a subset of the full package, not the package in its entirety. However, further analysis is needed as some templates such as TP-E1 and TP-F1 may need more detailed information derived from other Life and Non-life templates to be fulfilled.	Only the selected templates (data items within them as relevant), as prescribed in the preparatory guidelines are to be reported
142	IE	1,15	<p>For the QRTs that are in scope, it is unclear if the changes to the QRTs remain in place (as the Consultation paper implies) or will undertakings have to revert back to the QRTs issued in July. For example the changes to the annual Own funds QRTs, for which under the interim measures there is reduced disclosure. However some of the changes to the interim measures are changes that we would expect to be replicated in the new QRTs as some are correcting formulas etc. How and when can we get greater clarity on future changes and which of the QRTs are most similar to what EIOPA expects to be the final QRTs?</p> <p>Do we assume that for the QRTs that are out of scope of this Consultation paper, the QRTs issued in July 2012 are still the most up to date? Is it likely that there will be some revised QRTs and log files issued soon as we believe that there could be some errors in the QRTs/log files? In addition, we feel that there could be some greater granularity in the log files in some cases.</p> <p>The colour keys were useful on the QRT templates that were issued in July 2012. Is there an intention to include these again? If not, what was the reason for them to be dropped?</p> <p>Is the intention to have separate reporting templates for Annual/Annual disclosure/Quarterly for Solo and for groups as we had in the QRTs issued in July 2012? Or are we reverting back to one template for each form as we had prior to July 2012 as this Consultation paper implies?</p> <p>Further analysis is also needed as some templates such as TP-E1 and TP-F1 may need more detailed information derived from other Life and Non-life templates to be fulfilled.</p>	<p>Change log will be published identifying all changes made to the package since July 2012 version</p> <p>See comment above</p> <p>QRT templates will be only published as visual presentation, data items listed in the Annexes will be part of ITS (Implementing Technical Standard) ; the colour coding will not be kept in the final package; It has been only used during development stage of QRTs</p> <p>the final ITS will cover reporting requirements separately for solo and groups and at annual and quarterly as well as separately public disclosures requirements</p> <p>Only the selected data items within TP - E1 and TO - F1 are to be reported in the preparatory guidelines; as such they would need to be entered, rather than linked to underlying templates</p>

No.	Name	Reference	Comment	Resolution
			See also our comments in the general comments section on the cycles of reporting and on need to assure that undertakings will have enough to establish the appropriate internal processes and IT systems.	Following comments received from stakeholders, EIOPA decided to extend reporting deadlines by 2 weeks,during preparatory phase
143	IUA London	1,15	Given that information will not be available, we agree that only a subset should be required. Moreover, some of the information still required may not be available for the templates.	Noted
146	Nordea	1,15	1) Even though the requirements is a subset of the expected full Solvency II requirements, it could be more costly to implement the subset (reduced approach) first and the full approach later, compared to implementing the full reporting package in one go. 2) If the subset is too small, i.e. the gap to the full Solvency II approach is too big, it may be wasted money/resources to develop the solution for the Guidelines, as several material changes subsequently will be required for full Solvency II compliance.	The preparatory reporting will include only a subset of the final package; The full package will be made available during 2014.
147	PZU	1,15	We welcome EIOPA idea of excluding part of full reporting package from requirements of preparation phase. However in our opinion the proposed list of information required during preparation phase is still regarded as very challenging and excessive. The application of current shape of reporting requirements would result in high implementation costs especially in the area of IT systems. Solvency II, especially during the preparation phase, is going to be the additional reporting framework apart from IFRS framework and Local GAAP framework. Due to this fact we would like to propose to split the preparation phase sub-phases during which the separate parts of final reporting requirements would be implemented. Expanding the duration of preparation phase would, in our opinion, allow to split the implementation costs and to minimize the risk of implementation errors.	EIOPA considers setting up systems and processes and procedures for reporting, as well as submitting annual and quarterly information as defined in the guidelines, as an important part of the preparation process. Some period of parallel reporting is unavoidable when introducing a new set of regulatory reporting that differs significantly from the existing one; EIOPA recognises the burden of firms that this is why a revisions clause has been included in the Guidelines, limiting period of parallel running of reporting On cost issue: This is in fact a reality that would have to occur during the preparation for Solvency II. Both undertakings and supervisory authorities would need to switch from SI to SII reporting from one day to the other. A preparation phase would always be needed in order to guarantee that a disruption in the daily management of the undertaking, in the activities of the supervisory authority and as a consequence in the protection of the policyholders would not occur.
148	RSA	1,15	We support EIOPA's proposal that the information to be reported be a subset of the full package, not the package in its entirety.	Noted
149	Assuralia	1,15	We support EIOPA's proposal that the information to be reported be a subset of the full package, not the package in its entirety. However, further analysis is needed as some templates such as TP-E1 and TP-F1 may need more detailed information derived from other Life and Non-life templates to be fulfilled. We support EIOPA's proposal that the information to be reported be a subset of the full package, not the package in its entirety. However, further analysis is needed as some templates such as TP-E1 and TP-F1 may need more detailed information derived from other Life and Non-life templates to be fulfilled.	Noted Only the selected data items within TP - E1 and TO - F1 are to be reported in the preparatory guidelines; as such they would need to be entered, rather than linked to underlying templates
150	DublinIMA	1,16	Reporting even the most material RFF should not form part of the reporting pack until such time as the Pillar 1 aspects are finalised.	EIOPA consider it important for undertakings to take active steps in setting up systems and processes to report at ring fenced funds level once Solvency 2 is in force. In order to reduce the reporting burden on undertakings during the preparatory phase, EIOPA decided that only the most material ring fenced fund and the remaining part are to be submitted to NCAs during preparatory.
151	ECIROA	1,16	Reporting even the most material RFF should not form part of the reporting pack until such time as the Pillar 1 aspects are finalised.	EIOPA consider it important for undertakings to take active steps in setting up systems and processes to report at ring fenced funds level once Solvency 2 is in force. In order to reduce the reporting burden on undertakings during the preparatory phase, EIOPA decided that only the most material ring fenced fund and the remaining part are to be submitted to NCAs during preparatory.
152	GC	1,16	We welcome that reporting will not be required during the preparatory phase at the level of each ring-fenced fund.	Noted. EIOPA consider it important for undertakings to take active steps in setting up systems and processes to report at ring fenced funds level once Solvency 2 is in force. In order to reduce the reporting burden on undertakings during the preparatory phase, EIOPA decided that only the most material ring fenced fund and the remaining part are to be submitted to NCAs during preparatory.
153	GDV	1,16	Should not be required any information at a ring fenced level during the preparatory phase.	EIOPA consider it important for undertakings to take active steps in setting up systems and processes to report at ring fenced funds level once Solvency 2 is in force. In order to reduce the reporting burden on undertakings during the preparatory phase, EIOPA decided that only the most material ring fenced fund and the remaining part are to be submitted to NCAs during preparatory.
154	IE	1,16	Information requirements at a ring fenced level should be reassessed as that topic is still under discussion at a legislative level including in regard the definition of ring fenced funds. We further underline that extending separate ring fenced information to group reporting is a new requirement (in EIOPA July 2012 report separate reporting on ring-fenced funds was just a solo requirement). We do not support the introduction of new not yet stable requirements during the preparatory phase.	EIOPA consider it important for undertakings to take active steps in setting up systems and processes to report at ring fenced funds level once Solvency 2 is in force. In order to reduce the reporting burden on undertakings during the preparatory phase, EIOPA decided that only the most material ring fenced fund and the remaining part are to be submitted to NCAs during preparatory.
155	ILAG	1,16	We agree that reporting should not be required at ring fenced fund level.	Noted. The reporting is not required for each material ring fenced funds , but only the most material and the remaining part during preparatory phase EIOPA consider it important for undertakings to take active steps in setting up systems and processes to report at ring fenced funds level once Solvency 2 is in force.

No.	Name	Reference	Comment	Resolution
156	IUA London	1,16	We believe that ring-fenced information should not be demanded at the preparatory stage.	EIOPA consider it important for undertakings to take active steps in setting up systems and processes to report at ring fenced funds level once Solvency 2 is in force. In order to reduce the reporting burden on undertakings during the preparatory phase, EIOPA decided that only the most material ring fenced fund and the remaining part is to be submitted to NCAs during preparatory.
159	RSA	1,16	We support EIOPA's proposal that ring-fenced fund reporting be limited.	Noted. The reporting is not required for each material ring fenced funds , but only the most material and the remaining part during preparatory phase EIOPA consider it important for undertakings to take active steps in setting up systems and processes to report at ring fenced funds level once Solvency 2 is in force.
161	GC	1,17	Given that preparatory reporting is planned by EIOPA for 2015, it would also be useful that local NCA's have their system supporting XBRL fully in place in line with final Solvency II requirements. This would help insurance companies to develop required interfaces only once, and submit the requested information in the right and consistent way.	The purpose of EIOPA's preparatory Guidelines is for undertakings as well as NCAs to get ready Solvency 2, as such NCAs are expected to have appropriate systems in place to receive submission of information during preparatory phase
162	IE	1,17	The proposed guidelines leave to the discretion of national competent authorities, the decision of whether or not to require use of the XBRL taxonomy developed by EIOPA. Should this be required it is imperative that the decision be communicated to undertakings as soon as possible since this will require additional planning and resources.	The decision as to the use of xbrl has been left to each NCAs. EIOPA is not going to mandate the use of xbrl for submission of information between undertakings and NCAs
164	Lloyds	1,17	EIOPA and NCAs should permit maximum flexibility to firms submitting the data required under these Guidelines. Lloyd's opposes: - Early adoption of XBRL - this needs sufficient time to implement properly. - Development and usage of an alternative 'XBRL-type' approach – this would be expensive and time-consuming to develop and would be discarded once Solvency II starts. Instead we propose that firms provide the data to NCAs using a straightforward file upload, with standardised protocols and/or standardised Excel spreadsheets.	The decision as to the use of xbrl has been left to each NCAs. EIOPA is not going to mandate the use of xbrl for submission of information between undertakings and NCAs
167	GC	1,18	Specific data checks to be applied in the preparatory phase should be identified and itemised. Exact specification of which data checks are required in the preparatory phase would be helpful.	See Technical Annex VII, where data checks applicable in preparatory phase are specified
168	IE	1,18	Consistency between CAS and CGS cross checks - it would be good for EIOPA to consider the consistency between all cross checks, it was noted that there were inconsistencies between CAS4 and CGS9, and also between CAS8 and CGS13 for example. Additional cross checks not noted - it would be good for EIOPA to consider the completeness of the cross checks. We believe that for example there are cross checks that should be in place between the QRT D1 and the Assets and liabilities by currency QRT ("C1D").	Cross-templates checks between BS_C1 and BS_C1D for groups have been deleted because BS_C1D will not be used for the group reporting. Checks with AS_D1 won't be included into the taxonomy for the preparatory phase.
170	AMICE	1,19	During the interim phase and as example of the proportionality principle, undertakings applying the accounting-consolidation method should be allowed to use the solvency capital requirements and eligible own funds of related third country undertakings.	See comment 5.
171	GC	1,19	The combined effect of guidelines 1.19 and 1.54 is that, if the Group Supervisor and the concerned supervisors agree to the use of the Deduction and Aggregation (D&A) method, then third countries can be consolidated into the Group balance sheet on the assumption that the third country is equivalent. Although this assumption of equivalence is helpful, it is dependent upon the D&A method decision which lies with the Group supervisor and is therefore uncertain. The EC and supervisors have already set the expectation that major third countries, such as the USA and Canada, will be equivalent. It would create a simpler and more streamlined approach if all third countries were automatically consolidated on an equivalent basis using the D&A method for the purpose of these guidelines. The effect of this would be to give firms certainty and ensure they do not build reporting tools and processes which may not later be needed.	See comment 5.
172	GDV	1,19	We support the proposal that D&A groups are allowed to use local rules for their third country undertakings and request EIOPA to apply this same principle to internal model reporting (see 1.13 above).	See comment 5.
173	GDV	1,19	Needs however to be clearly stated that during the preparatory phase the existence of third country undertakings should be a pre-requisite for using D&A. The current proposal allows for the use of the third countries' local rules just where D&A is used; however the latter is left to the full discretion of NCAs. EIOPA needs to assure a consistent and convergent approach.	See comment 5.
174	IE	1,19	We support the proposal that D&A groups are allowed to use local rules for their third country undertakings and request EIOPA to apply this same principle to internal model reporting (see 1.13 above). Needs to be clearly stated that during the preparatory phase the existence of third country undertakings should be a pre-requisite for using D&A. The current proposal allows for the use of the third countries' local rules just where D&A is used; however the latter is left to the full discretion of NCAs. EIOPA needs to assure a consistent and convergent approach.	Noted and welcomed for local rules. See also comment 5. See comment 5.
176	RSA	1,19	We support the proposal that D&A firms be allowed to assume that third-country equivalence will be approved and request EIOPA to apply this same principle to internal model reporting (see 1.13 above).	See comment 5.
177	Assuralia	1.20	(See general comments on threshold)	Noted
178	GDV	1.20	We appreciate the general application of the proportionality principle to all Guidelines. The establishment of thresholds is welcomed as well. However, the narrowing of the scope does not solely imply a proportionate application of rules. In addition, the embedded thresholds should be defined as target levels and not minimum market shares to provide for a consistent European-wide application.	Noted, EIOPA recognises that NCAs could choose to go further than any Guidelines issued by EIOPA. In fact NCAs are able to go beyond the provisions in the Guidelines, if that is appropriate for their local circumstances, and to the extent that it is consistent with Union law.
			We appreciate the general application of the proportionality principle to all Guidelines, although we would prefer instead of referring in this paragraph to an expectation, to include the principle within the guidelines...	See response to the comment 58

No.	Name	Reference	Comment	Resolution
179	IE	1.20	The establishment of thresholds is welcomed as well. However, the narrowing of the scope does not solely imply a proportionate application of rules. See comments on 1.33. See also our comments in the general comments section on the cycles of reporting and on need to assure that undertakings will have enough to establish the appropriate internal processes and IT systems..	See response to the comment 178 See response to the general comments
181	Lloyds	1.20	We welcome this paragraph. However we consider that, as during the preparatory period, firms will be expected to comply with the existing regulatory reporting framework, EIOPA's should provide confirmation that the Guidelines may be complied with on a 'best efforts' basis. Furthermore, firms would appreciate feedback from NCAs during the preparatory period based on their reviews of information submitted, to help firms refine their procedures/outputs as they move towards Solvency II compliance.	See response to the comment 58. See also EIOPA Final Report on CP13/10
182	ILAG	1.20	We agree that the guidelines should be applied in a proportionate manner.	Noted
184	GIC India	1,21	The paragraph states "The Guidelines apply to both individual insurance and reinsurance undertakings and at the level of the insurance and reinsurance group. Additionally, insurance and reinsurance groups need to take into consideration the group specific Guidelines". Whilst the application of these guidelines will be clear for most entities it is not clear how they would apply to third country branches of non EEA Re-insurers. As a UK branch of an Indian insurance company, General Insurance Corporation of India ('GIC') would welcome clarity on how the guidelines (and the wider Solvency II Directive) are expected to apply to third country branches. To date we still have no clarity on how Article 174 applies and have received conflicting messages from the regulators. GIC is a large, international reinsurer wholly owned by the Government of India and regulated by the Insurance Regulatory & Development Authority (IRDA), the Indian insurance regulator. IRDA is a member of the IAIS. The global premium income of the Company for the year ending 31st March 2013 was £1.76 billion, and its assets are approximately valued at £ 7.43 billion. GIC UK Branch is however a small EU based establishment, accounting for around 2.6 % of the global premium income of GIC. To apply full SII requirements (and the guidelines) to the level of GIC Mumbai would, in our opinion, be disproportionate and we would welcome clarity on this matter. We recommend the guidelines (and the full SII requirements when implemented) should apply at the level of the EEA branch only. The guidelines (and the full SII requirements when implemented) should not apply in full to the entire entity. It is our opinion that only the qualitative aspects of Pillar II should apply to the entire entity (systems & controls governance, internal audit, actuarial function, compliance function, fit & proper requirements etc.).	EIOPA has taken on board concerns raised by 3rd countries branches , and as a result , EIOPA clarifies that that 3d country branches are outside of the scope of application of the preparatory guidelines. A paper regarding clarification of an application of Solvency 2 requirements, including reporting requirements, to 3rd country branches will be made available in future.
187	I Actuaire	1,22	We understand that this quantitative reporting request is a only a preparation to Solvency 2 (for Governance or qualitative report is different as it requires some legal changes to be effective) expect by the NCA . This has two consequences: • we wanted to underline that the principle to have only two sets of reporting before Solvency 2 launch will not be jeopardized by an additional delay of Solvency 2 launch. To be clear: if S2 is postponed to 2017, then the sets of reporting should also be postponed of one year. • In any case, the NCAs could not take into account the results (especially solvency level) to take further decision (for example require an action plan), since 1) the specifications of the IM could be different with the definitive S2 specifications 2) the figures are produced by the undertaking under a test mode. For these two reasons, the figures could not be considered as fully reliable.	EIOPA will review the deadlines for the submission of information and the report on the forward looking assessment at the end of 2013 based on the latest developments. The deadlines of the submission of information will be revised accordingly. Following the stakeholders comments, a revision clause was introduced in the Guidelines.
189	AFM	1,23	The requirement to provide both standard formula and internal model SCR information at the level of detail requested will be onerous.	See response to the comment 122
190	GC	1,23	It seems that only the SCR calculated with the (partial) internal model needs to be reported, the risk margin based on internal model calculations seems not to be part of the preparatory reporting package. Is this correct, as the market consistent balance sheet can be different for the standard model as compared to the internal model (due to the risk margin)? Which version of the balance sheet will need to be reported?	the comment is not clear. Para 1.23 refer to the reporting of standard formula by internal model undertakings
191	GDV	1,23	See 1.13 and 1.19 above – we believe this proposal is inconsistent with the proposal for third-country equivalence and places an unnecessary burden on internal model applicants; we ask EIOPA to reconsider. Undertakings should be involved in the decision whether they submit information on the SCR calculated with standard formula or with the internal model.	See response to the comment 122
192	IE	1,23	See 1.13 and 1.19 above – we believe this proposal is inconsistent with the proposal for third-country equivalence and places an unnecessary burden on internal model applicants; we ask EIOPA to reconsider. Undertakings should be involved in the decision whether they submit information on the SCR calculated with standard formula or with the internal model.	See response to the comment 122
193	IUA London	1,23	We believe that this would be too heavy a requirement at the preparatory stage.	See response to the comment 122
194	Lloyds	1,23	If firms in the pre-application process for internal models are required to submit information on the SCR calculated with the standard formula, they should not be required to complete the detailed SCR standard formula templates proposed at SCR-B3A to SCR-B3G. Completing these would require these firms to build reporting systems which will be obsolescent once Solvency II is implemented and the firms have internal model approval.	See response to the comment 122

No.	Name	Reference	Comment	Resolution
			Instead, either SCR standard formula numbers should be reported to NCAs via the IMAP process, or summary SCR standard formula numbers should be reported on SCR-B2B and SCR-B2C.	
195	MetLife	1,23	See Comment 1.13	See response to the comment 129
196	PZU	1,23	Please refer to point 1.13.	See response to the comment 122
197	Royal London Mutual	1,23	The requirement to provide both standard formula and internal model SCR information at the level of detail requested will be onerous.	See response to the comment 122
198	RSA	1,23	See 1.13 and 1.19 above – we believe this proposal is inconsistent with the proposal for third-country equivalence and places an unnecessary burden on internal model applicants; we ask EIOPA to reconsider.	See response to the comment 122
199	GC	1,25	1. We note the intention to implement the guideline from 1 January 2014. Despite this being on a preparatory basis we note that this is a challenging timeframe for undertakings (and NCAs) as this is the first time some of this information has been issued publically. NCA's will require time to consider how, and indeed, whether (as envisaged by paragraphs 2.4 - 2.6 of the cover note), to implement the guidelines in their territory. This will create an additional communication delay and a further content uncertainty for undertakings. Clearly, this will impact on their ability and the time needed to respond to the requirements fully. 2. Additional clarity must be given as to the expectations of EIOPA and NCAs as at 1st January 2014. The cover letter implies that the requirements will be gradually phased in over the 'preparatory phase' and refers to specific and general phasing-in requirements. However, the consultation papers have a stronger statement that the requirements hold from 1 January 2014.	EIOPA acknowledges that it is a challenging timeframe for EIOPA to publish Guidelines in time for NCAs to implement by 1 January 2014; EIOPA believes that the preparation for the submission of information under Solvency II is crucial. In prior responses to consultations with regard to Solvency 2 reporting package, undertakings claimed that they would need at least 18 months for the preparation. Assuming that Solvency II will be applicable as from 1 January 2016, that would mean that they would need to start implementation as from 1 June 2014. This timing is consistent with the approach taken in the Guideline publicly consulted. EIOPA is determined to meet deadlines set in the Guidelines Please see also the Final Report on CP10 published by EIOPA
200	ILAG	1,25	We do not agree that the implementation date of 1 January 2014 is achievable.	EIOPA acknowledges that the deadline of 1 January is challenging, however EIOPA as well as NCAs are determined to meet the deadline set, however based on the assumption that OMB 2 will be finalised prior to 1 January 2014.
201	PZU	1,25	Please refer to point 1.11.	See response to the comment 115
202	IE	Section I. General Comments	It should be clarified that market share refers only to undertakings that under current circumstances would be subject to Solvency II and are not excluded due to size, the operations they carry out, because they are institutions excluded from its application or any other circumstances.	See comment 229
203	CFOF_CROF	1,26	Reporting should be on a best efforts basis. As this is a preparatory exercise, we expect EIOPA and the NCAs to allow reporting on a best efforts basis with the focus being on the process of generating the returns. This may include granting exemptions or simplifications for the purposes of the exercise. Further, from the solo perspective these measures will require parallel running of present SI reporting and the reporting required under the interim measures. As such, having to report exact numbers will create an undue burden on companies.	EIOPA considers application of proportionality principle as a crucial part of Solvency II framework. After taking into consideration stakeholders comments, EIOPA has clarified that for the purposes of quarterly reporting, proportionality and materiality have to be recognised. The quarterly measurements may rely on estimates and estimation methods to a greater extent than measurements of annual financial data. The measurement procedures for the quarterly reporting have to be designed to ensure that the resulting information is reliable and comply with the Solvency II standards and that all material information that is relevant for the understanding of the data is reported. EIOPA has also clarified that with regard to the calculation of technical provisions during the year, in particular the ones for the purpose of quarterly reporting, undertakings may rely on simplified methods in the calculation of the risk margin and best estimate, as elaborated at EIOPA Guidelines. See also EIOPA Final Report on CP13/10
205	IE	1,26	Reporting should be on a best efforts basis. As this is a preparatory exercise, we expect EIOPA and the NCAs to allow reporting on a best efforts basis with the focus being on the process of generating the returns. This may include granting exemptions or simplifications for the purposes of the exercise. Further, from the solo perspective these measures will require parallel running of present SI reporting and the reporting required under the interim measures. As such, having to report exact numbers will create an undue burden on companies.	See response to the comment 203 EIOPA considers some period of parallel reporting is unavoidable when introducing a new set of regulatory reporting that differs significantly from the existing one; EIOPA recognises the burden of firms that this is why a revisions clause has been included in the Guidelines, limiting period of parallel running of reporting
206	Munich Re	1,26	It is not realistic to prepare reporting templates without finalised implementing measures. The undertakings have either procedures to generate data for the reporting templates with a significant risk of changes during the discussion concerning the implementing measures or the undertakings have significant additional costs by implementing several options of possible implementing measures. A related starting point should be introduced.	See response to the comment 37
207	PZU	1,26	Please refer to point 1.11.	See response to the comment 115
208	CFOF_CROF	1,27	The guidance refers to undertakings taking appropriate steps to build systems and structures to deliver high quality information for supervisory purpose. It should be noted that while we would want to use our new IT architecture to calculate the underlying results, certain less material areas of the architecture will still be in development, and so we would expect EIOPA/NCAs to adopt a pragmatic approach to the methods used to prepare the interim disclosures. In addition, the final method of compiling the QRTs and narrative reports may still be in development, and so we may wish to use workarounds to populate the QRTs.	See the Final Report published by EIOPA where preparatory nature of the Guidelines is fully explained; NCAs and undertakings are expected to progress in their preparedness for Solvency II over time during the course of the preparatory phase.

No.	Name	Reference	Comment	Resolution
209	GC	1,27	It is unclear if the systems and structures required to deliver the high quality information need to be built and ready for 1 January 2014 (or at least substantially ready for application) or if there is a (current) two-year window for specification and building. It will be very challenging for the former to be achieved in point of the short timescale from now and the regulations still being in consultation form.	See the Final Report published by EIOPA where preparatory nature of the Guidelines is fully explained; NCAs and undertakings are expected to progress in their preparedness for Solvency II over time during the course of the preparatory phase.
210	IE	1,27	The guidance refers to undertakings taking appropriate steps to build systems and structures to deliver high quality information for supervisory purposes. We would assume that the systems used to calculate the solvency position should be based on end state architecture, however while we would want to use our new IT architecture to calculate the underlying results, certain less material areas of the architecture may still be in development, and so we would expect EIOPA/NCAs to adopt a pragmatic approach to the methods used to prepare the pillar 1 results or pillar 3 disclosures. In addition, the final method of compiling the QRTs and narrative reports may still be in development, and so undertakings may wish to use workarounds to populate the QRTs.	See the Final Report published by EIOPA where preparatory nature of the Guidelines is fully explained; NCAs and undertakings are expected to progress in their preparedness for Solvency II over time during the course of the preparatory phase.
211	MetLife	1,27	See Comment 1.7	There is no comment made re para 1.7
212	Munich Re	1,27	refer to comment on 1.26	See response to the comment 37
213	PZU	1,27	Please refer to point 1.8.	See response to the comment 213
214	AFM	1,28	It is not clear how the NCA's will report on progress by 28 Feb 2015 as this is before the deadline for submission of the 31/12/14 reporting	The progress report is not part of the requirements for preparation by undertakings towards Solvency II, but a measure of communication between EIOPA and its members, the NCAs. EIOPA consider it important to receive an update from NCAs on progress made towards preparing for Solvency 2 by them and their markets in February 2015
216	GC	1,28	If, as described in paragraph 1.11, insurers are to report on two quarter-ends and one year-end and in advance of the start of Solvency II, then these dates are likely to be quarter-end September 2015, quarter-end December 2015 and year-end 2015. If this is the case, what progress can NCAs be expected to report by February 2015? See also our remark in paragraphs 1.11 and 1.79.	The progress report is not part of the requirements for preparation by undertakings towards Solvency II, but a measure of communication between EIOPA and its members, the NCAs. EIOPA consider it important to receive an update from NCAs on progress made towards preparing for Solvency 2 by them and their markets in February 2015
217	GDV	1,28	It is difficult to understand what the NCAs should report to EIOPA in February 2015, which is a couple of months prior to the companies' reporting deadline.	The progress report is not part of the requirements for preparation by undertakings towards Solvency II, but a measure of communication between EIOPA and its members, the NCAs. EIOPA consider it important to receive an update from NCAs on progress made towards preparing for Solvency 2 by them and their markets in February 2015
218	IA Cyprus	1,28	The intention of this requirement is not clear since the progress report is required in February 2015, that is, three months before the companies' reporting deadline.	See response to the comment 217
219	IE	1,28	See 1.7	see above response to comment 70 or response to the comment 217
220	Munich Re	1,28	refer to comment on 1.26	See response to the comment 217
221	Nordea	1,28	If the first progress report should be delivered by 28 February 2015 it's probably too late to make any adjustments. If the result is not acceptable the deadline for the report should be earlier	See response to the comment 217
222	PZU	1,28	In our opinion the annual progress report prepared by local NCA should not be supplemented by any kind of comply or explain procedure (e.g. local peer review report etc.). Such report would require the analysis of compliance of each undertaking with the interim measures requirements. We believe that the compliance should be tested on the basis of final requirements after the official introduction of Solvency II.	See response to the comment 217
223	Royal London Mutual	1,28	It is not clear how the NCA's will report on progress by 28 Feb 2015 as this is before the deadline for submission of the 31/12/14 reporting	See response to the comment 217
224	RSA	1,28	We note that the deadline for the first NCA report to EIOPA is before the deadline for the annual reporting submission.	See response to the comment 217
225	I Actuaire	Section II. General Comments	We understand that a few NCAs would use different system of threshold (not expressed in terms of market share but in terms of total balance sheet) which is easier and could be consistent with the CP. From an actuarial standpoint, it neglects small entities which represent specific risks which should be taken into account.	Regarding methodologies for the calculation of market share, EIOPA believes that the use of technical provisions for life undertakings and gross written premiums for non-life is the most adequate. Also, although EIOPA acknowledges the concerns on the flexibility, it believes that it is important for NCAs to apply a risk-based approach, in line with Solvency II principles. As a result EIOPA has provided further clarification regarding the undertakings to be included in the market share calculation and the methodology for identification of undertakings covered by the market share has also been amended.

No.	Name	Reference	Comment	Resolution
226	Munich Re	Section II. General Comments	To ensure an equal treatment and to make further progress in the implementation of Solvency II, the guidelines should be applied to all undertakings independent of their size. To relieve the burden, NCAs should be allowed to ease the requirements for small undertakings.	NCA's can go beyond the market share coverage proposed in the GIs
227	RSA	Section II. General Comments	As EIOPA states in the Impact Assessment, the use of thresholds is proposed in order to pre-empt the introduction of proportionality in reporting and disclosure under OMDII. Given these Guidelines are not intended to come into force until after the approval of OMDII, it is well within EIOPA's capability to produce guidelines that apply to <u>all</u> firms that are within the scope of Pillar III reporting as per OMDII. This attempt by EIOPA to predict the OMDII outcome will result in one of two possibilities: 1) some undertakings exempt under OMDII will be caught by these Guidelines; or 2) some undertakings caught by OMDII will be outside the proposed threshold, meaning they will not have had the opportunity to demonstrate progress towards SII compliance. EIOPA ought simply to refer to the OMDII thresholds (if any) when they are finalised.	EIOPA believes that this proposal will be in line with OMDII. As for undertakings not covered by the guidelines EIOPA believe that it is an appropriate application of proportionality principle given the preparatory nature. Nevertheless, EIOPA encourages all undertakings of the market to prepare for Solvency II.
228	AFM	1,29	We support the principle of using thresholds to ensure only the larger insurance entities are required to comply with the interim reporting measures.	Noted. See also comment 225
229	FEE	1,29	The requirement, that national competent authorities should ensure that insurance and reinsurance undertakings are included in a way, that at least 80 % of the national market share should be represented is imprecise. It does not become clear, how it has to be decided from the perspective of a (small or mid-size) single undertaking if it is within or out of the 80 %-threshold. So, in order to clarify the scope there should be criteria, how it has to be defined. In addition defining the thresholds in relation to the market share on the solo level may lead to problematic implications for the group reporting. E.G. the following szenario is possible: It can happen that a group has to apply group reporting although some of its entities are not within the solo-threshold. This seems adequate as long as it affects the small subsidiaries of a group. But the identification relative to the national market share may mean that although a subsidiary is of great importance for a group it does not have to apply the solo-reporting (and is not prepared to deliver its data to the group) because of being insignificant enough in relation to the national market.	To determine the 100% national market share the following entities are excluded: non-EEA (re)insurers with a share in the national market through a branche office and other EEA (re)insurers with a share in the national market through a branch office or freedom of services and local (re)insurers not falling within the scope of Solvency II. The Guideline was amended. EIOPA would like to clarify that insurance and reinsurance undertakings not falling within the scope of Solvency II and for which NCA don't intend to apply Solvency II regime should also not be considered in the calculation of the market share. See also comment 225.
230	GC	1,29	The selection based on market share is ambiguous, leaving room for different interpretations and possibly difficult to implement. See also our remark on paragraph 1.9. 1) For national markets where cross-border activities play an important role, the local NCAs should cooperate so that the results will reflect the situation in the market. The definition of market share might need to include specific definitions on local or international business. 2) The objective is to support both NCAs and undertakings in their preparation for the Solvency II requirements. From participation rates in previous QIS studies, it seemed that particularly smaller companies face difficulties in their Solvency II preparations. The objective of an 80% market share, might not lead to an appropriate view of the status of the market as a whole. 3) It is possible in smaller insurance markets that the 80% threshold would capture relatively small companies which would not be required to report if they were situated in larger member states. An additional threshold based on absolute size of company would be useful. 4) Companies in run-off which would not expected to be captured under Solvency II from 2016 should be exempt in the preparatory phase.	See comment 229
231	GDV	1,29	As EIOPA states in the Impact Assessment, the use of thresholds is proposed in order to pre-empt the introduction of proportionality in reporting and disclosure under OMDII. This attempt by EIOPA to predict the OMDII outcome can result in one of two possibilities: 1) some undertakings exempt under OMDII will be caught by these Guidelines; or 2) some undertakings caught by OMDII will be outside the proposed threshold – meaning they will not have the opportunity to demonstrate progress towards SII compliance. Only when the outcome of OMDII is known should the focus turn to what, if any, interim measures should be applied to reporting.	See comment 225
232	GIC India	1,29	The consultation paper proposes National competent authorities should require undertakings representing at least 80% of the market share submit the set of annual quantitative information identified in Guideline 12. Following on from our comments against paragraph 1.21 above we would welcome further clarity on application of the guidelines to third country branches. In particular, we would welcome clarity on whether inclusion within the 80% threshold would be evaluated based on the business of the EEA branch (in our case 2.6% of global premium) or the business of the entire entity (100% of global premium). In this scenario we do not believe it would be proportionate to include a non EEA entity in the preparatory phase based on the 97.4% of premiums written outside of the EEA. We recommend inclusion within the 80% threshold should be based only on premiums written by the EEA branch.	See response to the comment 184 and 229.

No.	Name	Reference	Comment	Resolution
233	IA Cyprus	1,29	We do not support any requirements in the guidelines relating to Solvency II pillar 1. If SII pillar I requirements are kept, we underscore the following: In (small) markets such as Cyprus where only a few insurers possess the big majority of the market share while a large number of others share the remaining, the 80% threshold will include very small insurers. Imposing annual quantitative and narrative reporting requirements on such undertakings would impose a huge and disproportional burden on them. We suggest an exemption for undertakings that fall within the 80% threshold but are below a certain absolute size in terms of technical provisions (Life) and premiums written (Non-Life) calculated on the basis of Solvency I.	See comment 229
234	IE	1,29	See our comments in the general comments section on the cycles of reporting and on need to assure that undertakings will have enough to establish the appropriate internal processes and IT systems..	See resolution general comments.
235	Royal London Mutual	1,29	We support the principle of using thresholds to ensure only the larger insurance entities are required to comply with the interim reporting measures.	Noted
236	RSA	1,29	We believe the use of a threshold undermines the stated purpose of the phasing in ("to review and evaluate the quality of the information and the progress made" – paragraph 1.27(b)).	Question is not clear in which sense a threshold undermines the stated purpose of the preparatory phase.
237	AMICE	1.30	We oppose any requirement to submit quarterly information during the interim phase.	EIOPA considers setting up systems and processes and procedures for quarterly reporting, as well as submitting quarterly information as defined in the guidelines, as an important part of the preparation process
238	RSA	1.30	See 1.29.	See comment 236
239	GDV	1.30	See 1.29 Thresholds cover 80% of national market share for annual information and 50% for quarterly information when the ECB would in principle cover 80% of the quarterly statements for its own reporting. Harmonization between the two should be achieved and the use of own simplification for quarterly reporting should be permitted. 60%-70% would be a good compromise. It is very important to get harmonization at European level and a fair treatment for scopes and entities of the same size across the different countries.	See comment 225
240	FEE	1.30	The comment to 1.29 applies accordingly to the 50 % threshold.	See response to the comment 229
241	GC	1.30	How are composite insurers to be treated? Will they report on all templates if they are captured by either the life or non-life thresholds?	If the composite undertaking is selected automatically through the methodology used by the NCA to cover the required threshold, by falling into the threshold for life or non-life business, the undertaking will have to report the templates applicable to the entire business of the undertaking.
242	GIC India	1.30	The consultation paper proposes National competent authorities should require undertakings representing at least 80% of the market share submit the set of annual quantitative information identified in Guideline 12. Following on from our comments against paragraph 1.21 above we would welcome further clarity on application of the guidelines to third country branches. In particular, we would welcome clarity on whether inclusion within the 50% threshold would be evaluated based on the business of the EEA branch (in our case 2.6% of global premium) or the business of the entire entity (100% of global premium). In this scenario we do not believe it would be proportionate to include a non EEA entity in the preparatory phase based on the 97.4% of premiums written outside of the EEA. We recommend inclusion within the 50% threshold should be based only on premiums written by the EEA branch.	See response to the comment 184
243	Assuralia	1.30	Thresholds cover 80% of national market share for annual information and 50% for quarterly information when the ECB would in principle cover 80% of the quarterly statements for its own reporting. Harmonization between the two should be achieved and the use of own simplification for quarterly reporting should be permitted	EIOPA's cooperation with the ECB has ensured that the reporting package proposed by the Guidelines is sufficient to meet ECB's initial requirements. EIOPA will continue to engage in a dialogue with the ECB aiming as much as possible to avoid undue costs to the undertakings arising from different requirements. However, the set of the Solvency II reporting requirements aim the information needed for the supervisory review process.
244	IA Cyprus	1.30	We do not support any requirements in the guidelines relating to Solvency II pillar 1.	Noted
245	ROAM	1.30	Les membres de la ROAM s'opposent aux exigences de mise en place de reporting trimestriel durant la période transitoire.	Noted
246	GC	1,31	The guidelines should make clear the treatment of cross border business in calculating "national market shares"	See comment 232
247	PZU	1,31	With reference to point 1.33 and 1.34:	See comment 229
			According to point 1.31 the NCA "should calculate the national market share (...) based on the data submitted by insurance (...) undertakings for the purpose of supervisions on the annual reporting period ending during 2012".	

No.	Name	Reference	Comment	Resolution
248	PZU	1,31	<p>Points 1.33 and 1.34 state that the market share of undertaking should be based on the undertaking's level of gross technical provisions for life business and gross premium written for non-life business.</p> <p>In our opinion there is a potential risk that 2012 year end information will not be representative for 2014 reporting or 2015 reporting according to our proposal especially in terms of fast growing markets. For example in terms of Poland the 2012 data might not be representative for life business due to large number of short term investment products which had a strong impact on the balance sheet position of technical provisions.</p> <p>The local NCA should have an ability to base on most recent data available (as far as the data are complete and accurate and refer to all market players), but within the timeline defined in point 1.35 (the NCA must notify the undertaking of falling into defined thresholds no later than 11 months before the initial submission reference dates).</p>	See comment response to the comment 229; also please revised text of the Guidelines
249	AMICE	1,33	<p>Guideline 6 – Calculation of market share for life business We oppose any requirement to submit quarterly information during the interim period.</p> <p>Paragrah c should be amended as follows: Identify the insurance and reinsurance undertakings for which the accumulated market share calculated in the previous paragraph reaches at least 80% for the purpose of Guideline 3 and 50% for the purpose of Guideline 4, classifying them from the one with the highest amount of gross life-technical provisions to the one with the smallest.</p>	See response to the comment 237
250	DublinIMA	1,33	Capital requirement would be an appropriate treatment for life market share.	See comment 225
251	ECIROA	1,33	Capital requirement would be an appropriate treatment for life market share.	See comment 225
252	FEE	1,33	See comment to 1.29 above. In addition it is not specified which accounting basis should be applied for the calculation of technical provisions.	Regulatory submission for Solvency 1 purposes are to be used; it will depend on the local market rules
253	GC	1,33	We observe that the reserve (for Life) is not necessarily the right indicator to measure market share and/or the risk profile. Calculating Life Market Shares by reference to (Solvency I) technical provisions will potentially include many lower-risk companies writing unit linked business and thereby may exclude companies with a relatively higher-risk profile.	See comment 225
254	GDV	1,33	Defining minimum levels of market shares which should be covered does not allow for a consistent application of the thresholds. The minimum market shares provided for in the Guidelines should be replaced by target levels to prevent small undertakings from overly burdensome requirements at this early stage.	Agree, during the preparatory phase any inconsistency in the selection made by the NCAs to cover the required national market share can not be avoided.
255	IE	1,33	<p>It seems that the annuities from non-life policies are counted here. It is not clear if non-life companies are to be included in two market share calculations by 1.33 and 1.34 . We underline that accordingly to Solvency II Directive (2009) Article 2(3)(a)(ii) and Life Insurance Directive (2002) Article 2(1)(b) annuities are life insurance.</p> <p>It could be emphasized that the TP is Solvency I TP.</p> <p>An exemption for undertakings that fall within the threshold but are below a certain absolute size in terms of technical provisions (Life) and premiums written (Non-Life) calculated on the basis of Solvency I could be foreseen considering that in some jurisdictions the threshold can capture very small undertakings. Imposing annual quantitative and narrative reporting requirements on small insurers would create a huge and disproportional burden on them.</p> <p>See also our comments in the general comments section on the cycles of reporting and on need to assure that undertakings will have enough to establish the appropriate internal processes and IT systems</p>	<p>The market share calculations are to be based on Solvency 1 regulatory returns (annual reporting period ending during 2012). Regarding the split between life and non-life local specificities may need to be taken into account.</p> <p>See also comment 227.</p>
256	PZU	1,33	Please refer to point 1.31.	See comment 229
257	ROAM	1,33	<p>Guideline 6 – Calculation of market share for life business</p> <p>Les membres de la ROAM souhaitent s'assurer qu'aucune autorité de supervision ne puisse aller au-delà des seuils d'application définis par l'EIOPA.</p>	See comment 229
258	AMICE	1,34	<p>Guideline 7 – Calculation of market share for non-life business</p> <p>See comment above.</p>	See comment 229
259	FEE	1,34	See comment to 1.29 above.	See commeny 240
260	GC	1,34	Premium volume (for non-life) is not necessarily the right indicator to measure market share, since also long tailed business could contain relatively high risks.	See comment 225
261	GDV	1,34	See 1.33	See comment 254
262	IE	1,34	<p>See comment to 1.33. Should composite insurance undertakings provide data for both market share calculations? Has it been thought all the consequences if life companies are included in two market share calculations by 1.33 and 1.34?</p> <p>See also our comments in the general comments section on the cycles of reporting and on need to assure that undertakings will have enough to establish the appropriate internal processes and IT systems.</p>	See comment 241
263	PZU	1,34	Please refer to point 1.31.	See comment 229

No.	Name	Reference	Comment	Resolution
264	ROAM	1,34	Guideline 7 – Calculation of market share for non-life business Les membres de la ROAM souhaitent s'assurer qu'aucune autorité de supervision ne puisse aller au-delà des seuils d'application définis par l'EIOPA.	See comment 229
265	AMICE	1,35	Guideline 8 – Notification by NCAs to insurance and reinsurance undertakings NCAs should notify insurance and reinsurance undertakings long before 11 months the initial submission date. We would propose 18 months before the initial submission as notification date.	Noted
266	Deloitte	1,35	We would welcome if national competent authorities notified relevant undertakings (especially small and medium undertakings that do fall within the reporting thresholds) at an earlier point of time than 11 months before the first submission date, for example, with the publication of guidelines by national competent authorities. This would ensure higher data quality as the implementation of reporting processes means huge efforts for many undertakings, especially w.r.t. quarterly and group reporting.	It is up to each NCAs when they decide to notify, but at the latest, it will have to be 11 months prior to the first reporting reference date. See also comment 270.
267	GC	1,35	Eleven months for an NCA to provide notice of submission requirements being due seems a reasonable time period for action to be taken by the insurer / reinsurer. We note this could be more difficult where an undertaking is required to submit information for the first time.	Noted
268	GDV	1,35	Undertakings have to be notified much earlier than 11 months before submission date. NCAs ought to be able to notify affected undertakings now, as the determining criteria are based on 2012 figures. Waiting until Q2 2014 is far too late. There is also the connection to the forward looking assessment of the undertaking's own risks (based on the ORSA principles). The threshold applies also to some requirements in the Guidelines on the forward looking assessment of the undertaking's own risks; however those Guidelines do not include any reference to notification deadlines. We underline that undertakings need certainty on which forward looking assessment of the undertaking's own risks requirements they are expected to comply at an earlier stage. The same comment applies to 1.40 and 1.45	See comment 266 and 270
269	IA Cyprus	1,35	We believe that NCAs should notify affected companies as early as possible, i.e. as soon as the final guidelines are adopted by EIOPA.	See comment 266 and 270
270	IE	1,35	Would enhance clarity, and avoid misleading interpretations, if the guideline would clearly state that the initial submission reference dates coincide with the financial year end for the annual information and the quarter end for the quarterly information, and not with the deadline for the submission. There is also the connection to the forward looking assessment of the undertaking's own risks (based on the ORSA principles). The threshold applies to some requirements in the Guidelines on the forward looking assessment of the undertaking's own risks; however those Guidelines do not include any reference to notification deadlines. We underline that undertakings need certainty on which forward looking assessment of the undertaking's own risks requirements they are expected to comply at an earlier stage. We also believe that 11 months' notice of whether or not an undertaking is caught by the thresholds is insufficient time and perpetuates additional uncertainty. The same comment applies to 1.40 and 1.45	Where undertakings or groups are permitted by national laws to report their financial information based on their accounting year-end which deviates from the calendar year, reporting reference dates may be adjusted accordingly. The reference dates to be used should be approved by the supervisory authority. Notification date - In case the initial submission reference date for the annual quantitative information relates to the financial year ending on 31 December 2014, the notification by the NCA is no later than 31 January 2014.
271	IUA London	1,35	Eleven months will not give firms adequate time to prepare for the threshold company requirements.	See comment 266 and 270
272	Lloyds	1,35	With respect to thresholds, NCAs should advise firms which will be required to comply with the Guidelines in advance of any period covered by them. On current scheduling, this means providing this advice no later than 31 December 2013 (ie before the 2014 calendar year period covered by the annual reporting as at 31 December 2014).	See comment 266 and 270
273	MetLife	1,35	See Comment 1.11	See response to the comment 113
274	PZU	1,35	According to point 1.35 the NCAs are required to notify undertakings falling into defined thresholds no later 11 months before the initial submission reference dates. In our opinion the period of 11 month is too short as part of the information used in annual reporting has to be collected during the whole year. Moreover the falling of the undertaking into defined threshold would result in the necessity of introduction or further development of reporting systems which might be also time consuming. Due to those the period of 18 months is regarded by us as minimum.	See comment 266 and 270
275	ROAM	1,35	Guideline 8 – Notification by NCAs to insurance and reinsurance undertakings Il apparaît fondamental que les entreprises concernées par le reporting (durant la période transitoire) soient informées à minima 18 mois avant la date de soumission du reporting (et non 11 mois comme indiqué dans les guidelines).	The undertaking are to be notified 11 months, prior to the first reporting reference date
276	RSA	1,35	The national competent authorities ought to be able to notify affected undertakings now, as the determining criteria are based on 2012 figures. Waiting until Q2 2014 is too late.	Notification date - In case the initial submission reference date for the annual quantitative information relates to the financial year ending on 31 December 2014, the notification by the NCA is no later than 31 January 2014.
277	Assuralia	1,35	Notification of insurance and reinsurance undertakings falling into the predefined thresholds should happen as early as possible such that concerned undertakings are timely informed and able to prepare themselves adequately. A notification by the NCA 11 months before the initial submission reference date is considered to be too late.	Notification date - In case the initial submission reference date for the annual quantitative information relates to the financial year ending on 31 December 2014, the notification by the NCA is no later than 31 January 2014.

No.	Name	Reference	Comment	Resolution
278	DublinIMA	1,36	Reporting should be restricted to solo undertakings because not all solo undertakings are required to report, hence their information may not be available for the group consolidation.	In cases where undertakings don't fall into the thresholds on solo level, they should be reported on group level when they are part of a group which is subject to reporting under the preparatory Guidelines. The purpose is to prepare groups for SII which should include all solo undertaking which are subject to SII.
279	GC	1,36	A 12 billion Euro threshold for total assets appears high for a non-life company. Is the focus of the requirements intended to be biased towards a certain sector of the industry?	The threshold on group level is general and not biased towards a certain sector.
280	GDV	1,36	See general comments. Preparatory Guidelines should be limited to the solo perspective only. If requirements for groups are introduced the thresholds should be consistent with those applied to solo entities. The market shares provided for in Guideline 6 should not be undermined.	Also the group level is applicable for the preparatory phase to prepare also groups for SII
				The group level is applicable for the preparatory phase to prepare also groups for SII. Regarding the thresholds, market shares are difficult to apply at group level. Additionally, the 12 billion threshold is consistent with the threshold used by EIOPA at group level for financial stability purposes.
281	IE	1,36	See general comments. Preparatory Guidelines should be limited to the solo perspective only because not all solo undertakings are required to report, hence there information may not be available for the group consolidation. If requirements for groups are introduced the thresholds should be consistent with those applied to solo entities.	In cases where undertakings don't fall into thresholds on solo level, they should be reported on group level when they are part of a group which is subject to reporting under the preparatory Guidelines. The purpose is to prepare groups for SII which should include all solo undertaking which are subject to SII.Regarding the thresholds, market shares are difficult to apply at group level. Additionally, the 12 billion threshold is consistent with the threshold used by EIOPA at group level for financial stability purposes.
282	IUA London	1,36	As not all solo companies are required to report, the required information will not be available at group level.	In cases where undertakings don't fall into thresholds on solo level, they should be reported on group level when they are part of a group which is subject to reporting under the preparatory Guidelines. The purpose is to prepare groups for SII which should include all solo undertaking which are subject to SII.Regarding the thresholds, market shares are difficult to apply at group level. Additionally, the 12 billion threshold is consistent with the threshold used by EIOPA at group level for financial stability purposes.
283	Munich Re	1,36	All reporting requirements should be seen in the context whether an internal model is used or not. In case of usage of an internal model guideline 16 should reflect that not all SCR sheets are useful in such a case because the structure of an internally calculated SCR may differ from the standard SCR.	The internal model undertakings are required to report one template- SCR B2C, and a design of this template is to be agreed between an undertaking and supervisor/NCA
284	RSA	1,36	The lack of harmonisation resulting from the application of thresholds conflicts with the proposal for Group reporting: in order to procure data for the whole group, all operations in that group will have to provide data, no matter what their size. We believe the proposals regarding thresholds contradict the following aim: "to review and evaluate the quality of the information and the progress made" (paragraph 1.27).	In cases where undertakings don't fall into thresholds on solo level, they should be reported on group level when they are part of a group which is subject to reporting under the preparatory Guidelines. The purpose is to prepare groups for SII which should include all solo undertaking which are subject to SII.
285	Steproe & Jonshon LLP	1,36	According to the Guideline, the obligation to report on behalf of the insurance group would belong to the participating (re)insurance undertaking or to the insurance holding company at the head of a group. We consider that other companies within the group may be better placed to fulfil these reporting duties. An express reference in the Guideline would positively reflect the existing variety of corporate structures of insurance groups across the EU. (Re)insurance groups differ from each other in their structure and organisation. In particular, we note that insurance holding companies may fulfil different roles within the groups: active insurance holding companies may centralise the management and supervision of the group companies, establish the risk appetite for the group and control capital allocation for efficiency purposes. Conversely, holding companies may carry out a financial or non-financial, industrial activity, or their corporate object and sole activity may be limited to holding shares in subsidiaries (we refer to this last category as "inactive holding companies"). Inactive holding companies do not carry out a regulated activity and do not actively participate or control the subsidiaries' business activities. Given the limited involvement of the inactive holding company in its subsidiaries' activities, its reporting function on behalf of the group would be limited to an aggregation of those of the subsidiaries, which the regulator has access to in any case. Aggregate reports of this nature may therefore not be appropriate where the holding company is inactive i.e. it does not centrally determine and monitor neither risk appetite nor the management of capital against that appetite. Due to the above reasons, the inactive holding company may not be the best vehicle to report on the subsidiaries' activities or to ensure compliance. Therefore, we suggest that the Guideline should expressly allow the national supervisor to determine, together with the parent undertaking, the entity within the group which is best placed to perform the duty to report. The national supervisors should be able to consider the entity responsible for fulfilling the governance requirements at group level as the main entry or contact point for reporting purposes. The inclusion of this possibility in the Guideline would also be consistent with other EIOPA guidelines. For instance, we note that under the Guidelines on the System of Governance the entity responsible for fulfilling the governance requirements at group level may be other than the parent undertaking. This entity would also have a duty to design the group forward looking assessment of the undertaking's own needs. We consider that the entity responsible for fulfilling the governance requirements at group level would normally be best placed to perform the duty to report. Our comment also applies to the following paragraphs: 1.41; 1.53; 1.59.	This approach under preparatory Guidelines follows in general the SII approach that the ultimate (parent) participating undertaking is subject to group reporting stated in Art. 213 SII-Directive.
286	Assuralia	1,36	Preparatory Guidelines should be limited to the solo perspective only. If requirements for groups are introduced the thresholds should be consistent with those applied to solo entities. The market shares provided for in Guideline 6 should not be undermined.	In cases where undertakings don't fall into the thresholds on solo level, they should be reported on group level when they are part of a group which is subject to reporting under the preparatory Guidelines. The purpose is to prepare groups for SII which should include all solo undertaking which are subject to SII. Regarding the thresholds, market shares are difficult to apply at group level. Additionally, the 12 billion threshold is consistent with the threshold used by EIOPA for financial stability purposes at group level.

No.	Name	Reference	Comment	Resolution
287	FEE	1,37	In the guideline proposal it is stated that all quantitative data is submitted in units. We wonder if a rounding to thousands is also allowed and think it should be for reasons of materiality.	Roundings may be applied in the individual case according to the proportionality principle.
288	GDV	1,37	This should be rephrased as it not clear: we presume it means to refer to "the exchange rate prevailing as at the end of the reporting period"; what is currently stated could be misinterpreted as the rate prevailing as at the date of submission.	OK, noted. The wording in 1.37 should be changed to: "The equivalent amount in national currency should be calculated by applying the exchange rate at the end of the reporting period for supervisory purposes referred in the previous paragraph."
289	IE	1,37	This should be rephrased as it not clear: we presume it means to refer to "the exchange rate prevailing as at the end of the reporting period"; what is currently stated could be misinterpreted as the rate prevailing as at the date of submission.	OK, noted. The wording in 1.37 should be changed to: "The equivalent amount in national currency should be calculated by applying the exchange rate at the end of the reporting period for supervisory purposes referred in the previous paragraph."
290	RSA	1,37	This needs to be rephrased to clarify that it refers to "the exchange rate prevailing as at the end of the reporting period"; what is currently stated could be misinterpreted as the rate prevailing as at the date of submission.	OK, noted. The wording in 1.37 should be changed to: "The equivalent amount in national currency should be calculated by applying the exchange rate at the end of the reporting period for supervisory purposes referred in the previous paragraph."
291	GDV	1,38	See 1.35.	See response to the comment 266 and 270
292	IE	1,38	See 1.35.	See response to the comment 266 and 270
293	Assuralia	1,38	see 1.35	See response to the comment 266 and 270
294	Assuralia	1.40	See 1.35 – this notification ought to be made much earlier: the relevant data currently exist for this. The same notification date should apply also to 1.38	See response to the comment 266 and 270
295	GDV	1.40	See 1.35 – this notification ought to be made much earlier: the relevant data currently exist for this. The same notification date should apply also to 1.38	See response to the comment 266 and 270
296	PZU	1.40	Please refer to point 1.35.	See response to the comment 266 and 270
297	RSA	1.40	See 1.35 – this notification ought to be made much earlier: the relevant data currently exist for this.	See response to the comment 266 and 270
298	AMICE	1,41	Guideline 10 – Groups' quarterly quantitative reporting thresholds We oppose any requirement to submit quarterly information for groups. This guideline should be deleted.	For preparation purposes groups are required to also submit quarterly templates during the preparatory phase, but a very limited set of templates that reflect the proportionality principle. See also response to the comment 237
299	GDV	1,41	See general comments. Preparatory Guidelines should be limited to the solo perspective only. If requirements for groups are introduced the thresholds should be consistent with those applied to solo entities. The market shares provided for in Guideline 6 should not be undermined. The use of proxies should be allowed without predefined closed list of simplifications made by NCAs. Undertakings should be allowed to use their own proxies as long as material risks are well captured.	In cases where undertakings fall below thresholds on solo level, they should be reported on group level when they are part of a group which is subject to reporting under the preparatory Guidelines. The purpose is to prepare groups for SII which should include all solo undertaking which are subject to SII. The threshold on group level is general and not biased towards a certain sector The group level is applicable for the preparatory phase to prepare also groups for SII. Regarding the thresholds, market shares are difficult to apply at group level. Additionally, the 12 billion threshold is consistent with the threshold used by EIOPA for financial stability purposes at group level.
300	IE	1,41	See general comments. Preparatory Guidelines should be limited to the solo perspective only. If requirements for groups are introduced the thresholds should be consistent with those applied to solo entities. The use of proxies should be allowed without predefined closed list of simplifications made by NCAs. Undertakings should be allowed to use their own proxies as long as material risks are well captured.	In cases where undertakings fall below thresholds on solo level, they should be reported on group level when they are part of a group which is subject to reporting under the preparatory Guidelines. The purpose is to prepare groups for SII which should include all solo undertaking which are subject to SII. The group level is applicable for the preparatory phase to prepare also groups for SII. Regarding the thresholds, market shares are difficult to apply at group level. Additionally, the 12 billion threshold is consistent with the threshold used by EIOPA for financial stability purposes at group level.
301	ROAM	1,41	Guideline 10 – Groups' quarterly quantitative reporting thresholds Les membres de la ROAM s'opposent à soumettre des reporting Groupe de manière trimestrielle.	For preparation purposes groups are required to also submit quarterly templates during the preparatory phase, but a very limited set of templates that reflects the proportionality principle.
302	RSA	1,41	See 1.36.	See response to the comment 284
303	Assuralia	1,41	Preparatory Guidelines should be limited to the solo perspective only. If requirements for groups are introduced the thresholds should be consistent with those applied to solo entities. The market shares provided for in Guideline 6 should not be undermined.	The group level is applicable for the preparatory phase to prepare also groups for SII. Regarding the thresholds, market shares are difficult to apply at group level. Additionally, the 12 billion threshold is consistent with the threshold used by EIOPA for financial stability purposes at group level.
304	GDV	1,42	See 1.37.	See response to the comment 288
305	IE	1,42	See 1.37.	See response to the comment 288
306	RSA	1,42	See 1.37.	See response to the comment 288
307	GDV	1,43	See 1.35.	See response to the comment 266 and 270
308	IE	1,43	See 1.35.	See response to the comment 266 and 270
309	RSA	1,43	See 1.35.	See response to the comment 266 and 270

No.	Name	Reference	Comment	Resolution
310	Deloitte	1,45	Guideline 10 – Groups’ quarterly quantitative reporting thresholds: Where it says "they are required to submit to the group supervisor the set of annual quantitative information identified in Guideline 19", should it be a "... set of quarterly quantitative information..." instead?	Noted. It will be changed to: "...the set of quarterly quantitative information identified in Guideline 9."
311	GDV	1,45	See 1.35.	See response to the comment 266 and 270
312	IE	1,45	See 1.35.	See response to the comment 266 and 270
313	PZU	1,45	There is an inconsistency in this point – the Guideline 10 refers to quarterly reporting while point 1.45 refers to annual quantitative information.	Noted. It will be changed to: "...the set of quarterly quantitative information identified in Guideline 9."
314	RSA	1,45	See 1.35.	See response to the comment 266 and 270
315	GDV	1,46	See general comments on the narrative information. The cover note says (page 8, 4.4) that the specific “phasing in” applies to the guidelines (...) of quantitative reporting items. On the other side the guideline on the submission of information (Guideline 11) says that there also threshold for the narrative reporting. EIOPA should correct the cover note.	See response to the comment 135
316	IA Cyprus	1,46	Although we do not object to the aim pursued by narrative reporting, we do not agree with the formal reporting approach taken in the guidelines as this would require substantial resources to coordinate and produce that would come on top of the resources already needed to produce the reporting for Solvency 1. Especially for Cyprus, being a small country with small-sized insurers, double reporting would represent a huge and disproportional burden and local insurers would lack sufficient resources for carrying it out. It would moreover not be cost effective since reporting systems/processes/manuals will again have to be changed once the full Solvency II regime is introduced in 2016. Hence we consider that a framework for monitoring progress in respect of the Governance requirements should better be left to national supervisors to decide in tandem with their markets, taking into account national specificities. We believe that it would be very beneficial if EIOPA requests national supervisors to engage in a dialogue with insurers in their respective markets with an aim to agree on a clear timetable concerning what they concretely expect from undertakings to have in place at different stages during the preparatory stage until 2016 and when/what information should be submitted.	Noted. See also comments on Narrative reporting. In response to the comment 28
317	IE	1,46	See general comments on the narrative information.	
318	Assuralia	1,46	(See general comments & paragraph 1.14) If narrative reporting is required, it should only be required at group level, not at solo level.	See resolution comments on narrative reporting
319	AMICE	1,47	Guideline 12 – Solo quantitative annual information Information about technical provisions (TP-E1, TP-F1), solvency capital requirements (SCR-B2, SCR-B3) and minimum capital requirements (MCR-B4) should be only submitted to the supervisory authorities provided there is an agreement on Pillar I issues.	Noted
320	AON	1,47	Until the legislative process is completed it is not appropriate to report on Pillar 1 calculations. Is it an error that you propose both TP-E1 and TP-E1Q for annual reporting?	See response to the comment 13 Following responses and feedback received from stakeholders, EIOPA decided to use annual template TP - E1 for annual submission (selected data items) and quarterly template TP - E1Q for quarterly submission
321	CFOF_CROF	1,47	In the schedule of reporting templates, items TP-F1Q and TPE1Q, listed at h) and i) respectively appear to duplicate reference to these forms at f) and g). They are separately listed for quarterly reporting at 1.52. We suggest that the references at h) and i) in this paragraph be deleted. We would not support the list being extended. The proposal includes a significant broadening of the capital requirements QRTs, as 1.48 states that the data is required for both Internal Model and Standard Formula. This should be recognised as an additional burden to industry and we would not want it to set a precedent for reporting both internal model and standard formula in these templates after the date of implementation of Solvency 2.	Following stakeholders' feedback, EIOPA decided to use annual version of TP templates for annual reporting and quarterly version for quarterly reporting - the guidelines have been amended accordingly See response to the comment 122
322	DublinIMA	1,47	Until the legislative process is completed it is not appropriate to report on Pillar 1 calculations. Is it an error that you propose both TP-E1 and TP-E1Q for annual reporting?	Following stakeholders' feedback, EIOPA decided to use annual version of TP templates for annual reporting and quarterly version for quarterly reporting - the guidelines have been amended accordingly
323	ECIROA	1,47	Until the legislative process is completed it is not appropriate to report on Pillar 1 calculations. Is it an error that you propose both TP-E1 and TP-E1Q for annual reporting?	Following stakeholders' feedback, EIOPA decided to use annual version of TP templates for annual reporting and quarterly version for quarterly reporting - the guidelines have been amended accordingly
324	GC	1,47	The level of detail on assets is extensive. We question whether this information should be requested to this extent and this frequency. Is this request driven by ECB requirements or is it based on a specific Solvency II requirement? In particular for groups with small undertakings in different countries, this and similar requirements, may imply that in countries where the NCA explains why not to comply, groups may still have to do the reporting.	EIOPA consider preparation for assets reporting by undertakings as crucial and included reporting of assets AS - D1 template and reporting of derivatives AS - D20 template in the preparatory package On group level the information on assets is required even if the NSA in that country explains why not to comply on solo level. But the information for the solo undertaking should be available for the ultimate parent undertaking to report on group level.
			See general comments - It is critical requiring the complete Pillar I calculation while the legislative process is not completed. If the legislative process is not completed, Pillar I elements cannot be part of the preparatory reporting.	

No.	Name	Reference	Comment	Resolution
325	GDV	1,47	In the schedule of reporting templates, items TP-F1Q and TPE1Q, listed at h) and i) respectively appear to duplicate reference to these forms at f) and g). They are separately listed for quarterly reporting at 1.52. We suggest that the references at h) and i) in this paragraph are deleted. We believe that SCR QRTs B2A/B and B3A-B3G ought not to apply to internal model applicants -see 1.13 and 1.23:	See response to the comment 108
326	IA Cyprus	1,47	We do not support quantitative reporting requirements relating to Solvency II pillar 1. If these are nonetheless introduced, we strongly support an extension of the submission deadline to end September 2015 instead of end May 2015. This is particularly important not least because end of May is also the deadline for reporting under Solvency I.	Following the consultation process, EIOPA took on board concerns raised by stakeholders and decided to request reporting of the quarter ended 30 September 2015 ONLY during preparatory phase. The deadline for quarterly submission has been kept at 8 weeks. The annual submission deadline has been extended by 2 weeks
327	IE	1,47	See general comments - It is critical requiring the complete Pillar I calculation while the legislative process is not completed. If the legislative process is not completed, Pillar I elements cannot be part of the preparatory reporting. Items TP-F1Q and TPE1Q, listed at h) and i) respectively appear to duplicate reference to these forms at f) and g). They are separately listed for quarterly reporting at 1.52. We suggest that the references at h) and i) in this paragraph are deleted. We believe that SCR QRTs B2A/B and B3A-B3G ought not to apply to internal model applicants -see 1.13 and 1.23. See also our comments in the general comments section on the cycles of reporting and on need to assure that undertakings will have enough to establish the appropriate internal processes and IT systems	See response to general comments
328	ILAG	1,47	This appears to be inconsistent with paragraph 1.15 which says that TP-F1 and TP-E1 will not be required at this stage. We are concerned that items K to V appear to include most of the Solvency II balance sheet, even though the SII capital requirements are not yet finalised.	The GIs have been reviewed and correct references included
329	IUA London	1,47	We do not believe that it will be feasible to provide useful Pillar I information at this stage.	EIOPA is working under the assumption that Omnibus II and final delegated acts will be available in time for NCAs and undertakings to prepare for the submission of quantitative and qualitative information in 2015. In which case, at that stage, EIOPA would prepare technical specifications and provide guidance on the assumptions underlying the calculation of technical provisions and the standard formula calculation, which reflect the decision on OMDII and the available delegated acts .
330	Lloyds	1,47	As we comment on paragraph 1.13, firms seeking internal model approval should not be required to complete the detailed SCR standard formula templates proposed at SCR-B3A to SCR-B3G. In the schedule of reporting templates, items TP-F1Q and TPE1Q, listed at h) and i) respectively, duplicate reference to these forms at f) and g). They are separately listed for quarterly reporting at 1.52. We suggest that the references at h) and i) in this paragraph be deleted.	See response to the comment 122
331	MetLife	1,47	We understand from the July 2012 release that those QRTs were near their final state so we have focused our comments here on the QRTs required for Interim Measures. See Comment 1.11	Noted. See response to the comment 113
332	PZU	1,47	This point is in Section III, not Section II.	Noted
333	ROAM	1,47	Guideline 12 – Solo quantitative annual information Les membres de la ROAM pensent que les informations sur les provisions techniques (TP-E1, TP-F1), les calculs de SCR (SCR-B2, SCR-B3) et de MCR (MCR-B4) devraient être transmises aux autorités de tutelle dès lors qu'un accord serait trouvé sur les principales problématiques du Pilier 1.	EIOPA acknowledges undertakings concerns about uncertainties as to Omnibus 2 negotiations and their impact on Pillar 1 requirements and as a consequence, a possible impact on Pillar 3 requirements. . However it believes that the preparation for the submission of information under Solvency II is crucial.
334	RSA	1,47	See 1.13 and 1.23: we believe that QRTs B2A/B and B3A-B3G ought not to apply to internal model applicants.	See response to the comment 122
335	Assuralia	1,47	It is not clear why the Best Estimate of technical provisions at solo annual level is required by country? The calculation per country is much more detailed and burdensome. It is proposed that the calculation of the technical provisions as a whole should be sufficient.	EIOPA consider the subset of the full reporting package selected for preparatory phase as sufficient ; Disagree with the proposal of calculating technical provision as a whole during preparatory period.
336	AON	1,48	Submitting information relating to internal models, particularly when those models are still to be authorised, is overly onerous; Requiring the SCR-B3 templates from the standard formula for firms in the IMAP process goes beyond the requirements of the full QRT package. Given that paragraph 1.49 provides for "any additional information requested by the national competent authority about the internal model under pre application should be submitted according to specific templates agreed with the respective national competent authority" why is it necessary for the SCR-B3 templates to be required in 1.48?	EIOPA have taken on board comments received from stakeholders and decided to not to include reporting of standard formula in the preparatory reporting GIs. See comment 2.

No.	Name	Reference	Comment	Resolution
337	CFOF_CROF	1,48	<p>Guideline 13 (para 1.48 and 1.49) indicates that solo entities on a planned internal model approach need to complete the SCR-B2s and SCR-B3s - on both an IM and SF basis. Our current "Go Live" expectation is that they feed into SCR-B2A and SCR-B2B and complete SCR-B2C on IM basis only.</p> <p>Submitting information for both internal model and standard formula might not be sensible in all cases, e.g. where undertakings are already advanced in the pre-application process and therefore might already have sufficiently demonstrated standard formula results to their supervisors. Therefore we propose some flexibility (as supervisors may anyway ask for standard formula information under the pre-approval):</p> <p>"NCAs may abstain from requiring the undertaking to report Standard Formula results during the interim period if all of the following conditions are fulfilled</p> <p>(1) The undertaking has demonstrated its ability to produce and deliver Standard Formula results.</p> <p>(2) The undertaking has demonstrated its understanding of the differences in the assumptions underlying the Standard Formula and the internal model.</p> <p>(3) The NSA or, where appropriate, the relevant college of supervisors, has analysed the undertaking's internal model and received and analysed corresponding results.</p> <p>(4) The undertaking is reporting internal model results during the interim period"</p> <p>We are therefore not in favour of building systems just to meet the interim reporting requirements.</p>	See response to the comment 336
338	DublinIMA	1,48	<p>We reiterate our general comment that submitting information relating to internal models, particularly when those models are still to be authorised, is overly onerous; requiring the SCR-B3 templates from the standard formula for firms in the IMA process goes beyond the requirements of the full QRT package. It is vital to avoid multiple sets of reporting basis and in particular avoid reporting based on the standard formula for internal model users. See also comments at 1.49</p>	See response to the comment 336
339	ECIROA	1,48	<p>We reiterate our general comment that submitting information relating to internal models, particularly when those models are still to be authorised, is overly onerous; Requiring the SCR-B3 templates from the standard formula for firms in the IMA process goes beyond the requirements of the full QRT package. See also comments at 1.49</p>	See response to the comment 336
340	FEE	1,48	<p>The proposal, that internal model users should provide information on SCR-calculation also based on the standard formula (in addition to the reporting of the internal model outcome) means a significant workload for the undertakings. Neither the framework directive nor the draft level 3 standards published so far require a parallel calculation and reporting; so we wonder, if the requirement is necessary.</p>	See response to the comment 336
342	GC	1,48	<p>The requirement, where relevant, that firms applying for an internal model submit information for both the internal model and standard formula calculations is very onerous, particularly given these undertakings will also be submitting information to NCA's under existing regulatory regimes. We would encourage an extension of the timeframes for submitting information in recognition of the dual reporting burdens that undertakings will face.</p>	See response to the comment 336
343	GDV	1,48	<p>See 1.13 and 1.47.</p> <p>Undertakings applying for internal model approval will not necessarily be geared up to report standard formula data using the specific templates. Also this requirement goes against what has been set out in the stabilised package, i.e. that these QRTs (SCR-B3 series) are intended for standard formula undertakings only.</p> <p>EIOPA should allow a flexible approach and less burdensome for industry having in mind the preparatory nature of this phase, as made in regard third-country equivalence. Internal model applicants should be allowed to be able to report on the basis that their models will be approved.</p> <p>We further underline that NCAs may anyway ask for standard formula information under the pre-approval, as such is not reasonable to impose reporting of Standard Formula results during the interim period having in mind that:</p> <ul style="list-style-type: none"> - The undertaking has demonstrated its ability to produce and deliver Standard Formula results; -The undertaking has demonstrated its understanding of the differences in the assumptions underlying the Standard Formula and the internal model; -The NCA or, where appropriate, the relevant college of supervisors has analysed the undertaking's internal model and received and analysed corresponding results; - The undertaking is reporting internal model results during the interim period. 	See response to the comment 124
344	I Actuaire	1,48	<p>If insurers have to report according to the standard formula plus according to the internal model, it is discouraging burden.</p>	See response to the comment 336
			<p>See 1.13 and 1.47.</p> <p>Undertakings applying for internal model approval will not necessarily be geared up to report standard formula data using the specific templates. Also this requirement goes against what has been set out in the stabilised package, i.e. that these QRTs (SCR-B3 series) are intended for standard formula undertakings only.</p> <p>EIOPA should allow a flexible approach and less burdensome for industry having in mind the preparatory nature of this phase, as made in regard third-country equivalence. Internal model applicants should be allowed to be able to report on the basis that their models will be approved.</p>	

No.	Name	Reference	Comment	Resolution
345	IE	1,48	<p>We further underline that NCAs may anyway ask for standard formula information under the pre-approval, as such is not reasonable to impose reporting of Standard Formula results during the interim period if:</p> <ul style="list-style-type: none"> - The undertaking has demonstrated its ability to produce and deliver Standard Formula results; -The undertaking has demonstrated its understanding of the differences in the assumptions underlying the Standard Formula and the internal model; -The NCA or, where appropriate, the relevant college of supervisors has analysed the undertaking's internal model and received and analysed corresponding results; - The undertaking is reporting internal model results during the interim period. 	See response to the comment 336
346	ILAG	1,48	This paragraph could be interpreted as extending the scope of the the reporting requirements to all firms in the pre-application process for an internal model, whether or not they are included in the 80% of market share.	See response to the comment 336
347	IUA London	1,48	We do not believe that it will be reasonable at this stage to demand standard formula calculations from firms preparing the internal model.	See response to the comment 336
348	Lloyds	1,48	As we comment on paragraph 1.13, firms seeking internal model approval should not be required to complete the detailed SCR standard formula templates proposed at SCR-B3A to SCR-B3G.	See response to the comment 336
349	MetLife	1,48	See Comment 1.13	See response to the comment 129
350	PZU	1,48	<p>This point is in Section III, not Section II.</p> <p>Based on current reporting requirements the undertaking is expected to calculate and report both SCR on the basis of Internal/Partially-Internal Model and SCR based on Standard Formula. In many cases this means a double reporting which is connected with additional implementation cost.</p> <p>Additionally in our opinion the presented SCR templates are mainly applicable for Standard Formula users only. Based on the point 1.48 the undertakings which use Internal/Partially Internal Model are required to report the results in templates predefined for Standard Formula users. In many cases the predefined templates do not give the possibility to appropriately report the final results. For example in terms of life underwriting risk (template SCR-B3C) there is no place where the undertaking can present the result of shock of base case assumptions regarding take-up rates of different options embedded in insurance contracts (e.g. take-up rate of premium indexation). It is possible for Internal Model owners to define undertaking specific risks which are not covered by Standard Formula (e.g. risk of change of product charges, legislation risk etc.) hence the lack of appropriately flexible templates for Internal/Partially-Internal Model users is an issue which should be solved before the final acceptance of reporting requirements.</p> <p>Please refer also to point 1.13.</p>	See response to the comment 336
351	RSA	1,48	See 1.47.	See response to the comment 336
352	Assuralia	Section III. General Comments	For supervisors to have a good understanding on the composition of the Solvency Capital Requirements, undertakings should also provide some information on the application of the look through approach.	Noted
353	FEE	Section III. General Comments	The detailed reporting requirements demand the existence of processes to generate the numbers which also are defined in detail. Many insurers do not have implemented such processes yet (or not in detail) as for the QIS many shortcuts were allowed which do not seem to be allowed now.	EIOPA considers setting up systems and processes and procedures for reporting, as well as submitting information as defined in the guidelines, as crucial part of the preparation for Solvency II
354	I Actuaire	Section III. General Comments	At the end of 2015, we would have 3 reportings: Q4 2015, annual 2015, solvency 1, and opening S2. At least one of these should be given up. The 20 weeks for the reporting seem too stressed and 24 weeks would seem more realistic. The use of fast closing should be allowed.	Following the consultation process, EIOPA took on board concerns raised by stakeholders and decided to request reporting of the quarter ended 30 September 2015 ONLY during preparatory phase. The deadlines for the submission of annual information have been extended by 2 weeks.
356	RSA	Section III. General Comments	The major objection we have to the proposed Guidelines in this section concerns the mooted requirement of internal model applicants to submit standard formula SCR data via the prescribed templates. To be clear: it is not that such firms are unable to produce such data, or that they are unable to provide such data to NCAs, as they already need to do both for the purposes of model approval. What is objectionable is that these firms will need to invest time, resource and IT cost to package the same data into these prescribed templates and report within stipulated deadlines that run parallel to existing commitments.	See response to the comment 336
357	AON	1,49	Given that paragraph 1.49 provides for "any additional information requested by the national competent authority about the internal model under pre application should be submitted according to specific templates agreed with the respective national competent authority" why is it necessary for the SCR-B3 templates to be required in 1.48?	See response to the comment 336
358	DublinIMA	1,49	Given that paragraph 1.49 provides for "any other information requested by the national competent authority about the about the internal model under pre application should be submitted according to specific templates agreed with the respective competent authority" why is it necessary for the SCR-B3 templates to be required in 1.48?	See response to the comment 336
359	ECIROA	1,49	Given that paragraph 1.49 provides for "any other information requested by the national competent authority about the about the internal model under pre application should be submitted according to specific templates agreed with the respective competent authority" why is it necessary for the SCR-B3 templates to be required in 1.48?	See response to the comment 336

No.	Name	Reference	Comment	Resolution
361	GC	1,49	It is acknowledged that an internal model can have a different structure (categorization of risks) than the standard formula. Results of the internal model need to be submitted to the NCA's based on specific templates agreed with the respective NCA. Given that insurance companies are still in the pre-application phase with the submission of internal models, it is questionable if agreements on submission of information on internal models can be implemented on a timely manner for the first submission beginning of 2015.	See response to the comment 336
362	GDV	1,49	See 1.48. It is unclear how this should be interpreted, namely if there are further reports in addition to those contained in the reporting package. On the other hand, given that EIOPA envisages the possibility of NCAs requesting additional information from internal model applicants using "specific templates", we consider disproportionate to require such undertakings to submit QRTs B2A/B and QRTs B3A-B3G – to do otherwise could result in an unnecessary, increased burden on undertakings for no benefit.	See response to the comment 124 and comment 336
363	IE	1,49	See 1.48. It is unclear how this should be interpreted, namely if there are further reports in addition to those contained in the reporting package. On the other hand, given that EIOPA envisages the possibility of NCAs requesting additional information from internal model applicants using "specific templates", we consider disproportionate to require such undertakings to submit QRTs B2A/B and QRTs B3A-B3G – to do otherwise could result in an unnecessary, increased burden on undertakings for no benefit.	See response to the comment 336
364	PZU	1,49	With reference to point 1.48: There is a risk that the specific templates (mentioned in point 1.49) will be defined by NCA and agreed with undertaking too late to be entirely implemented by the undertaking. The first reporting period is 2014 which means that the templates should be defined already at the beginning of 2014 so the undertaking will have more or less one year to introduce appropriate processes in order to meet local reporting requirements. In our opinion, due to timeline of pre-application/IMAP process there is a material risk that local NCA won't be able to introduce local templates for Internal Model users till the end of 2014. Therefore, reporting should be binding for insurers starting from 2015 according to our proposal.	See response to the comment 336
365	RSA	1,49	Given EIOPA envisages the possibility of NCAs requesting additional information from internal model applicants using "specific templates", there is no need for such undertakings to submit QRTs B2A/B and QRTs B3A-B3G – to do otherwise would result in an unnecessary, increased burden on undertakings for no benefit.	See response to the comment 336
366	AON	1.50	Calculation of capital requirements per Ring Fenced Fund should not form part of the reporting until such time as the Pillar 1 aspects are finalised.	EIOPA is working under the assumption that Omnibus II and final delegated acts will be available in time for NCAs and undertakings to prepare for the submission of quantitative and qualitative information in 2015. In which case, at that stage, EIOPA would prepare technical specifications and provide guidance on the assumptions underlying the calculation of technical provisions and the standard formula calculation, which reflect the decision on OMDII and the available delegated acts .
367	DublinIMA	1.50	Calculation of capital requirements per Ring Fenced Fund should not form part of the reporting until such time as the Pillar 1 aspects are finalised.	EIOPA is working under the assumption that Omnibus II and final delegated acts will be available in time for NCAs and undertakings to prepare for the submission of quantitative and qualitative information in 2015. In which case, at that stage, EIOPA would prepare technical specifications and provide guidance on the assumptions underlying the calculation of technical provisions and the standard formula calculation, which reflect the decision on OMDII and the available delegated acts .
368	ECIROA	1.50	Calculation of capital requirements per Ring Fenced Fund should not form part of the reporting until such time as the Pillar 1 aspects are finalised.	EIOPA is working under the assumption that Omnibus II and final delegated acts will be available in time for NCAs and undertakings to prepare for the submission of quantitative and qualitative information in 2015. In which case, at that stage, EIOPA would prepare technical specifications and provide guidance on the assumptions underlying the calculation of technical provisions and the standard formula calculation, which reflect the decision on OMDII and the available delegated acts .
369	FEE	1.50	It should be explained in more detail how ring fenced funds are defined respectively how the definition has to be applied. This is especially important given, that certain system requirements depend on the ring fenced funds definition and later amendments would be costly.	EIOPA is working under assumption that Omnibus 2 and delagated acts measures will be available in time for undertakings and NCAs
370	GDV	1.50	A non-uniform application of the rules at the European level on ring fenced funds would be counterproductive and lead to a lack of harmonization, especially for groups. This issue on ring fenced funds criteria is still part of the pillar 1 OMDII negotiations.	EIOPA is working under assumption that Omnibus 2 and delagated acts measures will be available in time for undertakings and NCAs
371	GC	1.50	We welcome that reporting will not be required during the preparatory phase at the level of each ring-fenced fund. Are we correct to understand from paragraphs 1.16 and 1.50 that, while the calculation of solvency capital requirement for the undertaking as a whole will allow for any Ring Fenced Funds, there will be no requirement to consolidate ring fenced funds on the one hand and to consolidate solo accounts on the other (which would require two different sets of reports).	See comment 2.
372	I Actuaire	1.50	If insurers have to consolidate ring fenced funds in the one hand and consolidate solo accounts on the other hand, we would have 2 different reportings at the end.	The insurers should be able to identify ring fenced funds at group level
373	DublinIMA	1,51	see 1.50	See response to comment 367

No.	Name	Reference	Comment	Resolution
374	GDV	1,51	See above	See response to the comment 370
375	IE	1,51	See above	See response to the comment 370
376	AMICE	1,52	Guideline 15 – Solo quantitative quarterly information We oppose any requirement to submit information on a quarterly basis. We suggest this guideline to be deleted.	EIOPA considers setting up systems and processes and procedures for quarterly reporting, as well as submitting quarterly information as defined in the guidelines, as an important part of the preparation process
377	AON	1,52	Until the legislative process is completed it is not appropriate to report on Pillar 1 calculations.	See response to the comment 366
378	DublinIMA	1,52	Until the legislative process is completed it is not appropriate to report on Pillar 1 calculations.	See response to comment 367
379	ECIROA	1,52	Until the legislative process is completed it is not appropriate to report on Pillar 1 calculations.	See response to comment 368
380	FEE	1,52	The guideline proposed here lists the MCR as a quarterly solo requirement. In contrast, the policy options included in the impact assessment suggest the MCR only as an annual solo requirement (see question 2 page 248 et seq. and appendices 1-3, page 266 et seq.). This should be clarified.	MCR is to be reported on annual and quarterly basis ; The Appendix 1 has been updated
381	GC	1,52	The level of detail on assets is extensive. We question whether this information should be requested to this extent and this frequency. Quarterly Information: There are fewer templates to populate for the quarterly returns but it should be noted that the same level of calculation work is required as the annual return. The draft guideline are silent on whether / which what proxies can be used for the quarterly information.	See response to the comment 324
382	GDV	1,52	See general comments - It is critical requiring the complete Pillar I calculation while the legislative process is not completed. If the legislative process is not completed, Pillar I elements cannot be part of the preparatory reporting.	See response to the comment 108
383	I Actuares	1,52	It is not indicated what proxies can be used for the quarterly information	See response to the comment 58
384	IA Cyprus	1,52	We do not support quantitative reporting requirements relating to Solvency II pillar 1. If these are nonetheless introduced, we strongly support an extension of the quarterly submission deadline from 8 to 12 weeks.	Following the consultation process , EIOPA took on board concerns raised by stakeholders and decided to request reporting of the quarter ended 30 September 2015 ONLY during preparatory phase. The deadline for quarterly submission has been kept at 8 weeks. The annual submission deadline has been extended by 2 weeks
385	IE	1,52	See general comments - It is critical requiring the complete Pillar I calculation while the legislative process is not completed. If the legislative process is not completed, Pillar I elements cannot be part of the preparatory reporting. The QRTs in sub-paragraph h) and i) should be deleted in accordance with Appendix 2.	See response to general comments
386	ILAG	1,52	This appears to be inconsistent with paragraph 1.15 which says that TP-F1 and TP-E1 will not be required at this stage. We are concerned that items K to V appear to include most of the Solvency II balance sheet, even though the Solvency II capital requirements are not yet finalised.	See response to the comment 328
387	IUA London	1,52	We do not believe that it will be feasible to provide useful Pillar I information at this stage.	EIOPA is working under the assumption that Omnibus II and final delegated acts will be available in time for NCAs and undertakings to prepare for the submission of quantitative and qualitative information in 2015. In which case, at that stage, EIOPA would prepare technical specifications and provide guidance on the assumptions underlying the calculation of technical provisions and the standard formula calculation, which reflect the decision on OMDII and the available delegated acts .
388	ROAM	1,52	Guideline 15 – Solo quantitative quarterly information Les membres de la ROAM s'opposent à l'établissement d'états trimestriels pendant la période transitoire qui conduirait à augmenter encore de manière considérable les coûts. De plus, il n'est pas acceptable que le niveau de détail de ces états soit proche de celui demandé pour les états annuels.	EIOPA considers setting up systems and processes and procedures for quarterly reporting, as well as submitting quarterly information as defined in the guidelines, as an important part of the preparation process
389	Assuralia	1,52	(See general comments) It is critical requiring the complete Pillar I calculation while the legislative process is not completed. If the legislative process is not completed, Pillar I elements cannot be part of the preparatory reporting.	See response to the comment 14
390	PZU	1,52	We believe that some of the proposed quarterly reporting templates/information should be excluded from quarterly reporting as they do not bring any additional value. The main issue is with assets and derivatives information (AS-D1, AS-D20) - as the required information is very detailed and some of the information is not readily available (for example asset rating) we believe that, due to potential operational constraints, this type of information should be required once a year.	EIOPA consider it important that firms also prepare for quarterly reporting of detailed list of assets and derivatives. ONLY one quarter is required during preparatory phase

No.	Name	Reference	Comment	Resolution
391	CFOF_CROF	1,53	Reporting of ring-fenced funds should not be extended to group reporting (as proposed in guideline 18 to report on the reports in paragraphs (f) - (h)). As per the Final Report (issued on 9th July 2012) on CP 11/009 and CP11/011, separate reporting on ring-fenced funds was a solo requirement only. The interim measures consultation indicates that the requirement has been extended to groups as well. We do not support this new requirement as it goes beyond the final QRT reporting requirements.	RFF reporting should be done at group level as well, this requirement was intended to be included in the final package of QRT, however we agree it' has not been not explicitly stated in CP09/2011.
392	DublinIMA	1,53	see 1.36, 1.47, 1.48 and 1.49	See response to the comments: 278, 322, 338, 358,
393	GDV	1,53	See general comments on group's reporting and on reporting of Pillar I calculations as well as 1.13, 1.47 and 1.48 (QRTs B2A/B and QRTs B3A-B3G ought not to apply to internal model applicants). The responsible undertaking should be notified on which national supervisor the group reporting should be submitted to.	See response to the comment 108 and the comment 124 Noted. The group reporting should be submitted to the group supervisor who is usually the NSA in the country where the ultimate parent undertaking is headed.
394	IE	1,53	See general comments on group's reporting and on reporting of Pillar I calculations as well as comments on 1.13, 1.47 and 1.48 (QRTs B2A/B and QRTs B3A-B3G ought not to apply to internal model applicants) and on 1.50 (ring fenced funds). The responsible undertaking should be notified on which national supervisor the group reporting should be submitted to.	See response to the comment 108 and the comment 124 Noted. The group reporting should be submitted to the group supervisor who is usually the NSA in the country where the ultimate parent undertaking is headed.
395	IUA London	1,53	We do not believe that it will be feasible to provide useful Pillar I information at this stage.	EIOPA is working under the assumption that Omnibus II and final delegated acts will be available in time for NCAs and undertakings to prepare for the submission of quantitative and qualitative information in 2015. In which case, at that stage, EIOPA would prepare technical specifications and provide guidance on the assumptions underlying the calculation of technical provisions and the standard formula calculation, which reflect the decision on OMDII and the available delegated acts .
396	MetLife	1,53	See Comment 1.13	See response to the comment 129
397	RSA	1,53	See 1.13 and 1.23: we believe that QRTs B2A/B and QRTs B3A-B3G ought not to apply to internal model applicants.	See response to the comment 108 and the comment 124
398	CFOF_CROF	1,54	A combination of Method 1 and Method 2 for consolidation can be approved by the group supervisor where the exclusive application of Method 1 is not considered appropriate. Based on what we have been led to expect, our working assumption is that we will be allowed to use Method 2 - otherwise the third-country equivalence assumption in the Guidelines has no value resulting in us not being able to compete on a level playing field in third countries like Canada.	See comment 5.
399	GDV	1,54	See 1.19. EIOPA should clearly state that during the preparatory phase the existence of third country undertakings should be a pre-requisite for using D&A. The current proposal allows for the use of the third countries' local rules just where D&A is used; however the latter is left to the full discretion of NCAs. EIOPA needs to assure a consistent and convergent approach.	See comment 5.
400	IE	1,54	See 1.19. EIOPA should clearly state that during the preparatory phase the existence of third country undertakings should be a pre-requisite for using D&A. The current proposal allows for the use of the third countries' local rules just where D&A is used; however the latter is left to the full discretion of NCAs. EIOPA needs to assure a consistent and convergent approach.~	See comment 5.
401	CFOF_CROF	1,55	We do not agree with the expansion of the SCR templates to cover both a standard formula basis and an internal model basis. We believe that this comparison data should be sourced through the IMA application process, not through the submission of QRTs.	See response to the comment 122
402	DublinIMA	1,55	We reiterate our general comment that submitting information relating to internal models, particularly when those models are still to be authorised, is overly onerous. See 1.48	See response to the comment 357 and 338
403	GDV	1,55	Internal model applicants should be allowed to be able to report on the basis that their models will be approved. See 1.48 and 1.53	See response to the comment 124
404	IE	1,55	Internal model applicants should be allowed to be able to report on the basis that their models will be approved. See 1.48 and 1.53	Internal model undertakings are to report using SCR B2C template; See also response to the comment 129
405	MetLife	1,55	See Comment 1.13	See response to the comment 129
406	RSA	1,55	See 1.47.	See response to the comment 334

No.	Name	Reference	Comment	Resolution
407	Steptoe & Jonshon LLP	1,55	<p>The Guideline imposes on groups certain reporting obligations. However, it is silent as to which entity within the (re)insurance group has the obligation to report the group's information. We consider that an express clarification of this point in the Guideline would positively contribute to a consistent application of such Guideline by the national supervisors.</p> <p>(Re)insurance groups differ from each other in their structure and organisation. In particular, we note that insurance holding companies may fulfil different roles within the groups Insurance holding companies may fulfil different roles: active insurance holding companies may centralise the management and supervision of the group companies, establish the risk appetite for the group and control capital allocation for efficiency purposes. Conversely, holding companies may carry out a financial or non-financial, industrial activity, or their corporate object and sole activity may be limited to holding shares in subsidiaries (we refer to this last category as "inactive holding companies"). Inactive holding companies do not carry out a regulated activity and do not actively participate or control the subsidiaries' business activities.</p> <p>Given the limited involvement of the inactive holding company in its subsidiaries' activities, its reporting function on behalf of the group would be limited to an aggregation of those of the subsidiaries, which the regulator has access to in any case. Aggregate reports of this nature may therefore not be appropriate where the holding company is inactive i.e. it does not centrally determine and monitor neither risk appetite nor the management of capital against that appetite.</p> <p>Due to the above reasons, the inactive holding company may not be the best vehicle to report on the subsidiaries' activities or to ensure compliance. Therefore, we suggest that the Guideline should expressly allow the national supervisor to determine, together with the parent undertaking, the entity within the group which is best placed to perform the duty to report. The national supervisors should be able to consider the entity responsible for fulfilling the governance requirements at group level as the main entry or contact point for reporting purposes.</p> <p>The inclusion of this possibility in the Guideline would also be consistent with other EIOPA guidelines. For instance, we note that under the Guidelines on the System of Governance the entity responsible for fulfilling the governance requirements at group level may be other than the parent undertaking. This entity would also have a duty to design the group forward looking assessment of the undertaking's own needs. We consider that the entity responsible for fulfilling the governance requirements at group level would normally be best placed to perform the duty to report. Our comment also applies to paragraphs 1.65 and 1.66.</p>	<p>The preparatory guideline on the submission of information follows the approach under Solvency II. Subject to group reporting is the ultimate parent undertaking of the group. All entities in the scope of group supervision should be included in group reporting. Amongst others they should be included in template G01 (S.32.01.g). This follows mainly from Art. 212, 213, 214 and Art. 215 of the Solvency II Directive. This may also include (insurance) holding companies no matter whether they are active or inactive. See also comment 5.</p>
408	PZU	1,55	Please refer to point 1.48.	See response to the comment 350
409	AON	1,56	Given that paragraph 1.56 provides for "any additional information requested by the national competent authority about the internal model under pre application should be submitted according to specific templates agreed with the respective national competent authority" why is it necessary for the SCR-B3 templates to be required in 1.53?	See response to the comment 336
410	DublinIMA	1,56	see 1.49	See response to the comment 358
411	ECIROA	1,56	see 1.49	See response to the comment 339 and 359
412	GDV	1,56	See 1.49.	See response to the comment 124
413	IE	1,56	See 1.49.	See response to the comment 363
414	If P&C	1,56	How shall 1.56 be interpreted? Are there further reports from the NCAs in addition to the ones contained in the reporting package? What are these foreseen to be?	This refers to pre - application process and not to reporting requirements included in these Guidelines - see Guidelines on pre - application process
415	RSA	1,56	See 1.49.	See response to the comment 365
416	PZU	1,56	Please refer to point 1.49.	See response to the comment 364
417	AON	1,57	Calculation of capital requirements per Ring Fenced Fund should not form part of the reporting until such time as the Pillar 1 aspects are finalised.	See response to the comment 366
418	CFOF_CROF	1,57	See comments on 1.53 above	See response to the comment 391
419	DublinIMA	1,57	see 1.50	See response to the comment 367
420	ECIROA	1,57	see 1.50	See response to comment 368
421	IE	1,57	See 1.53	See response to the comment 394
422	AMICE	1,58	<p>Guideline 19 – Groups' quantitative quarterly information</p> <p>We oppose any requirement to submit information on a quarterly basis. We suggest this guideline to be deleted.</p>	Noted

No.	Name	Reference	Comment	Resolution
423	AON	1,58	Calculation of capital requirements per Ring Fenced Fund should not form part of the reporting until such time as the Pillar 1 aspects are finalised.	See response to the comment 366
424	DublinIMA	1,58	see 1.50	See response to the comment 367
425	ECIROA	1,58	see 1.50	See response to comment 368
426	GDV	1,58	See 1.51	See response to the comment 370
427	IE	1,58	See 1.50	there is no comment made re para 1.50
428	ROAM	1,58	Guideline 19 – Groups’ quantitative quarterly information Les membres de la ROAM s’opposent à l’établissement d’états trimestriels pendant la période transitoire qui conduirait à augmenter encore de manière considérable les coûts. De plus, il n’est pas acceptable que le niveau de détail de ces états soit proche de celui demandé pour les états annuels.	EIOPA considers setting up systems and processes and procedures for quarterly reporting, as well as submitting quarterly information as defined in the guidelines, as an important part of the preparation process
429	GDV	1,59	See general comments on group’s reporting and on reporting of Pillar I calculations.	See response to the comment 299
430	IE	1,59	See general comments on group’s reporting and on reporting of Pillar I calculations.	See response to the general comment
431	Assuralia	1,59	See general comments on group’s reporting and on reporting of Pillar I calculations.	See response to the comment 14 and the comment 303
432	PZU	1,59	Please refer to point 1.52.	See response to the comment 390
433	PZU	1.60	Please refer to General Comments section (Timeline for the Guidelines Implementation). This point is in Section IV, not Section III. In our opinion the local NCAs should define the list of required information based on which it will be able to understand and assess the appropriateness of system of governance of the undertaking. Otherwise there is a risk that the information provided by undertaking won't be regarded by NCA as sufficient. We believe that lack of predefined detailed requirements in this area of reporting may result in extension of potential duration of reporting process during implementation phase, as the local NCA may, in each reporting iteration, request for additional information.	Noted
434	IE	1.60	See above.	Noted
435	IUA London	1.60	We believe that it will not be feasible for firms to provide useful narrative reports during the preparatory report as the information provided will have a limited shelf-life and key data will be lacking.	See response to the comment 436
436	Assuralia	1.60	If the purpose of these Guidelines is to assess progress towards achieving compliance with SII requirements, spending time and resources producing narrative that describes a temporary situation (temporary, because undertakings will be in the course of making progress towards achieving compliance) seems unduly burdensome. We believe that NCAs will be able to assess progress towards Pillar II compliance via the means proposed for the System of Governance. We therefore do not believe the Guidelines proposed on the narrative reporting are necessary.	The objective of introducing narrative reporting during preparatory phase is for firms to prepare for the narrative reporting (i.e. to set up systems and procedures in order to gather necessary information and to prepare reports) and for supervisors to assess firms preparedness (for example, whether the narrative reporting is sufficient in terms of a scope and details). In addition, supervisors may use this information contained in the narrative reporting, for example, with regard to SoG, to assist them in assessing progress made by firms in preparation for Solvency 2 SoG requirements.
437	GDV	1.60	If the purpose of these Guidelines is to assess progress towards achieving compliance with SII requirements, spending time and resources producing narrative that describes a temporary situation (temporary, because undertakings will be in the course of making progress towards achieving compliance) seems unduly burdensome. We believe that NCAs will be able to assess progress towards Pillar II compliance via the means proposed for the System of Governance. We therefore do not believe the Guidelines proposed on the narrative reporting are necessary.	The objective of introducing narrative reporting during preparatory phase is for firms to prepare for the narrative reporting (i.e. to set up systems and procedures in order to gather necessary information and to prepare reports) and for supervisors to assess firms preparedness (for example, whether the narrative reporting is sufficient in terms of a scope and details). In addition, supervisors may use this information contained in the narrative reporting, for example, with regard to SoG, to assist them in assessing progress made by firms in preparation for Solvency 2 SoG requirements.
438	Deloitte	1.60	TO BE NOTED: SECTION IV STARTS WITH GUIDELINE 20 (REF.1.60) TO GUIDELINE 26 (REF. 1.67)_PLEASE PAY ATTENTION IN ORDER TO AVOID MISUNDERSTANDING OF COMMENTS 1) Ref. 1.60, a): We question on what will the NCAs be basing the assessment of the adequacy of the SoG to the business strategy of the undertaking, since no information regarding the latter is requested here? 2) Ref. 1.60 c): We question if a specific focus on the key SII functions (risk management, actuarial function, internal audit and compliance) is expected within the broader description of the "System of governance". In this regard we suggest including some specific information at least related to the risk management and actuarial functions, considering their importance within the entire framework of the directive. It could also be useful both internally (for undertakings) and externally (regulator) to get a view on how the two functions are structured. Please consider that in Guideline 23 specific information on the compliance function is explicitly requested. 3) We also suggest requesting explicitly any material changes in the system of governance that have taken place over the reporting period, in order to enhance the reporting of any material change incurred.	See also response to the comment 436 1.60 a) Information about business strategy is implicitly required through this guideline to allow whether the SoG is appropriate to the business strategy and operations. it is up to each NCA to decide how they assess firms' preparedness for compliance with SoG requirements; the narrative reporting can be used as a tool in an assessment but it is not going to be the only tool available to supervisors A description of the main roles and responsibilities of key functions is expected in guideline 20. Guidelines 22 and 23 focus on system rather than on functions. 3) Noted; this is just a preparatory phase, not considered necessary; the material changes will be reported once Solvency 2 is in force.

No.	Name	Reference	Comment	Resolution
439	GC	1.60	The narrative reporting requirements appear reasonable will help companies to prepare for their SFCR/RSR reports and of importance to explain results of the Solvency II reporting to stakeholders. However the requirements can be onerous if the processes have not been created / implemented yet within the undertaking.	Narrative reporting should describe requirements as proposed in preparatory GIs i.e policies, processes and procedures that are already in place or being put in place in order for undertakings to prepare to be Solvency 2 compliant see also reponse to the comment 436
440	IA Cyprus	1.60	Please refer to our comment in section IV	Proportionality principle fully apply to reporting itself and narrative reporting in particular.
441	ROAM	1.60	Narrative information on System of Governance Les membres de la ROAM pensent qu'il n'est pas nécessaire de soumettre un reporting narratif aux autorités de tutelle sachant que la majorité des éléments seront repris dans le rapport ORSA.	The narrative reporting does not include information on the forward-looking assessment, so there is no duplication of reporting.
442	Deloitte	1,61	1) Ref. 1.61, a): We ask for clarification whether Solvency II key functions (risk management, actuarial function, internal audit and compliance) are meant here? 2) Ref. 1.61, b): We welcome the requirements in point b, since the existence of policies, processes and procedures for ensuring fit and proper requirements are essential.	Yes, Solvency II key functions are meant here. Noted.
444	GC	1,61	See 1.60	Please refer to answer 439.
445	IA Cyprus	1,61	Please refer to our comment in section IV	Please refer to answer 440.
446	PZU	1,61	This point is in Section IV, not Section III.	Noted
447	Deloitte	1,62	1) Could you please provide an explanation as to why it is requested, within the Guideline 25 (Ref. 1.66 d), to provide the qualitative and quantitative information about material specific risks at group level and it is not requested to provide the information on material risks at solo entity level? 2) Ref. 1.62 a a) and c): the two bullets seem to be partly repetitive in terms of information requested. We suggest merging bullet c) into bullet a) in order to enhance clarity: "A general description of the undertaking's risk management system including information on how the undertaking is able to effectively identify, measure, monitor, manage and report, on a continuous basis, the risks on individual and aggregated level, to which the undertaking is or could be exposed; an information on risk management strategies, processes and reporting procedures for each category of risk, with an explanation how these are documented, monitored and enforced." 3) Ref. 1.62 e): Could you please provide more guidance on how to perform the assessment of adequacy? Please check the following examples - Information related to the adoption of an internal credit assessment model; - Information on how external credit assessments are used for the calculation of the SCR (second best approach).	1) A selection has been made for this preparatory phase to allow a progressive phasing in. and EIOPA has been considered it important for groups to identify and to report groups specific risks; 2) a) is more about risk management system as a whole, whereas c) requests details at the level of each category of risk. 3) it will be considered by EIOPA when developing technical specifications
449	GC	1,62	See 1.60 In relation to item E, will the information provided by EIOPA to justify the assumptions underlying the Standard Formula SCR include commentary of the use of credit assessments that will assist undertakings in providing the information sought under this bullet point?	Please refer to answer 439. it will be considered by EIOPA when developing technical specifications
450	GDV	1,62	We propose part (d) be reworded to say, "...how the undertaking intends to fulfil its obligation...": it is not possible to describe compliance with something that has yet to enter into force and that is therefore not an "obligation".	Narrative reporting should describe requirements as proposed in preparatory GIs i.e policies, processes and procedures that are already in place or being put in place in order for undertakings to prepare to be Solvency 2 compliant see also reponse to the comment 436
451	IA Cyprus	1,62	Please refer to our comment in section IV	Please refer to answer 440. and also please response to the comment 436
452	IE	1,62	Part (d) should be reworded to say, "...how the undertaking intends to fulfil its obligation...": it is not possible to describe compliance with something that has yet to enter into force and that is therefore not an "obligation".	See response to the comment 450
453	RSA	1,62	We propose part (d) be reworded to say, "...how the undertaking intends to fulfil its obligation...": it is not possible to describe compliance with something that has yet to enter into force and that is therefore not an "obligation".	See response to the comment 450
454	PZU	1,62	This point is in Section IV, not Section III.	Noted.
455	AFM	Section IV. General Comments	It should be made clear that the narrative reporting should describe the position under full implementation of Solvency II. At the time firms report on their 31/12/2014 position, many Solvency II requirements will still be in development or may not yet be 'business as usual', ie fully implemented. There is little value in firms describing this transition period, as it will not apply once Solvency II is fully live.	Narrative reporting should describe requirements as proposed in preparatory GIs i.e policies, processes and procedures that are already in place or being put in place in order for undertakings to prepare to be Solvency 2 compliant see also reponse to the comment 436

No.	Name	Reference	Comment	Resolution
456	AMICE	Section IV. General Comments	Narrative Reporting We believe there is no need to invest resources on a narrative reporting that will try to describe a temporary situation. We suggest the whole section is deleted.	Noted
457	Assuralia	Section IV. General Comments	See general comments on narrative reporting	Noted.
458	CFOF_CROF	Section IV. General Comments	We note that the narrative information required appears to have significant cross over with the interim ORSA requirements. We are therefore not in favour of requiring additional reporting in addition to the requirement to prepare an ORSA as it will result in potential repetition and the additional burden of checking consistency.	The narrative reporting does not include information on the forward-looking assessment, so there is no duplication of reporting.
459	Deloitte	Section IV. General Comments	1) Please confirm our understanding regarding the narrative contents required within the interim measures. Some sections already foreseen for both the SFCR and RSR have been selected as requirements to be submitted and they are related to - System of Governance - Capital management - Valuation for solvency purposes We are wondering if there are specific reasons for selecting only these areas instead of including general information related to the risks within the "Risk Profile" section since some narrative contents related to this section are required within the interim measures (For example, Ref. 22 d), Ref 22 e), Ref. 1.66 d)). We welcome minimization of deviations in structure of reports between the interim measures and final Solvency II guidelines with regard to same or similar content requirements. 2) Since there aren't any specific references to the L3 guidelines (Final Report CP 11 and previous) in this new CP, we would like to receive some guidance on how undertakings should comply with the requirements. In fact, the majority of the information requested is consistent with the one described within the L3 guidelines, with the difference that the latter prescribed and expanded the nature of the information needed into more granular depth. That said, could you please confirm that undertakings, when developing the information requested herein, should take L3 guidelines into account? We believe that taking into consideration L3 at this stage could lead to additional unnecessary burden, so we suggest stating the relationship between L3 text and Interim Measures within the text in order to avoid misunderstanding or doubts.	The requirements on narrative reporting only ask for part of the final narrative reporting to be submitted for the preparatory phase carefully balancing the need for preparation by undertaking with the burden the narrative reporting places on undertaking during the preparatory phase.
460	DublinIMA	Section IV. General Comments	The narrative information should be excluded during the preparatory phase. The value added would not justify the resources to produce it. Much of this will be covered already by CP 13-008 "Governance". A key difficulty in the preparatory phase is that the narrative reporting would need to describe both the existing governance system which complies with the current legal requirements and also Solvency II (which would not yet be in force and hence not possible to comply with due to laws not being changed yet). This will be even more difficult for group reporting.	Narrative reporting should describe requirements as proposed in preparatory GIs i.e policies, processes and procedures that are already in place or being put in place in order for undertakings to prepare to be Solvency 2 compliant see also reponse to the comment 436
461	EClInternal Audit	Section IV. General Comments	New guideline 24 In accordance with Articles 35 and 254 of Solvency II, national competent authorities should ensure that the narrative report referred to in Guideline 11 includes the following information regarding insurance and reinsurance undertaking's internal audit function: a) a description how the function is organised in the undertaking (e.g. outsourcing or insourcing; existence or not of an Audit Committee) b) The structure of the internal audit function in the system of government (charts organisation) and its reporting lines to the AMSB c) How the independence and objectivity of the audit function is ensured. Adding a new guideline to this section regarding Internal Audit, which requests 1) a description how the function is organised in the undertaking: outsourcing or insourcing; existence or not of an Audit Committee 2) The structure of the internal audit function in the system of government (charts organisation) and reporting lines to the AMSB 3) How the independence and objectivity of the audit function is ensured. 4) Add an additional line e) on the guideline 25. This line should ask for a description of how the internal audit function is implemented into the group structure.	EIOPA considers setting up internal audit function as very important and crucial during preparatory phase and this requirement has been fully reflected in the SoG GIs - however, in terms of reporting, it has been decided that only a selection of narrative reporting requirements will be asked of firms
462	GC	Section IV. General Comments	On balance, the level of reporting envisaged by the guidelines (particularly, sections IV and V) is complicated and onerous for the undertaking who has not implemented this yet. To fulfil these requirements to that level of detail will require significant resource investment.	see response to the comment 436
463	GDV	Section IV. General	The narrative information should be excluded during the preparatory phase. It will require substantial resources to produce and coordinate the narrative information. During the preparatory phase this is more complicated since it could require describing two systems, one that comply with the current legal requirements and one shadow system (Solvency II) not yet in force and not possible to comply with due to laws not being changed yet. This will be even more difficult in a group.	Narrative reporting should describe requirements as proposed in preparatory GIs i.e policies, processes and procedures that are already in place or being put in place in order for undertakings to prepare to be Solvency 2 compliant see also reponse to the comment 436

No.	Name	Reference	Comment	Resolution
463	GDV	General Comments	If EIOPA decides to require anyway narrative reporting, it is unhelpful for the Guidelines to replicate the provisions contained in the draft Level 2 text; it would be better for the Guidelines to refer to the October 2011 draft of the Level 2 rules. Whilst the eventual wording of such texts are dependent on the outcome of Omnibus II negotiations, such negotiations will very likely result in the detail of these proposals being altered. In any event, the Guidelines ought not to prescribe any requirements which go beyond the draft Level 2 text and be proportionate, which in case of groups should mean for example the ability to choose the language for the narrative information.	References to draft L2 text is not possible as the text is not publically available. The current proposal for preparatory phase will help the undertakings in their preparation. Moreover, the structure and content is not being discussed in OMBII discussions.
464	IA Cyprus	Section IV. General Comments	<p>Although we do not object to the aim pursued by narrative reporting, we do not agree with the formal reporting approach taken in the guidelines as this would require substantial resources to coordinate and produce that would come on top of the resources already needed to produce the reporting for Solvency 1. Especially for Cyprus, being a small country with small-sized insurers, double reporting would represent a huge and disproportional burden and local insurers would lack sufficient resources for carrying it out. It would moreover not be cost effective since reporting systems/processes/manuals will again have to be changed once the full Solvency II regime is introduced in 2016.</p> <p>Hence we consider that a framework for monitoring progress in respect of the Governance requirements should better be left to national supervisors to decide in tandem with their markets, taking into account national specificities. We believe that it would be very beneficial if EIOPA requests national supervisors to engage in a dialogue with insurers in their respective markets with an aim to agree on a clear timetable concerning what they concretely expect from undertakings to have in place at different stages during the preparatory stage until 2016 and when/what information should be submitted.</p>	See responses to the comment 436 and 438
465	IE	Section IV. General Comments	<p>See general comments on narrative reporting</p> <p>If the purpose of these Guidelines is to assess progress towards achieving compliance with SII requirements, spending time and resources producing narrative information that describes a temporary situation (temporary, because undertakings will be in the course of making progress towards achieving compliance) seems unduly burdensome. We believe that NCAs will be able to assess progress towards Pillar II compliance via the means proposed for the System of Governance. We therefore do not believe the Guidelines proposed on the narrative reporting are necessary.</p> <p>If EIOPA decides to require anyway narrative reporting, it is unhelpful for the Guidelines to replicate the provisions contained in the draft Level 2 text; it would be better for the Guidelines to refer to the October 2011 draft of the Level 2 rules. Whilst the eventual wording of such texts are dependent on the outcome of Omnibus II negotiations, such negotiations will very likely result in the detail of these proposals being altered. In any event, the Guidelines ought not to prescribe any requirements which go beyond the draft Level 2 text.</p>	Noted
466	MetLife	Section IV. General Comments	We believe there should be no duplication of disclosures already included in the ORSA. We would hope that EIOPA supports our point of view but we are concerned that the Interim Measures do not provide clear guidance in this area.	The narrative reporting does not include information on the forward-looking assessment (FLAOR), so there is no duplication of reporting.
467	PZU	Section IV. General Comments	In general the list of required information in the narrative is very extensive. We would like to suggest limiting the required information to some sort of executive summary with reference to appropriate procedures and other undertaking's internal documents.	See response to the comment 436
468	Royal London Mutual	Section IV. General Comments	It should be made clear that the narrative reporting should describe the position under full implementation of Solvency II. At the time of reporting on the 31/12/2014 position many SII requirements will still be in development or may not yet be in 'business as usual', ie fully implemented. There is little value in firms describing this period of change which will not apply once Solvency II is fully live.	Narrative reporting should describe requirements as proposed in preparatory GIs i.e policies, processes and procedures that are already in place or being put in place in order for undertakings to prepare to be Solvency 2 compliant see also reponse to the comment 436
469	RSA	Section IV. General Comments	<p>RSA Insurance Group plc, together with all of its entities that will be subject to SII, has undertaken a number of dry-run exercises on Pillar III reporting, including the production of mocked-up SFCRs and RSRs.</p> <p>Part of this exercise has involved the drafting of policies and procedures to suit anticipated Pillar II requirements, thereby contributing to the content of relevant Pillar III reporting and disclosure.</p> <p>If the purpose of these Guidelines is to assess progress towards achieving compliance with SII requirements, spending time and resource producing narrative that describes a temporary situation (temporary, because firms will be in the course of making progress towards achieving compliance) does not achieve anything other than bureaucracy. We believe that NCAs will be able to assess progress towards Pillar II compliance via the means set out in the Guidelines proposed for the System of Governance. We therefore do not believe the Guidelines proposed here for reporting are necessary.</p>	Noted
470	Deloitte	1,63	Ref. 1.63 c): Please see comment on 1.60 (1). Additionally, we question why information on the compliance function is requested here with reference to the internal control system. We suggest removing this requirement from here and adding information on the key SII functions (i.e. risk management, actuarial, internal audit and compliance functions within the description of the overall System of Governance) in 1.60.	Please refer to answer 438. This is only part of the final requirements in order to balance the burden on undertakings with the need to prepare. The key functions will be covered in the final requirements.
472	GC	1,63	See 1.60	Please refer to answer 439.
473	IA Cyprus	1,63	Please refer to our comment in section IV	Please refer to answer 464.
474	PZU	1,63	In terms of a description of the undertaking's internal control system in our opinion it is necessary to define the list of information which will be required to be reported to NCA. Otherwise there is a risk that the information provided by undertaking won't be regarded by NCA as sufficient. We believe that lack of predefined detailed requirements in this area of reporting may result in extension of potential duration of reporting process during implementation phase, as the local NCA may, in each reporting iteration, request for additional information.	Noted
475	GC	1,64	See 1.60	Please refer to answer 439.

No.	Name	Reference	Comment	Resolution
476	IA Cyprus	1,64	Please refer to our comment in section IV	Please refer to answer 464.
477	Assuralia	1,64	"Any other material information" is very vague and should be clarified by EIOPA.	Undertakings are to report any other information they consider material to the user of the information reported
478	GC	1,65	See 1.60	Please refer to answer 439.
479	GDV	1,65	By referring solely to Guidelines 20 to 24, this gives the impression that Guideline 26 does not apply to groups. We shall therefore assume this to be the case, unless EIOPA explicitly confirms otherwise.	Guideline 26 also applies to groups.
480	IA Cyprus	1,65	Please refer to our comment in section IV	Please refer to answer 464.
481	IE	1,65	Following the reference to Guidelines 20 to 24, we note that Guideline 26 does not apply to groups. We shall therefore assume this to be the case, unless EIOPA explicitly confirms otherwise.	Guideline 26 also applies to groups.
482	Assuralia	1,65	If groups provide a narrative reporting on governance, fit & proper, risk management and the internal control system, it seems unnecessary to require an additional narrative reporting on these aspects for each of group subsidiaries. Therefore, it is proposed to drop the narrative reporting requirement for subsidiaries if the group provides a complete narrative reporting on these elements.	Requirements at solo and group level are different but complementary. For example, you cannot expect to have a proper view of each solo undertakings' risk management and internal control system by only having that information at group level.
483	RSA	1,65	By referring solely to Guidelines 20 to 24, this gives the impression that Guideline 26 does not apply to groups. We shall therefore assume this to be the case, unless EIOPA explicitly confirms otherwise.	Guideline 26 also applies to groups.
484	Deloitte	1,66	1) Ref. 1.66 d: Could you please provide more explanations as to why qualitative and quantitative information/data regarding material specific risk at group level is requested in relation to the system of governance? Would it be more appropriate to ask how the undertaking deals with other material risks arising at group level through a perspective that is more "system of governance" oriented instead of a "pure risk management" one, i.e. similar to Ref. 1.60 c) to ask for providing information on the undertaking's risk management strategies, objectives, processes and reporting procedures for these material specific group risks, with an explanation how these are documented, monitored and enforced? 2) Ref. 1.66 d: Could you please provide more explanation on what is meant by "quantitative information" since the nature of the risks which have been recognized as group specific seem to be difficult to quantify? We kindly request if EIOPA could provide more guidance and examples on the risks at the level of the group that could be quantitatively treated.	1) This is a consequence of the level 2 text structure. 2) this is not a reporting issue, undertakings/groups are expected to be able to quantify risks
485	GC	1,66	See 1.60	Please refer to answer 439.
486	I Actuaire	1,66	It is not mentioned that the reporting regarding the system of governance will replace the existing requirements or not, for example regarding "rapport de contrôle interne" or "rapport de solvabilité". As we understand that new Gouvernance (including the duty to deliver qualitative reports) requirement may require legal changes in France, we expect that undertaking do not have to deliver both reports "S1" and S2 reports, which would be clearly a burdensome, artificial and useless requirement. We advocate for a merging of all the qualitative requirement as soon as the interim measures are effective in France.	The situation in France is for ACP to decide.
487	IA Cyprus	1,66	Please refer to our comment in section IV	Please refer to answer 464.
488	IE	1,66	(b) refers to Article 246(4) of Solvency II which refers to 45. Both articles discuss about ORSA which is not a known element of this interim phase.	Corrected. It refer to the Guidelines rather than to the Solvency II Directive
489	GC	1,67	See 1.60	Please refer to answer 439.
490	GDV	1,67	See 1.65: we assume this Guideline does not apply to groups. Also this Guideline seems to replicate level 3 guidance. We believe that the Guidelines ought not to prescribe any requirements which go beyond the draft Level 2 text.	Guideline 26 also applies to groups.
491	IA Cyprus	1,67	Please refer to our comment in section IV	Please refer to answer 464.
492	IE	1,67	See 1.65: we assume this Guideline does not apply to groups. Also this Guideline seems to replicate Level 3 guidance. We believe that the Guidelines, if applicable, ought not to prescribe any requirements which go beyond the draft Level 2 text.	Guideline 26 also applies to groups
493	RSA	1,67	See 1.65: we assume this Guideline does not apply to groups.	Guideline 26 also applies to groups.
494	PZU	1,68	This point is in Section V, not Section IV. In our opinion the phrase "material differences" requires precise definition. Moreover EIOPA should define the benchmark for the "material differences" (e.g. level of Own Funds, SCR etc.) based on which the undertaking will be able to decide whether the considered difference can be classified as material or not-material. Additionally we would like to request for explanation how the "quality of own funds" should be interpreted and described by undertaking.	Noted

No.	Name	Reference	Comment	Resolution
495	Deloitte	1,68	TO BE NOTED: SECTION V STARTS WITH GUIDELINE 27 (REF.1.68) TO GUIDELINE 27 (REF. 1.69)_PLEASE PAY ATTENTION IN ORDER TO AVOID MISUNDERSTANDING OF COMMENTS Ref. 1.68 b): Potential repetition based on the information included within the quantitative template OF. We question which kind of information is expected here? Is more or different quantitative information being requested here in comparison with the data included within the templates? We kindly ask for more guidance on how to deal with quantitative/qualitative information in order to enhance comparability and convergence among undertakings.	This is complementary information to OF templates bringing justifications of the classifications for example.
496	IA Cyprus	1,68	Please refer to our comment above, section IV Also, we reiterate our disagreement with any requirements relation to Solvency II pillar 1.	Please refer to answer 464. Noted
497	GDV	1,69	This Guideline seems to derive from level 3 guidance. We believe that the Guidelines ought not to prescribe any requirements which go beyond the draft Level 2 text.	The current proposal for preparatory phase will help the undertakings in their preparation.
498	IA Cyprus	1,69	Please refer to our comment above, section IV Also, we reiterate our disagreement with any requirements relation to Solvency II pillar 1.	Please refer to answer 464. Noted
499	IE	1,69	This Guideline seems to derive from Level 3 guidance. We believe that the Guidelines, if applicable, ought not to prescribe any requirements which go beyond the draft Level 2 text.	The current proposal for preparatory phase will help the undertakings in their preparation.
500	PZU	1,69	This point is in Section V, not Section IV.	Noted
501	Deloitte	1.70	TO BE NOTED: SECTION VI STARTS WITH GUIDELINE 28 (REF.1.70) TO GUIDELINE 32 (REF. 1.77)_PLEASE PAY ATTENTION IN ORDER TO AVOID MISUNDERSTANDING OF COMMENTS 1) Ref.1.70 a): We question if undertakings could use classes other than those used in the Solvency II balance sheet template (for example using classes which are mostly based on the function of the asset rather than only on its nature) during the interim phase, since it was foreseen within the L3 text (previous CP 11, Guideline 7). Despite the fact that including information on the function of the asset could be extremely useful for the NCA, we are wondering if a closer consistency with financial statements reporting (Local and IFRS) in certain countries could be reached. 2) Ref. 1.70 b): We kindly ask for more guidance and examples on what kind of quantitative information is needed with regard to valuation basis, assumptions etc.	Noted. Regarding more guidance, EIOPA believes that it is better to be more principles based than prescriptive.
502	IA Cyprus	1.70	Please refer to our comment above, section IV Also, we reiterate our disagreement with any requirements relation to Solvency II pillar 1.	Please refer to answer 464. Noted.
503	MetLife	1.70	We appreciate the exemption from presenting the Statutory Accounts balances on BS-C1 for those undertakings not generating Group Financial Statements (availing of the exemption under EU Directive) . Does this exemption also apply to the explanation of material differences in valuation for solvency purposes and valuation in financial statements required under the narrative guidelines? Given that both IFRS and US GAAP have a three-level hierarchy on valuation, we question the relevance and significance of introducing a four-level hierarchy. This will have significant cost implications as systems and processes will require updates. As substantially all the industry players are prioritising QRT reporting and had not been planning for SFCR/ RSR given the uncertainty around the Solvency II implementation dates, we are concerned that this requirement may require a relatively longer lead in time. Also, it will make the disclosures different to that produced under IFRS and US GAAP	We would like to clarify that undertakings are not exempted from providing statutory balance sheet on annual basis; Undertakings need to provide details of material differences in valuation basis in accordance with GIs 28 and 30. The intention is not to introduce a four level hierarchy. It is actually a 3 level hierarchy as the last two are only applicable to participations. The methods identified reflect the draft Level 2 text and we acknowledge that this does not fully map with the IFRS levels. These guidelines are part of the preparatory framework in order to help undertakings to be ready when SII enters into force. For this reason, it is important that these guidelines be part of this preparation. Having no reporting means that NSA can only have information by requesting systematically information to undertakings and even doing on site inspections. So a narrative reporting is the most proportionate solution.
505	Deloitte	Section V. General Comments	We question if there was any specific reason why information, at least on internal processes and policies, on OF have not been foreseen, especially taking into account the fact that all the necessary quantitative data are already included within the QRT OF and they do not need to be repeated.	It is important for undertakings to be able to qualitatively explain their approach to own funds. A selection has been made for these preparatory guidelines.
506	GC	Section V. General Comments	See Section IV general comments	Please refer to answer 462.
507	GDV	Section V. General Comments	See comments on Section IV – general comments.	Please refer to answer 463.
508	IE	Section V. General Comments	See comments on Section IV – general comments.	Please refer to answer 465.

No.	Name	Reference	Comment	Resolution
509	Deloitte	1,71	Ref. 1.71): We agree on the decision to not request the other requirements related to some of the corrective measures discussed within the LTGA assessment, that are "(i) any material changes in the relevant assumptions made in the calculation of technical provisions compared to the previous reporting period, (ii) where applicable, the counter-cyclical premiums applied in the calculation of technical provisions, (iii) where applicable, the matching premiums applied in the calculation of technical provisions." That said, we question if EIOPA envisages that any potential requirements of the ones stated above could be added before the first reporting during the interim phase is due.	Noted.
510	IA Cyprus	1,71	Please refer to our comment above, section IV Also, we reiterate our disagreement with any requirements relation to Solvency II pillar 1.	Please refer to answer 464. Noted.
511	MetLife	1,71	In our opinion the level of narrative is far too detailed for pre-Solvency II reporting. In particular, we do not believe that it should be necessary to provide the comparisons with financial statements as requested in 1.71 (c)(See comment 1.70) or the description of the level of uncertainty in 1.71 (b).	Noted. Disagree. EIOPA consider it important for undertakings to be able to compare and describe and quantify valuation differences between Solvency and statutory financial statements
512	Nordea	1,71	Subject to cover note 4.12 to 4.15 (Connection to SII Pillar I requirements)	Noted.
513	PZU	1,71	This point is in Section VI, not Section V.	Noted.
515	GC	1,72	The requirement to justify the actuarial methodologies and assumptions should, in addition to the references to the nature, scale and complexity of risks, also facilitate the many undertakings who are likely to use simplifications in the preparatory phase as a means to being fully ready for more accurate methods by the time of the full launch of Solvency II.	Undertakings should describe methodologies and assumptions underlying valuation basis applied; if simplifications are used - they should be reflected in reporting
516	GDV	1,72	This Guideline seems to derive from level 3 guidance. We believe that the Guidelines ought not to prescribe any requirements which go beyond the draft Level 2 text.	Noted.
517	IA Cyprus	1,72	Please refer to our comment above, section IV Also, we reiterate our disagreement with any requirements relation to Solvency II pillar 1.	Please refer to answer 464. Noted.
518	IE	1,72	This Guideline seems to derive from Level 3 guidance. We believe that the Guidelines, if applicable, ought not to prescribe any requirements which go beyond the draft Level 2 text.	Noted.
519	Nordea	1,72	Subject to cover note 4.12 to 4.15 (Connection to SII Pillar I requirements)	Noted.
520	PZU	1,72	This point is in Section VI, not Section IV.	Noted.
521	GDV	Section VI. General Comments	See comments on Section IV – general comments.	Please refer to answer 463.
522	IE	Section VI. General Comments	See comments on Section IV – general comments.	Please refer to answer 465.
523	PZU	Section VI. General Comments	In general the list of required information in the narrative is very extensive. We would like to suggest limiting the required information to some sort of executive summary with reference to appropriate procedures, methodology documents and other undertaking's internal documents.	The requirements on narrative reporting only ask for part of the final narrative reporting to be submitted for the preparatory phase carefully balancing the need for preparation by undertaking with the burden the narrative reporting places on undertaking during the preparatory phase.
524	Deloitte	1,73	Please see comments on 1.70	Please refer to answer 501.
525	IA Cyprus	1,73	Please refer to our comment above, section IV Also, we reiterate our disagreement with any requirements relation to Solvency II pillar 1.	Please refer to answer 464. Noted.
526	MetLife	1,73	See comment 1.70	Please refer to answer 503.
527	IA Cyprus	1,74	Please refer to our comment above, section IV Also, we reiterate our disagreement with any requirements relation to Solvency II pillar 1.	Please refer to answer 464. Noted.
528	Deloitte	1,75	We question if there is a specific reason in requesting "strategic and undertaking-specific" information in relation to assets and liabilities (i.e. future management actions and policyholders behaviour), since almost the entirety of the information which is more "strategic and undertaking-specific" has not been selected as due during the preparatory phase. We feel that at this stage, since the majority of Solvency II requirements are not finalised yet, it would be more appropriate to address this kind of information in the undertaking's internal report on FLA (ORSA).	The information reported should reflect valuation basis as used in the calculations of technical provisions for the purposes of preparatory reporting i.e. known position and on position that is being developed in order to make progress is setting up valuation processes for final solutions

No.	Name	Reference	Comment	Resolution
529	IA Cyprus	1,75	Please refer to our comment above, section IV Also, we reiterate our disagreement with any requirements relation to Solvency II pillar 1.	Please refer to answer 464. Noted
530	Deloitte	1,76	Ref. 1.76 c-d): These two points should be better explained in terms of what is expected (e.g. quantitative/qualitative explanations, documentation of the assumptions) Could EIOPA provide undertakings with examples? Please consider describing into more depth what is expected in terms of content and consider the fact that few NCAs already ask for this kind of information (which may vary across Europe) within their jurisdiction.	Noted. EIOPA do not intend to provide more guidance in this area
531	GDV	1,76	This Guideline seems to derive from level 3 guidance. We believe that the Guidelines ought not to prescribe any requirements which go beyond the draft Level 2 text.	Noted.
532	IA Cyprus	1,76	Please refer to our comment above, section IV Also, we reiterate our disagreement with any requirements relation to Solvency II pillar 1.	Please refer to answer 464. Noted.
533	IE	1,76	This Guideline seems to derive from Level 3 guidance. We believe that the Guidelines, if applicable, ought not to prescribe any requirements which go beyond the draft Level 2 text.	Noted.
534	PZU	1,76	According to IAS 1 standard the undertaking is required to disclose the “sources of estimation uncertainty”. Should the “assessment of the valuation uncertainty of assets and liabilities” under Solvency II be understood and reported in the similar way as the description of “source of estimation uncertainty” under IAS 1? If not we would like to request for explanation how the “assessment of the valuation uncertainty of the assets and liabilities” should be interpreted and described by undertaking.	EIOPA expects that IAS 1 should be followed in these instances.
535	IA Cyprus	1,77	Please refer to our comment above, section IV Also, we reiterate our disagreement with any requirements relation to Solvency II pillar 1.	Please refer to answer 464. Noted.
536	CFOF_CROF	1,78	We presume that the ‘reporting policy’ referred to in this paragraph does not need to be submitted to the supervisor. Our understanding is that the intention is that the undertaking must prepare and use one, which may be reviewed by the supervisor at any time as part of the supervisor’s assessment of the undertaking’s preparations for Solvency II.	This is correct.
537	DublinIMA	1,78	Is the reporting policy expected to form part of the disclosure to NCAs?	The reporting policy only has to be provided if the NCA asks for it.
539	GC	1,78	It is not clear why this requirement is specified for solo entities only and not also for groups.	Corrected, this requirement applies to solo entities and groups.
540	GDV	1,78	Alternatively, must an undertaking prepare and use a reporting policy, which may be reviewed by the supervisor at any time as part of the supervisor’s assessment of the undertaking’s preparations for Solvency II? If so, by when would the undertaking be expected to prepare its reporting policy?	Undertakings should be taking active steps in setting up processes and policies as prescribed in the GI 33 so by the end of 2015 all reporting systems and processes are in place and running.
541	IA Cyprus	1,78	More clarity is needed on when such a “reporting policy” should be ready, and whether or not it should also be submitted to the NCAs and by when.	Undertakings should be taking active steps in setting up processes and policies as prescribed in the GI 33 so by the end of 2015 all reporting systems and processes are in place and running. The reporting policy only has to be provided if the NCA asks for it.
542	IE	1,78	The relevance of a guideline on a description of the reporting processes themselves during the interim period is seriously questioned. This relates to the internal controls of the reporting processes and not really with the reporting itself anymore. Since requirements on the internal control system already are included in the interim measures relating to the system of governance, it is proposed to drop this guideline.	The requirements included within the Guideline 33 are not reporting requirements Firms are required to set up reporting policies and procedures The reporting policy only has to be provided if the NCA asks for it.
543	Lloyds	1,78	This paragraph should make clear that the ‘reporting policy’ it refers to does not need to be submitted to the NCA. It could state that a firm’s reporting policy may be reviewed by the NCA at any time, as part of the NCA’s assessment of the firm’s preparations for Solvency II.	The reporting policy only has to be provided if the NCA asks for it.
544	RSA	1,78	Again, as the Guideline refers explicitly to solo undertakings only, we assume groups do not need to comply with it under these Guidelines.	Corrected, this requirement applies to solo entities and groups.
545	Assuralia	1,78	The relevance of a guideline on a description of the reporting processes themselves during the interim period is seriously questioned. This relates to the internal controls of the reporting processes and not really with the reporting itself anymore. Since requirements on the internal control system already are included in the interim measures relating to the system of governance, it is proposed to drop this guideline here.	The requirements included within the Guideline 33 are not reporting requirements Firms are required to set up reporting policies and procedures The reporting policy only has to be provided if the NCA asks for it.
546	PZU	1,78	This point is in Section VII, not Section VI.	Noted.

No.	Name	Reference	Comment	Resolution
547	AMICE	1,79	<p>Undertakings will be subject to double reporting as Solvency I and Solvency II will be running in parallel. Some flexibility from the national supervisory authorities is requested.</p> <p>We would suggest an extended period for the submission of the annual reporting selected templates in 2015 and 2016. The deadlines are extended by 5 weeks.</p> <p>This paragraph should be amended as follows:</p> <p>In accordance with Articles 35 and 254 of Solvency II, national competent authorities should ensure that insurance and reinsurance undertakings submit the annual quantitative information referred to in Section III, regarding the annual quantitative information related to the financial year of the undertaking ending on or after 31 December 2014, no later than 20 25 weeks after the undertaking's financial year end.</p>	<p>Following the consultation process , EIOPA took on board concerns raised by stakeholders and decided to extend reporting deadlines for annual reporting by 2 weeks. In addition, it has been decided to request reporting of the quarter ended 30 September 2015 ONLY during preparatory phase.</p> <p>EIOPA will review the deadlines for the submission of information and the report on the forward looking assessment at the end of 2013 based on the latest developments. Following the stakeholders comments, a revision clause was introduced in the Guidelines.</p>
548	CFOF_CROF	1,79	Please refer to comments made in response to point 1.11	See response to the comment 1.11
549	DublinIMA	1,79	Reflecting the interim nature of these proposals, and the "preparatory" nature for the full Solvency II implementation, the proposed timeframe appears particularly onerous. The timeframe should be the decision of the national competent authority, reflecting the readiness of both supervisor and industry, particularly in the earlier phases.	<p>EIOPA confirms that there will be one annual submission for the year ended 31 December 2014 required under preparatory Guidelines;</p> <p>Following the consultation process , EIOPA took on board concerns raised by stakeholders and decided to request reporting of the quarter ended 30 September 2015 ONLY and to extend reporting deadline for annual submission by 2 weeks during preparatory phase.</p>
550	FEE	1,79	Especially because of the huge administrative burden on firms to be able to meet both Solvency I (solo and group) reporting and the interim guideline submissions the timeframes suggested for annual reporting seem to be too short. Perhaps a solution could be leaving the decision about deadlines to national supervisory authorities as the effort necessary for an insurance company in a specific country to fulfill the preparatory requirements does also depend on how the solvency I reporting in the respective country looks like.	<p>EIOPA confirms that there will be one annual submission for the year ended 31 December 2014 required under preparatory Guidelines;</p> <p>Following the consultation process , EIOPA took on board concerns raised by stakeholders and decided to request reporting of the quarter ended 30 September 2015 ONLY and to extend reporting deadline for annual submission by 2 weeks during preparatory phase.</p>
551	GC	1,79	<p>Paragraph 1.11 says it is EIOPA's intention that "annual information is submitted once before Solvency II is applicable".</p> <p>However Guideline 34 appears to require an annual information return for financial years ending on or after 31 December 2014. This would imply at least two such returns, both submission over financial year 2014 and 2015. This conflicts with the text in paragraph 1.11.</p> <p>The guideline should recognise the fact that insurers will also be reporting under the existing Solvency I regime at the same time. Because of this it would be appropriate to extend the 20 week timeline.</p>	<p>EIOPA confirms that there will be one annual submission for the year ended 31 December 2014 required under preparatory Guidelines;</p> <p>Following the consultation process , EIOPA took on board concerns raised by stakeholders and decided to request reporting of the quarter ended 30 September 2015 ONLY and to extend reporting deadline for annual submission by 2 weeks during preparatory phase.</p>
552	GDV	1,79	Unlike under a "real" Solvency II environment, undertakings will be required to report under the Guidelines in addition to existing Solvency I reporting. This additional burden ought to be reflected in an extended submission deadline: at least two extra weeks. This comment also applies to 1.80, 1. 81 and 1.82	<p>Following the consultation process , EIOPA took on board concerns raised by stakeholders and decided to extend reporting deadlines for annual reporting by 2 weeks. In addition, it has been decided to request reporting of the quarter ended 30 September 2015 ONLY during preparatory phase.</p> <p>EIOPA will review the deadlines for the submission of information and the report on the forward looking assessment at the end of 2013 based on the latest developments. Following the stakeholders comments, a revision clause was introduced in the Guidelines.</p>
553	IA Cyprus	1,79	We reiterate our disagreement with the requirements for quantitative reporting based on SII pillar 1. Were these requirements to be introduced, we consider it very important that the submission deadlines be extended to 36 weeks for annual reporting (Sept. 2015) and to 12 weeks for quarterly reporting.	<p>Following the consultation process , EIOPA took on board concerns raised by stakeholders and decided to extend reporting deadlines for annual reporting by 2 weeks. In addition, it has been decided to request reporting of the quarter ended 30 September 2015 ONLY during preparatory phase.</p> <p>EIOPA will review the deadlines for the submission of information and the report on the forward looking assessment at the end of 2013 based on the latest developments. Following the stakeholders comments, a revision clause was introduced in the Guidelines.</p>
554	ILAG	1,79	We note there is an inconsistency between the requirement for reporting financial information no later than 20 weeks after 31 December 2014 and the requirement for NCAs to report by 28 February 2015.	<p>The progress report is not part of the requirements for preparation by undertakings towards Solvency II, but a measure of communication between EIOPA and its members, the NCAs.</p> <p>EIOPA consider it important to receive an update from NCAs on progress made to</p>
555	MetLife	1,79	<p>We advocate a more gradual approach with regard to Supervisory Reporting. The current proposals suggest that undertakings that fall within certain categories must submit annual quantitative information for 2014 within 20 weeks of their year end, which implies a May deadline for companies with a calendar year end, such as MetLife. Separately, the Guidelines state that NCAs need to inform undertakings at least 11 months in advance about whether they fall into the categories required to submit such information.</p> <p>We believe these timelines do not provide sufficient time to ensure all our business units are ready, given that the Solvency II implementation date also remains unclear.</p>	<p>Following the consultation process , EIOPA took on board concerns raised by stakeholders and decided to extend reporting deadlines for annual reporting by 2 weeks. In addition, it has been decided to request reporting of the quarter ended 30 September 2015 ONLY during preparatory phase.</p> <p>EIOPA will review the deadlines for the submission of information and the report on the forward looking assessment at the end of 2013 based on the latest developments. Following the stakeholders comments, a revision clause was introduced in the Guidelines.</p>

No.	Name	Reference	Comment	Resolution
556	RSA	1,79	Unlike under a "real" Solvency II environment, undertakings will be required to report under the Guidelines in addition to existing Solvency I reporting. This additional burden ought to be reflected in an extended submission deadline: at least two extra weeks.	Following the consultation process , EIOPA took on board concerns raised by stakeholders and decided to extend reporting deadlines for annual reporting by 2 weeks. In addition, it has been decided to request reporting of the quarter ended 30 September 2015 ONLY during preparatory phase. EIOPA will review the deadlines for the submission of information and the report on the forward looking assessment at the end of 2013 based on the latest developments. Following the stakeholders comments, a revision clause was introduced in the Guidelines.
557	Assuralia	1,79	During the interim period undertakings will be required to report Solvency II figures in addition to the Solvency I figures. A reasonable period of time should be foreseen for undertakings to prepare these additional reports. It is proposed to extend the reporting deadline of the annual figures of 20 weeks with at least 5 more weeks.	Following the consultation process and comments received from stakeholders, EIOPA decided to extend reporting deadlines for annual submission by 2 weeks during preparatory phase
558	PZU	1,79	This point is in Section VIII, not Section VI. For comments to timeline please refer also to point 1.11. In our opinion the 1st annual reporting period for the implementation phase should refer to period one year ahead of the date of introduction of Solvency II (based on current deadlines this is the date of 1st of January 2016 hence the first reporting period should cover year 2014). In case of change of the date of Solvency II introduction the first annual reporting period during implementation phase should be also changed (moved according to the change of date of introduction of Solvency II).	See the revision clause. EIOPA confirms that there will be one annual submission for the year ended 31 December 2014 required under preparatory Guidelines; Following the consultation process , EIOPA took on board concerns raised by stakeholders and decided to request reporting of the quarter ended 30 September 2015 ONLY during preparatory phase. EIOPA will review the deadlines for the submission of information and the report on the forward looking assessment at the end of 2013 based on the latest developments. Following the stakeholders comments, a revision clause was introduced in the Guidelines.
559	GDV	1.80	See comment above. Paragraph 1.80 says that quarterly reporting templates (QRT) will be required for submission as at 30 September 2015. In paragraph 1.11, EIOPA states that its intention is that <i>'the annual information is submitted once before Solvency II is applicable and the quarterly information is submitted in relation to the two quarters prior to the application of Solvency II'</i> . Will QRT also be required at 31 December 2015?	See response to comment above
560	IE	1.80	See our comments (general comments section) on the cycles of reporting.	See response to the general comments section
561	IUA London	1.80	It is not clear to us whether QRT will be required at 31 December 2015.	EIOPA confirms that there will be one annual submission for the year ended 31 December 2014 required under preparatory Guidelines;
562	Lloyds	1.80	We do not agree with the proposed timescale for quarterly reporting. As the primary purpose of this exercise is to help firms prepare for Solvency II, the deadline for quarterly reporting should be 12 weeks rather than 8 weeks. This will give firms greater opportunities to produce meaningful data and to benefit from what is effectively a 'dry run' for the reporting requirements.	Following the consultation process , EIOPA took on board concerns raised by stakeholders and decided to request reporting of the quarter ended 30 September 2015 ONLY during preparatory phase. The deadline for quarterly submission has been kept at 8 weeks.
563	AMICE	1.80	See comment above.	Noted. See response to the comment 547
564	CFOF_CROF	1.80	Please refer to comments made in response to point 1.11	See response to the comment 105
565	DublinIMA	1.80	Reflecting the interim nature of these proposals, and the "preparatory" nature for the full Solvency II implementation, the proposed timeframe appears particularly onerous. The timeframe should be the decision of the national competent authority, reflecting the readiness of both supervisor and industry, particularly in the earlier phases.	See response to the comment 549
566	GC	1.80	The guideline should recognise the fact that insurers will also be reporting under the existing Solvency I regime at the same time. Because of this it would be appropriate to extend the 8 week timeline.	See response to the comment 551
567	IA Cyprus	1.80	We reiterate our disagreement with the requirements for quantitative reporting based on SII pillar 1. Were these requirements to be introduced, we consider it very important that the submission deadlines be extended to 36 weeks for annual reporting (Sept. 2015) and to 12 weeks for quarterly reporting.	Following the consultation process , EIOPA took on board concerns raised by stakeholders and decided to request reporting of the quarter ended 30 September 2015 ONLY during preparatory phase. The deadline for quarterly submission has been kept at 8 weeks. The deadline for annual submission has been extended by 2 weeks
568	Lloyds	1.80	We do not agree with the proposed timescale for quarterly reporting. As the primary purpose of this exercise is to help firms prepare for Solvency II, the deadline for quarterly reporting should be 12 weeks rather than 8 weeks. This will give firms greater opportunities to produce meaningful data and to benefit from what is effectively a 'dry run' for the reporting requirements.	Following the consultation process , EIOPA took on board concerns raised by stakeholders and decided to request reporting of the quarter ended 30 September 2015 ONLY during preparatory phase. The deadline for quarterly submission has been kept at 8 weeks.
569	Assuralia	Section VII. General Comments	EIOPA and NCAs need to allow for the fact that any policy or documented process might not be fully operational as at the time of implementing these Guidelines.	it is expected that undertakings gradually implement the Guidelines in a way that by end 2015 processes and systems for submission of information are in place and aligned with the requirements in the preparatory Guidelines.

No.	Name	Reference	Comment	Resolution
570	GDV	Section VII. General Comments	EIOPA and NCAs need to allow for the fact that any policy or documented process might not be fully operational as at the time of implementing these Guidelines.	it is expected that undertakings gradually implement the Guidelines in a way that by end 2015 processes and systems for submission of information are in place and aligned with the requirements in the preparatory Guidelines.
571	IE	Section VII. General Comments	EIOPA and NCAs need to consider the fact that any policy or documented process might not be fully operational as at the time of implementing these Guidelines.	it is expected that undertakings gradually implement the Guidelines in a way that by end 2015 processes and systems for submission of information are in place and aligned with the requirements in the preparatory Guidelines.
572	RSA	Section VII. General Comments	EIOPA and NCAs need to allow for the fact that any policy or documented process might not be fully operational as at the time of implementing these Guidelines.	it is expected that undertakings gradually implement the Guidelines in a way that by end 2015 processes and systems for submission of information are in place and aligned with the requirements in the preparatory Guidelines.
573	AMICE	1,81	See comment above.	Noted. See response to the comment 547
574	GDV	1,81	See 1.79 Deadlines should also be extended to narrative reporting as would be the case when the SFCR and RSR are submitted for real.	See response to the comment 552
575	IE	1,81	See our comments (general comments section) on the cycles of reporting and on group reporting . . If narrative reporting is required, deadlines should also be extended to narrative reporting as would be the case when the SFCR and RSR are submitted for real.	EIOPA confirms that narrative and quantitative submissions deadlines are the same (at group level and solo level respectively)
576	RSA	1,81	This provision, though welcome, ought to be extended to narrative reporting as would be the case when the SFCR and RSR are submitted for real.	EIOPA confirms that narrative and quantitative submissions deadlines are the same (at group level and solo level respectively)
577	Assuralia	1,81	The extension of the deadline (6 weeks) for quantitative group reporting should also hold for quantitative solo reporting (see comment paragraph 1.79). The extension of the deadline (6 weeks) for quantitative group reporting should also hold for qualitative group reporting (narrative reporting) (see comment paragraph 1.82).	See response to the comment 557
578	PZU	1,81	This point is in Section VIII, not Section VII.	Noted
579	AMICE	Section VIII. General Comments	Dates of initial application and deadlines	Noted
580	GC	Section VIII. General Comments	There is just one year of preparation before the full implementation of the directive (2015 if Omnibus II is passed and the implementation is still 1/1/2016). It should be specified that the date in this section (i.e. financial year ending 31/12/2014) is subject to Omnibus II and also what will happen if Omnibus II is delayed	EIOPA is working under the assumption that OMBII and delegated acts will be available in time for NCAs and undertakings to prepare for the submission of quantitative and qualitative information in 2015. In which case, at that stage, EIOPA would prepare technical specifications and provide guidance on the assumptions underlying the calculation of technical provisions and the standard formula calculation, which reflect the decision on OMDII and the available delegated acts . EIOPA will review the deadlines for the submission of information at the end of 2013 based on the latest developments. Following the consultation process, The revision clause was introduced in the Guidelines.
581	GDV	Section VIII. General Comments	Given the overlapping with Solvency I reporting and other commitments, NCAs ought to be given the flexibility to apply the proposed deadlines as they think appropriate.	Following the consultation process , EIOPA took on board concerns raised by stakeholders and decided to request reporting of the quarter ended 30 September 2015 ONLY and to extend reporting deadline for annual submission by 2 weeks during preparatory phase.
582	I Actuaire	Section VIII. General Comments	There is only one year of preparation before the full implementation of the directive (2015 if omnibus 2 is passed and the implementation is still 1/1/2016). It should be specified that the date in this section (financial year ending 31/12/2014) is subject to omnibus 2 and tell what happens if not so.	EIOPA confirms that there will be one annual submission for the year ended 31 December 2014 required under preparatory Guidelines; Following the consultation process , EIOPA took on board concerns raised by stakeholders and decided to request reporting of the quarter ended 30 September 2015 ONLY during preparatory phase. EIOPA will review the deadlines for the submission of information and the report on the forward looking assessment at the end of 2013 based on the latest developments. Following the stakeholders comments, a revision clause was introduced in the Guidelines.
583	IE	Section VIII. General Comments	Given the overlapping with Solvency I reporting and other commitments, NCAs ought to be given the flexibility to apply the proposed deadlines as they think appropriate. See our comments (general comments section) on the cycles of reporting and on need to assure that undertakings will have enough to establish the appropriate internal processes and IT systems	Following the consultation process , EIOPA took on board concerns raised by stakeholders and decided to request reporting of the quarter ended 30 September 2015 ONLY and to extend reporting deadline for annual submission by 2 weeks during preparatory phase. EIOPA disagree with setting up flexible deadlines at national level
584	IE	Section VIII. General Comments	See also our comments (general comments section) on the cycles of reporting, on narrative reporting and on need to assure that undertakings will have enough to establish the appropriate internal processes and IT systems	See comments above

No.	Name	Reference	Comment	Resolution
585	IUA London	Section VIII. General Comments	Firms will be under great pressure to respond to many regulatory demands, so we suggest that NCAs should be able to fix deadlines nationally, taking into account local circumstances.	Following the consultation process , EIOPA took on board concerns raised by stakeholders and decided to request reporting of the quarter ended 30 September 2015 ONLY and to extend reporting deadline for annual submission by 2 weeks during preparatory phase. EIOPA disagree with setting up flexible deadlines at national level
586	RSA	Section VIII. General Comments	Given the overlapping with Solvency I reporting and other commitments, NCAs ought to be given the flexibility to apply the proposed deadlines as they think appropriate. In any case, we believe group-level narrative reporting ought to benefit from the 6 week extension set out in 1.81.	Following the consultation process , EIOPA took on board concerns raised by stakeholders and decided to request reporting of the quarter ended 30 September 2015 ONLY and to extend reporting deadline for annual submission by 2 weeks during preparatory phase. EIOPA disagree with setting up flexible deadlines at national level
587	AFM	1,82	There appears to be an error in paragraph 1.81. This extends the deadline for group reporting by 6 weeks. However this only applies to the 'previous paragraphs', ie 1.79 and 1.80. It does not appear to cover 1.82.	This has been a drafting error. EIOPA confirm that the deadline for submission of information on annual basis (narrative and quantitative) at group level is 28 weeks (extended by 2 weeks following the consultation process) .
588	CFOF_CROF	1,82	The timeline for submission of the narrative information appears to be 20 weeks for both Group and Solo information. We presume that this is a drafting error and that the timelines are 20 weeks for the solo narrative reporting and 26 weeks for the Group narrative reports. This section should be reworded to be clear.	This has been a drafting error. EIOPA confirm that the deadline for submission of information on annual basis (narrative and quantitative) at group level is 28 weeks and at solo level 22 weeks (20 weeks deadline/26 weeks deadline has been extended by 2 weeks , following consultation process)
589	Deloitte	1,82	It appears that according to this paragraph the solo and group narrative reporting needs to be submitted 20 weeks after the undertaking's financial year end. This is inconsistent with the reporting of quantitative information for groups where paragraph 1.81 grants an extra 6 weeks additional time for group reporting. Therefore, we suggest that the 6 weeks additional time for group reporting also applies to narrative reporting.	This has been a drafting error. EIOPA confirm that the deadline for submission of information on annual basis (narrative and quantitative) at group level is 28 weeks and at solo level 22 weeks (20 weeks deadline/26 weeks deadline has been extended by 2 weeks , following consultation process)
590	DublinIMA	1,82	Reflecting the interim nature of these proposals, and the "preparatory" nature for the full Solvency II implementation, the proposed timeframe appears particularly onerous. The timeframe should be the decision of the national competent authority, reflecting the readiness of both supervisor and industry, particularly in the earlier phases.	See response to the comment 549
591	GC	1,82	Narrative reporting: The same comment applies as per 1.79.	See response to the comment 551
592	GDV	1,82	Groups will need at least 6 more weeks as for the quantitative information. The deadline of 20 weeks for submitting information to national competent authorities for the group reporting is not consistent with the requirement in 1.81.	This has been a drafting error. EIOPA confirm that the deadline for submission of information on annual basis (narrative and quantitative) at group level is 28 weeks.
593	IA Cyprus	1,82	Concerning narrative reporting, we do not agree with the formal reporting approach taken in the guidelines as this would require substantial resources to coordinate and produce that would come on top of the resources already needed to produce the reporting for Solvency 1. Especially for Cyprus, being a small country with small-sized insurers, double reporting would represent a huge and disproportional burden and local insurers would lack sufficient resources for carrying it out. It would moreover not be cost effective since reporting systems/processes/manuals will again have to be changed once the full Solvency II regime is introduced in 2016. Hence we consider that a framework for monitoring progress in respect of the Governance requirements should better be left to national supervisors to decide in tandem with their markets, taking into account national specificities. We believe that it would be very beneficial if EIOPA requests national supervisors to engage in a dialogue with insurers in their respective markets with an aim to agree on a clear timetable concerning what they concretely expect from undertakings to have in place at different stages during the preparatory stage until 2016 and when/what information should be submitted.	Disagree - The objective of introducing narrative reporting during preparatory phase is for firms to prepare for the narrative reporting (i.e to set up systems and procedures in order to gather necessary information and to prepare reports) and for supervisors to assess firms preparedness (for example, whether the narrative reporting is sufficient in terms of a scope and details). In addition, supervisors may use this information contained in the narrative reporting, for example, with regard to SoG, to assist them in assessing progress made by firms in preparation for Solvency 2 SoG requirements.
594	IE	1,82	See our comments (general comments section) on the cycles of reporting, narrative reporting and group reporting in the general comments section. In order to avoid inconsistent application of the guidelines it should be indicated that the reporting of the qualitative information should be submitted within the same time constraints but not before the reporting of the related quantitative information. The timeline for submission of the narrative information appears to be 20 weeks for both Group and Solo information. We presume that this is a drafting error and that the timelines are 20 weeks for the solo narrative reporting and 26 weeks for the Group narrative reports. This section should be reworded to be clear.	This has been a drafting error. EIOPA confirm that the deadline for submission of information on annual basis (narrative and quantitative) at group level is 28 weeks (extended by 2 weeks following the consultation process) .
595	MetLife	1,82	See Comment 1.9 It should be confirmed that the EEA Group Narrative Report will have additional time over the Solo requirements.	Group narrative reporting will have the same submission deadlines as quantitative submissions for groups. i.e. additional 6 weeks (in comparison to solo submission deadline)
596	Royal London Mutual	1,82	There appears to be an error in para 1.81. This extends the deadline for group reporting by 6 weeks. However this only applies to the 'previous paragraphs', ie 1.79 and 1.80. It does not appear to cover 1.82.	This has been a drafting error. EIOPA confirm that the deadline for submission of information on annual basis (narrative and quantitative) at group level is 28 weeks (extended by 2 weeks following the consultation process) .
597	RSA	1,82	See 1.81: groups ought to be given additional time for the narrative reporting.	

No.	Name	Reference	Comment	Resolution
598	Assuralia	1,82	In order to avoid inconsistent application of the guidelines it should be indicated that the reporting of the qualitative information should be submitted within the same time constraints but not before the reporting of the related quantitative information. As such, an extension of the submission deadline for the quantitative part should result in an extension of the submission deadline of the qualitative part.	EIOPA confirm , that the reporting deadline for submission of annual narrative and quantitative information are the same.
599	CFOF_CROF	1,83	The timeline for submission of the narrative information appears to be 20 weeks for both Group and Solo information. We presume that this is a drafting error and that the timelines are 20 weeks for the solo narrative reporting and 26 weeks for the Group narrative reports. Please confirm that this is the case.	This has been a drafting error. EIOPA confirm that the deadline for submission of information on annual basis (narrative and quantitative) at group level is 28 weeks and at solo level 22 weeks (20 weeks and 26 weeks deadlines have been extended by 2 weeks respectively , following consultation process)
600	PZU	1,83	This point is in Section IX, not Section VIII.	Every format inconsistency will be corrected in the final version
601	AMICE	1,84	Guideline 35 – Lines of Business and Complementary Identification Code More guidance on how to apply the CIC codes will be needed. Classifying the assets according to the CIC code will be very difficult in practice. We appreciate if EIOPA can publish a mapping exercise.	Noted
602	CFOF_CROF	1,84	EIOPA should note that insurers will make assumptions on the best possible groupings of assets in the CIC codes. EIOPA should therefore expect that there will be inconsistency with the use of the CIC code across organisations, depending upon whether the CIC codes are sourced from an external data vendor or if they are derived from mapping tables used by the organisation.	Noted. No additional guidance will be provided in the instructions. However, EIOPA's training plans for 2014, may include a seminar where CIC codes examples can be addressed and provide practical guidance
603	IE	1,84	We expect that there will be inconsistency with the use of the CIC code across organisations, depending upon whether the CIC codes are sourced from an external data vendor or if they are derived from mapping tables used by the organisation and EIOPA will have to accept inconsistencies initially	See response to the comment 602
604	ROAM	1,84	Guideline 35 – Lines of Business and Complementary Identification Code Les membres de la ROAM souhaitent avoir plus de clarification sur les codes CIC et leur mise en pratique. La classification des actifs selon les codes CIC constituera un exercice très difficile et consommateur de temps pour les entreprises.	See response to the comment 602
605	PZU	1,84	This point is in Section IX, not Section VIII.	Every format inconsistency will be corrected in the final version
606	GC	1,85	Is it intended that the reports would be submitted in spreadsheet format or will the proposed XBRL reporting tools be available in the preparatory phase? It would be very desirable that the XBRL reporting tools to be used when Solvency II goes live are available for the preparatory phase, so as to avoid insurers needing to re-engineer the process in 2016.	In accordance with the EIOPA's preparatory Guidelines, undertakings are required to submit information requested in electronic format; It is up to each NCA to make a decision as to the use of xbrl; However, EIOPA will make available a tool for undertakings to use xbrl in time for preparatory phase
607	IA Cyprus	1,85	We consider that it is appropriate for the preparatory phase, to entitle companies to report using excel format or similar. A potential requirement to switch to a different reporting format (i.e XBRL) that has never been used before would be extremely onerous for insurers in Cyprus.	see response to the comment 607
608	MetLife	1,85	Implementing XBRL taxonomy will be a cumbersome exercise that will need to be embedded into the reporting systems. We believe the requirements for XBRL (incl taxonomy) should be made available sooner rather than later	see response to the comment 607
609	PZU	1,85	This point is in Section IX, not Section VIII. In our opinion both the final reporting templates and the means of reporting should be defined by NCAs before the start of the implementation phase in order to avoid the potential risk of setting inappropriate reporting processes by undertakings. In our opinion the information which will be provided by undertaking to NCA is going to be of very sensitive nature hence the local NCA is expected to set up an appropriate system providing security of data during the data transfer process. We believe that the system should be established and tested before the date of the beginning of first reporting process in order to decrease the potential risk of not fulfilling the reporting requirements regarding reporting deadlines by the undertaking due to potential issues connected with data transfer process.	Every format inconsistency will be corrected in the final version
610	DublinIMA	1,86	What should the treatment be where the undertaking's and group currency differ?	For undertaking reporting, the currency should be the one of the country of the undertaking; for group reporting the currency should be the one of the country of the group.
611	GDV	1,86	This paragraph is slightly unclear: we presume that the reference to the “group currency of reporting” applies only to group reporting and not to solo undertaking reporting.	It refers to the currency the group uses to report
612	IE	1,86	This paragraph is slightly unclear: we presume that the reference to the “group currency of reporting” applies only to group reporting and not to solo undertaking reporting.	It refers to the currency the group uses to report
613	RSA	1,86	This paragraph is slightly unclear: we presume that the reference to the “group currency of reporting” applies only to group reporting and not to solo undertaking reporting.	It refers to the currency the group uses to report
614	PZU	1,86	This point is in Section IX, not Section VIII.	Every format inconsistency will be corrected in the final version
615	CFOF_CROF	1,87	QRTs reporting should be completed in thousands. In certain member states, the current Solvency I reports are only required to rounded to thousands and IFRS financial statements are produced in millions. We propose that the QRTs are completed in thousands rather than at the lower level of granularity currently proposed (units).	it is a common practice to use units when applying xbrl taxonomies
616	DublinIMA	1,87	This paragraph requires that all quantitative data is submitted in units; most existing financial information is presented in €'000, £'000 or \$'000 which would be an appropriate measure with which to continue.	Data points with the data type 'Monetary' shall be reported using a minimum precision. In XBRL, to avoid ambiguity and interpretation errors, monetary data are reported in ISO 4217 units.

No.	Name	Reference	Comment	Resolution
617	MetLife	1,87	Please clarify what is meant by "submitted in units" . Reporting in the lowest denomination would be burdensome without being of much usefulness to the users.	Data points with the data type 'Monetary' shall be reported using a minimum precision. In XBRL, to avoid ambiguity and interpretation errors, monetary data are reported in ISO 4217 units.
618	PZU	1,87	In our opinion the quantitative data should be submitted in thousands of units rather than in single units. It will be consistent with previous reporting standards.	Data points with the data type 'Monetary' shall be reported using a minimum precision. In XBRL, to avoid ambiguity and interpretation errors, monetary data are reported in ISO 4217 units.
620	GC	1,88	We expect the local NCA to specify which specific data checks companies must perform. The technical list in Annex VII is comprehensive. It is not possible to verify that these data checks are consistent prior to the actual test reporting.	The data checks provided in the Guidelines are the minimum that undertakings will need to comply with . For the undertakings that will use xbrl, these checks will be included in the taxonomy.
621	IE	1,88	The extensive data checks will increase the workload and costs for the undertaking. Automatically built-in data checks would relieve the workload and therefore would be much appreciated.	Those data checks are going to be included in the taxonomy and therefore the procedure is fully automated
622	Munich Re	1,88	The Data Checks are too detailed and should be omitted. Most of the data checks can be summarized as "Data should be consistent". A principle based approach should be preferred, especially as a data reporting system has to be developed and is under serious implementation risk as no final version of Level 2 / Level 3 texts exists.	Data checks are automated and the level of details is not excessive
623	Assuralia	1,88	The extensive data checks will increase the workload and costs for the undertaking. Automatically built-in data checks would relieve the workload and therefore would be much appreciated.	Those data checks are going to be included in the taxonomy and therefore the procedure is fully automated
624	PZU	1,89	This point is in Section "Compliance and Reporting Rules General Comments", not Section IX.	Noted
625	GC	1,91	Companies will wish to know what their NCA intends to do at the earliest possible date.	Noted
626	PZU	1,91	This point is in Section "Compliance and Reporting Rules General Comments", not Section IX.	Noted
627	PZU	1,92	This point is in Section "Compliance and Reporting Rules General Comments", not Section IX.	Noted
628	PZU	1,93	There is no such point in the document "Consultation Paper on the Proposal for Guidelines on submission of information to national competent authorities" (EIOPA-CP-13/010; 27 March 2013).	Noted
629	PZU	1,94	There is no such point in the document "Consultation Paper on the Proposal for Guidelines on submission of information to national competent authorities" (EIOPA-CP-13/010; 27 March 2013).	Noted
630	PZU	1,95	There is no such point in the document "Consultation Paper on the Proposal for Guidelines on submission of information to national competent authorities" (EIOPA-CP-13/010; 27 March 2013).	Noted
631	PZU	1,96	There is no such point in the document "Consultation Paper on the Proposal for Guidelines on submission of information to national competent authorities" (EIOPA-CP-13/010; 27 March 2013).	Noted
632	Deloitte	Technical Annex I General Comments	Part of the information in "General comments" at the top of the log files (July 2012) is missing in Annexes I and II of the Consultation Paper. As this information is necessary for understanding how to fill out the QRTs (for example no individualised reporting for CICs 71, 72 and 73 for AS-D1) we would welcome clarification from EIOPA whether the general comments in the log files (July 2012) also apply during the preparatory phase or whether EIOPA is going to publish further documents where this information is included.	Some information from the general comments of the Log files have been included within the Technical Annex 1
633	GC	Technical Annex I General Comments	We have concentrated on the guidelines around reporting rather than the content and structure of the reporting templates themselves. For the remainder of the report we give some initial views of individual member associations of the Groupe without detailed analyses or discussion. We would welcome the opportunity to review the fine detail of the templates in a technical sense at a later date.	Noted
634	GDV	Technical Annex I General Comments	Given EIOPA's publication of the stabilised reporting package in July 2012, it would be far easier to comment on this Annex if a list of changes (if any) to that package was available, instead of simply replicating the requirements of the package alongside any such changes. Instructions to QRTs in Annexes I and II do not include some of general comments (Item "General Comment" in log files) that are part of the log files (Final report on public consultations CP11/009 and CP11/011) and quite essential for understanding of general requirements with regard to each QRT, for example, with regard to simplifications in AS-D1 (no individualised reporting for CICs 71, 72 and 73 in AS-D1 etc.). Therefore clarification from EIOPA is required whether the general comments included in log files are relevant during preparatory phase or EIOPA intends to publish additional instructions for QRTs during the preparatory phase that take missing general comments into account. We highly appreciate that, if EIOPA decides to take reporting requirements in the interim phase further, the complete quantitative reporting requirements under SII are limited to a subset of QRTs for the pre-application phase. Especially avoiding requesting critical templates (such as VA- and Re-templates) appears to be an appropriate approach. However as described below there are still some formula errors that needs to be addressed.	Noted. EIOPA will publish " Log Changes" listing all changes made to the templates and technical annexes since July 2012 publication and the consulted version of the Preparatory Guidelines as well as the final version of the Preparatory Guidelines
			Given EIOPA's publication of the stabilised reporting package in July 2012, it would be far easier to comment on this Annex if a list of changes (if any) to that package was available, instead of simply replicating the requirements of the package alongside any such changes.	

No.	Name	Reference	Comment	Resolution
635	IE	Technical Annex I General Comments	<p>Instructions to QRTs in Annexes I and II do not include some of general comments (Item "General Comment" in log files) that are part of the log files (Final report on public consultations CP11/009 and CP11/011) and quite essential for understanding of general requirements with regard to each QRT, for example, with regard to simplifications in AS-D1 (no individualised reporting for CICs 71, 72 and 73 in AS-D1 etc.). Therefore clarification from EIOPA is required whether the general comments included in log files are relevant during preparatory phase or EIOPA intends to publish additional instructions for QRTs during the preparatory phase that take missing general comments into account.</p> <p>We highly appreciate that, if EIOPA decides to take reporting requirements in the interim phase further, the complete quantitative reporting requirements under SII are limited to a subset of QRTs for the pre-application phase. Especially avoiding requesting critical templates (such as VA- and Re-templates) appears to be an appropriate approach.</p> <p>However as described below there are still some formula errors that needs to be addressed.</p>	<p>Noted.</p> <p>EIOPA will publish " Log Changes" listing all changes made to the templates and technical annexes since July 2012 publication and the consulted version of the Preparatory Guidelines as well as the final version of the Preparatory Guidelines</p> <p>Some information from the general comments of the Log files have been included within the Technical Annex 1</p>
636	MetLife	Technical Annex I General Comments	<p>Undertakings need to be certain that the reporting requirements will not be altered once the Guidelines have been published to avoid potential duplication of effort.</p>	<p>Noted.</p> <p>EIOPA will publish " Log Changes" listing all changes made to the templates and technical annexes since July 2012 publication and the consulted version of the Preparatory Guidelines as well as the final version of the Preparatory Guidelines</p>
637	RSA	Technical Annex I General Comments	<p>Given EIOPA's publication of the stabilised reporting package in July 2012, it would be far easier to comment on this Annex if a list of changes (if any) to that package was available, instead of simply replicating the requirements of the package with any such changes being already incorporated.</p>	<p>EIOPA will publish " Log Changes" listing all changes made to the templates and technical annexes since July 2012 publication and the consulted version of the Preparatory Guidelines as well as the final version of the Preparatory Guidelines</p>
638	AMICE	BI-1	<p>Balance Sheet</p> <p>We oppose any requirement to report Balance Sheet information should there be no agreement on Omnibus II before the end of 2013.</p>	<p>Noted</p>
639	MetLife	BI-1	<p>Undertakings need to be certain that the reporting requirements will not be altered once the Guidelines have been published to avoid potential duplication of effort.</p>	<p>EIOPA believes that the preparation for the submission of information under Solvency II is crucial.</p> <p>EIOPA has minimised the possibilities of changes with the use of only a sub-set of the information to be submitted in future. EIOPA is working under the assumption that Omnibus II and final delegated acts will be available in time for NCAs and undertakings to prepare for the submission of quantitative and qualitative information in 2015. In which case, at that stage, EIOPA would prepare technical specifications and provide guidance on the assumptions underlying the calculation of technical provisions and the standard formula calculation, which reflect the decision on OMDII and the available delegated acts .</p>
640	AMICE	BS-C1-2	<p>See comment above.</p>	<p>See comment above.</p>
641	GC	BS-C1-2	<p>The production of this template should be relatively straightforward once the Pillar I calculations are complete. However, annual reporting of this sheet seems to be sufficient. A quarterly reporting will be burdensome and costly.</p>	<p>This is a preparation. It has been considered important to include this requirement in the preparatory phase. Please note that quarterly submission of balance sheet do not require reporting of statutory balance sheet information</p>
642	GDV	BS-C1-2	<p>It is unnecessary to include statutory accounts figures in the preparatory reporting since the current reporting requirements are supposed to stay in force during the preparatory phase.</p>	<p>One of the principles of this template is to compare Solvency II values and statutory values. For this purpose, it is important that statutory numbers are reported in the same structure as solvency 2 balance sheet. This template aims at giving an overall view of the financial and solvency condition of the undertaking under Solvency II valuation rules, along with a quantitative reconciliation with statutory accounts.</p>
643	IE	BS-C1-2	<p>It is unnecessary to include statutory accounts figures in the preparatory reporting since the current reporting requirements are supposed to stay in force during the preparatory phase.</p>	<p>One of the principles of this template is to compare Solvency II values and statutory values. For this purpose, it is important that statutory numbers are reported in the same structure as solvency 2 balance sheet. This template aims at giving an overall view of the financial and solvency condition of the undertaking under Solvency II valuation rules, along with a quantitative reconciliation with statutory accounts.</p>
644	ROAM	BS-C1-2	<p>Balance Sheet</p> <p>Dans le cadre de la période transitoire, les membres de la ROAM s'opposent à l'exigence de transmettre un Bilan S2 si Omnibus 2 n'est pas adoptée avant fin 2013.</p>	<p>Noted</p>
645	AFM	BS-C1-3	<p>We support the exclusion of IFRS figures for quarterly reporting</p>	<p>There isn't any statutory account column in the quarterly BS_C1. "For quarterly reporting, the balance sheet data indicated in the previous paragraph should only consider valuation in accordance with article 75 of Solvency II ." This article only refers to Solvency II values, not to any other statutory value.</p>
646	AMICE	BS-C1-3	<p>See comment above.</p>	<p>There isn't any statutory account column in the quarterly BS_C1. "For quarterly reporting, the balance sheet data indicated in the previous paragraph should only consider valuation in accordance with article 75 of Solvency II ." This article only refers to Solvency II values, not to any other statutory value.</p>
647	Royal London Mutual	BS-C1-3	<p>We support the exclusion of IFRS figures for quarterly reporting</p>	<p>There isn't any statutory account column in the quarterly BS_C1. "For quarterly reporting, the balance sheet data indicated in the previous paragraph should only consider valuation in accordance with article 75 of Solvency II ." This article only refers to Solvency II values, not to any other statutory value.</p>

No.	Name	Reference	Comment	Resolution
648	AMICE	BS-C1D-4	See comment above.	There isn't any quarterly reporting for BS_C1D
649	GC	BS-C1D-4	This template is relatively straightforward on the assumption that unit-linked business is not required to be split by currency of the underlying securities on a look through basis.	Disagree. Undertakings have to split by currency all underlying assets of their unit-linked business.
650	IE	BS-C1D-4	The Interim Guidelines do not specify if values in BS-C1D shall be calculated according to "statutory accounts" or "Solvency II" valuation principles as stated in BS-C1.	As explained in the Technical Annex II, <i>the BS items presented here are based on BS-C1 (for SII BS only)</i> .
651	MetLife	BS-C1D-4	As this template will be difficult and cumbersome to report at a group level, we welcome the decision to require it only for Solo reporting. We believe the same should apply post Solvency II Implementation.	The exemption of BS_C1D for groups is only valid for the preparatory phase. For Solvency II implementation, its Summary Doc is still valid and explains that BS_C1D needs to be reported at group level also <i>"in case of default or combination methods"</i>
652	IRSG	AS-D1-5	<p>Annex 1: Detailed list of assets IRSG Opinion 2012 Part I Annex 1 Detailed list of assets Extract of general comments "The benefits to supervisors of the availability of detailed lists of assets do not outweigh the cost to insurers of providing them and IRSG questions the relevance to micro-prudential and macroprudential supervision. Moreover, given the dynamic nature of investment portfolios, in the event of specific holdings facing rapid reductions in value or exhibiting extreme volatility IRSG would expect microprudential and macroprudential supervisors to request ad hoc reports if annual or even quarterly reports were provided. IRSG believes that delivering a more suitable aggregation of assets will give more relevant information, sufficient to eliminate the need for the proposed detailed lists." EIOPA answer 2012 "30.The Solvency II framework gives undertakings extensive freedom to perform their activities as they see fit. A principle based regime, with a reduction in the prescribed constraints on the way undertakings are managed should be balanced with a higher degree of information to supervisory authorities to allow the latter to discharge their duties. Furthermore, the information required for reporting purposes will also be needed by undertaking to properly manage their investments under Solvency II. " Guidelines 2013 The detailed list of assets has to be given quarterly to NCAs. There is no links with the threshold previously mentioned (a total balance sheet of 12bn and 50% per cent national coverage. Assets backing unit-linked contracts are still present whereas the assets are closely matched to liabilities and insurers bear no financial risk on such contracts. In many ways unit linked funds are analogous with mutual funds and other collective investment schemes which are not subject to the same disclosure requirements. IRSG are also supportive of the fact that the look-through disclosure for investment funds (Asset template D4), is not part of the draft interim reporting templates. IRSG opinion on detailed list of assets and on the inclusion of assets backing unit-linked contract, expressed the 27 January 2012, still applies. The detailed list of assets shouldn't be required on a quarterly basis and, even on a yearly basis. Especially, assets backing closely matched unit linked contracts should be removed from all asset templates.</p>	Noted. Excluding unit-linked assets undermines a comprehensive view of the undertaking risk profile, in particular contagious risk. The security-by-security reporting will also concern unit-linked products, since we consider that these also present specific risks (for instance, undertakings selling bonds issued by entities of their own group, leading to conflicts of interests; or undertakings exposed to reputational risk if they have a major problem on one of their unit-linked; etc.).
653	CFOF_CROF	AS-D1-5	<p>Unit linked asset reporting should be excluded from the scope of detailed asset reporting. Asset template D1 interim reporting requires information on unit linked assets. Collection of line by line asset data of unit linked business appears to be driven primarily by Pillar 3 interim reporting. We believe this aspect should be deferred until full adoption of Solvency II as it will be particularly burdensome for limited benefit. Further, we believe that there should be an option to allow the submission of detailed asset data for non-EEA at a much higher level of granularity, i.e. on a summary basis and not on a line-by-line basis. In addition line-by-line analysis of assets should not be required for small holdings in assets that are individually immaterial; these holdings should be aggregated together and presented as a sub-total within the line by line asset analysis on AS-D1.</p>	Noted. On unit linked assets see comment 652. EIOPA confirms that no line-by-line reporting is required for assets held through investment funds
654	Deloitte	AS-D1-5	<p>Compared to "General Comments" in the log file (July 2012) for AS-D1 QRT Annexes I and II of the Consultation Paper lack information on how to deal with loans and mortgages. We would welcome clarification from EIOPA whether the instructions in the log file (July 2012) for AS-D1 QRT with respect to loans and mortgages to individuals (one row for loans to senior management board and one row for everything else) also apply during the preparation phase. Furthermore, we would welcome clarification from EIOPA with regard to loans to non-individuals as this is not further specified in the log file and information in the EIOPA Final Comments of July 2012 ("Comments_template_QRT_Assets_final") is contradictory: - Comment 54 says that legal persons are individuals as well. This implies that in total there only have to be two lines for loans and mortgages since a legal person includes companies and corporations. - On the other hand, comment 921 states that loans to collective entities (corporates) have to be shown on a different basis from those to individuals. Therefore, we would welcome if EIOPA clarified terms such as individuals, legal persons, corporates and collective entities more precisely. Alternatively, EIOPA could provide another meaningful specification that clarifies whether a separate row is needed for every loan to non-individuals. It should be taken into account that terms such as legal persons differ from member state to member state and thus may lead to a different interpretation of this requirement, which would lead to distortions among insurers in different countries.</p>	Noted. Will be included in the final version. By "individuals" it is understood, for this purpose, single persons like the senior manager of the undertaking, a person that holds a key function in the undertakings, a policyholder that is also a single person (not an entity in any of its legal formats). Corporates and collective entities are any entity that is not a person, whatever its legal form, like an insurance undertaking, a commercial bank, a policyholder that is a collective entity, like an employer that holds an Health insurance policy on behalf of its employees.

No.	Name	Reference	Comment	Resolution
655	GC	AS-D1-5	We repeat the previous comment that we do not agree with the need for a security-by-security listing for UL funds, and that asset category details (in line with that required for form D4 under full Solvency 2 reporting) should provide adequate information. It would be helpful if EIOPA could confirm that where the undertaking holds assets in the form of units or shares in investment funds operated by third-parties, that such assets are not subject to the look-through requirement applicable to directly-held assets of the undertaking.	Noted. On unit linked assets see comment 652. EIOPA confirms that, at solo level, no line-by-line reporting is required for assets held through investment funds At group level, EIOPA is still considering application of look through requirements and their reporting implications, where undertaking exercise a dominant influence over investment fund; clarification will be provided in the Technical specifications.
656	IE	AS-D1-5	Unit-linked asset reporting should be excluded from the scope of detailed asset reporting. Asset template D1 interim reporting requires information on unit linked assets. Collection of line by line asset data of unit linked business appears to be driven primarily by Pillar 3 interim reporting. We believe this aspect should be deferred until full adoption of Solvency II as it will be particularly burdensome for limited benefit. Further, we believe that there should be an option to allow the submission of detailed asset data for non-EEA at a much higher level of granularity, ie on a summary basis and not on a line-by-line basis. In addition line-by-line analysis of assets should not be required for small holdings in assets that are individually immaterial; these holdings should be aggregated together and presented as a sub-total within the line by line asset analysis on AS-D1.	See comment 653
657	MetLife	AS-D1-6	We welcome the change in treatment of participations in other financial sectors. We suggest this continue to be applicable once SII is implemented.	Noted
658	GC	AS-D20-7	Same comment as AS-D1 above.	Noted
659	AMICE	TP-F1-9	We oppose any requirement to submit information related to technical provisions there should be no agreement on Omnibus II before the end of 2013.	EIOPA consider preparation for submission of information under Solvency 2 as crucial. The final Solvency 2 Directive requirements will be determined by the OMDII and the delegated acts (Level 2). EIOPA is working under the assumption that these measures will be available in time for NCAs and undertakings to prepare for the submission of preparatory reporting in 2015. In which case, at that stage, EIOPA would prepare technical specifications and provide guidance on the assumptions underlying calculation of technical provisions and the standard formula calculation, which reflect decision of OMD II and the delegated acts. If there is a further delay to Solvency II legislative process and the above assumptions are not correct, EIOPA will review the deadlines for submission of information at the end of 2013 based on the latest developments. Following the consultation process, the revision clause was introduced in the Guidelines.
660	Deloitte	TP-F1-9	Could you please confirm that our understanding of reporting requirements for the technical provisions templates is correct: 2014 -> Annual reporting of: - TP-F1Q, TP-E1Q - TP-F1, TP-E1 (only information w.r.t. best estimates by country) 2015 -> Annual reporting of: - TP-F1, TP-E1 (only information w.r.t. best estimates by country) - no annual reporting of TP-F1Q and TP-E1Q 2015 -> Quarterly reporting (3rd and 4th quarter) of - TP-F1Q and TP-E1Q For insurers that only have business in their home country, reporting of TP-F1 and TP-E1 would not add value as this information is already included in TP-F1Q and TP-E1Q. Therefore, we suggest that insurers with business only in their home country be exempted from reporting TP-F1 and TP-E1 during the preparation phase.	Annual reporting 2014 - Correct Annual reporting 2015 - no reporting as only one year submission Quarterly reporting 2015 - Only 3rd quarter reporting. Decision taken to need only report one quarterly report. Changed in Guideline. Change to report F1 for annual reporting and not F1Q for annual and quarterly. Home country has one line to be reported. If only Home country data reported this will also give confirmation that no other country exist within the undertaking for BE.
661	GDV	TP-F1-9	The gross best estimate split per country, where the risk is located, will not be applicable for certain LoB, e.g. life reinsurance. Comment also applicable to TP-E1-10	The criteria of 'localization of risk' is required. No possible to cover all/extreme cases, undertaking will have to use their judgment to provide correct data, in line with assumptions used for the calculation of TP.
662	IE	TP-F1-9	The gross best estimate split per country, where the risk is located, will not be applicable for certain LoB, e.g. life reinsurance. Comment also applicable to TP-E1-10	See comment 661

No.	Name	Reference	Comment	Resolution
663	ROAM	TP-F1-9	Life and Health similar to Life Techniques Technical Provisions Dans le cadre de la période transitoire, les membres de la ROAM s'opposent à l'exigence de transmettre des états de provisions techniques S2 si Omnibus 2 n'est pas adoptée avant fin 2013.	EIOPA consider preparation for submission of information under Solvency 2 as crucial. The final Solvency 2 Directive requirements will be determined by the OMDII and the delegated acts (Level 2). EIOPA is working under the assumption that these measures will be available in time for NCAs and undertakings to prepare for the submission of preparatory reporting in 2015. In which case, at that stage, EIOPA would prepare technical specifications and provide guidance on the assumptions underlying calculation of technical provisions and the standard formula calculation, which reflect decision of OMD II and the delegated acts. If there is a further delay to Solvency II legislative process and the above assumptions are not correct, EIOPA will review the deadlines for submission of information at the end of 2013 based on the latest developments. Following the consultation process, the revision clause was introduced in the Guidelines.
664	AMICE	TP-E1-10	See comment above.	See response to the comment 659
665	AON	TP-E1-10	For certain lines of business (e.g. Marine) information on the specific geographic location of risk is not available. Proxies will need to be used.	According to the instruction for reporting of BE by country, the criteria of the 'localization of risk' is required only some LoBs and for the others (e.g. Marine) the criteria of 'country of underwriting' applies.
666	Deloitte	TP-E1-10	1) see comment in "TP-F1-9" 2) Split of technical provisions among countries based on the localization of risk which is required for the following LoBs (Log File July 2012) might be difficult. We would appreciate more exact guideline on localization of risk. - Medical expense - Income protection - Workers' compensation - Fire and other damage to property - Credit and suretyship The example is medical expense insurance. The extreme case might look like the following - Czech policyholder concluded policy in Austria with coverage in whole Europe, falls ill in Hungary, and is hospitalised in Slovakia. What would be the country under which the technical provision should be presented?	The criteria of 'localization of risk' is required for a limited number of LoBs (5 out of 12 LoBs) for which it was thought it should work. No possible to cover all/extreme cases, undertaking will have to use their judgment to provide correct data, in line with assumptions used for the calculation of TP.
667	DublinIMA	TP-E1-10	For certain lines of business (eg Marine) information on the specific geographic location of risk is not available. Proxies will need to be used.	See response to the comment 665
668	ECIROA	TP-E1-10	For certain lines of business (eg Marine) information on the specific geographic location of risk is not available. Proxies will need to be used.	See response to the comment 665
669	GC	TP-E1-10	b) (DCH): Split of technical provisions among countries based on the localization of risk which is required for the following LoBs might be difficult. We would appreciate more exact guideline on localization of risk. - Medical expense - Income protection - Workers' compensation - Fire and other damage to property - Credit and surety ship The example is medical expense insurance. The extreme case might look like the following - Czech policyholder concluded policy in Austria with coverage in the whole Europe, falls ill in Hungary, and is hospitalised in Slovakia. What would be the country under which the TP should be presented?	See response to the comment 666
670	GDV	TP-E1-10	For several lines of insurance and reinsurance written such as marine and transit, information on the specific geographical location of risk is not available.	See response to the comment 665
671	IE	TP-E1-10	For several lines of insurance and reinsurance written such as marine and transit, information on the specific geographical location of risk is not available. Proxies will need to be used.	See response to the comment 665
672	ROAM	TP-E1-10	Non-life Technical Provisions Dans le cadre de la période transitoire, les membres de la ROAM s'opposent à l'exigence de transmettre des états de provisions techniques S2 si Omnibus 2 n'est pas adoptée avant fin 2013.	see response to the comment 663
673	AMICE	TP-F1Q-11	See comment above.	See response to the comment 659
674	Deloitte	TP-F1Q-11	Please see comments in "TP-F1-9"	See response to the comment 660
675	GDV	TP-F1Q-11	It should not be required to split the Risk Margin by LoB. Any split should be determined by the undertaking itself.	It is required to report the allocation of the total risk margin to the prescribed LoBs following the L2 requirements
676	IE	TP-F1Q-11	It should not be required to split the Risk Margin by LoB. Any split should be determined by the undertaking itself.	See response to the comment 675

No.	Name	Reference	Comment	Resolution
677	ROAM	TP-F1Q-11	Life and Health similar to Life Techniques Technical Provisions Dans le cadre de la période transitoire, les membres de la ROAM s'opposent à l'établissement d'états trimestriels pendant la période transitoire qui conduirait à augmenter encore de manière considérable les coûts. De plus, il n'est pas acceptable que le niveau de détail de ces états soit proche de celui demandé pour les états annuels.	EIOPA considers setting up systems and processes and procedures for quarterly reporting, as well as submitting quarterly information as defined in the guidelines, as and important part of the preparation process
678	AMICE	TP-E1Q-12	See comment above.	See response to the comment 659
679	Deloitte	TP-E1Q-12	Please see comments in "TP-F1-9"	See response to the comment 660
680	ROAM	TP-E1Q-12	Non-life Technical Provisions Dans le cadre de la période transitoire, les membres de la ROAM s'opposent à l'établissement d'états trimestriels pendant la période transitoire qui conduirait à augmenter encore de manière considérable les coûts. De plus, il n'est pas acceptable que le niveau de détail de ces états soit proche de celui demandé pour les états annuels.	See response to the comment 667. Following the consultation process it has been decided to use a quarterly layout for quarterly reporting and annual layout for annual reporting (clearly identifying cells that are not applicable during preparatory phase)
681	GC	OF-B1Q-13	This template appears a combination of the previous solo OF-B1 template and the previous OF-B1 group template. We suggest splitting it into the original 2 templates as was the case in the set published by EIOPA in 2012. We disagree with the detailed level of the public disclosure requirements proposed for both the preparatory phase and live environment. It is much too detailed. In particular we don't agree to the idea of public disclosure the EPIFP. We support the approach of including EPIFP in Tier 1 as part of the reconciliation reserve. Any tiering of EPIFP would result in double-counting of risks which are already taken into consideration in the calculation of both technical provisions and the SCR. While we acknowledge the importance of liquidity risk management in general, we do not understand the rationale behind monitoring EPIFP separately from other cash inflows and cash outflows. We do not think it would make sense to identify EPIFP separately as the concept of EPIFP seems to be contradictory to the economic balance sheet approach under Solvency II. It appears to be unclear which concern the concept of EPIFP is trying to address and why the identification of this particular aspect of expected cash inflows is necessary to achieve the Solvency II objectives.	Reporting and disclosure of EPIFP is a Level II requirement - the templates will follow these requirements. The own funds template has been split for solo and groups separately.
682	GDV	OF-B1Q-13	Where in the template shall non-available Tier 2 Own Funds on group level which is not subordinated liabilities or DTA be reported?	The comment is not very clear, since there are other lines than subordinated liabilities where groups can insert non available tier 2 OF items such as ordinary share capital, preference shares... About the tiering of DTA, it's Tier 3 at solo level then we need to keep the same tiering at group level.
683	IE	OF-B1Q-13	Where in the template shall non-available Tier 2 Own Funds on group level which is not subordinated liabilities or DTA be reported?	The comment is not very clear, since there are other lines than subordinated liabilities where groups can insert non available tier 2 OF items such as ordinary share capital, preference shares... About the tiering of DTA, it's Tier 3 at solo level then we need to keep the same tiering at group level.
684	If P&C	OF-B1Q-13	Where in the template shall non- available tier 2 own funds on group level which is not subordinated liabilities or DTA be reported?	The comment is not very clear, since there are other lines than subordinated liabilities where groups can insert non available tier 2 OF items such as ordinary share capital, preference shares... About the tiering of DTA, it's Tier 3 at solo level then we need to keep the same tiering at group level.
685	GC	SCR-B2A-14	The same holds for this template as for the OF-B1Q as remarked above.	It is not clear to which above comment you refer. See response to the comment 681 and 929
686	GDV	SCR-B2A-14	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 124 and 191
687	IE	SCR-B2A-14	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 125 and 192
688	RSA	SCR-B2A-14	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 132 and 198
689	CFOF_CROF	SCR-B2A-15	Our understanding of this requirement is that no data is required in relation to entities brought in under Method 2. This is same for all of the capital requirements templates.	SCR templates are not applicable when deduction and aggregation method is used to determine group solvency capital requirement
690	GDV	SCR-B2A-15	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 124 and 191
691	IE	SCR-B2A-15	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 125 and 192
692	IE	SCR-B2A-15	Our understanding of this requirement is that no data is required in relation to entities brought in under Method 2. This is same for all of the capital requirements templates.	SCR templates are not applicable when deduction and aggregation method is used to determine group solvency capital requirement
693	RSA	SCR-B2A-15	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 132 and 198
694	GDV	SCR-B2B-16	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 124 and 191
695	IE	SCR-B2B-16	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 125 and 192
696	RSA	SCR-B2B-16	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 132 and 198
697	GDV	SCR-B2B-17	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 124 and 191
698	IE	SCR-B2B-17	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 125 and 192
699	RSA	SCR-B2B-17	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 132 and 198
700	AMICE	SCR-B3A-20	Market Risk We oppose any requirement to report solo SCR related information if Omnibus II has not been agreed at political level before the end of 2013. We oppose any requirement to report solo SCR related information if Omnibus II has not been agreed at political level before the end of 2013.	EIOPA acknowledges undertakings concerns about uncertainties as to Omnibus 2 negotiations and their impact on Pillar 1 requirements and as a consequence, a possible impact on Pillar 3 requirements. . However it believes that the preparation for the submission of information under Solvency II is crucial. In addition, EIOPA is working under the assumption that OMBII and delegated acts requirements will be available in time for NCAs and undertakings to prepare for interim reporting; In which case, at that stage, EIOPA will prepare a technical specification on Pillar 1 quantitative issues and provide guidance on the assumptions underlying the calculation of the standard formula calculation, which reflect the decision on OMBII.

No.	Name	Reference	Comment	Resolution
701	BVI	SCR-B3A-20	In our view, our members need further advice to fulfill the Template SCR-B3A-T (Quantitative reporting templates - Solvency Capital Requirements - Market risk). In particular, it is unclear which processes should subsequently be used to identify the special market risks such as interest rate risk, spread risk, market risk concentration. This depends on the findings of the Quantitative Impact Studies (QIS) and the finalised Level 2 Measures to Solvency II. At present, the reliability of the data provided is not known and no such data are publicly available.	See response to the comment 700
702	GC	SCR-B3A-20	The requirement to produce asset and liability values pre and post shock should relate to the full assets and liabilities as opposed to that portion which is impacted by the stress. The process of identifying the portion of assets and liabilities impacted by the stress is very involved and does not add value. The sub module CCP-risk is explicitly excluded from the requested information in the template. The LTGA study has been set up to particularly to investigate the CCP (and MA). As a consequence, this is currently a relevant part of the SCR and should not be missing.	EIOPA's intention is to promote effective supervision by focusing the reporting on the assets and liabilities that are affected by the shock. Most of the modules are scenario based and the shock impacts both assets and liabilities under specific scenario (.e.g. derivatives out of the money); for some undertakings the liabilities cells could be the same but not for all. Therefore, EIOPA consider it important to include SCR reporting at the granular level during preparatory phase At the time of responding to the comments, Omnibus 2 negotiations are on-going and an outcome is unknown, and therefore this was left out of the preparatory phase."
703	GDV	SCR-B3A-20	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 124 and 191
704	IE	SCR-B3A-20	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 125 and 192
705	ROAM	SCR-B3A-20	Market risk Dans le cadre de la période transitoire, la ROAM s'oppose à l'exigence de transmettre des informations sur le SCR Solo si Omnibus 2 n'est pas adoptée avant fin 2013.	See response to the comment 700
706	RSA	SCR-B3A-20	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 132 and 198
707	AMICE	SCR-B3A-21	We oppose any requirement to report group SCR related information if Omnibus II has not been agreed at political level before the end of 2013.	See response to the comment 700
708	GDV	SCR-B3A-21	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 124 and 191
709	IE	SCR-B3A-21	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 125 and 192
710	ROAM	SCR-B3A-21	Market risk Dans le cadre de la période transitoire, la ROAM s'oppose à l'exigence de transmettre des informations sur le SCR Groupe si Omnibus 2 n'est pas adoptée avant fin 2013.	See response to the comment 705
711	RSA	SCR-B3A-21	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 132 and 198
712	AMICE	SCR-B3B-22	Counterparty Default Risk We oppose any requirement to report solo SCR related information if Omnibus II has not been agreed at political level before the end of 2013. We oppose any requirement to report solo SCR related information if Omnibus II has not been agreed at political level before the end of 2013.	See response to the comment 700
713	GDV	SCR-B3B-22	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 124 and 191
714	IE	SCR-B3B-22	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 125 and 192
715	ROAM	SCR-B3B-22	Counterparty Default Risk Dans le cadre de la période transitoire, la ROAM s'oppose à l'exigence de transmettre des informations sur le SCR Solo si Omnibus 2 n'est pas adoptée avant fin 2013.	See response to the comment 700
716	RSA	SCR-B3B-22	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
717	AMICE	SCR-B3B-23	We oppose any requirement to report group SCR related information if Omnibus II has not been agreed at political level before the end of 2013.	See response to the comment 700
718	GDV	SCR-B3B-23	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
719	IE	SCR-B3B-23	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
720	ROAM	SCR-B3B-23	Counterparty Default Risk Dans le cadre de la période transitoire, la ROAM s'oppose à l'exigence de transmettre des informations sur le SCR Groupe si Omnibus 2 n'est pas adoptée avant fin 2013.	See response to the comment 715
721	RSA	SCR-B3B-23	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
722	GC	SCR-B3C-24	Same comment as SCR-B3A above.	See response to the comment 702
723	GDV	SCR-B3C-24	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 124 and 191
724	IE	SCR-B3C-24	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 125 and 192
725	ROAM	SCR-B3C-24	Life Underwriting Risk Dans le cadre de la période transitoire, la ROAM s'oppose à l'exigence de transmettre des informations sur le SCR Solo si Omnibus 2 n'est pas adoptée avant fin 2013.	EIOPA acknowledges undertakings concerns about uncertainties as to Omnibus 2 negotiations and their impact on Pillar 1 requirements and as a consequence, a possible impact on Pillar 3 requirements. . However it believes that the preparation for the submission of information under Solvency II is crucial.
726	RSA	SCR-B3C-24	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 132 and 198
727	GDV	SCR-B3C-25	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 124 and 191
728	IE	SCR-B3C-25	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 125 and 192

No.	Name	Reference	Comment	Resolution
729	ROAM	SCR-B3C-25	Life Underwriting Risk Dans le cadre de la période transitoire, la ROAM s'oppose à l'exigence de transmettre des informations sur le SCR Groupe si Omnibus 2 n'est pas adoptée avant fin 2013.	See response to the comment 725
730	RSA	SCR-B3C-25	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 132 and 198
731	AMICE	SCR-B3D-26	Health Underwriting Risk We oppose any requirement to report solo SCR related information if Omnibus II has not been agreed at political level before the end of 2013. We oppose any requirement to report solo SCR related information if Omnibus II has not been agreed at political level before the end of 2013.	EIOPA acknowledges undertakings concerns about uncertainties as to Omnibus 2 negotiations and their impact on Pillar 1 requirements and as a consequence, a possible impact on Pillar 3 requirements. . However it believes that the preparation for the submission of information under Solvency II is crucial.
732	GC	SCR-B3D-26	Same comment as SCR-B3A above.	See response to the comment 702
733	GDV	SCR-B3D-26	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 124 and 191
734	IE	SCR-B3D-26	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 125 and 192
735	ROAM	SCR-B3D-26	Health Underwriting Risk Dans le cadre de la période transitoire, la ROAM s'oppose à l'exigence de transmettre des informations sur le SCR Solo si Omnibus 2 n'est pas adoptée avant fin 2013.	EIOPA acknowledges undertakings concerns about uncertainties as to Omnibus 2 negotiations and their impact on Pillar 1 requirements and as a consequence, a possible impact on Pillar 3 requirements. . However it believes that the preparation for the submission of information under Solvency II is crucial.
736	RSA	SCR-B3D-26	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 132 and 198
737	AMICE	SCR-B3D-27	We oppose any requirement to report group SCR related information if Omnibus II has not been agreed at political level before the end of 2013.	See response to the comment 731
738	GDV	SCR-B3D-27	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 124 and 191
739	IE	SCR-B3D-27	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 125 and 192
740	ROAM	SCR-B3D-27	Health Underwriting Risk Dans le cadre de la période transitoire, la ROAM s'oppose à l'exigence de transmettre des informations sur le SCR Groupe si Omnibus 2 n'est pas adoptée avant fin 2013.	See response to the comment 735
741	RSA	SCR-B3D-27	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 132 and 198
742	AMICE	SCR-B3E-28	Non-Life Underwriting Risk We oppose any requirement to report solo SCR related information if Omnibus II has not been agreed at political level before the end of 2013. We oppose any requirement to report solo SCR related information if Omnibus II has not been agreed at political level before the end of 2013.	EIOPA acknowledges undertakings concerns about uncertainties as to Omnibus 2 negotiations and their impact on Pillar 1 requirements and as a consequence, a possible impact on Pillar 3 requirements. . However it believes that the preparation for the submission of information under Solvency II is crucial.
743	GC	SCR-B3E-28	Why should insurers not report USPs in the preparatory phase? Given that Internal Model SCR figures should be reported, it seems inconsistent not to report USPs as well.	Undertakings are not to use USP as there is no pre-approval process in place as for internal model
744	GDV	SCR-B3E-28	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 124 and 191
745	IE	SCR-B3E-28	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 125 and 192
746	ROAM	SCR-B3E-28	Non-Life Underwriting Risk Dans le cadre de la période transitoire, la ROAM s'oppose à l'exigence de transmettre des informations sur le SCR Solo si Omnibus 2 n'est pas adoptée avant fin 2013.	EIOPA acknowledges undertakings concerns about uncertainties as to Omnibus 2 negotiations and their impact on Pillar 1 requirements and as a consequence, a possible impact on Pillar 3 requirements. . However it believes that the preparation for the submission of information under Solvency II is crucial.
747	RSA	SCR-B3E-28	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 132 and 198
748	AMICE	SCR-B3E-29	We oppose any requirement to report group SCR related information if Omnibus II has not been agreed at political level before the end of 2013.	See response to the comment 742
749	GDV	SCR-B3E-29	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 124 and 191
750	IE	SCR-B3E-29	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 125 and 192
751	ROAM	SCR-B3E-29	Non-Life Underwriting Risk Dans le cadre de la période transitoire, la ROAM s'oppose à l'exigence de transmettre des informations sur le SCR Groupe si Omnibus 2 n'est pas adoptée avant fin 2013.	See response to the comment 746
752	RSA	SCR-B3E-29	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 132 and 198
753	AMICE	SCR-B3F-30	Catastrophe Risk Underwriting Risk This template will put a heavy burden on undertakings. This template has been designed not only to allow an understanding of how the SCR catastrophe risk module has been calculated and what are the main risk drivers but also to grant supervisors the computation of this module with the information provided. We believe that the application of reinsurance to the catastrophe risk module cannot be standardised in a predefined reporting template so that it is appropriate in all cases. While specific criteria are defined in the EIOPA Level 3 guidelines, a more flexible approach on the required information should be taken. This template will put a heavy burden on undertakings. This template has been designed not only to allow an understanding of how the SCR catastrophe risk module has been calculated and what are the main risk drivers but also to grant supervisors the computation of this module with the information provided.	Undertakings only using the Standard Formule must use the consulted templates which are based on the final version when Solvency II will be implemented. The flexible approach regarding the application of reinsurance will be reflected by the Level 3 Guidelines.

No.	Name	Reference	Comment	Resolution
			We believe that the application of reinsurance to the catastrophe risk module cannot be standardised in a predefined reporting template so that it is appropriate in all cases. While specific criteria are defined in the EIOPA Level 3 guidelines, a more flexible approach on the required information should be taken.	
754	GDV	SCR-B3F-30	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 122
755	IE	SCR-B3F-30	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See comment 754
756	ROAM	SCR-B3F-30	Non-Life Catastrophe Risk Dans le cadre de la période transitoire, la ROAM s'oppose à l'exigence de transmettre des informations sur le SCR Solo si Omnibus 2 n'est pas adoptée avant fin 2013.	See response to the comment 746
757	RSA	SCR-B3F-30	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See comment 754
758	GDV	SCR-B3F-31	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See comment 754
759	IE	SCR-B3F-31	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See comment 754
760	ROAM	SCR-B3F-31	Non-Life Catastrophe Risk Dans le cadre de la période transitoire, la ROAM s'oppose à l'exigence de transmettre des informations sur le SCR Groupe si Omnibus 2 n'est pas adoptée avant fin 2013.	See response to the comment 746
761	RSA	SCR-B3F-31	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See comment 754
762	AMICE	SCR-B3G-32	Operational Risk We oppose any requirement to report solo SCR related information if Omnibus II has not been agreed at political level before the end of 2013. We oppose any requirement to report solo SCR related information if Omnibus II has not been agreed at political level before the end of 2013.	EIOPA acknowledges undertakings concerns about uncertainties as to Omnibus 2 negotiations and their impact on Pillar 1 requirements and as a consequence, a possible impact on Pillar 3 requirements. . However it believes that the preparation for the submission of information under Solvency II is crucial.
763	GDV	SCR-B3G-32	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 124 and 191
764	IE	SCR-B3G-32	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 125 and 192
765	ROAM	SCR-B3G-32	Operational Risk Dans le cadre de la période transitoire, la ROAM s'oppose à l'exigence de transmettre des informations sur le SCR Solo si Omnibus 2 n'est pas adoptée avant fin 2013.	See response to the comment 746
766	RSA	SCR-B3G-32	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 132 and 198
767	AMICE	SCR-B3G-33	We oppose any requirement to report group SCR related information if Omnibus II has not been agreed at political level before the end of 2013.	See response to the comment 762
768	GDV	SCR-B3G-33	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 124 and 191
769	IE	SCR-B3G-33	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 125 and 192
770	ROAM	SCR-B3G-33	Operational Risk Dans le cadre de la période transitoire, la ROAM s'oppose à l'exigence de transmettre des informations sur le SCR Groupe si Omnibus 2 n'est pas adoptée avant fin 2013.	See response to the comment 765
771	RSA	SCR-B3G-33	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 132 and 198
772	AMICE	Technical Annex II General Comments	We are aware EIOPA has not published any of the changes agreed as from the publication of the stabilised reporting package in July 2012. It is not clear either whether undertakings will have to resort to the LOG files published in July 2012 or they would have to stick to the instructions to QRTs in Annexes I and II.	Noted. EIOPA will publish a changes LOG. The instructions for preparatory submission of information are the ones issued under these Guidelines and undertakings should not refer to the previous published LOG files. Furthermore, these instructions will be part of the future Reporting ITS
773	Bloomberg	Technical Annex II General Comments	A9 Issuer Sector: Bloomberg is concerned about EIOPA's new recommendation for using S&P GICS to classify the economic sector of issuer. GICS does not provide adequate coverage; one key example is that it does not support the government or non-corporate sectors; so, all the debt securities issued by sovereign, multi-nationals, local, muni governments do not have the appropriate GICS codes. Last year EIOPA recommended NACE or another industry classification; many companies and vendors including Bloomberg have implemented NACE classifications which are more comprehensive. The GICS recommendation is biased towards a particular vendor and subjects the entire insurance industry and their asset managers / custodians to a single vendor's SLA and licensing models; it unfairly stifles competition.	Noted. See also comment 776.
774	BVI	Technical Annex II General Comments	We propose that the Templates should provide the possibility to use the global LEI (Legal Entity Identifier). As soon as the final LEI is not available, the so called Pre LEI should be used for the reporting obligation. The LEI will be used for all kinds of regulatory reporting, and - in the long run - for many more operations within financial services firms.	LEI has been now introduced to the template
			General Comments Does the "Technical Annex II: List of quantitative reporting items" section replace the existing log files? If so, it would have been useful if the changes in the log files were highlighted. Also it appears that there was some useful information from the log files deleted, one example is for BS-C1-L, where the following has been deleted "Indication for health similar to non-life should be treated as reference to the following LoBs: Medical expense insurance, ". Will items such as this be reinstated? If not, what was the rationale for deleting them? Balance sheet QRT ("BS-C1-L") A14A - Loans on Policies says "See cross-templates checks tab CAS 4". We do not believe that this is relevant as BS-C1-L also says "A14=A14A+A14B+A14C" and correctly refers to CAS 4.	

No.	Name	Reference	Comment	Resolution
775	IE	Technical Annex II General Comments	<p>CAS 4 in "Technical Annex VII: Data checks" is incorrect as it has both BS_C1.A14 and BS_C1.A14A hence we are effectively double counting A14A in that cross check. This is also noted as a change to CAS 4 in the feedback on "Technical Annex VII: Data checks" below.</p> <p>A16 "Reinsurance recoverables from:" says "See cross-templates checks tab CGS 11 See cross-templates checks tab CGS 13",</p> <p>A16 is noted in both CGS 11 and CGS 13, when it should only be included in one. This point is also noted as a change to CGS 13 in the feedback on "Technical Annex VII: Data checks" below. Once the cross checks are corrected, the reference in A16 needs to be amended accordingly.</p> <p>- The formula for A30 for the Statutory accounts value is wrong, it needs to include AS1 and AS24</p> <p>A possible change could be rename cell A30 for the "Statutory accounts value" column, and call it AS30 and add the following in Annex II.</p> <p>AS30 - Total assets - "Sum of the assets A30=AS1+AS24+A2+A26+A25B+A3+A4+A12+A14+A16+A13+A20+A21+A23+A28A+A28B+A27+A29". Please note if there are any further changes to the BS-C1 QRT form then this formula may have to be reviewed.</p> <p>Own funds QRT ("OF-B1Q-L") - A53 "MCR (solo)" says "This is the MCR of the undertaking and should correspond to the total MCR disclosed in MCR B2A "</p> <p>The above should not refer to MCR B2A, instead it should say "MCR B2B if a composite firm, or MCR B2A if not a composite firm."</p> <p>- It appears that the following has been deleted from B26 "Other basic own fund items", we have assumed that the formula is still relevant.</p> <p>"Solo formula- 'B26=(A1-B24)+A2+A3+A4 +A6+A8+A9+A15+A16". Please confirm that this is the case. This of course may need to be updated if there were any further changes to the "OF-B1Q"QRT.</p> <p>Assets and liabilities by currency QRT ("BS-C1D-L") - A16 in BS-C1 needs to be included in one of the lines.</p>	<p>Noted on the missing parts from the former LOG files. It will be reviewed and included where needed. Correction on CAS 4 has been made.</p> <p>CGS 13 and CGS 11 has been deleted because BS_C1D will not be used for group reporting. The formula for A 30 for the statutory accounts column has been corrected in BS_C1.</p> <p>B26 has been included in the cross-templates checks with OF_B1 template.</p>
776	IMA	Technical Annex II General Comments	<p>Technical Annex II: List of quantitative reporting items AS-D1-L Detailed list of assets =====</p> <p>A9 Issuer Sector (Economic sector of issuer) EIOPA-CP-13/010 27 March 2013 Consultation Paper on the Proposal for Guidelines on submission of information to national competent authorities</p> <p>In previous versions of Solvency II reporting templates the economic sector of issuer was specified as "NACE or equivalent". However the most recent version, as it appears in EIOPA-CP-13/010 27 March 2013, narrows the choice completely to GICs (Global Industry Classification Standard) only. There is a concern that by selecting a single exclusive eligible data source would create a monopoly for the GICs supplier. Therefore to prevent disproportionate data costs we propose that either reasonable cost license for GICs is stipulated by EIOPA (e.g. a reasonable fee for each Insurer and no charge for other parties involved in reporting) or alternatively the choice is widened once more (e.g. "NACE, GICs or ICB can be used")</p> <p>"Identify the economic sector of issuer, based on the GICS (Global Industry Classification Standard). One of the options in the following closed list shall be used: Energy Materials Capital Goods"</p> <p>A24 Valuation method SII EIOPA-CP-13/010 27 March 2013 Consultation Paper on the Proposal for Guidelines on submission of information to national competent authorities</p> <p>The following categorisation differs from the International Accounting Standards Board (IASB) IFRS 7 Fair value hierarchy (Levels 1, 2 and 3). We propose that the Solvency II valuation method should be changed to be consistent with IASB's existing reporting guidelines for Insurers, or alternatively that IASB should be consulted in order to achieve consistent regulatory reporting obligations for Insurers</p> <p>"Identify the valuation method used when valuing assets. One of the options in the following closed list shall be used: 1. Quoted market price in active markets for the same assets: QMP 2. Alternative valuation method - quoted market price in active markets for similar assets: QMPS 3. Alternative valuation method - other alternative valuation methods: AVM 4. Adjusted equity methods (applicable for the valuation of participations): AEM 5. IFRS equity methods (applicable for the valuation of participations): IEM"</p>	<p>EIOPA highlighted in the July 2012 Report that the code to be used to identify the "Economic sector of issuer" was not decided yet, making however a reference to NACE. In CP-13/010 EIOPA proposed the use of the GICS code based on different feedbacks and analysis of the purpose.</p> <p>Since then different views were received from different types of stakeholders. Considering that NACE is the code defined by European Union for statistical purposes and is also adequate for prudential analysis of the investments and that NACE is free of charge EIOPA, after having fully considered all arguments, decided to ask the identification of the "Economic sector of issuer" using the letter reference of the NACE code for identifying sectors (e.g. A: Agriculture, hunting and forestry; Section B: Fishing, etc.) except for the NACE relating to Section J: Financial intermediation, for which the 4 digits code should be used.</p>
777	AFM	Technical Annex III General Comments	<p>There are a number of changes to the templates from the version issued in July 2012. It would be helpful to clarify if these are changes that will also apply to the full reporting after full implementation.</p>	<p>EIOPA confirms that the present reporting requirements version will be maintained in the full reporting after full SII implementation.</p>

No.	Name	Reference	Comment	Resolution
778	MetLife	Technical Annex III General Comments	Whilst comparing the QRTs in this appendix to those released in July 2012 we identified a number of changes (in addition to the elements highlighted as not being required for the purpose of the preparatory phase) Are these updated QRTs specifically for the preparatory phase or do they supersede those that were issued in July 2012?	See comment 777
779	PZU	Technical Annex III General Comments	<p>1. Burdensome Requirements:</p> <p>In general the level of data disaggregation and the number of details required to be reported during implementation phase (through quantitative reporting templates) is very extensive. Due to the high cost of reporting requirement's implementation (at the level of single undertaking) the regulator is expected to prove that the data in such disaggregation are indeed necessary to report and that each reported position shall be used by the regulator. This is especially the case of data requirements in the assets templates (AS-D1-L, AS-D2O-L) in which for each separate asset unit 26 positions must be reported (33 positions in terms of derivatives – open positions). It is questionable to what extend the requested data are supported by Pillar I requirements and what the purpose is of reporting it to NCA. The reporting burden is not proportionate to the goals assumed for transition (implementation) phase.</p> <p>Based on the above we would like to propose to exclude reporting templates used of the purpose of financial stability reporting and templates covering detailed list of assets and derivatives (i.e. Assets and liabilities by currency, Life and Health SLT Technical Provisions – Best Estimate by country, Non-life Technical Provisions – Best Estimate by country, Detailed list of assets, Detailed list of derivatives – open positions)</p> <p>2. Pillar I vs. Pillar III:</p> <p>We would like to point out our considerations relating to potential inconsistencies between Pillar I and Pillar III. In our opinion the main role of Pillar III is reporting based on data (analysis, calculations) provided by Pillar I. Any additional reporting requirements which cannot be easily supported by Pillar I should be excluded from the final reporting requirements.</p> <p>Examples of inconsistencies:</p> <p>A. Treatment of property. Under Pillar I the whole property is treated as an investment while under Pillar III there is a split of property between property for own use and investment property.</p> <p>3. Data availability:</p> <p>In many areas of reporting the required data are not readily available. Especially in the areas of assets some of the required can be obtained only through the third-party (data/information vendor). In case of some areas the data are available thorough different IT systems hence the current reporting requirements will probably lead to the need of setting up a special Solvency II data warehouse which will be both costly and time consuming. In some cases the reporting of information (such as for example information obtained from other company based on the agreement) may be treated as braking the property rights and lead to serious legal problems.</p> <p>4. Cost of implementation:</p> <p>The application of current shape of reporting requirements would result in high implementation costs especially in the area of IT systems. Solvency II, especially during the implementation phase, is going to be the additional reporting framework apart from IFRS framework and Local GAAP framework. Due to this fact the application phase should be divided into sup-phases during which the separate parts of final reporting requirements would be implemented. Expanding the duration of application phase would, in our opinion, allow to split the implementation costs and to minimize the risk of implementation errors.</p>	<p>The data required to be reported should be available in the undertaking, as it is necessary for investing under the prudent person principle. Additionally, not all the reporting requirements are directly linked to Pillar I requirements, but also linked to supervisory needs. Please see also document "EIOPA-CP-11/009g", on the impact assessment on the reporting package for Solvency II, part of CP 11/009, where the impact assesment of the detailed list of assets is included.</p> <p>The preparatory reporting package has not been driven by financial stability data needs</p> <p>Please General comments on Pillar 1 requirements during preparatoy phase</p> <p>Noted</p> <p>EIOPA consider it important for undertakings to start preparing and setting up systems nad procedures for assets reporting</p> <p>EIOPA considers some period of parallel reporting is unavoidable when introducing a new set of regulatory reporting that differs significantly from the existing one; EIOPA recognises the burden of firms that this is why a revisions clause has been included in the Guidelines, limiting period of parallel running of reporting</p>
780	Royal London Mutual	Technical Annex III General Comments	There are a number of changes to the templates from the version issued in July 2012. It would be helpful to clarify if these are changes that will also apply to the full reporting after full implementation.	EIOPA will publish " Log Changes" listing all changes made to the templates and technicl annexes since July 2012 publication and the consulted version of the Preparatory Guidelines as well as the final version of the Preparatory Guidelines
781	CFOF_CROF	BI- cell A5	The closed list option for this cell includes IFRS or GAAP, we believe that IFRS-EU (IFRS as endorsed by the European Union) should also be included.	IFRS only relates to those standards endorsed in the EU
782	IE	BI- cell A5	IFRS-EU (IFRS as endorsed by the European Union) should be added to the options. For larger European Insurers this is the most common GAAP that is used.	IFRS only relates to those standards endorsed in the EU
783	Deloitte	BI- cell A6	For the future "full" implementation of the Solvency II reporting (we are aware that for the interim phase the usage of USP is not envisaged), we suggest giving the opportunity to state whether the undertaking shall be applying for USP, other than for full/partial internal model or standard formula.	Not agreed. The purpose of this template is to allow for correctlty model data and to provide meaning to certain reported values, like the case of valuation criteria for accounting figures. USP figures will have dedicated elements, like in SCR-B3C and SCR_B3D.
784	Deloitte	BI- cell A7	Additionally to the information with regard to whether the undertaking is composite or non-composite the QRT may give the opportunity to state whether the solo-undertaking is an insurance/reinsurance and if it underwrites life, non life and /or health business (in context of LoBs).	See comment 783
785	AFM	BI- cell A8	Cell A8 asks if reporting is done by RFF or not. Why is this as reporting by RFF is not required?	Please see Guideline 14, paragraph 1.51
786	Royal London Mutual	BI- cell A8	Cell A8 asks if reporting is done by RFF or not. Why is this as reporting by RFF is not required?	Please see Guideline 14, paragraph 1.51
787	AFM	BI- cell A9	Cell A9 asks for a group identification code provided by the supervisor. This does not currently exist. Will this be supplied before the interim measures come into force?	Yes, it should be a code used at the local market, to be provided and comunicated by the group supervisor

No.	Name	Reference	Comment	Resolution
788	Royal London Mutual	BI- cell A9	Cell A9 asks for a group identification code provided by the supervisor. This does not currently exist. Will this be supplied before the interim measures come into force?	Yes, it should be a code used at the local market, to be provided and communicated by the group supervisor
789	AFM	BS-C1 - General Comment	Most of the Statutory figure labels incorrectly use the same value as the Solvency II figures, eg, A2 instead of AS2.	Following the consultation process, the same codification of the cells was kept. However, all references to valuation basis have been deleted from the Technical Annex II to avoid any misunderstandings. The column on Solvency II should include valuation in accordance with the Directive and the column on statutory accounts should include the valuation in accordance with local GAAP.
790	CFOF_CROF	BS-C1 - General Comment	In the majority of cases, the cells in the Solvency II and Statutory Accounting columns are the same. We find it confusing that the cells are numbered the same which indicates to us that the values are the same.	See response to the comment 789
791	Deloitte	BS-C1 - General Comment	<p>1) In line with our previous comments, we would consider it useful to include a reconciliation between the statutory and Solvency II balance sheet, for material differences, as a standard in the annual reporting. However, we feel that to include this in quarterly reporting would place a disproportional burden on those territories which do not require quarterly GAAP or IFRS reporting. This reconciliation can be shown separately whereby the different items are detailed and explained. This may be particularly important for items which are valued at nil for Solvency II, but have a GAAP value, or vice-versa. We recognise that the material differences will be explained in the narrative reporting (RSR & SFCR).</p> <p>2) It is currently unclear whether the investment lines (A4 - A14A) in the Solvency II balance sheet should include the full "dirty" market value of investments (ie including adjustments such as accrued interest) or whether they should show just the "clean" market value with no accrued interest or index linking. Both the clean and dirty price could be reconciled to the assets report D1; however, the IFRS value in the GAAP statutory accounts column here would show the clean value, since IFRS splits the accrued interest out separately. This is a further example of why a reconciliation between the GAAP and said balance sheets is important.</p> <p>3) The instructions often switch between referencing IFRS and referencing local GAAP. This could have a dysfunctional effect if undertakings report in local GAAP but must calculate IFRS values for their balance sheet for particular items. An example of this is in cell A2 which states that the value of deferred tax assets "should have a value if accounts are under IFRS", but also that they "may not have an accounting value under statutory accounts". If these assets are given an IFRS value here, it is inconsistent with the rest of the statutory accounts column for a GAAP reporting undertaking.</p> <p>4) Finally, we do not see why cells in the SII and Statutory Accounts columns have the same reference, whereas in the past they have been separated as distinct unique references (eg A1 and AS1, not A1 and A1).</p>	<p>1) There isn't any statutory account column in the quarterly BS_C1. "For quarterly reporting, the balance sheet data indicated in the previous paragraph should only consider valuation in accordance with article 75 of Solvency II." This article only refers to Solvency II values, not to any other statutory values.</p> <p>2) When IFRS is used in the statutory column, you need to report the fair value which will include accrued interest. For investments held at amortised costs, the undertaking should add the accrued interest. SII Balance Sheet is in "dirty" market value. It is required to include adjustments such as accrued interest in the values of BS_C1.</p> <p>3) All valuation issues have been deleted from the Technical Appendix II. Future Level 2 and Technical Standards for SII and statutory accounts column will deal with it.</p> <p>4) See response to the comment 620</p>
792	IE	BS-C1 - General Comment	We do not think that labelling all Statutory accounts value as AXX instead of ASXX is very helpful, also see point on A30 on the Balance sheet QRT ("BS-C1-L") in the feedback on "Technical Annex II: List of quantitative reporting items" above.	See response to the comment 620
793	MetLife	BS-C1 - General Comment	Cell references for Statutory Accounts Value should include an S to differentiate the cells from the Solvency II value cells.	See response to the comment 620
794	Royal London Mutual	BS-C1 - General Comment	Most of the Statutory figure labels incorrectly use the same value as the Solvency II figures, eg, A2 instead of AS2.	See response to the comment 620
795	Deloitte	BS-C1- cell A2	Specific instructions should be included here on whether the definition of an intangible asset, being "sold separately and the insurance and reinsurance undertaking can demonstrate that there is a market value for the same or similar assets", is in line with IFRS (IAS 38) requirements for recognition and valuation of an intangible asset. We recognise that the technical guidance refers to the revaluation method in IAS 38 as appropriate for valuing intangibles, however, this does not address the definition of an intangible and ability to recognise. For example, should the SII valuation require rights to future economic benefits and the control of an intangible asset? The presence of a market value for such an intangible asset could be that a potential acquirer has made a bid to purchase at a price, or could refer to a deeper, more liquid market, which is unlikely to exist, in our opinion.	It means the use of quoted market prices in active markets for the same assets or liabilities shall be the default valuation method, regardless of whether international accounting standards, as endorsed by the Commission in accordance with Regulation (EC) No 1606/2002 allow valuation methods that are consistent with Article 75 of Directive 2009/138/EC to follow a different valuation hierarchy. It is true that most of time there won't be any value in this cell because active markets are so rare for intangible assets. The Technical Annex has been amended. The valuation issues will be dealt with in Technical Specification.
796	PZU	BS-C1- cell A3	Also with reference to cell A5: Under Pillar I the whole property is treated as an investment while under Pillar III there is a split of property between property for own use (cell A3) and investment property (cell A5). This inconsistency is an example of inconsistent requirements of Pillar I and Pillar III (for further details please refer to "Technical Annex III General Comments").	Noted. Pillar 3 requirements are not solely introduced for the purpose of reviewing Pillar 1 requirements. See also comment 40
797	AFM	BS-C1- cell A6	Description of what is included in the group version of cell A6 (participations) is helpful - it clarifies that only insurance and ancillary service undertakings are fully consolidated.	Noted
798	FEE	BS-C1- cell A6	The additional information on participations in the group balance sheet is welcomed. However it does not become completely clear, how investment funds have to be treated.	At group level, EIOPA is still considering application of look through requirements and their reporting implications, where undertaking exercise a dominant influence over investment fund; clarification will be provided in the Technical specifications.
799	Royal London Mutual	BS-C1- cell A6	Description of what is included in the group version of cell A6 (participations) is helpful - it clarifies that only insurance and ancillary service undertakings are fully consolidated.	Noted
800	CFOF_CROF	BS-C1- cell A8	See comment on Cell A8E	See response to the comment 809
801	IE	BS-C1- cell A8	Clarity is needed on the treatment of accrued interest.	See response to the comment 809
802	CFOF_CROF	BS-C1- cell A8A	See comment on Cell A8E	See response to the comment 809
803	IE	BS-C1- cell A8A	Clarity is needed on the treatment of accrued interest.	See response to the comment 809

No.	Name	Reference	Comment	Resolution
804	Polish Chamber of Insurance	BS-C1- cell A8A	It would be important to have a similar code for corporate bonds as for government bonds (CIC) as currently there is no standard name code for such securities.	Disagree. The issuer is not the same. They have to be separated.
805	CFOF_CROF	BS-C1- cell A8C	See comment on Cell A8E	See response to the comment 809
806	IE	BS-C1- cell A8C	Clarity is needed on the treatment of accrued interest.	See response to the comment 809
807	CFOF_CROF	BS-C1- cell A8D	See comment on Cell A8E	See response to the comment 809
808	IE	BS-C1- cell A8D	Clarity is needed on the treatment of accrued interest.	See response to the comment 809
809	CFOF_CROF	BS-C1- cell A8E	<p>It is not clear from the cell definition whether accrued interest should be presented separately on the S2 Balance sheet in A29 Other Assets (consistent with IFRS) or included in the Bonds valuation in cells A8 (A-E). Our view is that accrued interest should be presented separately for the following reasons:</p> <ul style="list-style-type: none"> - Ensures consistency with IFRS and therefore enables the IFRS statutory to be more easily directly compared to the S2 Balance sheet particularly for debt securities carried at fair value for IFRS - A consistent approach with IFRS would be cheaper to implement as it eliminates a reconciliation item - BS-C1 would still be reconcilable to Asset D1 template (Cell A26 'Total S2 Amount' LESS Cell A30 'Accrued Interest') <p>This is a presentational issue rather than a valuation issue and should be considered in addition to EIOPA's previous comments on the treatment of accrued interest.</p>	<p>SII Balance Sheet is in "dirty" market value. It is required to include adjustments such as accrued interest in the values of BS_C1.</p> <p>If undertakings use IFRS, you need to report the fair value which will include accrued interest. For investments held at amortised costs, the undertaking should add the accrued interest to the investment.</p>
810	IE	BS-C1- cell A8E	Clarity is needed on the treatment of accrued interest.	See response to the comment 809
811	AFM	BS-C1- cell A9	A9 - no mention of further split, which is required for public disclosure, i.e. Into equity investment funds, bond investment funds etc. So presumably this extra detail will not be required in the preparatory phase.	EIOPA confirms that this is not required in the preparatory phase
812	Deloitte	BS-C1- cell A9	<p>1) We welcome the removal of the requirement to use the "look-through" approach here to split the investments in funds down further into classes of assets.</p> <p>2) We would welcome it if this split of investments was also removed from the public disclosure template for the final implementation of Solvency II. The current version based on the July 2012 QRTs still contains the split of investments for public disclosure purposes.</p>	Noted
813	Royal London Mutual	BS-C1- cell A9	A9 - no mention of further split, which is required for public disclosure, i.e. Into equity investment funds, bond investment funds etc. So presumably this extra detail will not be required in the preparatory phase.	EIOPA confirms that this is not required in the preparatory phase
814	GDV	BS-C1- cell A14	We criticize that Loans and mortgages are still not a part of investments.	It's not an investment. In BS_C1D, loans and mortgages are included in "Other assets within scope of Assets-D1" (A4).
815	IE	BS-C1- cell A14	We criticize that Loans and mortgages are still not a part of investments.	See response to the comment 814
816	DublinIMA	BS-C1- cell A30	In the statutory accounts value column, the total of assets (formula in A30) currently excludes the values of Goodwill and Deferred acquisition costs. These need to be included in total assets so that it equates to the statutory accounts.	Agree, Technical Annex has been amended
817	IE	BS-C1- cell A30	In the statutory accounts value column, the total of assets (formula in A30) currently excludes the values of Goodwill and Deferred acquisition costs. These should be included in total assets so that it equates to the statutory accounts.	See response to the comment 816
818	IUA London	BS-C1- cell A30	In the statutory accounts value column, the total assets (formula in A30) currently excludes the values of Goodwill and Deferred acquisition costs. These need to be included in total assets so that it equates to the statutory accounts.	See response to the comment 816
819	AFM	BS-C1- cell L50	Cells L50 and L56F are new sub-totals only applied to the statutory column. Not clear what they are there for?	These cells are dotted lines. Either you can split your technical provisions between life or non-life and their linked health business, either you cannot and you directly fill in cells L50 and L56F with the correct total value.
820	Royal London Mutual	BS-C1- cell L50	Cells L50 and L56F are new sub-totals only applied to the statutory column. Not clear what they are there for?	These cells are dotted lines. Either you can split your technical provisions between life or non-life and their linked health business, either you cannot and you directly fill in cells L50 and L56F with the correct total value.
821	Deloitte	BS-C1- cell L1A	<p>For technical provisions and for those undertakings which report using IFRS valuation basis, the split between "whole", "best estimate" and "risk margin" could be included in the statutory accounts column also, with instructions to complete at a total level (as is currently the only option) until such a time as future GAAP may allow the split. This will future-proof the templates with a view to the BEL + margin approach of IFRS 4 phase II being phased in shortly after the assumed commencement date of Solvency II.</p> <p>This would leave the option for undertakings to complete these individual cells or to complete the total cell, depending on whether their current GAAP allows this - we recognise that this is likely to apply only to IFRS reporters, after the introduction of IFRS 4 phase II.</p> <p>We also suggest considering the opportunity to foresee two additional columns (IFRS and Local GAAP columns) other than the SII one in order to take into account potential differences/analogies/allowances between SII, IFRS and Local GAAP schemes with the option for insurers to complete only one column (IFRS or Local GAAP).</p> <p>This comment applies to all technical provisions cells here - L1A through to L12.</p>	<p>We cannot change anything in the template or the Technical Annex because we cannot foresee exactly what will be the future changes in IFRS 4.</p> <p>About your second suggestion, all valuation issues have been deleted from the Technical Annex. The valuation issues will be dealt with in Technical Specification.</p>

No.	Name	Reference	Comment	Resolution
822	Deloitte	BS-C1- cell L2	Please see comments for cell L1A	See response to the comment 821
823	Deloitte	BS-C1- cell L3	Please see comments for cell L1A	See response to the comment 821
824	Deloitte	BS-C1- cell L4	Please see comments for cell L1A	See response to the comment 821
825	Deloitte	BS-C1- cell L4A	Please see comments for cell L1A	See response to the comment 821
826	Deloitte	BS-C1- cell L5	Please see comments for cell L1A	See response to the comment 821
827	Deloitte	BS-C1- cell L6	Please see comments for cell L1A	See response to the comment 821
828	Deloitte	BS-C1- cell L6B	Please see comments for cell L1A	See response to the comment 821
829	Deloitte	BS-C1- cell L6C	Please see comments for cell L1A	See response to the comment 821
830	Deloitte	BS-C1- cell L6D	Please see comments for cell L1A	See response to the comment 821
831	Deloitte	BS-C1- cell L6E	Please see comments for cell L1A	See response to the comment 821
832	Deloitte	BS-C1- cell L7	Please see comments for cell L1A	See response to the comment 821
833	Deloitte	BS-C1- cell L7A	Please see comments for cell L1A	See response to the comment 821
834	Deloitte	BS-C1- cell L8	Please see comments for cell L1A	See response to the comment 821
835	Deloitte	BS-C1- cell L9	Please see comments for cell L1A	See response to the comment 821
836	Deloitte	BS-C1- cell L56F	Please see comments for cell L1A	See response to the comment 821
837	Deloitte	BS-C1- cell L10	Please see comments for cell L1A	See response to the comment 821
838	Deloitte	BS-C1- cell L10A	Please see comments for cell L1A	See response to the comment 821
839	Deloitte	BS-C1- cell L11	Please see comments for cell L1A	See response to the comment 821
840	Deloitte	BS-C1- cell L12	Please see comments for cell L1A	See response to the comment 821
841	PZU	BS-C1- cell L22	Regarding pension benefit obligations this position is calculated once a year hence it is not available for quarterly reporting. The possible solution here is to report some sort of approximation.	Noted
842	CFOF_CROF	BS-C1- cell L26	Subordinated liabilities in BOF are counted and reported twice. In the public consultation of July 2012, EIOPA responded that the split in BS-C1 was for presentation purposes, therefore cell L26 should not include the formula for L25A "total Liabilities". As currently drafted, L26 is double counted.	Disagree. To get BOF, it is required to take Excess of Asset over Liabilities (L27, where L26 is subtracted) and to add "Subordinated liabilities in BOF" (L26). So L26 is reported only one time. Using an example : If you consider a balance sheet (BS_C1 format) with assets of 100 and liabilities of 80 (including subordinate liabilities in BOF of 10), you have an Excess of Assets over Liabilities (EoAoL) of 20. However, Basic Own Funds (BOF) are calculated as EoAoL + subordinate liabilities in BOF). Then, BOF = 20 + 10 = 30.
843	IE	BS-C1- cell L26	The presentation of the "subordinate liabilities in BOF" as liabilities has implications in the formula L25A	Disagree. To get BOF, it is required to take Excess of Asset over Liabilities (L27, where L26 is subtracted) and to add "Subordinated liabilities in BOF" (L26). So L26 is reported only one time. Using an example : If you consider a balance sheet (BS_C1 format) with assets of 100 and liabilities of 80 (including subordinate liabilities in BOF of 10), you have an Excess of Assets over Liabilities (EoAoL) of 20. However, Basic Own Funds (BOF) are calculated as EoAoL + subordinate liabilities in BOF). Then, BOF = 20 + 10 = 30.
844	AFM	BS-C1D – General Comments	Cell A0 (which specifies the consolidation method used) is included on the July 2012 version but excluded from the new one.	There is no consolidation used : BS_C1D will be required for solo undertakings only during the preparatory phase
845	Royal London Mutual	BS-C1D – General Comments	Cell A0 (which specifies the consolidation method used) is included on the July 2012 version but excluded from the new one.	There is no consolidation used : BS_C1D will be required for solo undertakings only during the preparatory phase
846	Deloitte	BS-C1D- cell A4	The formula in the instructions for this (A3 + A27 in BS-C1) item ignores loans and mortgages in A14 in BS-C1. In our opinion, these should be included in the formula. Therefore in our opinion the correct formula is A3 + A27 + A14 in BS-C1. We would welcome it if EIOPA could check the formula and amend if necessary.	See response to the comment 814
847	CFOF_CROF	AS-D1- General Comment	Compared to the July 2012 EIOPA QRT Stable platform there have been a number of changes in cell definitions per the July 2012 EIOPA "Log" and the "instructions" in Technical Annex II (for example Issuer Sector is defined as a closed list based on GICS rather than NACE). To avoid wasted expenditure in implementation it is important that EIOPA clarify this would be the reporting basis moving forward.	It is EIOPA intention that the reporting requirements to be published after this public consultation will not be changed unless the outcome of OMDII implies differently. EIOPA will publish " Log Changes" listing all changes made to the templates and technical annexes since July 2012 publication and the consulted version of the Preparatory Guidelines as well as the final version of the Preparatory Guidelines
848	IE	AS-D1- General Comment	Cross check requirement to BS-C1 missing. Compared to the July 2012 EIOPA QRT Stable platform there have been a number of changes in cell definitions per the July 2012 EIOPA "Log" and the "instructions" in Technical Annex II (for example Issuer Sector is defined as a closed list based on GICS rather than NAIC). To avoid wasted expenditure in implementation it is important that EIOPA clarify whether for undertakings implementing S2 QRT reporting requirements the "Instructions" per this guidance should replace the "Definitions" per EIOPA's July 2012 "Log" as EIOPA's latest thinking on S2 QRT cell definitions.	Noted. It is not certain whether these cross checks will be incorporated , therefore it has been decided not to include them in the preparatory phase
849	Lloyds	AS-D1- General	The EIOPA final report issued in July 2012 required the "issuer sector" field to be completed using NACE codes. In the Guidelines, a closed list of Global Industry Classification Standard (GICS) list is provided and this is required in the completion of "issuer sector" field.	See comment 776.

No.	Name	Reference	Comment	Resolution
		Comment	EIOPA should make it clear whether GICS replaces NACE codes. This list should be enhanced, as it does not cover all types of securities, for example, those issued by government.	
850	PZU	AS-D1- General Comment	Please refer to comments to "Technical Annex III General Comments". In our opinion the list of required information in terms of assets is very extensive. Some of information are not readily available and require additional agreements with external data vendors (e.g. assets ratings). Moreover we do not believe that quarterly reporting of such detailed list of information is necessary. The investment portfolios of large undertakings are usually quite stable hence the quarterly reporting is not expected to bring additional value while it will definitely result in additional work and cost.	The data required to be reported should be available in the undertaking, as it is necessary for investing under the prudent person principle. Additionally, not all the reporting requirements are directly linked to Pillar I requirements, but also linked to supervisory needs. Please see also document "EIOPA-CP-11/009g", on the impact assessment on the reporting package for Solvency II, part of CP 11/009, where the impact assessment of the detailed list of assets is included.
851	CFOF_CROF	AS-D1- cell A1	We believe that the closed list option for this cell - "Life"; "Non-Life"; "General"; "Ring-fenced funds" - would benefit from a "General" option. This would allow for a clear alternative other than those listed, for example shareholders' funds.	Agreed. "Stakeholders' funds" will be added to the closed list to allow for identifying shareholders' funds, in line with the "Life" and "Non-Life" options, when the undertaking performs this split for internal purposes.
852	GC	AS-D1- cell A1	It would be helpful if EIOPA could confirm that where the undertaking holds assets in the form of units or shares in investment funds operated by third-parties, that such assets are not subject to the look-through requirement applicable to directly-held assets of the undertaking.	See comment 655
853	IE	AS-D1- cell A1	It is unclear in which portfolio would shareholders funds be included	see comment 851
854	GC	AS-D1- cell A2	The requirement to report the fund number for each asset held in a ring-fenced or internal fund suggests that for a given security that is part of the investments of multiple unit-linked funds, the security will be reported on as many lines as the number of unit-linked funds where the security is present. We believe this is unnecessarily complicated and does not enhance understanding of the risks associated with the unit-linked business.	Don't agree. Identifying every assets belonging to each unit-linked portfolio will in fact enable understanding the risks associated with each portfolio. See comment 652.
855	BVI	AS-D1- cell A4	Insurance undertakings should also provide the LEI or, if not available, an Interim Entity Identifier (IEI), e.g. the Pre-LEI could be used as an ID Code.	See comment 774
856	BVI	AS-D1- cell A5	Insurance undertakings should also provide the LEI or, if not available, an Interim Entity Identifier (IEI), e.g. the Pre-LEI could be used as an ID Code.	See comment 774
857	PZU	AS-D1- cell A8	In our opinion there is a risk that the information on the ultimate parent will not be available from one source (data vendor), for all securities. In such situation the additional costs of data capture may occur.	EIOPA believes this is essential information for the undertaking, in order to invest under the prudent person principle, and as such it should be available.
858	AFM	AS-D1- cell A9	A9 - July 2012 version required a NACE code for the issuer sector. This new version now requires an industry sector from a closed list (eg Energy, Materials etc). Have NACE codes been dropped from this template?	See comment 776
859	BVI	AS-D1- cell A9	Regarding Cell Number A9 of the List of quantitative reporting items AS-D1-L (Detailed list of assets), we assume that the 'Issuer Sector' of an investment management company should be identified as 'Diversified Financials'.	That's correct.
860	CFOF_CROF	AS-D1- cell A9	To avoid wasted implementation expenditure, EIOPA should clarify that the GIC codes which appear in the latest draft QRTs will be used as the reporting basis moving forward. EIOPA should also consider whether this new coding system covers all industry sectors. In this respect, we query where Government Bonds would be dealt with.	See comment 776
861	Deloitte	AS-D1- cell A9	In case the instructions from the general comment in the log file (see comment for Technical Annex I General Comments) are also valid during the preparatory phase, we would welcome clarification from EIOPA whether cells A9 (Issuer sector), A10 (Issuer group), and A11 (Issuer Country) need to be filled out for CIC 8 and 95. In our understanding, this is not the case since these items do not need to be reported on a line-by-line basis (according to the general comment in the log file) and a meaningful entry could thus not be provided. Therefore we would welcome if EIOPA, in line with description of other cells (for example cell A22 Quantity), could explicitly name those CICs for which cells A9, A10 and A11 are not applicable.	Noted. Clarification will be provided by incorporating the relevant information in the previous LOG file
862	IE	AS-D1- cell A9	Please confirm that the use of GICS codes supercedes early S2 guidance on use of NACE codes and that in preparing for S2 QRT AS-D1 we would plan on using GICS codes. The GICS classifications shown in the closed list do not address all sector types, for example there is no classification for government bonds.	See comment 776
863	MetLife	AS-D1- cell A9	We welcome the change from NACE to GICS and the publication of the closed list - we assume this is intended to be applicable for both the preparatory phase and post Solvency II implementation Please confirm if EIOPA is expecting an issuer section for cash and for property?	See comment 776
865	PZU	AS-D1- cell A9	In our opinion, from the operational point of view, it might be difficult to obtain and handle this kind of information.	EIOPA believes this is essential information for the undertaking, in order to invest under the prudent person principle, and as such it should be available.
866	Royal London Mutual	AS-D1- cell A9	A9 - July 2012 version required a NACE code for the issuer sector. This new version now requires an industry sector from a closed list (eg Energy, Materials etc). Have NACE codes been dropped from this template?	See comment 776
867	Deloitte	AS-D1- cell A10	Please see comments in "As-D1-cell A9"	See response to the comment 861
869	PZU	AS-D1- cell A10	In terms of the issuer group this type of information is not always available in standard data set delivered by the asset data vendors hence the requirement of such will probably result in increase of implementation cost.	EIOPA believes this is essential information for the undertaking, in order to invest under the prudent person principle, and as such it should be available.
870	Deloitte	AS-D1- cell A11	Please see comments in "As-D1-cell A9"	See response to the comment 861
872	AMICE	AS-D1- cell A15	More guidance on how to apply the CIC codes will be needed. Classifying the assets according to the CIC code will be very difficult in practice.	Noted. No additional guidance will be provided in the instructions. However, EIOPA is planning to held training seminar in 2014 , that may include CIC codes examples which can provide practical guidance.

No.	Name	Reference	Comment	Resolution
873	Deloitte	AS-D1- cell A15	<p>1) We would welcome feedback from EIOPA whether callable bonds (bonds that are solely equipped with the issuer option to redeem prior to its maturity date but are plain vanilla with respect to everything else) are to be classified as CIC 1 or 2 and not as CIC 5 (structured notes). In case of reply that undertakings have to decide this themselves based on the main risk features of callable bonds we would welcome more clarification from EIOPA on which criteria this classification should be based.</p> <p>2) We would welcome clarification from EIOPA to which CIC financial assets belong for which a price has been agreed on before the actual transaction date (pre-emptions). We believe that such financial assets belong to CIC 1 or 2 and not to CIC 5 (structured notes) as long as a separate fair value measurement of the embedded derivative (pre-emption) is not required for the Solvency II balance sheet.</p>	<p>1) Although CIC codes to attribute to a specific security should be assessed by referring to a given security, in principle a bond with the described characteristics should be classified under CIC 1 or 2.</p> <p>2) Although CIC codes to attribute to a specific security should be assessed by referring to a given security, in principle a bond with the described characteristics should be classified under CIC 1 or 2.</p>
874	AFM	AS-D1- cell A16	A16 - the new options added for group reporting when method 1 is used - there is no option for a controlled participation which is not consolidated and is not an OFS.	Agree. The following options will be added : Other related undertaking under method 1 (ORUT1) and Other related undertaking under method 2 (ORUT2)
875	CFOF_CROF	AS-D1- cell A16	We support that participations are now included in the Group AS-D1 template however we note that the closed list option does not include subsidiaries which are included on the basis of the adjusted equity method under Method 1 (see L2 Article 323 bis SCG3 1(f)). This would apply to non-insurance and non-financial sector subsidiaries, which are neither ancillary service companies or insurance holding companies.	Agree. The following options will be added : Other related undertaking under method 1 (ORUT1) and Other related undertaking under method 2 (ORUT2)
876	IE	AS-D1- cell A16	We note this has changed from the EIOPA's July 2012 QRT "Log" to also be applicable for Group reporting. For Group reporting the options listed do not include subsidiaries which are included on the basis of the adjusted equity method under Method 1 (see L2 Article 323 bis SCG3 1(f)). This would apply to non-insurance and non-financial sector subsidiaries, which are neither ancillary service companies nor insurance holding companies.	Agree. The following options will be added : Other related undertaking under method 1 (ORUT1) and Other related undertaking under method 2 (ORUT2)
877	Royal London Mutual	AS-D1- cell A16	A16 - the new options added for group reporting when method 1 is used - there is no option for a controlled participation which is not consolidated and is not an OFS.	Agree. The following options will be added : Other related undertaking under method 1 (ORUT1) and Other related undertaking under method 2 (ORUT2)
878	PZU	AS-D1- cell A17	This information is usually not readily available and requires additional agreements with external data vendors. Moreover there is a risk that based on standard agreements the undertaking won't be allowed by external vendors to report / present/ disclose externally the received data. The special licences will be probably necessary to be purchased from external data vendors which will generate extra cost.	The draft Delegated Act requires that undertakings use external rating assessments to determine the capital requirement of the undertaking.
879	CFOF_CROF	AS-D1- cell A24	For non-participations there are 3 possibilities of classification - QMP, QMPS and AVM. We would like to clarify that it is the intention of industry to align these with the IFRS Fair Value hierarchy classifications (i.e. QMP=FV1, QMPS=FV2, AVM=FV3). IFRS FV2 requires valuation to be based on observable market inputs, which would only be appropriate if they related to assets with similar characteristics (i.e. credit risk, duration, liquidity). If the QRT and IFRS classifications are not aligned this would greatly increase the cost of implementation for little additional benefit.	See comment 503
880	IE	AS-D1- cell A24	<p>We note this has changed from the EIOPA's July 2012 QRT "Log" to also be applicable for Group reporting. For Group reporting the options listed do not include subsidiaries which are included on the basis of the adjusted equity method under Method 1 (see L2 Article 323 bis SCG3 1(f)). This would apply to non-insurance and non-financial sector subsidiaries, which are neither ancillary service companies nor insurance holding companies.</p> <p>Classifications need to be updated in line with D1</p>	This comment repeats comment 876, and is not clear its relation with cell A24.
881	CFOF_CROF	AS-D1- cell A25	The historical acquisition price is not retained in the administration of most insurance company's investments in investment funds, this cell will be difficult to report as a result.	Noted. Not clear why this difficulty exists for investment funds only.
882	GDV	AS-D1- cell A25	Further guidance from EIOPA is required with regard to the definition of the item "Acquisition price": should the reported price include any transaction costs such as brokerage fees, bank charges etc.?	The acquisition price should be the fair value of the assets at the acquisition date
883	IE	AS-D1- cell A25	It is unclear the definition of the item "Acquisition price": (should the reported price include any transaction costs such as brokerage fees, bank charges etc.?)	The acquisition price should be the fair value of the assets at the acquisition date
884	PZU	AS-D1- cell A25	In our opinion the acquisition price of each asset should be excluded from reporting requirements as it is not used in under the Solvency II regime (assets are priced on the basis of fair value). Moreover this information is not required in Pillar I calculations hence to keep the consistency between pillars it should not be required in Pillar III reporting.	Noted
885	AFM	AS-D1- cell A28	A28 - Maturity date - in July 2012 version perpetual securities are given a 'P'. In this version this is now a date - 31/12/9999. Is this a change that will apply to the full reporting after full implementation of Solvency II?	Yes.
886	Assuralia	AS-D1- cell A28	What is the maturity for a mortgage loan to the senior management or to others? Is it the weighted average maturity date, the maximum maturity date, the minimum maturity date, ...	The instructions will be clarified. It is the weighted average maturity date.
887	IE	AS-D1- cell A28	It is unclear what is the maturity for a mortgage loan to the senior management or to others (weighted average maturity date, the maximum maturity date, the minimum maturity date, ...)?	The instructions will be clarified. It is the weighted average maturity date.
888	MetLife	AS-D1- cell A28	For Asset Category 8X Loans to individuals, is maturity date required when reporting/aggregating multiple loans in one line?	The instructions will be clarified. It is the weighted average maturity date.

No.	Name	Reference	Comment	Resolution
889	Royal London Mutual	AS-D1- cell A28	A28 - Maturity date - in July 2012 version perpetual securities are given a 'P'. In this version this is now a date - 31/12/9999. Is this a change that will apply to the full reporting after full implementation of Solvency II?	Yes.
890	CFOF_CROF	AS-D2O- cell A13	The closed list of options for this cell includes "micro hedging", "macro hedging" and "efficient portfolio management". We do not believe that this list is extensive enough, for example it is not clear how to deal with derivatives held for speculative positions.	According to Article 132(4) of Directive 2009/138/EC, the use of derivative instruments shall be possible insofar as they contribute to a reduction of risks or facilitate efficient portfolio management. Given this, no specific category regarding derivatives used for speculative purposes is included in the reporting templates. Nevertheless, and without prejudice of Article 132(4), derivatives held for speculative positions, can be classified under EPM.
891	PZU	AS-D2O- cell A14	This information is usually not readily available for complex derivatives and requires stochastic modelling. In our opinion the requirement of quarterly reporting of this information will generate additional unnecessary costs to undertaking.	This information is important for the undertaking to monitor the effectiveness of coverage of an asset by the option, especially for OTC options, and so should be available at the undertaking. For options traded on derivatives markets it is available from financial services providers
892	CFOF_CROF	AS-D2O- cell A29	We query whether there is an error in the LOG for this cell, the closed list for S2 valuation method (has only 2 methods - Mark to model and Mark to market) is inconsistent with Asset Template D1 (cell A24), which lists 3 possibilities for non-participations: <ul style="list-style-type: none"> • Quoted market price in active markets for the same assets (QMP) • Quoted market price in active markets for similar assets (QMPS) • Alternative valuation methods (AVM) A consistent approach with classifications aligned to the IFRS Fair Value hierarchy would make implementation easier.	Noted and will be aligned with the classification required for AS-D1
893	AFM	AS-D2O- General Comments	Cell A0 (which specifies the consolidation method used) is included on the July 2012 version but excluded from the new one.	Please note that there are different requirements to report this information, described in Annex I, paragraphs 7 and 8, that replaces the need to include an element to identify the consolidation method. Additionally, item A10 of BI will identify if method 1 or a combination of methods is used for calculating group solvency of at least one undertaking in the scope.
894	IE	AS-D2O- General Comments	It would be helpful considering the definitions used in the EMIR directive . It is unclear the unit of reporting for this template (e.g. the entire derivative, or each leg of the derivative).	Noted. EIOPA is working on the need and adequacy of harmonizing definitions and concepts with the EMIR Directive. See comment 893
895	Royal London Mutual	AS-D2O- General Comments	Cell A0 (which specifies the consolidation method used) is included on the July 2012 version but excluded from the new one.	See comment 893
896	IE	AS-D2O- cell A29	Classifications need to be updated in line with D1	See comment 892
897	PZU	AS-D2O- cell A33	Please refer to AS-D1- cell A20.	Please note that there aren't any comments to AS-D1 cell A20
898	PZU	AS-D2O- cell A34	Please refer to AS-D1- cell A17.	Please see the answer in the corresponding comment
899	Assuralia	TP-F1Q- General Comments	Can the quarterly templates have the same lay-out as the annual templates? For example TP-F1 needs to be provided on yearly basis while TP_F1Q is required on quarterly basis. The content of the TP-F1Q is however reduced. Can we use the TP-F1 template to report the quarterly figures?	EIOPA have taken an approach from a beginning of having a separate template for quarterly submissions and a separate for annual submissions. Following consultation process it has been decided to use annual template for annual reporting and quarterly for quarterly submission .
900	CFOF_CROF	TP-F1- General Comments	(J series) The log-file states the requirement as being the "Amount of gross BE by country of the location of risk underwritten, when the country is the home country.." for LoBs including both Life and Health accepted reinsurance. For accepted reinsurance business, it is not possible to systematically provide a country split of the gross best estimate by risk location due to the fact that the location of original policyholders is unknown. Coverage is often provided on a worldwide basis irrespective of the location of the policyholder whose policy is reinsured.	The criteria of 'localization of risk' is required. The focus in the template is on the location of risk underwritten and not on the location of risk itself. No possible to cover all/extreme cases, undertaking will have to use their judgment to provide correct data, in line with assumptions used for the calculation of TP.
901	Deloitte	TP-F1- General Comments	1) We would welcome more precise guideline on classification of complicated Life products, especially of those where unbundling is difficult or not possible, to LoBs. E.g. for products with possibility to invest in both unit-linked (UL) and guaranteed funds and with possible subsequent change to the proportion of those investments. In which category of the following LoBs - Insurance with profit participation, UL with/without O&G, Other life insurance with /without O&G - the products should be classified? 2) Some clarification will ultimately be required, either from EIOPA or at a national level as several understandings can be observed regarding classification of products with certain guarantees (e.g. classification of the Best-Estimate related to GMDBs offered on unit-linked products).	Noted that these questions are valid ones. Some clarification have already been developed by EIOPA by additional guidance on the valuation of TP. This request will be looked into and see what can be done to clarify more requested informations.

No.	Name	Reference	Comment	Resolution
902	GC	TP-F1- General Comments	<p>We welcome the phasing in of the detailed technical provision information i.e. gross best estimate information required for the annual template. The level of detail is increased for the quarterly templates required closer to SII implementation. This allows firms to improve quality of data submitted over the phasing in period and attempts to make the annual information required during the phasing in period less burdensome.</p> <p>While attempts have been made to make technical provision reporting less burdensome by not including the risk margin and recoveries, we note the risk margin is required both for template BS-C1 and for narrative reporting (see guideline 29). We would question whether the level of detail should be similar across all reporting requirements.</p> <p>We would welcome more precise guideline on classification of more complicated Life products to LoBs. E.g. for products with possibility to invest in both UL and guaranteed funds and with possible subsequent change to the proportion of those investments. In which category of the following LoBs - Insurance with profit participation, UL with/without O&G, Other life insurance with /without O&G - the products should be classified?</p>	<p>Noted and welcomed</p> <p>It is required to report the allocation of the total risk margin to the prescribed LoBs following the L2 requirements</p> <p>Noted that this question is a valid one. Some clarification have already been developed by EIOPA by additional guidance on the valuation of TP. This request will be looked into and see what can be done to clarify more requested informations.</p>
903	IE	TP-F1- General Comments	Country split information is hardly possible to be obtained in case of reinsurance.	See response to the comment 900
904	FEE	TP-F1- cell J1,J2,J4,J6,J7,J9,J10,J12,J13,J14	The requirement to report amounts according to geographic criteria (e.g. country of underwriting) often cannot be fulfilled by reinsurers as the relevant data is missing (and cannot be obtained with reasonable effort).	See response to the comment 900
905	FEE	TP-F1- cell JA1,JA2,JA4,JA6,JA7,JA9,JA10,JA12,JA13,JA14	See comment above.	See response to the comment 900
906	FEE	TP-F1- cell JE1,JE2,JE4,JE6,JE7,JE9,JE10,JE12,JE13,JE14	See comment above.	See response to the comment 900
907	FEE	TP-F1- cell JF1,JF2,JF4,JF6,JF7,JF9,JF10,JF12,JF13,JF14	See comment above.	See response to the comment 900
908	CFOF_CROF	TP-E1- General Comments	(Cells A5-Q13) It is not always possible to accurately capture the impact of reinsurance or retrocession at the LoB level. This is the case for coverages which go across lines of business (e.g. whole account protections or stop loss covers) where breakdown to the LoB level is not required since protection is provided at a portfolio level. Technical provisions are calculated at the level of the protection and any further splits would be artificial.	It's required to report the details of TP according to the segmentation required by L2. We're aware that in some cases some allocations are needed.
909	GC	TP-E1- General Comments	<p>As for TP-F1, we welcome the phasing in of the detailed technical provision information i.e. gross best estimate information required for the annual template.</p> <p>While attempts have been made to make technical provision reporting less burdensome by not including the risk margin and recoveries, we note the risk margin is required for template BS-C1 and both the risk margin and recoveries are required for narrative reporting (see guideline 29).</p> <p>The minimum segmentation required to calculate technical provisions is by line of business. We feel the split by country is forcing an additional degree of segmentation which may not be straightforward for all business, for example:</p> <ul style="list-style-type: none"> - For LOBs that are considered global (e.g. marine/aviation/transport business) and multi-territory policies. - Where different territories that are considered homogenous and are projected in aggregate. - Where business is written on a delegated authority basis. <p>We note that no technical provision information is collected in respect of accepted non-proportional reinsurance.</p>	<p>1) A phase-in period has been already introduced by requiring to report annually the information that will be reported quarterly in future, i.e. less detail.</p> <p>2) Don't understand the comment, i.e. risk margin and recoverable from re are asked in TP-E1Q and TP-F1Q</p> <p>3) it's required to report the details of TP according to the segmentation required by L2. Furthermore, the split by geographical area is based on localization of risk/contry of underwriting.</p> <p>4) Insurance obligations related to accepted-non proportional reinsurance is required with a specifi segmentaion (see Technical Annex III: Lines of business - section C)</p>
910	GDV	TP-E1- General Comments	"Gross, retro, net" split for reinsurance liabilities are not available in most cases. For reinsurers, retrocession often covers more than one line of reinsurance business in one contract	It's required to report the details of TP according to the segmentation required by L2. We're aware that in some cases some allocations are needed.
911	IE	TP-E1- General Comments	"Gross, retro, net" split for reinsurance liabilities is not available in a significant number of cases. This split is particularly difficult for contracts that cover more than one line of reinsurance business. In those cases arbitrary allocations would have to be done.	It's required to report the details of TP according to the segmentation required by L2. We're aware that in some cases some allocations are needed.
912	IE	TP-E1- cells A43-L43	For claims incurred on 'Medical Expense', 'Income protection', 'Workers compensation', 'Fire and other damage to property' and 'Credit and suretyship' LOBs the localisation of the risk is the determining factor when splitting this per country. However for IBNR this split may not be available.	It's required to report the details of TP according to the segmentation required by L2. We're aware that in some cases some allocations are needed.
913	Deloitte	TP-F1Q- cells A3	We suggest renaming this cell A2 instead of A3 to be consistent with cells E2 and F2.	EIOPA is aware that codification of the cells can be improved. It will be addressed in the drafting of ITS.
914	GC	TP-F1Q- cells A3	We suggest renaming this cell A2 instead of A3 to be consistent with cells E2 and F2.	See response to the comment 913

No.	Name	Reference	Comment	Resolution
915	CFOF_CROF	TP-F1Q- cells B2	See general comment	See response to the comment 902
916	CFOF_CROF	TP-F1Q- cells B3	See general comment	See response to the comment 902
917	CFOF_CROF	TP-F1Q- cells B4	See general comment	See response to the comment 902
918	CFOF_CROF	TP-F1Q- cells B5	See general comment	See response to the comment 902
919	CFOF_CROF	TP-F1Q- cells C2	See general comment	See response to the comment 902
920	CFOF_CROF	TP-F1Q- cells C3	See general comment	See response to the comment 902
921	CFOF_CROF	TP-F1Q- cells C4	See general comment	See response to the comment 902
922	CFOF_CROF	TP-F1Q- cells C5	See general comment	See response to the comment 902
923	GC	TP-F1Q- General Comments	See comments in relation to TP-F1.	See response to the comment 902
924	Deloitte	TP-E1Q- General Comments	<p>Split of the reinsurance recoverables into the prescribed lines of business might be difficult. The insurers are able to conclude one reinsurance contract with cover for more than one LoB (e.g. one stop loss contract covering more LoBs). We would appreciate more exact guideline, how this kind of contracts should be split among the particular lines of business (LoBs).</p> <p>In Pillar 1 the calculation requirements for technical provisions are principle-based, not going into details. So basically the company can calculate the BE liabilities by any method that fits the principles (for example, reinsurance shall be applied, but it is up to the company to come up with a method of estimation of the reinsurance effect). Only in the end the company must be able to report the net liabilities in this split by LoB - and that's where further guidance from EIOPA or NCAs may be needed.</p> <p>Example: the insurer is covered by a stop-loss treaty reinsurance covering for example 3 LoBs:</p> <ul style="list-style-type: none"> - Other motor (Casco), - Fire and property, - Accepted non-proportional property reinsurance. <p>The stop-loss conditions say: if total losses from these LoBs (in total) exceed given limit, the excess will be covered by reinsurer.</p> <p>How shall the effect of this reinsurance be allocated to individual LoBs? Based on premium? Based on losses in each of the LoB? Based on other criteria?</p> <p>Split of the effect of some reinsurance treaties covering e.g. the above 3 LoBs and having a complex commission/profit sharing/reinstatement rules might also be difficult.</p>	As comment as no. 908
925	GC	TP-E1Q- General Comments	<p>Split of the reinsurance recoverables into the prescribed lines of business might be difficult. The insurers are able to conclude one reinsurance contract with cover for more than one LoB (e.g. one stop loss contract covering more LoBs). We would appreciate examples how this kind of contracts should be split among the particular lines of business.</p> <p>In Pillar 1 the calculation requirements are principle-based, not going into details. So basically the company can calculate the BE liabilities by any method that fits the principles (for example, RI shall be applied, but it is up to the company to come up with a method of estimation of the RI effect). Only in the end the company must be able to report the net liabilities in this split by LoB - and that's where further guidance may be needed.</p> <p>Example: the insurer is covered by a stop-loss treaty reinsurance covering for example 3 LoBs:</p> <ul style="list-style-type: none"> - Other motor (Casco), - Fire and property, - Accepted non-proportional property reinsurance. <p>The stop-loss conditions say: if total losses from these LoBs (in total) exceed given limit, the excess will be covered by reinsurer.</p> <p>How shall the effect of this reinsurance be allocated to individual LoBs? Based on premium? Based on losses in each of the LoB? Based on other criteria?</p> <p>Split of the effect of some RI treaties covering e.g. the above 3 LoBs and having a complex commission/profit sharing/reinstatement rules might also be difficult.</p> <p>We feel quarterly reporting of the risk margin at a line of business level is arbitrary. We would welcome consideration of reporting of the quarterly risk margin at an overall level.</p> <p>We note in the quarterly non-life technical provision template there is no split of the claims provision between outstanding claims and IBNR. We believe this split, at a high level, would be useful to determine changes in reserving strength. We note the split can be derived in the annual templates based on information in TP-E3.</p>	NO CHANGE See response to the comment 908
926	AFM	OF-B1Q – General Comments	There still seem to be a lot of problems with this template. Many of the formulae still do not seem to work.	EIOPA will undertake to correct any errors.

No.	Name	Reference	Comment	Resolution
927	CFOF_CROF	OF-B1Q – General Comments	The fact that group and solo reporting has been merged into one template makes the new requirements very confusing. It is now very difficult to see what exactly is required at group and solo level.	Agree with feedback that combining solo and group is confusing. It has been decided to split the template as this is also going to be a solution included in the final technical standard for reporting
928	Deloitte	OF-B1Q – General Comments	Although compared with the log files in July 2012 some items have been clarified and unclear items have been left out of scope, we observe that the setup and definitions do not reflect a group consolidation perspective as will be required for insurance groups and many items will benefit greatly from added clarification in light of such group consolidation perspective. Therefore we welcome more guidance and explanations on OF items in light of the group consolidation perspective.	Additional clarification on group specific items will be inserted where explicitly requested in the following comments
929	GC	OF-B1Q – General Comments	<p>The design of the Own Funds template requires a granular level of data. All Own Funds items have to be shown in detail on the reporting date. Given that the July 2012 templates were communicated as being largely final with the exception of certain specified outstanding items, we do not understand why the level of detail in OF-B1Q has changed from the previous version. This increases the uncertainty of firms regarding the final templates that will be implemented.</p> <p>The Own Funds reporting requirements will create a costly, burdensome and hard-to-handle process for the European insurance industry. Therefore to our view the Own Fund reporting should be revised; the reporting need only focus on data that will allow supervising authorities to derive “quality and quantity” (as stated in the Directive 2009/138). All add on and unnecessary data for this aim must be deleted (e.g. information concerning: EPIFP, nominal values, buy back during the year etc.). Furthermore cost-benefits aspects and materiality must be considered.</p> <p>We disagree with the detailed level of the public disclosure requirements proposed for live environment. It is much too detailed. In particular we don't agree to the idea of public disclosure the EPIFP. We support the approach of including EPIFP in Tier 1 as part of the reconciliation reserve. Any tiering of EPIFP would result in double-counting of risks which are already taken into consideration in the calculation of both technical provisions and the SCR. While we acknowledge the importance of liquidity risk management in general, we do not understand the rationale behind monitoring EPIFP separately from other cash inflows and cash outflows. We do not think it would make sense to identify EPIFP separately as the concept of EPIFP seems to be contradictory to the economic balance sheet approach under Solvency II. It appears to be unclear which concern the concept of EPIFP is trying to address and why the identification of this particular aspect of expected cash inflows is necessary to achieve the Solvency II objectives.</p> <p>Tiering limits on Own Funds as detailed in Article 98 SII-Directive and Article 72 EOF1 delegated acts give room for interpretation. In our view it should be clarified that all available own funds are eligible as long as they conform with Article 98 SII-Directive, i.e. if tier 1-capital is at least 50% of the SCR and tier 3-capital is not exceeding 1/3 the SCR all other own funds are completely eligible. Limiting own funds (i.e. own funds are not allowed to use to cover the SCR) is not in line with the directive.</p>	The templates follow the Level II -- to the extent that there are numerous types of own funds items, the templates must accommodate these. Complexity will mirror the complexity of undertakings. For undertakings with simple capital structures, many cells will not be relevant. For undertakings with more complex capital structures, the information requested is only that deemed consistent with an undertaking that performs adequate capital management. Reporting and disclosure of EPIFP is currently a Level II requirement - the templates will follow these requirements.
930	GDV	OF-B1Q – General Comments	The Own Fund Template contains formula errors.	Noted. EIOPA will undertake to correct any errors.
931	IE	OF-B1Q – General Comments	<p>The Own Fund Template contains formula errors.</p> <p>Also clarity is needed in regard cells for group and solo reporting</p>	<p>Specific feedback is helpful. EIOPA will undertake to correct any errors.</p> <p>Agree with feedback that combining solo and group is confusing. It has been decided to split the template as this is also going to be a solution included in the final technical standard for reporting</p>
932	Royal London Mutual	OF-B1Q – General Comments	There still seem to be a lot of problems with this template. Many of the formulae still do not seem to work.	Specific feedback is helpful. EIOPA will undertake to correct any errors.
933	GDV	OF-B1Q- cell A12	There should not be any reference to accounting. The reconciliation reserve should be the difference as calculated in the Own Funds template. Also for cells B12, A12A and B12A (and for annual and quarterly submission).	The value of some own fund items e.g. ordinary share capital, will come from financial accounting. Specific reserves from the financial accounting are not used and are instead represented by the reconciliation reserve which is derived from the excess of assets over liabilities from the Solvency II balance sheet. In this way the reconciliation reserve, at least in part, represents differences between accounting valuation and Solvency II valuation.
934	IE	OF-B1Q- cell A12	There should not be any reference to accounting. The reconciliation reserve should be the difference as calculated in the Own Funds template. Also for cells B12, A12A and B12A (and for annual and quarterly submission).	See response to the comment 933
935	Deloitte	OF-B1Q- cell A17	All Minority Interest is included in Tier 1 unrestricted and so it is unclear why there is the option in the template to tier them. We suggest EIOPA either clarify why the option to tier is there or remove the ability to enter data in tiers other than Tier 1 unrestricted.	Minority Interest are not necessarily Tier 1 unrestricted, the option to enter into other Tiers should be kept.
936	FEE	OF-B1Q- cell A17	It does not become clear to us what has to be included here: Is a total of non-available own funds related to non-EEA entities for all types of own funds (eg share capital, preference shares etc) meant whereas for EEA entities these non-available items are presented separately under each own fund type? Or should a subset be included here, so does the line exist for disclosure purposes only?	Clarification was added in the Technical Annex : Non available non-EEA own funds, due to local restrictions: regulatory or otherwise, at group level - to be completed when all the own funds of a non-EEA entity are considered to be non available at group level due to the restrictions to their availability and fungibility (in this case they should not be counted twice and consequently they should not be indicated separately in other cells)
937	AFM	OF-B1Q- cell A21	A21 - Should B502 also be deducted? It was deducted from A20. The formula seems to be missing deferred tax A15?	The formula has been corrected, as well as the description of the cell
938	DublinIMA	OF-B1Q- cell A21	Why is the deferred tax asset (cell A15) not included in this total?	The formula has been corrected, as well as the description of the cell
939	ECIROA	OF-B1Q- cell A21	Why is the deferred tax asset (cell A15) not included in this total?	The formula has been corrected, as well as the description of the cell

No.	Name	Reference	Comment	Resolution
940	GDV	OF-B1Q- cell A21	We ask EIOPA to review the formula	The formula has been corrected, as well as the description of the cell
941	IE	OF-B1Q- cell A21	Why is the deferred tax asset (cell A15) not included in this total?	The formula has been corrected, as well as the description of the cell
942	IUA London	OF-B1Q- cell A21	Why is the deferred tax asset (cell A15) not included in this total?	The formula has been corrected, as well as the description of the cell
943	Royal London Mutual	OF-B1Q- cell A21	A21 - Should B502 also be deducted? It was deducted from A20. The formula seems to be missing deferred tax A15?	The formula has been corrected, as well as the description of the cell
944	IE	OF-B1Q- cell A30	Considering the uncertainty on the requirements for calculating EPIFP, we suggest that they are not applicable for the purpose of the preparatory phase.	Reporting and disclosure of EPIFP is currently a Level II requirement - the templates will follow these requirements.
945	GDV	OF-B1Q- cell A32	How should this amount be calculated in the preparatory phase?	The information will be provided in the Technical specifications
946	IE	OF-B1Q- cell A32	It is unclear how should this amount be calculated in the preparatory phase.	The information will be provided in the Technical specifications
947	Deloitte	OF-B1Q- cell A45A	For a sponsor backed IOPR in the UK the SII balance sheet already includes any pension deficit or surplus via consolidation. Thus, no separate value for pension scheme own funds exists. We suggest that EIOPA confirm that for this scenario pension scheme own funds would not be disclosed here.	Groups. The OF related to IORPS have to be reported separately in A45A
948	Deloitte	OF-B1Q- cell A503	As all participations will be included in the investments line in the Balance Sheet their value will be included in the reconciliation reserve in the OF template. This is all tier 1 unrestricted and so the deduction should be made to the corresponding tier. It is therefore unclear why the option to tier is available. We suggest EIOPA either clarify why the option to tier is there or remove the ability to enter data in tiers other than Tier 1 unrestricted.	Holdings in subordinated liabilities may be deducted from lower Tiers.
949	Deloitte	OF-B1Q- cell A52	1) We would welcome clarification from EIOPA whether the total SCR including Add-on (Item A20 in SCR-B2A) or excluding Add-on (Item A18 in SCR-B2A "Amount of the total diversified SCR before any capital add-on") is to be reported here. 2) There appears to be a typing error in the instructions to this data cell. Reference is made to template SCR B3C for the SCR of the full internal model, but we believe it should be made to SCR B2C. We would welcome if EIOPA reviewed and corrected this, if necessary.	The undertakings should report the total SCR here, which includes any capital add on. The typing error in the instruction has been corrected, SCR number for internal model firms should be cross referenced to SCR B2C template
950	Deloitte	OF-B1Q- cell A52A	The formula refers to SCR template B2A, which is for firms applying standard formulas. For firms applying a full internal model this would need to be amended to refer to SCR template SCR_B2C.	The reference to full internal model template; SCR B2C has been now added
951	AFM	OF-B1Q- cell A53	A53 - Reference to MCR B2A should be MCR B4A	The typing error in the instruction has been corrected, MCR number should be cross referenced to MCR B4A template ; the cross reference to MCR B4B has been also added
952	Royal London Mutual	OF-B1Q- cell A53	A53 - Reference to MCR B2A should be MCR B4A	The typing error in the instruction has been corrected, MCR number should be cross referenced to MCR B4A template ; the cross reference to MCR B4B has been also added
953	Deloitte	OF-B1Q- cell A53A	The formula refers to SCR template B2A, which is for firms applying standard formulas. For firms applying a full internal model this would need to be amended to refer to SCR template SCR_B2C.	The reference to full internal model template; SCR B2C has been now added
954	DublinIMA	OF-B1Q- cell A6	The definition of Surplus funds that fall under Article 91 (2) of the Solvency II Framework Directive (Directive 2009/138.EC) needs to be further clarified. We understand it to be the retained earnings on the existing accounting basis adjusted only for the solvency ii balance sheet valuation differences. Other items (such as those flowing through AOCI under US GAAP) are excluded and flow directly to the reconciliation reserve.	Undertakings should refer to Recitals 50 and 51 of the Directive for an understanding of surplus funds and to the relevant national law referred to in Article 91 (2)
955	ECIROA	OF-B1Q- cell A6	The definition of Surplus funds that fall under Article 91 (2) of the Solvency II Framework Directive (Directive 2009/138.EC) needs to be further clarified. We understand it to be the retained earnings on the existing accounting basis adjusted only for the solvency ii balance sheet valuation differences. Other items (such as those flowing through AOCI under US GAAP) are excluded and flow directly to the reconciliation reserve.	Undertakings should refer to Recitals 50 and 51 of the Directive for an understanding of surplus funds and to the relevant national law referred to in Article 91 (2)
956	IE	OF-B1Q- cell A6	The definition of Surplus funds that fall under Article 91 (2) of the Solvency II Framework Directive (Directive 2009/138.EC) is unclear. We understand it to be the retained earnings on the existing accounting basis adjusted only for the solvency II balance sheet valuation differences. Other items (such as those flowing through AOCI under US GAAP) are excluded and flow directly to the reconciliation reserve.	Undertakings should refer to Recitals 50 and 51 of the Directive for an understanding of surplus funds and to the relevant national law referred to in Article 91 (2)

No.	Name	Reference	Comment	Resolution
957	IUA London	OF-B1Q- cell A6	The definition of Surplus funds that fall under Article 91 (2) of the Solvency II Framework Directive (Directive 2009/138.EC) needs to be further clarified. We understand it to be the retained earnings on the existing accounting basis adjusted only for the solvency ii balance sheet valuation differences. Other items (such as those flowing through AOCI under US GAAP) are excluded and flow directly to the reconciliation reserve.	Undertakings should refer to Recitals 50 and 51 of the Directive for an understanding of surplus funds and to the relevant national law referred to in Article 91 (2)
958	Deloitte	OF-B1Q- cell A603	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
959	Deloitte	OF-B1Q- cell A604	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
960	Deloitte	OF-B1Q- cell A605	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
961	Deloitte	OF-B1Q- cell A606	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
962	Deloitte	OF-B1Q- cell A607	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
963	AFM	OF-B1Q- cell B10	B10 - Reference to subordinated member accounts is wrong. Should be preference shares.	Agreed. The technical annex has been amended.
964	Royal London Mutual	OF-B1Q- cell B10	B10 - Reference to subordinated member accounts is wrong. Should be preference shares.	Agreed. The technical annex has been amended.
965	AFM	OF-B1Q- cell B16A	B16A - typo - unrestricted should be 'restricted'.	Agreed. The technical annex has been amended.
966	Royal London Mutual	OF-B1Q- cell B16A	B16A - typo - unrestricted should be 'restricted'.	Agreed. The technical annex has been amended.
967	Deloitte	OF-B1Q- cell B17	Please see comments in "OF-B1Q-cell A17"	Please see response to the comment 936
968	Deloitte	OF-B1Q- cell B17A	Please see comments in "OF-B1Q-cell A17"	Please see response to the comment 936
969	AFM	OF-B1Q- cell B21	B21 - Should B502 also be deducted? It was deducted from A20.	Agreed. The technical annex will be amended. B502 should be deducted from B20 and B21. As should sum horizontally. Therefore, the formula in A20 = B20 + B20A + C20 + D20; and the formula for A21 = B21 + B21A + C21 + D21
970	Royal London Mutual	OF-B1Q- cell B21	B21 - Should B502 also be deducted? It was deducted from A20.	Agreed. The technical annex will be amended. B502 should be deducted from B20 and B21. As should sum horizontally. Therefore, the formula in A20 = B20 + B20A + C20 + D20; and the formula for A21 = B21 + B21A + C21 + D21
971	IE	OF-B1Q- cell B25	It is unclear if 'Foreseeable dividends and distributions' include both stock and cash dividends or only cash dividends.	The amount of the foreseeable dividends to be paid in a form that does not reduce the amount of Unrestricted Tier 1 own funds should not be deducted. This can include stock dividends but it will depend on the economic impact of the stock dividend in question.
972	GDV	OF-B1Q- cell B26	We ask EIOPA to review the formula	Agreed. The technical annex has been amended. The formula at solo level included.
973	IE	OF-B1Q- cell B26	We ask EIOPA to review the formula	Agreed. The technical annex has been amended. The formula at solo level included.
974	FEE	OF-B1Q- cell B28	It should be clarified whether the deductions that result from limitations to fungibility and transferability of capital which are specific to an instrument issued be presented here? Or should these amounts be presented elsewhere (e.g. in line 17 for non-EEA entities and other lines in case of EEA-entities (across tiers).	Those are non available own funds of other related undertakings, including ancillary service undertakings, that dont' belong to the insurance sector or to other financial sector (L2: art 323 bis SCG3 letter f) . They should not be counted twice and consequently not reported separately in other cells.
975	GDV	OF-B1Q- cell B28	We ask EIOPA to review the formula	No formula in B28

No.	Name	Reference	Comment	Resolution
976	IE	OF-B1Q- cell B28	We ask EIOPA to review the formula	No formula in B28
977	GDV	OF-B1Q- cell B29A	We ask EIOPA to review the formula	The formula is correct
978	IE	OF-B1Q- cell B29A	We ask EIOPA to review the formula	The formula is correct
979	AFM	OF-B1Q- cell B48	B48 - Should B502 and B603 to C605 also be deducted? The reference to B12 should be to B12A. Could this cell simply be equal to B21, ie B48=B21?	Agreed. The formula should be simplified : B48= B21
980	CFOF_CROF	OF-B1Q- cell B48	Formula not OK and not complete on several items, it is unclear how and where the OFS entities are excluded	Agreed. The formula should be simplified : B48= B21
981	GDV	OF-B1Q- cell B48	We ask EIOPA to review the formula	Agreed. The formula should be simplified : B48= B21
982	IE	OF-B1Q- cell B48	Formula not OK and not complete on several items. It is unclear how and where the OFS entities are excluded	Agreed. The formula should be simplified : B48= B21
983	Royal London Mutual	OF-B1Q- cell B48	B48 - Should B502 and B603 to C605 also be deducted? The reference to B12 should be to B12A. Could this cell simply be equal to B21, ie B48=B21?	Agreed. The formula should be simplified : B48= B21
984	Deloitte	OF-B1Q- cell B50	The formula given is B50=B46. This does not take into account that own funds cannot be negative. In our opinion the correct formula should therefore be B50=max(B46,0). We would welcome if EIOPA reviewed the formula and corrected it if necessary.	Agreed. The technical annex has been amended.
985	GDV	OF-B1Q- cell B50	We believe that the formula stated in the item instructions (B50=B46) of Annex II is not correct. The correct formula should be B50=max(B46,0). We ask EIOPA to review the formula and make a correction if necessary.	Agreed. The technical annex has been amended.
986	IE	OF-B1Q- cell B50	We believe that the formula stated in the item instructions (B50=B46) of Annex II is not correct. The correct formula should be B50=max(B46,0). We ask EIOPA to review the formula and make a correction if necessary.	Agreed. The technical annex has been amended.
987	IE	OF-B1Q- cell B502	It is not clear what should be included in B502. Own funds from the financial statements that do not qualify as S2 own funds would be excluded from B/S excess of assets over liabilities, and therefore would automatically not be represented in own funds and the reconciliation reserve. Inclusion in B502 would result in a double deduction.	OFSG review definition to see if clarity can be improved. B502 refers to items (e.g. preference shares) that do not meet the criteria. The assets that indirectly correspond to the issuance of the item will appear on the Solvency 2 balance sheet as assets. Therefore a deduction for the value of the item would not be a double deduction.
988	Deloitte	OF-B1Q- cell B503	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
989	Deloitte	OF-B1Q- cell B603	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
990	Deloitte	OF-B1Q- cell B604	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
991	Deloitte	OF-B1Q- cell B605	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
992	Deloitte	OF-B1Q- cell B606	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
993	Deloitte	OF-B1Q- cell B607	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
994	Deloitte	OF-B1Q- cell C17	Please see comments in "OF-B1Q-cell A17"	See response to the comment 936
995	CFOF_CROF	OF-B1Q- cell C43	Formula is based on inapplicable cells for the preparatory phase	Agreed, but the formulae have been preserved in anticipation of the implementation of Solvency II. The cells will have zero values and therefore no impact.
996	IE	OF-B1Q- cell C43	Formula is based on inapplicable cells for the preparatory phase	Agreed, but the formulae have been preserved in anticipation of the implementation of Solvency II. The cells will have zero values and therefore no impact.
997	CFOF_CROF	OF-B1Q- cell C44	Formula is based on inapplicable cells for the preparatory phase	Agreed, but the formulae have been preserved in anticipation of the implementation of Solvency II. The cells will have zero values and therefore no impact.
998	IE	OF-B1Q- cell C44	Formula is based on inapplicable cells for the preparatory phase	Agreed, but the formulae have been preserved in anticipation of the implementation of Solvency II. The cells will have zero values and therefore no impact.
999	AFM	OF-B1Q- cell C48	C48 - Is the formula missing '+B16A -B17A - B18A - B19A'? Should C603 to C605 also be deducted. Could this cell simply be equal to B21A, ie C48=B21A?	Agreed. The formula should be simplified : C48= B21A
1000	CFOF_CROF	OF-B1Q- cell C48	Formula not OK and not complete on several items, it is unclear how and where the OFS entities are excluded	Agreed. The formula should be simplified : C48= B21A

No.	Name	Reference	Comment	Resolution
1001	GDV	OF-B1Q- cell C48	We ask EIOPA to review the formula	Agreed. The formula should be simplified : C48= B21A
1002	IE	OF-B1Q- cell C48	Formula not OK and not complete on several items. It is unclear how and where the OFS entities are excluded	Agreed. The formula should be simplified : C48= B21A
1003	Royal London Mutual	OF-B1Q- cell C48	C48 - Is the formula missing '+B16A -B17A - B18A - B19A'? Should C603 to C605 also be deducted. Could this cell simply be equal to B21A, ie C48=B21A?	Agreed. The formula should be simplified : C48= B21A
1004	Deloitte	OF-B1Q- cell C50	The formula given is $C50=\max(0,(\min(B50*0.25,C46)))$. In our opinion the correct formula should be $C50=\max(0,(\min(B50*0.2,C46)))$. We would welcome if EIOPA reviewed the formula and corrected it if necessary.	Disagree. The formula references unrestricted Tier 1, where the limit is equivalent to 25%. As opposed to total Tier 1, where the limit is 20%.
1005	GDV	OF-B1Q- cell C50	We believe that the formula stated in the item instructions ($C50=\max(0,(\min(B50*0.25,C46)))$) of Annex II is not correct. The correct formula should be $C50=\max(0,(\min(B50*0.2,C46)))$. We ask EIOPA to review the formula and make a correction if necessary. --> see IM Art. 72 (3)	Disagree. The formula references unrestricted Tier 1, where the limit is equivalent to 25%. As opposed to total Tier 1, where the limit is 20%.
1006	IE	OF-B1Q- cell C50	We believe that the formula stated in the item instructions ($C50=\max(0,(\min(B50*0.25,C46)))$) of Annex II is not correct. The correct formula should be $C50=\max(0,(\min(B50*0.2,C46)))$. We ask EIOPA to review the formula and make a correction if necessary. --> see IM Art. 72 (3)	Disagree. The formula references unrestricted Tier 1, where the limit is equivalent to 25%. As opposed to total Tier 1, where the limit is 20%.
1007	Deloitte	OF-B1Q- cell C503	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
1008	AFM	OF-B1Q- cell C50A	C50A - The formula looks wrong. Shouldn't A52A actually be B50A?	Agreed. 25% needs to reference an unrestricted Tier 1 number: A52A should B50A
1009	GDV	OF-B1Q- cell C50A	We ask EIOPA to review the formula	Agreed. 25% needs to reference an unrestricted Tier 1 number: A52A should B50A
1010	IE	OF-B1Q- cell C50A	We ask EIOPA to review the formula	Agreed. 25% needs to reference an unrestricted Tier 1 number: A52A should B50A
1011	Royal London Mutual	OF-B1Q- cell C50A	C50A - The formula looks wrong. Shouldn't A52A actually be B50A?	Agreed. 25% needs to reference an unrestricted Tier 1 number: A52A should B50A
1012	Deloitte	OF-B1Q- cell C603	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
1013	Deloitte	OF-B1Q- cell C604	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
1014	Deloitte	OF-B1Q- cell C605	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
1015	Deloitte	OF-B1Q- cell C606	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
1016	Deloitte	OF-B1Q- cell C607	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
1017	Deloitte	OF-B1Q- cell D17	Please see comments in "OF-B1Q-cell A17"	See response to the comment 936
1018	AFM	OF-B1Q- cell D20	D20 - Formula says we deduct F502, but F502 does not exist.	Agree. F502 should not be referenced. Technical Annex has been amended
1019	Deloitte	OF-B1Q- cell D20	The formula given in the instructions is $D20= D4+D8+D9+D13+D15+D16-F502$. However, cell F502 does not exist. We would welcome if EIOPA reviewed the formula and corrected it if necessary.	Agree. F502 should not be referenced. Technical Annex has been amended
1020	DublinIMA	OF-B1Q- cell D20	The formula references cell F502, but this does not exist in the QRT	Agree. F502 should not be referenced. Technical Annex has been amended
1021	ECIROA	OF-B1Q- cell D20	The formula references cell F502, but this does not exist in the QRT	Agree. F502 should not be referenced. Technical Annex has been amended
1022	GDV	OF-B1Q- cell D20	We ask EIOPA to review the formula	Agree. F502 should not be referenced. Technical Annex has been amended
1023	IE	OF-B1Q- cell D20	The formula references cell F502, but this does not exist in the QRT	Agree. F502 should not be referenced. Technical Annex has been amended
1024	IUA London	OF-B1Q- cell D20	The formula references cell F502, but this does not exist in the QRT	Agree. F502 should not be referenced. Technical Annex has been amended
1025	Royal London Mutual	OF-B1Q- cell D20	D20 - Formula says we deduct F502, but F502 does not exist.	Agree. F502 should not be referenced. Technical Annex has been amended
1026	AFM	OF-B1Q- cell D21	A21 to D21 - 'ITEM' descriptions seem to be wrong. Surely they should be 'Total basic own funds after adjustment (group)'.	Agree, the technical annex has been updated.
1027	Royal London Mutual	OF-B1Q- cell D21	A21 to D21 - 'ITEM' descriptions seem to be wrong. Surely they should be 'Total basic own funds after adjustment (group)'.	Agree, the technical annex has been updated.
1028	CFOF_CROF	OF-B1Q- cell D43	Formula is based on inapplicable cells for the preparatory phase	Agreed, but the formulae have been preserved in anticipation of the implementation of Solvency II. The cells will have zero values and therefore no impact.

No.	Name	Reference	Comment	Resolution
1029	IE	OF-B1Q- cell D43	Formula is based on inapplicable cells for the preparatory phase	Agreed, but the formulae have been preserved in anticipation of the implementation of Solvency II. The cells will have zero values and therefore no impact.
1030	CFOF_CROF	OF-B1Q- cell D44	Formula is based on inapplicable cells for the preparatory phase	Agreed, but the formulae have been preserved in anticipation of the implementation of Solvency II. The cells will have zero values and therefore no impact.
1031	IE	OF-B1Q- cell D44	Formula is based on inapplicable cells for the preparatory phase	Agreed, but the formulae have been preserved in anticipation of the implementation of Solvency II. The cells will have zero values and therefore no impact.
1032	CFOF_CROF	OF-B1Q- cell D48	Formula not OK and not complete on several items, it is unclear how and where the OFS entities are excluded	The formula is correct
1033	GDV	OF-B1Q- cell D48	We ask EIOPA to review the formula	The formula is correct
1034	IE	OF-B1Q- cell D48	Formula not OK and not complete on several items. It is unclear how and where the OFS entities are excluded	The formula is correct
1035	Deloitte	OF-B1Q- cell D50	The formula given is $D50 = \max(0, (\min(0.5 * A52, ((C46) - C50) + (D46))))$. In our opinion the correct formula should be $\max(0, \min(B50 + C50, 0.5 * A52, (C46 - C50 + D46)))$ to take account of all tier limits. We would welcome if EIOPA reviewed the formula and corrected it if necessary.	The formula calculates eligible Tier 2 own funds. Tier 2 eligible own funds are those which meet the Tier 2 criteria in their own right or those Tier 1 restricted own funds that have been excluded from Tier 1 due to the operation of limits. Tier 1 unrestricted own funds are not included as they are always eligible to count as Tier 1 i.e. the SCR can be exceeded by unrestricted Tier 1 but Tier 2 own funds that account for 50% of the SCR would still be eligible.
1036	GDV	OF-B1Q- cell D50	We believe that the formula stated in the item instructions $D50 = \max(0, (\min(0.5 * A52, ((C46) - C50) + (D46))))$ of Annex II is not correct. The correct formula should be $D50 = \max(0, \min(B50 + C50, 0.5 * A52, (C46 - C50 + D46)))$. We ask EIOPA to review the formula and make a correction if necessary.	The formula calculates eligible Tier 2 own funds. Tier 2 eligible own funds are those which meet the Tier 2 criteria in their own right or those Tier 1 restricted own funds that have been excluded from Tier 1 due to the operation of limits. Tier 1 unrestricted own funds are not included as they are always eligible to count as Tier 1 i.e. the SCR can be exceeded by unrestricted Tier 1 but Tier 2 own funds that account for 50% of the SCR would still be eligible.
1037	IE	OF-B1Q- cell D50	We believe that the formula stated in the item instructions $D50 = \max(0, (\min(0.5 * A52, ((C46) - C50) + (D46))))$ of Annex II is not correct. The correct formula should be $D50 = \max(0, \min(B50 + C50, 0.5 * A52, (C46 - C50 + D46)))$. We ask EIOPA to review the formula and make a correction if necessary.	The formula calculates eligible Tier 2 own funds. Tier 2 eligible own funds are those which meet the Tier 2 criteria in their own right or those Tier 1 restricted own funds that have been excluded from Tier 1 due to the operation of limits. Tier 1 unrestricted own funds are not included as they are always eligible to count as Tier 1 i.e. the SCR can be exceeded by unrestricted Tier 1 but Tier 2 own funds that account for 50% of the SCR would still be eligible.
1038	Deloitte	OF-B1Q- cell D503	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
1039	Deloitte	OF-B1Q- cell D51	The formula given is $D51 = \max(0, (\min(0.2 * A53, ((C46) - C51) + (D46))))$. In our opinion the correct formula should be $D51 = \max(0, \min(0.25 * (B51 + C51), 0.2 * A53, C47 - C51 + D47))$. We would welcome if EIOPA reviewed the formula and corrected it if necessary.	Tier 1 unrestricted own funds are not included as they are always eligible to count as Tier 1 i.e. the MCR can be exceeded by unrestricted Tier 1 but Tier 2 own funds that account for 20% of the SCR would still be eligible.
1040	GDV	OF-B1Q- cell D51	We believe that the formula stated in the item instructions $(D51 = \max(0, (\min(0.2 * A53, ((C46) - C51) + (D46))))$ of Annex II is not correct. The correct formula should be $D51 = \max(0, \min(0.25 * (B51 + C51), 0.2 * A53, C47 - C51 + D47))$. We ask EIOPA to review the formula and make a correction if necessary.	Tier 1 unrestricted own funds are not included as they are always eligible to count as Tier 1 i.e. the MCR can be exceeded by unrestricted Tier 1 but Tier 2 own funds that account for 20% of the SCR would still be eligible.
1041	IE	OF-B1Q- cell D51	We believe that the formula stated in the item instructions $(D51 = \max(0, (\min(0.2 * A53, ((C46) - C51) + (D46))))$ of Annex II is not correct. The correct formula should be $D51 = \max(0, \min(0.25 * (B51 + C51), 0.2 * A53, C47 - C51 + D47))$. We ask EIOPA to review the formula and make a correction if necessary.	Tier 1 unrestricted own funds are not included as they are always eligible to count as Tier 1 i.e. the MCR can be exceeded by unrestricted Tier 1 but Tier 2 own funds that account for 20% of the SCR would still be eligible.
1042	Deloitte	OF-B1Q- cell D603	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
1043	Deloitte	OF-B1Q- cell D604	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
1044	Deloitte	OF-B1Q- cell D605	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
1045	Deloitte	OF-B1Q- cell D606	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
1046	Deloitte	OF-B1Q- cell D607	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
1047	CFOF_CROF	OF-B1Q- cell E48	Formula not OK and not complete on several items, it is unclear how and where the OFS entities are excluded	Groups. The formula is correct

No.	Name	Reference	Comment	Resolution
1048	GDV	OF-B1Q- cell E48	We ask EIOPA to review the formula	The formula is correct
1049	IE	OF-B1Q- cell E48	Formula not OK and not complete on several items. It is unclear how and where the OFS entities are excluded	The formula is correct
1050	Deloitte	OF-B1Q- cell E50	The formula given is $E50 = \max(0, \min((0.5 * A52) - D50, 0.15 * A52, (E46)))$. In our opinion the correct formula should be $E50 = \max(0, \min(0.15 / 0.85 * (B50 + C50 + D50); B50 + C50 - D50; 0.15 * A52; \text{Sum}(0.5 * A52, -D50), \text{Sum}(D46, -D50, E46)))$ to take account of all tier limits. We would welcome if EIOPA reviewed the formula and corrected it if necessary.	Tier 1 unrestricted own funds are not included as they are always eligible to count as Tier 1 i.e. the SCR can be exceeded by unrestricted Tier 1 but Tier 3 own funds that account for 15% of the SCR would still be eligible.
1051	GDV	OF-B1Q- cell E50	We believe that the formula stated in the item instructions ($E50 = \max(0, \min((0.5 * A52) - D50, 0.15 * A52, (E46)))$) of Annex II is not correct. The correct formula should be $E50 = \max(0, \min(0.15 / 0.85 * (B50 + C50 + D50); B50 + C50 - D50; 0.15 * A52; \text{Sum}(0.5 * A52, -D50), \text{Sum}(D46, -D50, E46)))$. We ask EIOPA to review the formula and make a correction if necessary.	Tier 1 unrestricted own funds are not included as they are always eligible to count as Tier 1 i.e. the SCR can be exceeded by unrestricted Tier 1 but Tier 3 own funds that account for 15% of the SCR would still be eligible.
1052	IE	OF-B1Q- cell E50	We believe that the formula stated in the item instructions ($E50 = \max(0, \min((0.5 * A52) - D50, 0.15 * A52, (E46)))$) of Annex II is not correct. The correct formula should be $E50 = \max(0, \min(0.15 / 0.85 * (B50 + C50 + D50); B50 + C50 - D50; 0.15 * A52; \text{Sum}(0.5 * A52, -D50), \text{Sum}(D46, -D50, E46)))$. We ask EIOPA to review the formula and make a correction if necessary.	Tier 1 unrestricted own funds are not included as they are always eligible to count as Tier 1 i.e. the SCR can be exceeded by unrestricted Tier 1 but Tier 3 own funds that account for 15% of the SCR would still be eligible.
1053	Deloitte	OF-B1Q- cell E604	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
1054	Deloitte	OF-B1Q- cell E605	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
1055	Deloitte	OF-B1Q- cell E606	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
1056	AFM	OF-B1Q- cell E607	E607 references E503 and E603, but these are blank cells (greyed out).	Agreed. The technical Annex has been amended
1057	Deloitte	OF-B1Q- cell E607	Please see comments in "OF-B1Q-cell A503"	Holdings in subordinated liabilities may be deducted from lower Tiers.
1058	Royal London Mutual	OF-B1Q- cell E607	E607 references E503 and E603, but these are blank cells (greyed out).	Agreed. The technical Annex has been amended
1059	AMICE	SCR - B2A – General Comment	This template covers the Solvency Capital Requirement for firms calculating their solvency requirements using a Standard Formula or Partial Internal Model. The template should be established according to the specific design of the undertaking's partial internal model in order to capture the appropriate level of the aggregation between the Standard Formula and the Internal Model components.	Noted
1060	Deloitte	SCR - B2A – General Comment	What is the purpose of the distinction between "N/A" and "N" for cell A30 (which is not applicable for the purpose of this CP)?	The option N/A is to be completed by undertakings, if they are not RFF reporters; Option N is to be selected when SCR B2A is to be completed for a remaining part (by RFF reporter)
1061	GDV	SCR - B2A – General Comment	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the supervisory reporting. See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	EIOPA acknowledges undertakings concerns about uncertainties as to Omnibus 2 negotiations and their impact on Pillar 1 requirements and as a consequence, a possible impact on Pillar 3 requirements. . However it believes that the preparation for the submission of information under Solvency II is crucial. In addition, EIOPA is working under the assumption that OMBII and delegated acts requirements will be available in time for NCAs and undertakings to prepare for interim reporting; In which case, at that stage, EIOPA will prepare a technical specification and provide guidance on the assumptions underlying the calculation of technical provisions and the standard formula calculation, which reflect the decision on OMBII and the available delegated acts.
1062	IE	SCR - B2A – General Comment	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the preparatory reporting.	EIOPA acknowledges undertakings concerns about uncertainties as to Omnibus 2 negotiations and their impact on Pillar 1 requirements and as a consequence, a possible impact on Pillar 3 requirements. . However it believes that the preparation for the submission of information under Solvency II is crucial. In addition, EIOPA is working under the assumption that OMBII and delegated acts requirements will be available in time for NCAs and undertakings to prepare for interim reporting; In which case, at that stage, EIOPA will prepare a technical specification and provide guidance on the assumptions underlying the calculation of technical provisions and the standard formula calculation, which reflect the decision on OMBII and the available delegated acts.

No.	Name	Reference	Comment	Resolution
			See 1.13 and 1.23: this QRT ought not to apply to internal model applicants. Checking formula in cell A31 (which is not applicable for interim measures) is wrong. It should be $A31 = B10 - A11 - A12 + A13$	
1063	ROAM	SCR - B2A – General Comment	Non-life Technical Provisions Dans le cadre de la période transitoire, les membres de la ROAM s'opposent à l'exigence de transmettre des états de provisions techniques S2 si Omnibus 2 n'est pas adoptée avant fin 2013.	EIOPA acknowledges undertakings concerns about uncertainties as to Omnibus 2 negotiations and their impact on Pillar 1 requirements and as a consequence, a possible impact on Pillar 3 requirements. . However it believes that the preparation for the submission of information under Solvency II is crucial. In addition, EIOPA is working under the assumption that OMBII and delegated acts requirements will be available in time for NCAs and undertakings to prepare for interim reporting; In which case, at that stage, EIOPA will prepare a technical specification and provide guidance on the assumptions underlying the calculation of technical provisions and the standard formula calculation, which reflect the decision on OMBII and the available delegated acts.
1064	RSA	SCR - B2A – General Comment	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 132 and 198
1065	IE	SCR - B2A - cell A13	Incorrect reference in log file to market risk should be referencing operational risk	The Technical Annex has been amended
1066	IE	SCR - B2A - cell A14C	It is unclear how will Loss-absorbing capacity of technical provisions be included	Technical specification will be provided
1067	AFM	SCR - B2A - cell A2	A2 - Reference to A1 in 2nd para on technical annex II should be A2.	The Technical Annex has been amended
1068	Royal London Mutual	SCR - B2A - cell A2	A2 - Reference to A1 in 2nd para on technical annex II should be A2.	The Technical Annex has been amended
1069	AFM	SCR - B2A - cell B1	B1 - Reference to A1 in 2nd para of technical annex II should be B1.	The Technical Annex has been amended
1070	Royal London Mutual	SCR - B2A - cell B1	B1 - Reference to A1 in 2nd para of technical annex II should be B1.	The Technical Annex has been amended
1071	Deloitte	SCR - B2B – General Comment	What is the purpose of the distinction between "N/A" and "N" for cell A30 (which is not applicable for the purpose of this CP)?	The option N/A is to be completed by undertakings, if they are not RFF reporters; Option N is to be selected when SCR B2B is to be completed for a remaining part (by RFF reporter)
1072	GDV	SCR - B2B – General Comment	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the supervisory reporting. See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 1061
1073	IE	SCR - B2B – General Comment	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the preparatory reporting. See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 1062
1074	RSA	SCR - B2B – General Comment	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 132 and 198
1075	Deloitte	SCR - B2C – General Comment	What is the purpose of the distinction between "N/A" and "N" for cell A30 (which is not applicable for the purpose of this CP)?	The option N/A is to be completed by undertakings, if they are not RFF reporters; Option N is to be selected when SCR B2C is to be completed for a remaining part (by RFF reporter)
1076	GDV	SCR - B2C – General Comment	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the supervisory reporting.	See response to the comment 1061
1077	IE	SCR - B2C – General Comment	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the preparatory reporting.	See response to the comment 1062
1078	Deloitte	SCR - B3A – General Comment	What is the purpose of the distinction between "N/A" and "N" for cell A30 (which is not applicable for the purpose of this CP)?	The option N/A is to be completed by undertakings, if they are not RFF reporters; Option N is to be selected when SCR B2A is to be completed for a remaining part (by RFF reporter)
1079	GDV	SCR - B3A – General	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the supervisory reporting. See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 1061
1080	IE	SCR - B3A – General	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the preparatory reporting. See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 1062
1082	RSA	SCR - B3A – General Comment	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 132 and 198

No.	Name	Reference	Comment	Resolution
1083	Deloitte	SCR - B3A- cell A1	Need for clarification in the presence of several General Accounts (not RFF) of "assets sensitive to interest rate down shock" as we observe more than one understanding from insurers: (1) the General Accounts that are sensitive to that shock or (2) there is a need to identify within the General Account the assets that are sensitive to this shock. (1) can be complex to put in place within an automated reporting process as it implies to flag the General Accounts according to their sensitivities, which might change over years (2) might be meaningless given the complex interactions between assets and liabilities as well as between types of assets Comment applies to A1 - A21 and A1A - A21A	It is not clear what is meant when referring to General Accounts; The underlying assets are to be reported, that reflect all assets sensitive to interest rate risk , as used for calculation of up or down shock
1084	GDV	SCR - B3B – General Comment	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the supervisory reporting. See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 1061
1085	IE	SCR - B3B – General Comment	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the preparatory reporting. See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 1062
1086	RSA	SCR - B3B – General Comment	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 132 and 198
1087	GDV	SCR - B3C – General	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the supervisory reporting. See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 1061
1088	IE	SCR - B3C – General Comment	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the preparatory reporting. See 1.13 and 1.23: this QRT ought not to apply to internal model applicants. It is not clear what is meant by assets subject to mortality risk or longevity risk (for example). It is not clear if undertakings need to show all assets backing liabilities here or just (for example) reinsurance assets whose value will change under the stress.	See response to the comment 1062
1089	RSA	SCR - B3C – General Comment	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 132 and 198
1090	Deloitte	SCR - B3C- cell A1	Need for clarification in the presence of several guarantees backed by a General Account of "assets and liabilities subject to mortality risks" as we observe more than one understanding from insurers: (1) the General Account is taken as a whole even if backing guarantees sensitive to mortality and longevity or (2) there a need to separate the liabilities sensitive to mortality from the liabilities sensitive to longevity. (2) might be complex to perform as the calculation is likely to be made a the level of the portfolio and would require to allocate the assets to liabilities Comment applies to A1 - A9 and A1A - A9A	It is not clear what is meant when referring to General Accounts; there is a need to separate the liabilities sensitive to mortality from the liabilities sensitive to longevity
1091	GDV	SCR - B3D – General Comment	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the supervisory reporting. See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See resposne to the comment 1061
1092	IE	SCR - B3D – General Comment	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the preparatory reporting. See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 1062
1093	RSA	SCR - B3D – General Comment	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 132 and 198
1094	IE	SCR - B3D- cell A21	Cross reference should be to A23 of SCR - B3F	Technical Annex has been amended
1095	IE	SCR - B3D- cell A22	Cross reference should be to A23 of SCR - B3F	We agree that Technical Annex should be amended, however the correct cross reference of cell A22 to SCR B3F should be cell A24; The Technical Annex SCR - B3D - L has been amended accordingly
1096	IE	SCR - B3D- cell A23	Cross reference should be to A23 of SCR - B3F	We agree that Technical Annex should be amended, however the correct cross reference of cell A23 to SCR B3F should be cell A25; The Technical Annex SCR - B3D - L has been amended accordingly
1097	GDV	SCR - B3E – General Comment	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the supervisory reporting. See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 1061
1098	IE	SCR - B3E – General Comment	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the preparatory reporting. See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 1062
1099	RSA	SCR - B3E – General Comment	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 132 and 198
		SCR - B3F –	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the supervisory reporting.	Disagree: the templates required during the preparatory phase are stable and it is unlikely that these will be affected

No.	Name	Reference	Comment	Resolution
1100	GDV	General Comment	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	by the legislative process. Also EIOPA considers setting up systems and processes ready for reporting as an important element of the preparation process
1101	IE	SCR - B3F – General Comment	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the preparatory reporting. See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See comment 1100
1102	RSA	SCR - B3F – General Comment	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See comment 754
1103	IE	SCR - B3F- cell C23-C25	Cross reference to OJ18 should be to OJ23.	Log has been amended C24=OJ34 C25=PM33
1104	Deloitte	SCR - B3F- cell NB1,ND1,NF1,NH1,NJ1	We would welcome more clarification with regard to the definition of benefits payable since it is not clear from Annex II guidance if benefits amount is the gross value of benefits or discounted value of benefits payable.	Agree - LOG file has been amended
1105	Deloitte	SCR - B3F- cell OA1	We would welcome more clarification with regard to what constitutes "largest number of persons".	Technical Annex II can not be adapted. Question needs to be specified because there are already 3 conditions mentioned.
1106	Deloitte	SCR - B3F- cell PB21	Please see comments on "SCR - B3F - Cell PC1"	Unfortunately, initial costst can not be avoided and reinsurers have to upgrade the renewal information.
1107	Deloitte	SCR - B3F- cell PC1	Reinsurance undertakings will need to develop systems to get policyholder level information, particularly when reinsurance undertaking accepts books by accepting bouquets of insurance.This could lead to disproportionally high costs for reinsurance undertakings for providing this information to regulators.	Unfortunately, initial costst can not be avoided and reinsurers have to upgrade the renewal information.
1108	Deloitte	SCR - B3F- cell PD1,PF1,PH1	Futher clarification is required whether the best estimate cost should be gross cost or discounted value of expected costs?	Agree - LOG file has been amended
1109	Deloitte	SCR - B3F- cell PE1, PG1, PI1	Please see comments on "SCR - B3F - Cell PC1"	Unfortunately, initial costst can not be avoided and reinsurers have to upgrade the renewal information.
1110	Deloitte	SCR - B3F- cell PK21	Futher clarification is required if this includes any specific treaty reinsurance contracts or all should be specific facultative contracts.	There is no need to adapt technical Annex II. Both types of reinsurance must be included.
1111	IE	SCR - B3F- cell PM21	The suggested formula does not capture capital requirement arising for IP element of calculation. Possibly needs an additional cell (PJ2 for example) that calculates CR for IP which is then added to formula for PM21 as it stands.	Template and LOG file has been chnaged and new cell and references added. Please see Log change file
1112	GDV	SCR - B3G – General Comments	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the supervisory reporting. See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 1061
1113	IE	SCR - B3G – General Comments	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the preparatory reporting. See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comment 1062
1114	RSA	SCR - B3G – General Comments	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	See response to the comments 132 and 198
1115	CFOF_CROF	MCR - B4A – General Comments	According to the tables in the appendices, the MCR templates are only to be completed on an annual basis. According to Guideline 15 (p1.52), the MCR templates are to be completed on a quarterly basis. There is an inconsistency which should be corrected.	EIOPA confirms that MCR is to be reported on quarterly and annual basis during the preparatory phase
1116	GDV	MCR - B4A – General Comments	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the supervisory reporting.	See response to the comment 1061
1117	IE	MCR - B4A – General Comments	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the preparatory reporting.	See response to the comment 1062
1118	AMICE	MCR - B4A- cell A27	MCR Cap The LOG document should make clearer that the CAP on the MCR should be based on the latest annual or recalculated SCR without add-on. We acknowledge that this could be a Level 2 issue. The LOG document should make clearer that the CAP on the MCR should be based on the latest annual or recalculated SCR without add-on. We acknowledge that this could be a Level 2 issue.	EIOPA confirms that SCR should be inclusive of capital add on. During preparatory phase, MCR CAP is to be based on SCR number without any capital add on

No.	Name	Reference	Comment	Resolution
1119	AMICE	MCR - B4A- cell A28	MCR Floor The LOG document should make clearer that the FLOOR on the MCR should be based on the latest annual or recalculated SCR without add-on. The LOG document should make clearer that the FLOOR on the MCR should be based on the latest annual or recalculated SCR without add-on.	See response to the comment 1118
1120	CFOF_CROF	MCR - B4B – General Comments	According to the tables in the appendices, the MCR templates are only to be completed on an annual basis. According to Guideline 15 (p1.52), the MCR templates are to be completed on a quarterly basis. There is an inconsistency which should be corrected.	EIOPA confirms that MCR is to be reported on quarterly and annual basis during the preparatory phase
1121	GDV	MCR - B4B – General Comments	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the supervisory reporting.	See response to the comment 1061
1122	IE	MCR - B4B – General Comments	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the preparatory reporting.	See response to the comment 1062
1123	GDV	G01-General Comments	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the supervisory reporting. Also group level requirements should follow in a next step after Solvency II comes into force.	See response to the comment 108
1124	IE	G01-General Comments	We reiterate that if the legislative process is not completed, Pillar I elements should not be part of the preparatory reporting. Also group level requirements should follow in a next step after Solvency II comes into force.	Noted. EIOPA is working under the assumption that Omnibus II and final delegated acts will be available in time for NCAs and undertakings to prepare for the submission of quantitative and qualitative information in 2015. In which case, at that stage, EIOPA would prepare technical specifications and provide guidance on the assumptions underlying the calculation of technical provisions and the standard formula calculation, which reflect the decision on OMDII and the available delegated acts .
1125	MetLife	G01-General Comments	We understand this template requires selected disclosures under SII and others using local GAAP - we question the relevance and usefulness of reporting and aggregating information for different undertakings under different bases	Noted. Even though the figures will not be always comparable, they will still allow to provide a general overview of the activities of the undertakings belonging to the group.
1126	CFOF_CROF	G01- cell D1	We note that the closed list for Type of Undertaking included in EIOPA's July 2012 Log did not include a category for non-insurance entities which are items 1 to 10 (i.e. Not insurance holding co's, Ancillary service co's, Other financial institutions, SPVs etc.) The instructions document no longer shows the list of values for type of undertaking, closed list options should address all possibilities for entities.	Noted. A provision for 'Other' will be added. Noted. The closed list will be included.
1127	Deloitte	G01- cell D1	1) A closed list similar to that provided in the Log file of the July 2012 QRT set should be provided here. 2) The aforementioned July 2012 closed list does not include Mixed Financial Holding Companies (MFHCs). We believe they should be included. 3) Cell B1 of template G04 refers to a notional requirement for MFHCs, which reinforces the idea that they should be included in the closed list.	1) Noted. The closed list will be included. 2) Noted. A revised closed list will also contain MFHC.
1128	IE	G01- cell D1	We note that the closed list for Type of Undertaking included in EIOPA's July 2012 Log did not include a category for non-insurance entities which are items 1 to 10 (i.e. Not insurance holding co's, Ancillary service co's, Other financial institutions, SPVs etc.) The instructions document no longer shows the list of values for type of undertaking.	Agreed. A provision for 'Other' will be added. Noted. The closed list will be included.
1129	CFOF_CROF	G01- cell F1	The instructions document no longer shows the list of values for category of undertaking.	Noted. The closed list will be included.
1130	Deloitte	G01- cell F1	1) The order of cells F1 and G1 has been inverted in Technical Annex II, G01-L (ie, ... E1, G1, F1, ...). 2) A closed list similar to that provided in the Log file of the July 2012 QRT set should be provided here.	1) Noted. The order of the cells will be changed in Technical Annex II so that G1 is after E1 and F1. 2) Noted. The closed list will be included.
1131	IE	G01- cell F1	The instructions document no longer shows the list of values for category of undertaking.	Noted. The closed list will be included.
1132	Deloitte	G01- cell G1	Please see first comment for cell F1.	Noted. The order of the cells will be changed in Technical Annex II so that G1 is after E1 and F1.
1133	Deloitte	G01- cell H1a	Information to be reported in cells H1a to H1c was contained in a single cell, H1, in the G01 template included in the July 2012 QRT set. Given that this split depends on the type of undertaking ((re)insurance /non-regulated /other regulated), which in turn is reported in cell D1, the split is not necessary and causes an additional burden to companies preparing their reporting systems.	The information was split as it refers to different concepts. For Data Point Modeling purposes it is considered appropriate to keep the split of the cells.
1134	Deloitte	G01- cell H1b	Please see comment for cell H1a.	See comment 1133.
1135	Deloitte	G01- cell H1c	Please see comment for cell H1a.	See comment 1133.
1136	Deloitte	G01- cell I1a	1) Information to be reported in cells I1a and I1b was contained in a single cell, I1, in the G01 template included in the July 2012 QRT set. Given that this split depends on the type of undertaking (insurance /other), which in turn is reported in cell D1, the split is not necessary and causes an additional burden to companies preparing their reporting systems. 2) For cell I1a, "(re)insurers" would be preferred to "insurers" as both base their activity on writing premiums.	1) See comment 1133 2) Agreed. Insurers will be replaced by (re)insurers

No.	Name	Reference	Comment	Resolution
1137	Deloitte	G01- cell I1b	1) Please see the first comment for cell I1a. 2)The instructions state that for other types of undertakings turn over defined as the gross revenue under IFRS or local GAAP is to be used here and for insurance holding companies where appropriate turnover defined as the gross revenue under IFRS or local GAAP. Can the group itself choose which definition of turn over or gross revenues to apply? The definition of turnover is not unambiguous depending on the sector of the undertaking (for example, building and loan associations) and will lead to different interpretations among market participants. We would thus welcome it if EIOPA or national authorities provided recommendations or examples of the IFRS or local GAAP figures to be used here for different types of undertakings.	1) See comment 1133. 2) Different interpretations may be expected but it would be difficult to provide recommendations for all possible types of undertakings.
1138	GDV	G01- cell I1b	Guidance or examples would be helpful with regard to which GAAP/IFRS figures exactly are to be used for reporting in I1b for other types of undertakings or insurance holding companies - whether by EIOPA or by national competent authorities	Different interpretations may be expected but it would be difficult to provide recommendations for all possible types of undertakings.
1139	IE	G01- cell I1b	Guidance or examples would be helpful with regard to which GAAP/IFRS figures exactly are to be used for reporting in I1b for other types of undertakings or insurance holding companies - whether by EIOPA or by national competent authorities	Different interpretations may be expected but it would be difficult to provide recommendations for all possible types of undertakings.
1140	CFOF_CROF	G01- cell J1	The instructions document no longer shows the list of values for category of undertaking.	There has never been a closed list for the cell J1.
1141	Deloitte	G01- cell J1	We would welcome further guidance concerning country specific characteristics of these performance figures. For instance, under local GAAP in Germany the underwriting performance for life insurers includes the investment performance whereas for nonlife insurers it is disclosed separately as "non-underwriting performance". EIOPA or national authorities should therefore clarify whether life insurers should - report underwriting performance as stated in the financial statement, which includes investment performance, and state the investment performance separately in cell K1. As a result, the total performance would not be the sum of the the underwriting and investment performance. - or adjust the underwriting performance by subtracting the investment performance. Then, the reported figure would deviate from the financial statement under local German GAAP. EIOPA or national authorities should provide guidance clarifying which figures should be employed here.	The log says that the performance should be reported in accordance with the financial statements so German life insurers should report underwriting performance as stated in the financial statement, Investment performance to be reported in cell K1 should not include any investment performance already included in J1.
1142	GDV	G01- cell J1	Further clarification is also necessary with regard to which GAAP figures exactly to use for reporting in J1 - L1 - whether by EIOPA or by national competent authorities.	It should be reported in accordance to financial statement, i.e in accordance with Local GAAP/IFRS used for the purposes of financial statements
1143	IE	G01- cell J1	Further clarification is necessary with regard to which GAAP figures exactly to use for reporting in J1 - L1 - whether by EIOPA or by national competent authorities.	See response to the comment 1142
1144	CFOF_CROF	G01- cell K1	The instructions document no longer shows the list of values for category of undertaking.	There has never been a closed list for the cell K1.
1145	GDV	G01- cell K1	See comment on G01- cell J1	Noted
1146	IE	G01- cell K1	See comment on G01- cell J1	Noted
1147	CFOF_CROF	G01- cell L1	The instructions document no longer shows the list of values for category of undertaking.	There has never been a closed list for the cell L1.
1148	GDV	G01- cell L1	See comment on G01- cell J1	Noted
1149	IE	G01- cell L1	See comment on G01- cell J1	Noted
1150	Deloitte	G01- cell N1	The definition of the cell in the log has changed with respect to the July 2012 version in an attempt to correct a typo, but the new wording is not clear. - July 2012 log: "Percentage as defined by the consolidated account directive for the integration of consolidated undertakings into the consolidation which may differ from M1For full integration, minority interests should also be reported in the cell." - New log: "Percentage as defined by the consolidated account directive for the integration of consolidated undertakings into the consolidation which may differ from item M1 for full integration, minority interests should also be reported in this item." - Proposed: "Percentage as defined by the consolidated account directive for the integration of consolidated undertakings into the consolidation which may differ from item M1. For full integration, minority interests should also be reported in this item."	Agreed. The sentence has been amended according to your proposal.
1151	Deloitte	G01- cell R1	In our opinion the last sentence of the definition given in G01-L: "As stated in article 221 of Directive 2009/138/EC, the proportional share should be determined by the group supervisor." is not totally correct, as the proportional share can be determined without intervention of the group supervisor, except in those cases mentioned in article 221(2) of the Directive. We would welcome if EIOPA reviewed the sentence and corrected it if necessary.	Agreed. The sentence has been removed.
1152	Deloitte	G01- cell U1	A closed list similar to that provided in the Log file of the July 2012 QRT set should be provided here.	Noted. The closed list will be included.
1153	GC	G01-36	For (re)insurance undertakings does "total amount of Solvency II balance sheet" (cell H1) mean cell A30 on BS-C1? If so this should be stated. Also cells J1, K1 and L1 should be clarified. Should "performance" also be on a Solvency II basis (as for balance sheet)?	Yes. For (re)insurance undertakings, 'total amount of Solvency II balance sheet' mean cell A30 in BS-C1. It is already stated in the Technical Annex II in cell H1a. No. Performace is not on a Solvency II basis. It is already stated in Technical Annex II in cell J1 that the performance to be reported is in accordance with the financial statements and consequently not on a Solvency II basis.
1154	GDV	G01-36	Some of the information to be provided in this form will actually come from the NCA after the implementation of Solvency II: it is therefore possible that some of the data might not be available during the preparatory phase.	Groups will be able to report all cells during the interim period except few cells which are based on a decision by the NCA.
1155	IE	G01-36	Some of the information to be provided in this form will actually come from the NCA after the implementation of Solvency II: it is therefore possible that some of the data might not be available during the preparatory phase.	Groups will be able to report all cells during the interim period except few cells which are based on a decision by the NCA.
1156	RSA	G01-36	Some of the information to be provided in this form will actually come from the NCA after the implementation of Solvency II: it is therefore possible that some of the data might not be available during the preparatory phase.	Groups will be able to report all cells during the interim period except few which are based on a decision by the NCA.

No.	Name	Reference	Comment	Resolution
1157	CFOF_CROF	G03 – General Comments	Several cells in this template, for example cell F1, require free text information as input. This is difficult to include in a group template as this type of data is not easily aggregated. In general, background information and free text responses can be sourced from solo templates.	Not feasible to get this information from solo templates
1158	Deloitte	G03 – General Comments	We believe clarification is needed that the group currency should be used for this template in general, as stated in EIOPA's response to comment N° 111 included in the Summary of Comments on CP 009/2011.	Noted. The group currency is the relevant currency to be used.
1159	IE	G03 – General Comments	The template should not include narrative reporting. Undertakings should also not be required to fill information that is provided by NCAs and should be exchanged in the college of supervisors.	Not feasible to get this information from solo templates
1160	Deloitte	G03- cell A2	We believe that the provided definition of ID code could be misleading, as it is very generic and may create confusion around what entities to report in this template. We would welcome if EIOPA reviewed the definition and formulated it more precisely.	Noted. LEI has now been introduced in the template and relevant explanation added to the Technical Annex
1161	CFOF_CROF	G03- cell B1	It should be noted that cells B1-B7 will not reconcile to the Group SCR as diversification would not be taken into account.	Noted
1162	Deloitte	G03- cell B1	1) Paragraph 1.51 (Guideline 14 – Solo quantitative annual information – Ring Fenced Funds) of the present CP states: "1.51. The information referred to in paragraphs n) to t) of Guideline 12 should comprise, separately, the solvency capital requirement regarding the Ring Fenced Fund with the biggest Solvency Capital Requirement and the Solvency Capital Requirement regarding the remaining part of the business of the undertaking." Paragraphs n) to t) refer, respectively, to the solo SCR-B3A to SCR-B3G templates. In the event an entity has a RFF, it has to report two QRTs per each of these paragraphs. Therefore, the definition of cell B1 in G03-L: "Solo SCR Market Risk for each entity as reported in solo SCR-B3A" should clarify what is understood by "as reported in solo SCR-B3A" when the entity has RFFs and more than one solo SCR-B3A QRT is reported. 2) Under the current wording "Solo SCR Market Risk for each entity as reported in Solo SCR - B3A", we query if this same cell should be used in the event the entity has an internal model.	See comment 2. The text of the Guidelines has been clarified.
1163	CFOF_CROF	G03- cell B2	It should be noted that cells B1-B7 will not reconcile to the Group SCR as diversification would not be taken into account.	Noted
1164	Deloitte	G03- cell B2	Please see comments for cell B1.	See response to the comment 1162
1165	CFOF_CROF	G03- cell B3	It should be noted that cells B1-B7 will not reconcile to the Group SCR as diversification would not be taken into account.	Noted
1166	Deloitte	G03- cell B3	Please see comments for cell B1.	See response to the comment 1162
1167	CFOF_CROF	G03- cell B4	It should be noted that cells B1-B7 will not reconcile to the Group SCR as diversification would not be taken into account.	Noted
1168	Deloitte	G03- cell B4	Please see comments for cell B1.	See response to the comment 1162
1169	CFOF_CROF	G03- cell B5	It should be noted that cells B1-B7 will not reconcile to the Group SCR as diversification would not be taken into account.	Noted
1170	Deloitte	G03- cell B5	Please see comments for cell B1.	See response to the comment 1162
1171	CFOF_CROF	G03- cell B6	It should be noted that cells B1-B7 will not reconcile to the Group SCR as diversification would not be taken into account.	Noted
1172	Deloitte	G03- cell B6	Please see comments for cell B1.	See above
1173	CFOF_CROF	G03- cell B7	It should be noted that cells B1-B7 will not reconcile to the Group SCR as diversification would not be taken into account.	Noted
1174	Deloitte	G03- cell N1	We ask EIOPA to clarify what should be entered here, if no such local requirement exists for certain countries.	Noted, the cell can be left blank
1175	Deloitte	G03- cell O1	We ask EIOPA to clarify what should be entered here, if no such local requirement exists for certain countries.	Noted, the cell can be left blank
1176	Deloitte	G04 – General Comments	In our opinion clarification is needed on the type of entities included in the scope of this QRT. The definition given in paragraph 40 of this CP does not mention holding companies other than IHCs. However, cell B1 mentions: - Mixed Activity Holding Companies: no capital requirement (but if these companies were not required for this QRT, this would be redundant); - Mixed Financial Holding Companies: a notional capital requirement (are MFHCs required for this QRT or not?)	The technical Annex has now been updated
1177	Deloitte	G04- cell A2	We believe that the provided definition of ID code could be misleading, as it is very generic and may create confusion around what entities to report in this template. We would welcome if EIOPA reviewed the definition and formulated it more precisely.	Noted. LEI has now been introduced in the template and relevant explanation added to the Technical Annex
1178	Deloitte	G04- cell B1	Please see General Comment for this QRT.	Noted
1179	Deloitte	G04- cell E1	In our opinion clarification is needed that the cell is intended to mean "eligible to meet the SCR (equivalent)", as stated in EIOPA's response to comment N° 207 included in the Summary of Comments on CP 009/2011.	Noted
1180	Deloitte	G14- General Comments	1) A new definition seems to have been decided for this QRT. The July 2012 Summary document stated that the template should provide an overview of the TP across (re)insurance undertakings within the group. In the present CP paragraph 41 does not convey this same information, therefore we query whether this is still intended. Also, the July 2012 Summary specified that only method 1 or combination of methods were relevant for this QRT. Now method 2 is also included, and a column (S1) has been added to identify which method is applied. 2) For cell R1, the name was changed in the new G14-L log file ("Total amount of TP (excluding IGT)") with respect to the July 2012 Log (Total of net contribution to Group TP). However, this amendment is reflected neither in the template itself nor in paragraph 41 f) of this CP. We ask EIOPA for clarification whether these amendments are final ones and are to comply with in the final Solvency II regime or they are only valid during the preparation phase.	1) This is not really a new definition because providing an overview of the TP across (re) insurance undertakings within the group is rather similar than asking the list of technical provisions that contribute to group technical provisions. The purpose is the same. Agreed. Now method 2 is also included. 2) This amendment will be reflected in the template itself and in paragraph 41. These amendments are final ones.
1181	Deloitte	G14- cell A1	We believe that the provided definition of ID code could be misleading, as it is very generic and may create confusion around what entities to report in this template. We would welcome if EIOPA reviewed the definition and formulated it more precisely.	Noted. LEI has now been introduced in the template and relevant explanation added to the Technical Annex
1182	Deloitte	G14- cell C1,F1,I1,L1,O1	Following the July 2012 log, we understand that these cells contain data gross of IGTs, gross of reinsurance. We ask EIOPA for clarification. If this is confirmed, we propose renaming these cells to "Amount of gross TP (gross of IGT)" for clarity.	Your understanding is correct. This will be clarified in Technical Annex II.

No.	Name	Reference	Comment	Resolution
1183	Deloitte	G14- cell D1,G1,J1,M1,P1	Following the July 2012 log, we understand that these cells contain data net of IGTs, gross of reinsurance ceded outside the group. We ask EIOPA for clarification. If this is confirmed, we propose renaming these cells to "Amount of gross TP (net of IGT)" for clarity.	Your understanding is correct. This will be clarified in Technical Annex II. The name of the cell will be amended according to your proposal.
1184	Deloitte	G14- cell R1	The name of the cell was changed in the new G14-L log file ("Total amount of TP (excluding IGT)") with respect to the July 2012 Log (Total of net contribution to Group TP). However, this amendment is reflected neither in the template itself nor in paragraph 41 f) of this CP. We ask EIOPA for clarification and if necessary amendment.	Noted. This amendment will be reflected in the template itself and in paragraph 41.
1185	Deloitte	G14- cell S1	The first value of the closed list "Method 1 or combination of methods 1 and 2" makes sense at the level of the group. However it is required at the level of each individual entity included in the template, and it is not clear what is meant by "combination of methods" in this context. We ask EIOPA for clarification.	Noted. It will be changed so that either Method 1 or Method 2 will be in the closed list. "Combination of methods" will be deleted.
1186	Bloomberg	Technical Annex VI General Comments	For "Corp Bonds", CIC 21 "Common Bonds" says "bonds issued by corporations not listed in the categories below" but CIC 29 "Other" says "other corp bonds not covered in categories above." So, this is a confusing circular definition. Please make the definition for 21 common bonds clearer. Bloomberg discussed this topic with JPM, HSBC, Schroders, Lloyds, Amundi, KPMG, Deloitte, etc. and we all have the same concern.	Noted. Definition will be changed. Definition of common bonds: "Bonds issued by corporations, with simple characteristics like defined maturity and fixed or variable return, and that don't have the characteristics to be classified under CIC 22 to 28". As for "Other", it is a residual category. Definition: "Other corporate bonds, with other characteristics than the ones identified in the above categories".
1188	IE	Technical Annex VI General Comments	There are some CIC whose definitions in Annex VI are ambiguous and require further elaboration to enable the effective implementation of S2, namely:	See comment 1189
1189	IE	Technical Annex VI General Comments	CIC 1# & 2# GOVERNMENT & CORPORATE BONDS: It is unclear whether a bonds classification is determined by the issuer or guarantor. For example should a municipal bond guaranteed by a sovereign government be classified as CIC14 or CIC11? Similarly should bonds issued by a state-owned enterprise guaranteed by a sovereign government be classified as CIC21 or CIC11? CORPORATE BONDS CIC21 v CIC29: As currently defined corporate bonds that do not fulfil the definitions of CIC22 to CIC28 could either be CIC21 and CIC29, as the default corporate bond classification. We suggest CIC29 is deleted or redefined to distinguish from CIC21. CIC6# COLLATERALISED SECURITIES: We would like clarification that the only securities to be included in CIC6# are those that have been "tranching". This is consistent with CP63 (& Basel II) definition of "securitisation", and thus consistent with credit stress treatment for calculation of the SCR. "Securitisation" means a transaction or scheme, whereby the credit risk associated with an exposure or pool of exposures is tranching. "Tranche" means a contractually established segment of the credit risk associated with an exposure or number of exposures, where a position in the segment entails a risk of credit loss greater than or less than a position of the same amount in each other such segment, without taking account of credit protection provided by third parties directly to the holders of positions in the segment or in other segments.	The bond classification is determined by the issuer.
1190	GDV	Technical Annex VII General Comments	We welcome this effort by EIOPA to produce a list of cross-checks.	Noted
1191	IE	Technical Annex VII General Comments	"We appreciate that it is difficult to keep the crosschecks up to date and consistent but we recommend that all cross checks are reviewed whenever there are further changes to the QRT forms. These cross checks are very useful controls that also aid the development of our QRT production process. We believe that the use of the Global filters actually complicates matters in the cross checks. References to the individual cells should suffice, see CAS34-CAS38 and CAS75-CAS77. It would be useful if a narrative was included on the cross checks. For example, CAS 1 "This cross checks that the total assets on the Balance sheet QRT ("BS-C1-L") agrees to the total assets on the Assets and liabilities by currency QRT (" BS-C1D").	Noted
1192	RSA	Technical Annex VII General Comments	We welcome this effort by EIOPA to produce a list of cross-checks.	Noted
1193	IE	CAS1	It is unclear if the control should be towards "statutory accounts" or "Solvency II" in BS-C1. This comment also applies to CAS2 to CAS15	Controls should be toward Solvency II values. Otherwise it would not be possible to compare with BS_C1D.
1194	Deloitte	CAS4	The formula stated in the assertion is $BS_C1.A3+BS_C1.A27 + BS_C1.A14 + BS_C1.A14A = \text{sum}(BS_C1D.A4[CUR])$. In our opinion the correct formula should be $BS_C1.A3 + BS_C1.A27 + BS_C1.A14 = \text{sum}(BS_C1D.A4[CUR])$, where $BS_C1.A14 = BS_C1.A14A + BS_C1.A14B + BS_C1.A14C$. We would welcome if EIOPA reviewed the formula and corrected it if necessary.	In general agree. "Loans and Mortgages" has to be included into the formula. However, prefer having the detail of these element rather than the total value. $BS_C1.A3+BS_C1.A27 + BS_C1.A14A + BS_C1.A14B + BS_C1.A14C = \text{sum}(BS_C1D.A4[CUR])$
1195	GDV	CAS4	We believe that the formula stated in the assertion for CAS 4 ($BS_C1.A3+BS_C1.A27 + BS_C1.A14 + BS_C1.A14A = \text{sum}(BS_C1D.A4[CUR])$) of Technical Annex VII is not correct. The correct formula should be $BS_C1.A3 + BS_C1.A27 + BS_C1.A14 = \text{sum}(BS_C1D.A4[CUR])$, where $BS_C1.A14 = BS_C1.A14A + BS_C1.A14B + BS_C1.A14C$. We ask EIOPA to review the formula and make a correction if necessary.	In general agree. "Loans and Mortgages" has to be included into the formula. However, prefer having the detail of these element rather than the total value. $BS_C1.A3+BS_C1.A27 + BS_C1.A14A + BS_C1.A14B + BS_C1.A14C = \text{sum}(BS_C1D.A4[CUR])$

No.	Name	Reference	Comment	Resolution
1196	IE	CAS4	We believe that the formula stated in the assertion for CAS 4 (BS_C1.A3+BS_C1.A27 + BS_C1.A14 + BS_C1.A14A = sum(BS_C1D.A4[CUR])) of Technical Annex VII is not correct. The correct formula should be BS_C1.A3 + BS_C1.A27 + BS_C1.A14 = sum(BS_C1D.A4[CUR]), where BS_C1.A14 = BS_C1.A14A + BS_C1.A14B + BS_C1.A14C. We ask EIOPA to review the formula and make a correction if necessary.	In general agree. "Loans and Mortgages" has to be included into the formula. However, prefer having the detail of these element rather than the total value. BS_C1.A3+BS_C1.A27 + BS_C1.A14A + BS_C1.A14B + BS_C1.A14C = sum(BS_C1D.A4[CUR])
1197	GDV	CAS10	There is a minor typographical error here: "L10" has a "-" after it which needs to be deleted.	The Technical Annex has been amended
1198	IE	CAS10	There is a minor typographical error here: "L10" has a "-" after it which needs to be deleted.	The Technical Annex has been amended
1199	RSA	CAS10	There is a minor typographical error here: "L10" has a "-" after it which needs to be deleted.	The Technical Annex has been amended
1200	GDV	CAS14	There is a minor typographical error here: "L23" has a "-" after it which needs to be deleted.	The Technical Annex has been amended
1201	IE	CAS14	There is a minor typographical error here: "L23" has a "-" after it which needs to be deleted.	The Technical Annex has been amended
1202	RSA	CAS14	There is a minor typographical error here: "L23" has a "-" after it which needs to be deleted.	The Technical Annex has been amended
1203	Deloitte	CAS33	We believe there are two data checks missing. We propose including the following two assertions: BS_C1.L10A = TP_F1Q_A3 BS_C1.L12 = TP_F1Q_E2 We would welcome if EIOPA reviewed the checks and amended it if necessary.	It is exactly the same data. There isn't any calculation. These 2 checks are not necessary
1204	GDV	CAS33	There are no separate cross checks for a) BS_C1.L10A (= TP_F1Q.A3) and b) BS_C1.L12 (= TP_F1Q.E2). These need to be added.	It is exactly the same data. There isn't any calculation. These 2 checks are not necessary
1205	IE	CAS33	There are no separate cross checks for a) BS_C1.L10A (= TP_F1Q.A3) and b) BS_C1.L12 (= TP_F1Q.E2). These need to be added.	It is exactly the same data. There isn't any calculation. These 2 checks are not necessary
1206	RSA	CAS33	There are no separate cross checks for a) BS_C1.L10A (= TP_F1Q.A3) and b) BS_C1.L12 (= TP_F1Q.E2). These need to be added.	It is exactly the same data. There isn't any calculation. These 2 checks are not necessary
1207	Deloitte	CAS34	1) We ask EIOPA to confirm whether TP_F1Q.A1[LOB:LB32] is the same as TP_F1Q.A10 + TP_F1Q.A12 + TP_F1Q.A13. 2) Furthermore we ask EIOPA for feedback why this notation is used and not the reference to the cells in the usual way as this notation is more confusing. We therefore suggest addressing the cells with their common codes such as TP_F1Q.A10 and not TP_F1Q.A1[LOB:LB32]. Furthermore, we ask EIOPA for explanation why this notation is used for the life templates only and not for the non-life templates? There is also another risk of confusion as LOB:LB26 does not refer to line of business 26 (Non-proportional casualty reinsurance), in the annexes of the LTGA, but is defined as "Lines of business for life obligations" on page 245 of the Consultation Paper, which can easily be overseen.	TP_F1Q.A10 + TP_F1Q.A12 + TP_F1Q.A13 are indeed the contents of LOB 32. But we needed to work this way because of codification issue. To answer to your second point. We indeed noticed the inconsistency between annexes at the level of the code of the LOB. It has been recodified.
1208	IE	CAS34	This cross check seems over complicated. Since F is the sum of A+B+E, can you refer to F in the cross check instead of A, B and E? We believe that the GlobalFilters Codes are not required. We believe that the cross checks would be better if they were i) the balance in cell L6B of the MCBS should agree to cell F14 of TP	This split is used to allow to check the content of each cell. Global filters have been deleted. This information, useful from an IT point of view, will only be included in the documentation for the taxonomy.
1209	Deloitte	CAS35	Please see comment for CAS34	See response to the comment 1208
1210	IE	CAS35	This cross check seems over complicated, we believe that the GlobalFilters Codes are not required. We believe that the cross checks would be better if they were i) the balance in cell L6C of the MCBS should agree to cell A14 of TP	See response to the comment 1208
1211	Deloitte	CAS36	Please see comment for CAS34	See response to the comment 1208
1212	IE	CAS36	This cross check seems over complicated, we believe that the GlobalFilters Codes are not required. We believe that the cross checks would be better if they were i) the balance in cell L6D of the MCBS should agree to cell B14 of TP	See response to the comment 1208
1213	Deloitte	CAS37	Please see comment for CAS34	See response to the comment 1208
1214	IE	CAS37	This cross check seems over complicated, we believe that the GlobalFilters Codes are not required. We believe that the cross checks would be better if they were i) the balance in cell L6E of the MCBS should agree to cell E14 of TP	See response to the comment 1208
1215	Deloitte	CAS38	Please see comment for CAS34	See response to the comment 1208
1216	IE	CAS38	This cross check seems over complicated, we believe that the GlobalFilters Codes are not required. We believe that the cross check would be better if it was the balance in cell A16 of the MCBS should agree to the total of cells C9 and C14 of TP	See response to the comment 1208
1217	Deloitte	CAS59	We believe the current formula does not capture well the case in which the TPs in MCR_B4A and TP_E1Q sheets will be both positive but of different values. We would rather change the formula in the following way: MCR_B4A.B2 = max(0;TP_E1Q.A24). We would welcome if EIOPA reviewed the formula and amended it if necessary.	Disagree. Theoretically, a Best Estimate could get a negative value. Your formula would not capture this situation.

No.	Name	Reference	Comment	Resolution
1218	GC	CAS59	We believe the current formula does not capture well the case in which the TPs in MCR_B4A and TP_E1Q sheets will be both positive but of different values. We would rather change the formula in the following way: MCR_B4A.B2 = max(0;TP_E1Q.A24).	Disagree. Theoretically, a Best Estimate could get a negative value. Your formula would not capture this situation.
1219	GDV	CAS59	Given the LOG (MCR-B4A-L) defines B2 as "the technical provisions for medical expense insurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs", we believe the cross-check ">=" ought to be replaced by "=".	The adjustment for expected losses due to counterparty default is not taken into account in MCR template. That's why you may not get any equality.
1220	IE	CAS59	Given the LOG (MCR-B4A-L) defines B2 as "the technical provisions for medical expense insurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs", we believe the cross-check ">=" ought to be replaced by "=".	See response to the comment 1219
1221	RSA	CAS59	Given the LOG (MCR-B4A-L) defines B2 as "the technical provisions for medical expense insurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs", we believe the cross-check ">=" ought to be replaced by "=".	See response to the comment 1219
1222	Deloitte	CAS60	Pease see comment for CAS 59.	See response to the comment 1219
1223	GC	CAS60	See comment for CAS 59.	See response to the comment 1219
1224	GDV	CAS60	See CAS59	See response to the comment 1219
1225	IE	CAS60	See CAS59	See response to the comment 1219
1226	RSA	CAS60	See CAS59	See response to the comment 1219
1227	Deloitte	CAS61	Pease see comment for CAS 59.	See response to the comment 1219
1228	GC	CAS61	See comment for CAS 59.	See response to the comment 1219
1229	GDV	CAS61	See CAS59	See response to the comment 1219
1230	IE	CAS61	See CAS59	See response to the comment 1219
1231	RSA	CAS61	See CAS59	See response to the comment 1219
1232	Deloitte	CAS62	Pease see comment for CAS 59.	See response to the comment 1219
1233	GC	CAS62	See comment for CAS 59.	See response to the comment 1219
1234	GDV	CAS62	See CAS59	See response to the comment 1219
1235	IE	CAS62	See CAS59	See response to the comment 1219
1236	RSA	CAS62	See CAS59	See response to the comment 1219
1237	Deloitte	CAS63	Pease see comment for CAS 59.	See response to the comment 1219
1238	GC	CAS63	See comment for CAS 59.	See response to the comment 1219
1239	GDV	CAS63	See CAS59	See response to the comment 1219
1240	IE	CAS63	See CAS59	See response to the comment 1219
1241	RSA	CAS63	See CAS59	See response to the comment 1219
1242	Deloitte	CAS64	Pease see comment for CAS 59.	See response to the comment 1219
1243	GC	CAS64	See comment for CAS 59.	See response to the comment 1219
1244	GDV	CAS64	See CAS59	See response to the comment 1219
1245	IE	CAS64	See CAS59	See response to the comment 1219
1246	RSA	CAS64	See CAS59	See response to the comment 1219
1247	Deloitte	CAS65	Pease see comment for CAS 59.	See response to the comment 1219
1248	GC	CAS65	See comment for CAS 59.	See response to the comment 1219
1249	GDV	CAS65	See CAS59	See response to the comment 1219
1250	IE	CAS65	See CAS59	See response to the comment 1219
1251	RSA	CAS65	See CAS59	See response to the comment 1219
1252	Deloitte	CAS66	Pease see comment for CAS 59.	See response to the comment 1219
1253	GC	CAS66	See comment for CAS 59.	See response to the comment 1219
1254	GDV	CAS66	See CAS59	See response to the comment 1219
1255	IE	CAS66	See CAS59	See response to the comment 1219
1256	RSA	CAS66	See CAS59	See response to the comment 1219
1257	Deloitte	CAS67	Pease see comment for CAS 59.	See response to the comment 1219
1258	GC	CAS67	See comment for CAS 59.	See response to the comment 1219
1259	GDV	CAS67	See CAS59	See response to the comment 1219
1260	IE	CAS67	See CAS59	See response to the comment 1219
1261	RSA	CAS67	See CAS59	See response to the comment 1219
1262	Deloitte	CAS68	Pease see comment for CAS 59.	See response to the comment 1219
1263	GC	CAS68	See comment for CAS 59.	See response to the comment 1219
1264	GDV	CAS68	See CAS59	See response to the comment 1219
1265	IE	CAS68	See CAS59	See response to the comment 1219
1266	RSA	CAS68	See CAS59	See response to the comment 1219
1267	Deloitte	CAS69	Pease see comment for CAS 59.	See response to the comment 1219
1268	GC	CAS69	See comment for CAS 59.	See response to the comment 1219
1269	GDV	CAS69	See CAS59	See response to the comment 1219
1270	IE	CAS69	See CAS59	See response to the comment 1219

No.	Name	Reference	Comment	Resolution
1271	RSA	CAS69	See CAS59	See response to the comment 1219
1272	Deloitte	CAS70	Pease see comment for CAS 59.	See response to the comment 1219
1273	GC	CAS70	See comment for CAS 59.	See response to the comment 1219
1274	GDV	CAS70	See CAS59	See response to the comment 1219
1275	IE	CAS70	See CAS59	See response to the comment 1219
1276	RSA	CAS70	See CAS59	See response to the comment 1219
1277	Deloitte	CAS71	Pease see comment for CAS 59.	See response to the comment 1219
1278	GC	CAS71	See comment for CAS 59.	See response to the comment 1219
1279	GDV	CAS71	See CAS59	See response to the comment 1219
1280	IE	CAS71	See CAS59	See response to the comment 1219
1281	RSA	CAS71	See CAS59	See response to the comment 1219
1282	Deloitte	CAS72	Pease see comment for CAS 59.	See response to the comment 1219
1283	GC	CAS72	See comment for CAS 59.	See response to the comment 1219
1284	GDV	CAS72	See CAS59	See response to the comment 1219
1285	IE	CAS72	See CAS59	See response to the comment 1219
1286	RSA	CAS72	See CAS59	See response to the comment 1219
1287	Deloitte	CAS73	Pease see comment for CAS 59.	See response to the comment 1219
1288	GC	CAS73	See comment for CAS 59.	See response to the comment 1219
1289	GDV	CAS73	See CAS59	See response to the comment 1219
1290	IE	CAS73	See CAS59	See response to the comment 1219
1291	RSA	CAS73	See CAS59	See response to the comment 1219
1292	Deloitte	CAS74	Pease see comment for CAS 59.	See response to the comment 1219
1293	GC	CAS74	See comment for CAS 59.	See response to the comment 1219
1294	GDV	CAS74	See CAS59	See response to the comment 1219
1295	IE	CAS74	See CAS59	See response to the comment 1219
1296	RSA	CAS74	See CAS59	See response to the comment 1219
1297	Deloitte	CAS75	Pease see comment for CAS 59.	See response to the comment 1219
1298	GC	CAS75	See comment for CAS 59.	See response to the comment 1219
1299	GDV	CAS75	See CAS59	See response to the comment 1219
1300	IE	CAS75	See CAS59	See response to the comment 1219
1301	RSA	CAS75	See CAS59	See response to the comment 1219
1302	Deloitte	CAS76	Pease see comment for CAS 59.	See response to the comment 1219
1303	GC	CAS76	See comment for CAS 59.	See response to the comment 1219
1304	GDV	CAS76	Whilst the Global Filters are correct, the cell references are not: the cross-check ought to refer to cells B2, B3, C2 and C3 of TP-F1Q, not B1 and C1, the latter being relevant for CAS75. Cross-check ought to be "=" not ">=".	Because of IT issue, we have to keep our formula. The information about the LoB is included in "[LOB:LBX][CBK:CBX]" and other equivalent assertions. Global filters have been deleted. This information, useful from an IT point of view, will only be included in the documentation for the taxonomy.
1305	IE	CAS76	Whilst the Global Filters are correct, the cell references are not: the cross-check ought to refer to cells B2, B3, C2 and C3 of TP-F1Q, not B1 and C1, the latter being relevant for CAS75. Cross-check ought to be "=" not ">=".	See response to the comment 1304
1306	RSA	CAS76	Whilst the Global Filters are correct, the cell references are not: the cross-check ought to refer to cells B2, B3, C2 and C3 of TP-F1Q, not B1 and C1, the latter being relevant for CAS75. Cross-check ought to be "=" not ">=".	See response to the comment 1304
1307	Deloitte	CAS77	Pease see comment for CAS 59.	See response to the comment 1219
1308	GC	CAS77	See comment for CAS 59.	See response to the comment 1219
1309	GDV	CAS77	Whilst the Global Filters are correct, the cell references are not: the cross-check ought to refer to cells B4-B7, B10-B13, C4-C7 and C10-C13 of TP-F1Q, not B1 and C1, the latter being relevant for CAS75. Cross-check ought to be "=" not ">=".	See response to the comment 1304
1310	IE	CAS77	Whilst the Global Filters are correct, the cell references are not: the cross-check ought to refer to cells B4-B7, B10-B13, C4-C7 and C10-C13 of TP-F1Q, not B1 and C1, the latter being relevant for CAS75. Cross-check ought to be "=" not ">=".	See response to the comment 1304
1311	RSA	CAS77	Whilst the Global Filters are correct, the cell references are not: the cross-check ought to refer to cells B4-B7, B10-B13, C4-C7 and C10-C13 of TP-F1Q, not B1 and C1, the latter being relevant for CAS75. Cross-check ought to be "=" not ">=".	See response to the comment 1304
1312	Deloitte	CAS78	We believe this formula should include cell B28 (other non available own funds) as a deduction. It would also make more sense to include deductions not included in the reconciliation reserve by replacing A503 with A607. The proposed formula would read: OF_B1Q.A20 = BS_C1.L27-OF_B1Q.B24-OF_B1Q.B25-OF_B1Q.B27-OF_B1Q.B28-OF_B1Q.B502-OF_B1Q.A607+BS_C1.L26 We would welcome if EIOPA reviewed the formula and amended it if necessary.	OF_B1Q.A607 and OF_B1Q.B28 include elements for groups so not relevant in a solo check. Nevertheless, OF_B1Q.B26 has been added in the formula.

No.	Name	Reference	Comment	Resolution
1313	Deloitte	CQS19	We believe there are two data checks missing. We propose including the following two assertions: BS_C1.L10A =TP_F1Q_A3 BS_C1.L12 = TP_F1Q_E2 We would welcome if EIOPA reviewed the checks and amended it if necessary.	It is exactly the same data. There isn't any calculation. These 2 checks are not necessary
1314	GDV	CQS19	There are no separate cross checks for a) BS_C1.L10A (= TP_F1Q.A3) and b) BS_C1.L12 (= TP_F1Q.E2). These need to be added.	It is exactly the same data. There isn't any calculation. These 2 checks are not necessary
1315	IE	CQS19	There are no separate cross checks for a) BS_C1.L10A (= TP_F1Q.A3) and b) BS_C1.L12 (= TP_F1Q.E2). These need to be added.	It is exactly the same data. There isn't any calculation. These 2 checks are not necessary
1316	RSA	CQS19	There are no separate cross checks for a) BS_C1.L10A (= TP_F1Q.A3) and b) BS_C1.L12 (= TP_F1Q.E2). These need to be added.	It is exactly the same data. There isn't any calculation. These 2 checks are not necessary
1317	Deloitte	CQS20	We ask EIOPA to confirm whetherTP_F1Q.A1[LOB:LB32] is the same as TP_F1Q.A10 + TP_F1Q.A12 + TP_F1Q.A13? We ask EIOPA to clarify why this notation is used and not the reference to the cells in the usual way as this notation is more confusing? We therefore suggest addressing the cells with their common codes such as TP_F1Q.A10 and not TP_F1Q.A1[LOB:LB32]. Furthermore, could ask EIOPA to clarify why this notation is used for the life templates only and not for the non-life templates? There is also another risk of confusion as LOB:LB26 does not refer to line of business 26 (Non-proportional casualty reinsurance), in the annexes of the LTGA, but is defined as "Lines of business for life obligations" on page 245 of the Consultation Paper, which can easily be overseen.	TP_F1Q.A10 + TP_F1Q.A12 + TP_F1Q.A13 are indeed the contents of LOB 32. But we needed to work this way because of codification issue. To answer to your second point. We indeed noticed the inconsistency between annexes at the level of the code of the LOB. It has been recodified.
1318	IE	CQS20	See comment in CAS34	This split is used to allow to check the content of each cell. Global filters have been deleted. This information, useful from an IT point of view, will only be included in the documentation for the taxonomy.
1319	Deloitte	CQS21	Please see comment for CQS19	It is exactly the same data. There isn't any calculation. These 2 checks are not necessary
1320	IE	CQS21	See comment in CAS35	This split is used to allow to check the content of each cell. Global filters have been deleted. This information, useful from an IT point of view, will only be included in the documentation for the taxonomy.
1321	Deloitte	CQS22	Please see comment for CQS19	It is exactly the same data. There isn't any calculation. These 2 checks are not necessary
1322	IE	CQS22	See comment in CAS36	This split is used to allow to check the content of each cell. Global filters have been deleted. This information, useful from an IT point of view, will only be included in the documentation for the taxonomy.
1323	Deloitte	CQS23	Please see comment for CQS19	It is exactly the same data. There isn't any calculation. These 2 checks are not necessary
1324	IE	CQS23	See comment in CAS37	This split is used to allow to check the content of each cell. Global filters have been deleted. This information, useful from an IT point of view, will only be included in the documentation for the taxonomy.
1325	Deloitte	CQS24	Please see comment for CQS19	It is exactly the same data. There isn't any calculation. These 2 checks are not necessary
1326	IE	CQS24	See comment in CAS38	This split is used to allow to check the content of each cell. Global filters have been deleted. This information, useful from an IT point of view, will only be included in the documentation for the taxonomy.
1327	Deloitte	CQS45	We believe the current formula does not capture well the case in which the TPs in MCR_B4A and TP_E1Q sheets will be both positive but of different values. We would rather change the formula in the following way: MCR_B4A.B2 = max(0;TP_E1Q.A24). We would welcome if EIOPA reviewed the formula and amended it if necessary.	Disagree. Theoretically, a Best Estimate could get a negative value. Your formula would not capture this situation.
1328	GC	CQS45	We believe the current formula does not capture well the case in which the TPs in MCR_B4A and TP_E1Q sheets will be both positive but of different values. We would rather change the formula in the following way: MCR_B4A.B2 = max(0;TP_E1Q.A24).	Disagree. Theoretically, a Best Estimate could get a negative value. Your formula would not capture this situation.
1329	GDV	CQS45	See CAS59	See response to the comment 1219
1330	IE	CQS45	See CAS59	See response to the comment 1219
1331	RSA	CQS45	See CAS59	See response to the comment 1219
1332	Deloitte	CQS46	Please see comment for CQS 45.	See response to the comment 1219
1333	GC	CQS46	See comment for CQS 45.	See response to the comment 1219
1334	GDV	CQS46	See CAS59	See response to the comment 1219
1335	IE	CQS46	See CAS59	See response to the comment 1219
1336	RSA	CQS46	See CAS59	See response to the comment 1219
1337	Deloitte	CQS47	Please see comment for CQS 45.	See response to the comment 1219
1338	GC	CQS47	See comment for CQS 45.	See response to the comment 1219
1339	GDV	CQS47	See CAS59	See response to the comment 1219
1340	IE	CQS47	See CAS59	See response to the comment 1219
1341	RSA	CQS47	See CAS59	See response to the comment 1219
1342	Deloitte	CQS48	Please see comment for CQS 45.	See response to the comment 1219
1343	GC	CQS48	See comment for CQS 45.	See response to the comment 1219
1344	GDV	CQS48	See CAS59	See response to the comment 1219

No.	Name	Reference	Comment	Resolution
1345	IE	CQS48	See CAS59	See response to the comment 1219
1346	RSA	CQS48	See CAS59	See response to the comment 1219
1347	Deloitte	CQS49	Please see comment for CQS 45.	See response to the comment 1219
1348	GC	CQS49	See comment for CQS 45.	See response to the comment 1219
1349	GDV	CQS49	See CAS59	See response to the comment 1219
1350	IE	CQS49	See CAS59	See response to the comment 1219
1351	RSA	CQS49	See CAS59	See response to the comment 1219
1352	Deloitte	CQS50	Please see comment for CQS 45.	See response to the comment 1219
1353	GC	CQS50	See comment for CQS 45.	See response to the comment 1219
1354	GDV	CQS50	See CAS59	See response to the comment 1219
1355	IE	CQS50	See CAS59	See response to the comment 1219
1356	RSA	CQS50	See CAS59	See response to the comment 1219
1357	Deloitte	CQS51	Please see comment for CQS 45.	See response to the comment 1219
1358	GC	CQS51	See comment for CQS 45.	See response to the comment 1219
1359	GDV	CQS51	See CAS59	See response to the comment 1219
1360	IE	CQS51	See CAS59	See response to the comment 1219
1361	RSA	CQS51	See CAS59	See response to the comment 1219
1362	Deloitte	CQS52	Please see comment for CQS 45.	See response to the comment 1219
1363	GC	CQS52	See comment for CQS 45.	See response to the comment 1219
1364	GDV	CQS52	See CAS59	See response to the comment 1219
1365	IE	CQS52	See CAS59	See response to the comment 1219
1366	RSA	CQS52	See CAS59	See response to the comment 1219
1367	Deloitte	CQS53	Please see comment for CQS 45.	See response to the comment 1219
1368	GC	CQS53	See comment for CQS 45.	See response to the comment 1219
1369	GDV	CQS53	See CAS59	See response to the comment 1219
1370	IE	CQS53	See CAS59	See response to the comment 1219
1371	RSA	CQS53	See CAS59	See response to the comment 1219
1372	Deloitte	CQS54	Please see comment for CQS 45.	See response to the comment 1219
1373	GC	CQS54	See comment for CQS 45.	See response to the comment 1219
1374	GDV	CQS54	See CAS59	See response to the comment 1219
1375	IE	CQS54	See CAS59	See response to the comment 1219
1376	RSA	CQS54	See CAS59	See response to the comment 1219
1377	Deloitte	CQS55	Please see comment for CQS 45.	See response to the comment 1219
1378	GC	CQS55	See comment for CQS 45.	See response to the comment 1219
1379	GDV	CQS55	See CAS59	See response to the comment 1219
1380	IE	CQS55	See CAS59	See response to the comment 1219
1381	RSA	CQS55	See CAS59	See response to the comment 1219
1382	Deloitte	CQS56	Please see comment for CQS 45.	See response to the comment 1219
1383	GC	CQS56	See comment for CQS 45.	See response to the comment 1219
1384	GDV	CQS56	See CAS59	See response to the comment 1219
1385	IE	CQS56	See CAS59	See response to the comment 1219
1386	RSA	CQS56	See CAS59	See response to the comment 1219
1387	Deloitte	CQS57	Please see comment for CQS 45.	See response to the comment 1219
1388	GC	CQS57	See comment for CQS 45.	See response to the comment 1219
1389	GDV	CQS57	See CAS59	See response to the comment 1219
1390	IE	CQS57	See CAS59	See response to the comment 1219
1391	RSA	CQS57	See CAS59	See response to the comment 1219
1392	Deloitte	CQS58	Please see comment for CQS 45.	See response to the comment 1219
1393	GC	CQS58	See comment for CQS 45.	See response to the comment 1219
1394	GDV	CQS58	See CAS59	See response to the comment 1219
1395	IE	CQS58	See CAS59	See response to the comment 1219
1396	RSA	CQS58	See CAS59	See response to the comment 1219
1397	Deloitte	CQS59	Please see comment for CQS 45.	See response to the comment 1219
1398	GC	CQS59	See comment for CQS 45.	See response to the comment 1219
1399	GDV	CQS59	See CAS59	See response to the comment 1219
1400	IE	CQS59	See CAS59	See response to the comment 1219
1401	RSA	CQS59	See CAS59	See response to the comment 1219
1402	Deloitte	CQS60	Please see comment for CQS 45.	See response to the comment 1219
1403	GC	CQS60	See comment for CQS 45.	See response to the comment 1219
1404	GDV	CQS60	See CAS59	See response to the comment 1219
1405	IE	CQS60	See CAS59	See response to the comment 1219
1406	RSA	CQS60	See CAS59	See response to the comment 1219
1407	GDV	CQS61	See CAS59	See response to the comment 1219
1408	IE	CQS61	See CAS59	See response to the comment 1219

No.	Name	Reference	Comment	Resolution
1409	RSA	CQS61	See CAS59	See response to the comment 1219
1410	GDV	CQS62	Whilst the Global Filters are correct, the cell references are not: the cross-check ought to refer to cells B2, B3, C2 and C3 of TP-F1Q, not B1 and C1, the latter being relevant for CQS61. Cross-check ought to be "=" not ">=".	See response to the comment 1304
1411	IE	CQS62	Whilst the Global Filters are correct, the cell references are not: the cross-check ought to refer to cells B2, B3, C2 and C3 of TP-F1Q, not B1 and C1, the latter being relevant for CQS61. Cross-check ought to be "=" not ">=".	See response to the comment 1304
1412	RSA	CQS62	Whilst the Global Filters are correct, the cell references are not: the cross-check ought to refer to cells B2, B3, C2 and C3 of TP-F1Q, not B1 and C1, the latter being relevant for CQS61. Cross-check ought to be "=" not ">=".	See response to the comment 1304
1413	GDV	CQS63	Whilst the Global Filters are correct, the cell references are not: the cross-check ought to refer to cells B4-B7, B10-B13, C4-C7 and C10-C13 of TP-F1Q, not B1 and C1, the latter being relevant for CQS61. Cross-check ought to be "=" not ">=".	See response to the comment 1304
1414	IE	CQS63	Whilst the Global Filters are correct, the cell references are not: the cross-check ought to refer to cells B4-B7, B10-B13, C4-C7 and C10-C13 of TP-F1Q, not B1 and C1, the latter being relevant for CQS61. Cross-check ought to be "=" not ">=".	See response to the comment 1304
1415	RSA	CQS63	Whilst the Global Filters are correct, the cell references are not: the cross-check ought to refer to cells B4-B7, B10-B13, C4-C7 and C10-C13 of TP-F1Q, not B1 and C1, the latter being relevant for CQS61. Cross-check ought to be "=" not ">=".	See response to the comment 1304
1416	Deloitte	CGS9	The formula in the instructions for this item (BS_C1.A3 + BS_C1.A27 =sum(BS_C1D.A4[CUR]) ignores loans and mortgages in BS_C1.A14 in BS-C1. In our opinion, these should be included in the formula. Therefore in our opinion the correct formula is BS_C1.A3 + BS_C1.A14 + BS_C1.A27 =sum(BS_C1D.A4[CUR]). We would welcome it if EIOPA could check the formula and amend if necessary.	This check has been deleted. BS_C1D won't be used during the preparatory phase for groups
1417	Deloitte	CGS13	The formula in the instructions for this item (BS_C1.A2+ BS_C1.A26 + BS_C1.A25B+ BS_C1.A16+ BS_C1.A14A+ BS_C1.A20+ BS_C1.A23+ BS_C1.A29+ BS_C1.A28A+ BS_C1.A28B = sum(BS_C1D.A7[CUR]) includes reinsurance recoverables (BS_C1.A16), loans on policies (BS_C1.A14A), and reinsurance receivables (BS_C1.A20). However, these items are already included in other items and should therefore not be counted twice. Therefore in our opinion the correct formula is A2+A26+A25B+A23+A29+A28A+A28B = sum(BS_C1D.A7[CUR]). We would welcome it if EIOPA could check the formula and amend if necessary.	This check has been deleted. BS_C1D won't be used during the preparatory phase for groups
1418	IE	CGS13	CGS 12 and 13 both include BS_C1.A20, however only one should include the reference. Please review crosschecks and amend as necessary. CGS 11 and 13 both include BS_C1.A16, however only one should include the reference. Please review crosschecks and amend as necessary.	This check has been deleted. BS_C1D won't be used during the preparatory phase for groups
1419	Deloitte	CGS21	We believe this formula should include cell B28 (other non available own funds) as a deduction. It should also include cell A607 (total deductions) in place of A503 (deductions for participations in financial and credit institutions (solo)). This is a group specific check and so the solo deduction is not seen as relevant. The proposed formula would read: OF_B1Q.A20 = BS_C1.L27-OF_B1Q.B24-OF_B1Q.B25-OF_B1Q.B27-OF_B1Q.B28-OF_B1Q.B502-OF_B1Q.A607+BS_C1.L26. We would welcome if EIOPA reviewed the formula and amended it if necessary.	OF_B1Q.A607 and OF_B1Q.B28 include elements for groups so they have been included. Also OF_B1Q.B26

No.	Name	Reference	Comment	Resolution
1420	Deloitte	Impact Assessment – General Comments	<p>1) Many of the SII elements which are still undefined (OMDII, L2, L3) will have an impact on the reporting. Prior to this CP, companies were already facing challenges in preparing their systems to comply with SII reporting requirements. Furthermore from responses to the July 2012 final report and the XBRL CP announced, companies were expecting an updated QRT set to be released sometime during 2013, which created additional uncertainty around the possibly diverging QRT sets and added burden in preparations insurers may have underway. EIOPA has, through this CP, introduced updates of the QRTs and log files, which was not announced, or expected by, the market. Notable changes include:</p> <ul style="list-style-type: none"> - Summary documents were not provided and some examples, closed lists and cells, such as the "General Comments", were removed from the log files. - A few guidelines were included instead of these (eg, CP, Annex I, paras 37 to 41 for group templates), but they do not necessarily convey the same information. This could, on its own, make the information provided with this CP less informative or even misleading. - Color coding / cell type was removed from the templates & logs; - Most notably, the newly released templates were changed, and some of them (eg G14) even changed significantly; - In addition, in some cases QRTs previously intended for quarterly reporting are now proposed for annual reporting. <p>Therefore two draft (QRT + log) sets - July 2012 and March 2013 - are available as the "latest set" that do not reconcile, which makes it hard for insurers to see what they should base development of their systems reporting on. Should it be considered that they have to maintain two different sets of QRTs at least for the preparatory phase?</p> <p>At least one final set is expected this year (see 2.15 of Final Report on CP 11/009 and 11/011). It is currently unclear whether guidelines for 2015 will remain in the "final set" or if the July 2012 will prevail.</p> <p>Therefore, in order to ensure that the costs of providing the information during the preparation phase do not overrun the benefits, we welcome the minimisation of deviations for some parts of narrative reporting and QRTs between the preparatory phase guidelines and final Solvency II regulations and ask EIOPA for clear guidance and uniform set of requirements with clear indication of deviations (for example simplifications or cells not to be reported during the preparation phase) between the preparation phase and the final Solvency II regime. It would be welcomed to understand the position of EIOPA in this.</p> <p>2) We believe NCAs should agree to implement these preparatory measures provided that NCAs accounting for a given threshold of the European market insurance market agree (to avoid too few markets applying the rules and being at a disadvantage). If this is not the case, there will be disproportionate impact on some member states, where NCAs require submission, whereas others may not.</p>	<p>1) Noted. EIOPA acknowledged that changes might be better highlighted. EIOPA is publishing a "change LOG" as an Annex to the Explanatory Text. EIOPA confirms that the requirements under the final preparatory guidelines are the ones envisaged for the final reporting package.</p> <p>2) The envisaged threshold should solve this problem. The implementation of the preparatory guidelines is in the discretion of each NCA. Legal issues will be dealt at a national level. EIOPA recognizes different situation.</p>
1422	Gard Group	Impact Assessment – General Comments	We have taken this opportunity to provide Gard's preferred options to the questions listed in Annex I Impact Assessment	Noted
1423	RSA	Impact Assessment – General Comments	We believe this cost assessment has not properly been carried out and seeks to understate the very significant impact it will have on insurance and reinsurance undertakings. The baseline described in 2.10 fails to take into factors such as EIOPA's decision to seek additional reporting from internal model firms, in excess of what would be submitted under Solvency II and therefore in addition to what would normally be considered internally by firms during a preparatory phase. No clear rationale is given for the options that are listed under each question, making it harder to understand the logic behind the decisions made.	See response to the comment 122
1424	GDV	Impact Assessment – General Comments	<p>The baseline described in 2.10 does not consider EIOPA's decision to seek additional reporting from internal model undertakings, going beyond of what would be submitted under Solvency II and therefore in addition to what would normally be considered internally by undertakings during a preparatory phase.</p> <p>No clear rationale is given for the options that are listed under each question, making it harder to understand the rationale behind the decisions made.</p>	<p>Internal Model issue see response to the comment 122</p> <p>Noted</p>
1425	IE	Impact Assessment – General Comments	<p>The baseline described in 2.10 does not consider EIOPA's decision to seek additional reporting from internal model undertakings, going beyond of what would be submitted under Solvency II and therefore in addition to what would normally be considered internally by undertakings during a preparatory phase.</p> <p>No clear rationale is given for the options that are listed under each question, making it harder to understand the rationale behind the decisions made.</p> <p>The Impact Assessment should discuss the reporting requirements of ECB.</p>	<p>Internal Model issue see response to the comment 122</p> <p>Noted</p> <p>The preparatory reporting is not driven by ECB requirements</p>
1426	Deloitte	2,1	<p>We believe that, in line with our comment in the "Impact Assessment - General Comments " cell above, in the interest of transparency a remark should be made to the fact that the (QRT+log) set released with the current CP differs from the July 2012 set. Therefore we suggest EIOPA amend the following last sentence in the paragraph "The information to be submitted is based on a limited subset of the reporting package EIOPA proposed in the EIOPA Final Report on Public Consultations No. 11/009 and 11/011 [...] published in July 2012".</p> <p>As a minimum, in order to reduce the burden on (re)insurers, we believe that EIOPA should make it clear where differences exist between the July 2012 (QRT+log) set and the one released with this CP. At this stage, with (re)insurers having reporting system preparations underway, a document including the track of changes made would be welcomed by the industry.</p>	Noted. Please see comment 1420.

No.	Name	Reference	Comment	Resolution
1428	Deloitte	2,2	It seems this article suggests that apart from Omnibus II, also the Level 2 and Level 3 have to be final before the application of these guidelines. Is it realistic that Level 2 and Level 3 will be agreed before the end of 2013 sufficiently in advance to enable insurers timely implementation? Will there be any guidance in case the Level 2 and Level 3 will not yet be approved?	Noted. Technical specification will be published in time to reflect the future Level 2 and Level 3 requirements needed to accompany the preparatory guidelines.
1429	GC	2,2	It seems this article suggests that apart from Omnibus II, also the Level 2 and Level 3 have to be final before the application of these guidelines. Is it realistic that Level 2 and Level 3 will be agreed sufficiently in advance to enable insurers timely implementation for reporting based on 2014 data? Will there be any guidance in case the Level 2 and Level 3 will not yet be approved?	Noted. Please see comment 1428.
1430	ROAM	2,2	La ROAM comprend bien l'importance de la phase de préparation mais il n'est pas utile de fournir un reporting narratif puisqu'un certain nombre d'informations figureront dans le rapport ORSA.	The objective of introducing narrative reporting during preparatory phase is for undertakings to prepare for the narrative reporting (i.e to set up systems and procedures in order to gather necessary information and to prepare reports) and for supervisors to assess undertakings preparedness (for example, whether the narrative reporting is sufficient in terms of a scope and details). In addition, supervisors may use this information contained in the narrative reporting, for example, with regard to SoG, to assist them in assessing progress made by undertakings in preparation for Solvency 2 SoG requirements.
1432	ILAG	2,3	We entirely agree this should be done in a proportionate manner.	Noted
1433	ROAM	2,3	Nous tenons à insister sur le fait qu'il s'agit d'une phase de préparation et que dans ce cas le principe de proportionnalité doit s'appliquer de manière à permettre aux petites sociétés de se préparer progressivement et d'éviter des surcoûts inutiles.	Noted
1434	ROAM	2,5	Les membres de la ROAM soutiennent totalement ce point de vue.	Noted
1435	RSA	2,5	All the arguments EIOPA puts forward about how the implementation costs to be incurred by firms will be met in any case, apply equally to smaller undertakings. For that reason – as well as the likelihood that smaller firms will find the transition to Solvency II more difficult – the Guidelines ought to apply equally to them. Since the Guidelines are not recommended for enforcement action by NCAs, we believe NCAs will be able to apply judgement when reviewing the progress made by such firms.	Noted. The thresholds do not indicate that requirements in this areas will not be in place for all insurance and reinsurance undertakings. Smaller undertakings are expected to prepare and develop appropriate plans as well.
1436	ROAM	2,6	Les membres de la ROAM soutiennent totalement ce point de vue.	Noted.
1437	AMICE	2,16	Should EIOPA issue Guidelines for preparation of submission of information to NCAs?	
1438	CFOF_CROF	Question 1	As previously communicated to EIOPA in our letter dated 23 January 2012, we do not support additional reporting on a Solvency II Basis on an interim basis in advance of Solvency II requirements coming into force. It is, in our view, an unwelcome burden while firms still have to report on a Solvency I basis and will be in the process of seeking internal model approval. If National Competent Authorities (NCAs) wish to assess the preparedness of firms systems and processes to comply with Solvency II reporting requirements, then this can be achieved by review and inspection of firm's implementation activity. We consider it unnecessary to try and achieve this through the request for narrative reporting and a sub-set of quantitative reporting templates (QRT) templates; indeed it may act as a distraction from work to implement reporting of the remaining QRT templates, as focus will be on those templates required for interim reporting.	The objective of introducing narrative reporting during preparatory phase is for undertakings to prepare for the narrative reporting (i.e to set up systems and procedures in order to gather necessary information and to prepare reports) and for supervisors to assess undertakings preparedness (for example, whether the narrative reporting is sufficient in terms of a scope and details). In addition, supervisors may use this information contained in the narrative reporting, for example, with regard to SoG, to assist them in assessing progress made by undertakings in preparation for Solvency 2 SoG requirements.
1439	Deloitte	Question 1	We understand EIOPA's reasons for wanting to check progress before full implementation of Solvency II, subject to our comments below. We agree with the proposed option 2 because divergence from uncertainty or opacity is unfavourable and more costly than understanding what general direction is intended. However, this is on the basis that the interim reporting is a "stepping stone" to the full Solvency II requirements and not a separate set of reporting, requiring additional work from undertakings already dealing with much change. We feel that if this interim reporting were an additional burden, not a stepping stone to full Solvency II reporting, this would not serve the purpose which EIOPA aim for but, rather, would distract undertakings from their core preparatory activities and have a detrimental effect on their work towards compliance.	Noted
1440	Gard Group	Question 1	Should EIOPA issue Guidelines for preparation of submission of information to NCA's?	
1441	GDV	Question 1	This question could have other policy options. NCAs can seek to prepare for submission of information in regard their own systems and processes, essential to receive the data that will be submitted after Solvency II implementation. The policy options are instead focused on insurance undertakings only and on submitting reports before implementation.	Noted. EIOPA wants to assess with this general questions the need either to have GL on information during the preparatory phase or not. Other options are dealt within the other questions of the impact assessment.
1442	IE	Question 1	As we referred in our general comments, we do not support the application of formal reporting to NCAs before Solvency II as we do not think the aim justifies the costs and administrative burden put on the undertakings. This question could have other policy options. The focus could be put on the supervisory review of the undertakings implementation plans as well as on the national competent authorities' own systems and processes, essential to receive the data that will be submitted after Solvency II implementation.	Noted Noted. Please see comment 1441 Noted. Please see comment 1438
1443	ROAM	Question 1	Question 1: Should EIOPA issue Guidelines for preparation of submission of information to NCA's?	
1444	RSA	Question 1	This question could have a number of meanings. NCAs can indeed seek to prepare for submission of information, but this could refer to their own systems and processes, essential to receive the data that will be submitted after Solvency II implementation; instead, EIOPA has chosen to focus the meaning of its question – as reflected in the options - on insurance firms only and on submitting reports before implementation.	Noted.

No.	Name	Reference	Comment	Resolution
1445	CFOF_CROF	Question 1 – Option 1	We support this option	Noted. See response to the comment 115
1446	GDV	Question 1 – Option 1	See above	Noted. See response to the comment 115
1447	IE	Question 1 – Option 1	See above	Noted. See response to the comment 115
1448	Munich Re	Question 1 – Option 1	We prefer Option 1 and therefore the "big Bang", when Solvency II will be applicable for the first time.	Noted. See response to the comment 115
1449	ROAM	Question 1 – Option 1	Option 1: To wait for Solvency II, i.e "one big approach"	Noted. See response to the comment 115
1450	AMICE	Question 1 – Option 2	We agree EIOPA should issue guidelines for the preparatory phase.	Noted
1451	CFOF_CROF	Question 1 – Option 2	We do not support this option but have given comments as part of this consultation should EIOPA pursue it.	Noted
1452	Gard Group	Question 1 – Option 2	Like EIOPA Gard believes option 2 is the best approach:	Noted.
1453	GDV	Question 1 – Option 2	See above	Noted.
1454	IE	Question 1 – Option 2	See above	Noted.
1455	Munich Re	Question 1 – Option 2	We disagree with the option two and therefore with a preapplication of Solvency II regarding the reporting issues.	Noted.
1456	ROAM	Question 1 – Option 2	Option 2: To issue Guidelines for a preparatory phase. Les membres de la ROAM sont en faveur de cette option.	Noted.
1457	Gard Group	Question 1 – Option 3	To issue Guidelines for a preparatory phase.	Noted.
1458	Gard Group	Question 1 – Option 4	Comment: We find it beneficial to have a gradual adjustment towards Solvency II compliance and therefore think it necessary with the early preparation work. This will allow us to take lessons from the first step and facilitate improvements for the next steps.	Noted and welcomed.
1459	AMICE	Question 2	What should be the scope of the information submitted in the preparatory phase? The scope should be limited to some annual templates on the condition there is an agreement on Omnibus II and the Level II Implementing Measures are published by the end of this year. Quarterly templates and narrative reporting should be excluded.	Noted. Covered by the revision clause. The objective of introducing narrative reporting during preparatory phase is for undertakings to prepare for the narrative reporting (i.e to set up systems and procedures in order to gather necessary information and to prepare reports) and for supervisors to assess undertakings preparedness (for example, whether the narrative reporting is sufficient in terms of a scope and details). In addition, supervisors may use this information contained in the narrative reporting, for example, with regard to SoG, to assist them in assessing progress made by undertakings in preparation for Solvency 2 SoG requirements.
1459	CFOF_CROF	Question 2	[While Option 4 as the least burdensome would be our preferred option of those listed, we do not support as required under this option the reporting of SCR-B3 templates by firms in the pre-application process for their internal models. Similarly we would also be supportive of Option 2 (excluding SCR-B3) as these would be the priority templates we would expect to be preparing as part of dry-run activity, and would help our Regulator to assess preparedness.]	See response to the comment 122

No.	Name	Reference	Comment	Resolution
1460	Deloitte	Question 2	<p>We do not support any of the four options in full, however, option 4 comes closest to our preferred course of action.</p> <p>We suggest no quarterly reporting and that the annual reporting should be the templates included in appendix 1, as long as these templates are confirmed as a stepping stone to final QRTs and not a separate exercise requiring different solutions alongside the planned Solvency II activities which undertakings are carrying out (as we mention above).</p> <p>We would suggest that, for EIOPA's purposes of assessing the progress made by the industry, 2014 year-end data should be reported in 2015, with considerably extended timescales (to give insurers flexibility over when during 2015 they complete it) – this would have the advantage of a) flexibility and b) providing annual comparatives.</p> <p>While it is true that undertakings are already familiar with the calculation of the SCR due to participation in QIS and, therefore, should be able to complete the SCR-B2 templates, the SCR-B3 templates contain very granular information such as the 10 largest counterparty exposures, the split into assets and liabilities or information for the catastrophe risk module etc. This granularity level potentially will not be fully implemented within the undertakings prior the first submission dates of the preparatory phase since no final guidelines with regard to SCR calculation are currently available. We would welcome it if EIOPA examined again whether the submission of this granular information in the preparatory phase makes sense, while no final guidelines are issued. As it takes time to set up proper processes and technical infrastructure for reliable reporting these data within the undertakings we recommend the submission of the SCR-B2 templates only in the preparatory phase. This provides authorities with sufficient information on undertakings' ability to calculate the SCR while ensuring at the same time that undertakings can dedicate more time and resources on implementation of requirements with regard to the data in SCR-B3 templates.</p> <p>Furthermore, we question the value the NCAs and EIOPA will get from the narrative reporting and group level reporting, over and above the suggested interim ORSA (Forward Looking Assessment) and quantitative templates. Different approaches to solo reporting between countries and the fact that not all solo entities are required to report will complicate the group consolidation. Also, it should be sufficient with solo reporting to test the data flow in the templates. Group reports would merely test the consolidation. Moreover, problems in the previous tests caused that the group level rules were never fully tested; as such enormous costs and potentially misleading conclusions are to be expected. We are afraid that the costs of earlier implementation of group reporting could exceed the benefits of the preparation phase since there are still too many open issues on Level 2 and Level 3 concerning group consolidation, transferability and eligibility of own funds, treatment of local specifics, for example of so called Gleichordnungskonzern (in Germany group of companies which are legally separate entities, but under unified control without a parent) etc. Therefore the implementation at the group level should only follow in a final step when Solvency II comes in force.</p> <p>We feel that resources could be better deployed in working on models; design of governance and control systems; and systems for end-state reporting and that if EIOPA or NCAs have specific questions to ask on the progress of key market participants, they have other avenues to do this. Any narrative information included in this interim reporting will be based on pre-implementation state, rather than the state which undertakings expect to be in by the full implementation date of Solvency II. While EIOPA may consider this important to assess the readiness of the industry, incomplete changes or new governance arrangements which are prepared but not implemented yet may not be captured in a consistent way. As the framing of this CP suggests to national competent authorities to implement these Guidelines mandatorily, we feel that Option 4 comes closest.</p>	<p>Noted.</p> <p>EIOPA considers setting up systems and processes and procedures for quarterly reporting, as well as submitting quarterly information as defined in the guidelines, as an important part of the preparation process. EIOPA also considers important for undertakings to prepare and submit the SCR templates at the level of granularity that will be required in future.</p> <p>The objective of introducing narrative reporting during preparatory phase is for undertakings to prepare for the narrative reporting (i.e. to set up systems and procedures in order to gather necessary information and to prepare reports) and for supervisors to assess undertakings preparedness (for example, whether the narrative reporting is sufficient in terms of a scope and details). In addition, supervisors may use this information contained in the narrative reporting, for example, with regard to SoG, to assist them in assessing progress made by undertakings in preparation for Solvency 2 SoG requirements.</p> <p>EIOPA will publish technical specifications to reflect the future Level 2 and Level 3 requirements to accompany the preparatory guidelines. See also response to the comment 26</p>
1461	Gard Group	Question 2	What should be the scope of the information submitted in the preparatory phase?	
1462	GDV	Question 2	EIOPA does not explain how these four options were arrived at: other options also exist (e.g. a mixture of options 3 and 4 – everything that is excluded under option 4 as well as those items excluded under option 3).	EIOPA assumed these options as most suitable for the preparatory phase but acknowledged that other options are possible as well.
1463	IE	Question 2	EIOPA does not explain how these four options were arrived at: other options also exist. See our comments in the general comments section on the cycles of reporting, on the narrative reporting and on need to assure that undertakings will have enough to establish the appropriate internal processes and IT systems	Noted. Please see comment 1462 Noted. Please see comment 29
1464	ROAM	Question 2	Question 2: What should be the scope of the information submitted in the preparatory phase?	
1465	RSA	Question 2	EIOPA does not explain how these four options were arrived at: other options also exist (e.g. a mixture of options 3 and 4 – everything that is excluded under option 4 as well as those items excluded under option 3).	Noted. Please see comment 1462
1466	CFOF_CROF	Question 2 – Option 1	We do not support Option 1, as the additional financial stability templates, A1Q, IGT and RC templates would be unnecessarily burdensome.	Noted.
1467	Deloitte	Question 2 – Option 1		
1468	IE	Question 2 – Option 1	See above	Noted. Please see comment 29
1469	ROAM	Question 2 – Option 1	Option 1: Use the subset of templates as defined in Appendix 1 as well as relevant narrative information	Noted
1470	CFOF_CROF	Question 2 – Option 2	See answer to Question 2	Noted
1471	Deloitte	Question 2 – Option 2		
			Like EIOPA Gard believes option 2 is the best option:	

No.	Name	Reference	Comment	Resolution
1472	Gard Group	Question 2 – Option 2	Use the subset of templates as defined in Appendix 1 as well as relevant narrative information but excluding financial stability specific templates, Cover A1Q and certain group-specific templates i.e. Intra Group Transactions and Risk Concentration (as identified in Appendix 2). Comment: We prefer this option because of the reduction of the most detailed information, excluding the information specific for financial stability during the preparatory phase, but still including the Solvency Capital Requirement calculation which is considered crucial for Solvency II preparations.	Noted.
1473	IE	Question 2 – Option 2	See above	Noted. Please see comment 29
1474	ROAM	Question 2 – Option 2	Option 2: Use the subset of templates as defined in Appendix 1 as well as relevant narrative information but excluding financial stability specific templates, Cover A1Q and certain group-specific templates i.e. Intra Group Transactions and Risk Concentration (as identified in Appendix 2) L'appendix 2 paraît être la meilleure option pour la préparation, à l'exception du reporting trimestriel.	Noted. EIOPA considers setting up systems and processes and procedures for quarterly reporting, as well as submitting quarterly information as defined in the guidelines, as and important part of the preparation process
1475	CFOF_CROF	Question 2 – Option 3	We do not support Option 3. The additional financial stability templates, A1Q, IGT and RC templates would be unnecessarily burdensome and do not provide useful additional information to assess preparedness.	Noted.
1476	Deloitte	Question 2 – Option 3		
1477	IE	Question 2 – Option 3	See above	Noted. Please see comment 29
1478	ROAM	Question 2 – Option 3	Option 3: Use the subset of templates as defined in Appendix 1 as well as relevant narrative information but excluding SCR-B3 risk modules (as identified in Appendix 3).	
1479	CFOF_CROF	Question 2 – Option 4	See answer to Question 2	Noted.
1480	Deloitte	Question 2 – Option 4	We wonder why the inclusion of quarterly reporting of MCR is considered here. This is not expected under any other option and we therefore ask EIOPA to review this. What should we make of the word "possibly"? We would welcome clarification from EIOPA, at least, on what this would depend.	EIOPA clarifies that MCR is included in the quarterly reporting under four options.
1481	IE	Question 2 – Option 4	See above	Noted. Please see comment 29
1482	ROAM	Question 2 – Option 4	Option 4: Use the subset of templates as defined in Appendix 1 as well as relevant narrative information but excluding financial stability specific templates, Cover A1Q and certain group-specific templates i.e. Intra Group Transactions and Risk Concentration, and for quarterly reporting only include Minimum Capital Requirements, Own Funds and possibly the balance sheet.	
1483	CFOF_CROF	Question 3	Our overall position, as noted in our general comments and cover note, is that we do not support additional Solvency II reporting on an interim basis in advance of Solvency II requirements coming into force. It is, in our view, an unwelcome burden while firms still have to report on a Solvency I basis and will be in the process of seeking internal model approval. If National Competent Authorities (NCAs) can assess the preparedness of firm's systems and processes by review and inspection of firm's implementation activity. We consider it unnecessary to try and achieve this through requesting additional narrative reporting and a sub-set of quantitative reporting templates (QRT) templates; indeed it may act as a distraction from work to implement reporting of the remaining QRT templates, as focus will be on those templates required for interim reporting. However should EIOPA still require interim reporting, we would prefer Option 3	Noted. The objective of introducing narrative reporting during preparatory phase is for undertakings to prepare for the narrative reporting (i.e to set up systems and procedures in order to gather necessary information and to prepare reports) and for supervisors to assess undertakings preparedness (for example, whether the narrative reporting is sufficient in terms of a scope and details). In addition, supervisors may use this information contained in the narrative reporting, for example, with regard to SoG, to assist them in assessing progress made by undertakings in preparation for Solvency 2 SoG requirements.
1484	Deloitte	Question 3	We would prefer the option 3. From our perspective, quarterly reporting means a huge effort for insurance companies and national competent authorities alike, especially for those undertakings which would fall within the threshold for quarterly reporting in the preparatory phase but which currently do not have to produce quarterly reports. An exemption from quarterly reporting for these undertakings would help them to set up processes properly while avoiding unnecessary expenses for requirements that may change again with the arrival of final guidelines. See also our comments on question 2, above.	Noted. EIOPA considers setting up systems and processes and procedures for quarterly reporting, as well as submitting quarterly information as defined in the guidelines, as and important part of the preparation process
1485	Gard Group	Question 3	What should be the information frequency during the preparatory phase?	
1486	IE	Question 3	See our comments in the general comments section on the cycles of reporting, on the narrative reporting and on need to assure that undertakings will have enough to establish the appropriate internal processes and IT systems	Noted. Please see comment 29
1487	ROAM	Question 3	Question 3: What should be the information frequency during the preparatory phase?	
1488	CFOF_CROF	Question 3 – Option 1	See response to Question3.	Please see comment 1483
1489	IE	Question 3 – Option 1	See above	Noted. Please see comment 29
1490	ROAM	Question 3 – Option 1	Option 1: Annual information submission with quarterly information submission beginning in quarter 1 2015	

No.	Name	Reference	Comment	Resolution
1491	CFOF_CROF	Question 3 – Option 2	See response to Question3.	Please see comment 1483
1492	Gard Group	Question 3 – Option 2	Like EIOPA Gard believes that option 2 is the best approach for monitoring Solvency II preparation during the preparatory phase: Annual information submission with quarterly information submission beginning in Quarter 3 2015.	Noted
1493	Gard Group	Question 3 – Option 2	Comment: We find it beneficial to have a gradual phasing-in of quarterly information and prefer to start with the quarterly reporting a bit later than the annual reporting, as suggested in this option.	
1494	IE	Question 3 – Option 2	See above	Noted. Please see comment 29
1495	ROAM	Question 3 – Option 2	Option 2: Annual information submission with quarterly information submission beginning in quarter 3 2015	
1496	AMICE	Question 3 – Option 3	We would favour Option 3.	Noted
1497	CFOF_CROF	Question 3 – Option 3	See response to Question3.	Please see comment 1483
1498	IE	Question 3 – Option 3	See above	Noted. Please see comment 29
1499	ROAM	Question 3 – Option 3	Option 3: Annual information submission only for the preparatory phase. Les membres de la ROAM souhaitent pour la phase de préparation qu'il n'y ait pas de reporting trimestriel. Dans un premier temps, nous souhaitons mettre en place le reporting annuel. De plus sans simplification, il nous est impossible de faire les calculs trimestriellement.	Noted. EIOPA considers setting up systems and processes and procedures for quarterly reporting, as well as submitting quarterly information as defined in the guidelines, as and important part of the preparation process
1500	CFOF_CROF	Question 4	We support Option 3, as enabling good coverage and consistent implementation across the EEA.	Noted.
1501	Deloitte	Question 4	We favor option 5, which would allow NCAs to use more flexible arrangements. European local insurance markets differ significantly, therefore in our opinion the option 5 appears the most favourable to allow NCAs to fix the thresholds so that the requirement to ensure that "the provisions described in the Opinion are applied to to in a manner which is proportionate to the nature, scale and complexity inherent in the business of the insurance and reinsurance undertaking" is fulfilled for each local market in the preparatory phase. However, as already stated above, we believe NCAs should agree to implement these preparatory measures provided that NCAs accounting for a given threshold of the European market insurance market agree (to avoid too few markets applying the rules and being at a disadvantage). If this is not the case, there will be disproportionate impact on some member states, where NCAs require submission, whereas others may not.	Noted. EIOPA introduced the threshold to aim for harmonised coverage and application of the guidelines as well as to take proportionality in the preparatory phase into account. However legal issues will be dealt with at national level. EIOPA recognizes different situations.
1502	Gard Group	Question 4	Should application thresholds be used in the preparatory phase?	
1503	IE	Question 4	See our comments in the general comments section on the cycles of reporting, on the narrative reporting and on need to assure that undertakings will have enough to establish the appropriate internal processes and IT systems	Please see comment 29
1504	ROAM	Question 4	Question 4: Should application thresholds be used in the preparatory phase?	
1505	CFOF_CROF	Question 4 – Option 1	See response to Question 4	Please see comment 1500
1506	IE	Question 4 – Option 1	See above	Please see comment 29
1507	ROAM	Question 4 – Option 1	Option 1: No information submission thresholds, no national competent authorities' discretion.	
1508	AMICE	Question 4 – Option 2	We would favour this option. We oppose any proposal based on minimum thresholds.	Noted.
1508	CFOF_CROF	Question 4 – Option 2	See response to Question 4	Please see comment 1500
1509	GDV	Question 4 – Option 2	EIOPA should publish a list for each market which demonstrates the insurance concerned.	Noted.
1510	IE	Question 4 – Option 2	See above We also would welcome that EIOPA would publish a list for each market which demonstrates the insurance concerned.	Please see comment 29 Noted
1511	ROAM	Question 4 – Option 2	Option 2: Fixed threshold at European level based on the Solvency 1 balance sheet. Pour une meilleure harmonisation, les membres de la ROAM sont en faveur de seuils fixés au niveau européen.	Noted
1512	CFOF_CROF	Question 4 – Option 3	See response to Question 4	Please see comment 1500
			Like EIOPA Gard believes that option 3 is the best approach for reaching a satisfying coverage at European level, while being proportionate during the preparatory phase:	

No.	Name	Reference	Comment	Resolution
1513	Gard Group	Question 4 – Option 3	<p>Minimum thresholds based on national market share coverage (gross technical provisions for life undertakings, gross written premiums for non-life undertakings). For solo annual information submission this should be at least 80% market share, for solo quarterly information submission this should be at least 50% market share. For group information submission it should be € 12 billion or an equivalent in another national currency of total assets in the consolidated accounting balance-sheet. If in a Member State no group reaches the threshold the national competent authority should decide whether a group is subject to group information submission.</p> <p>Comment: In order to cover various types of insurance and reinsurance undertakings, the minimum thresholds of the above mentioned 80% national market share for annual information and 50% for quarterly information should be applied per industry segment. We also believe there should be a common set of rules or guidelines behind the national competent authorities' decisions to whether a group is subject to group information submission.</p>	Noted
1514	IE	Question 4 – Option 3	See above	Please see comment 29
1515	ROAM	Question 4 – Option 3	Option 3: Minimum thresholds based on market share coverage. For solo annual information submission at least 80% market share, for solo quarterly at least 50%. For group information submission it should be €12 billion of total assets in the consolidated accounting balance-sheet.	
1516	CFOF_CROF	Question 4 – Option 4	See response to Question 4	Please see comment 1500
1517	IE	Question 4 – Option 4	See above	Please see comment 29
1518	ROAM	Question 4 – Option 4	Option 4: Minimum thresholds based on market share coverage. For solo information submission at least 80% market share. For group information submission it should be €12 billion of total assets in the consolidated accounting balance-sheet.	
1519	CFOF_CROF	Question 4 – Option 5	We do not support this option as it will lead to divergent application across the EEA, and for Groups operating throughout the EEA make it harder to implement.	Noted
1521	IE	Question 4 – Option 5	See above	Please see comment 29
1522	ROAM	Question 4 – Option 5	Option 5: Allow national competent authorities' discretion to decide application thresholds.	
1523	CFOF_CROF	Question 5	<p>Our view is that we do not support the proposal to submit both internal model and standard formula forms (even at a local NCA level) by insurers if they are sufficiently progressed in their internal model approval process (IMAP). Building systems to capture data on both in the prescribed format, which must be submitted electronically, involves building reporting processes and submission templates that may not be required longer term. For firms in IMAP any standard formula data should be sourced through the IMAP application process, not through the submission of QRTs. We consider both options to be equally burdensome and potentially costly for limited future benefit.</p> <p>However, should EIOPA pursue this line of reporting, we would prefer Option 2, predicated on the basis expressed in paragraph 2.68 that this will form a single data request to support both the IM pre application process and interim reporting process.</p>	<p>Reporting by IMAP undertakings, see response to the comment 122</p> <p>Noted</p>
1524	Deloitte	Question 5	We favor option 1. This is dependent on the outcome of question 7, where we state that we would prefer that this reporting is performed based on assumptions that models are approved as they stand. This is also consistent with our thinking that these interim measures should be a stepping stone towards full Solvency II implementation, rather than a separate set of reporting which will not be required under full implementation.	Reporting by IMAP undertakings, see response to the comment 122
1525	Gard Group	Question 5	What level of information submission should be required for insurance and reinsurance undertakings in the pre-application process for internal models regarding the Solvency Capital Requirement component of the risks categories/sub-categories/major business units calculated using an internal model during the preparatory phase up to Solvency II implementation?	Reporting by IMAP undertakings, see response to the comment 122
1526	IE	Question 5	<p>As we refer in our general comments, we do not consider being consistent with the aim of interim measures the creation of requirements specifically for the preparatory phase having in mind the costs that approach entails in terms of developing reporting processes and systems that will not be used when Solvency II is in place.</p> <p>As such, we do not support that undertakings in the pre-application process report forms intended only for undertakings using standard formula under EIOPA's stabilised QRT package.</p>	<p>Reporting by IMAP undertakings, see response to the comment 122</p> <p>Noted</p>
1527	ROAM	Question 5	Question 5: What level of information submission should be required for insurance and reinsurance undertakings in the pre-application process for internal models regarding the SCR component during the preparatory phase up to solvency implementation?	Reporting by IMAP undertakings, see response to the comment 122
1528	CFOF_CROF	Question 5 – Option 1	See response to Question 5	Reporting by IMAP undertakings, see response to the comment 122
1529	Gard Group	Question 5 – Option 1	To this question Gard prefers option 1:	Noted

No.	Name	Reference	Comment	Resolution
1530	Gard Group	Question 5 – Option 1	For the periodical submission of information insurance and reinsurance undertakings under pre-application will be required to provide figures to the most granular level as calculated by their internal model and at the same time they will need to provide an estimate of the calculation as per the standard formula but without the same level of granularity as the calculation using the model. This will be done through both harmonised set of information and ad-hoc templates agreed with National Competent Authorities. Comment: As Gard has already been in a pre-application process with the Norwegian national competent authority for some time, and our goal is an approved internal model, we find it desirable only to report figures to the most granular level calculated by the internal model, while reporting figures on a less granular level calculated by the standard model.	Reporting by IMAP undertakings, see response to the comment 122 Noted
1531	IE	Question 5 – Option 1	See above	See response to the comment above
1532	CFOF_CROF	Question 5 – Option 2	See response to Question 5	See response to the Question 5 above
1533	IE	Question 5 – Option 2	See above	See response to the comment above
1534	CFOF_CROF	Question 6	Our support for Option 3 is predicated on the fact that 1 year before Solvency II we would expect clarity from the European Commission on which 3rd country regimes will be considered equivalent or granted transitional recognition as equivalent. We do not wish to expend time and resource implement Solvency II capital and reporting rules in 3rd countries, which ultimately when Solvency 2 are implemented are considered equivalent.	Noted. A concrete timeline for the decision which 3rd country regimes will be considered equivalent is not available for most 3rd countries. Therefore clarity which 3rd countries will be considered equivalent can not be granted. If groups are using D&A then they are allowed to use local rules for all third countries during the interim period regardless of the final outcome on equivalence.
1535	Deloitte	Question 6	We favor option 2 (although this seems quite similar to option 3). Note that, consistent with our answer to question 7, we are assuming these models and countries are approved and that local rules may be used. This has the advantage of being straightforward for undertakings. It may also be difficult for undertakings to impose draft Solvency II rules on third countries, particularly when they may not be required to once Solvency II is fully implemented.	Noted
1536	Gard Group	Question 6	What should be the approach with group information submission and third country equivalence?	The ultimate parent undertaking is responsible for the submission of group information also for 3rd country undertakings belonging to the group. Local rules can only be applied if the group is using D&A.
1537	IE	Question 6	We support Option 2.	Noted. See comment 5.
1538	IE	Question 6	Needs however to be clearly stated that during the preparatory phase the existence of third country undertakings should be a pre-requisite for using D&A. The current proposal allows for the use of the third countries' local rules just where D&A is used; however the latter is left to the full discretion of NCAs. EIOPA needs to assure a consistent and convergent approach	
1539	ROAM	Question 6	Question 6 :What should be the approach with group information submission and third country equivalence?	The ultimate parent undertaking is responsible for the submission of group information also for 3rd country undertakings belonging to the group. Local rules can only be applied if the group is using D&A.
1540	CFOF_CROF	Question 6 – Option 1	We do not support Option 1, as it would result in wasted time and resource in implementing and applying Solvency II accounting rules in respect of subsidiaries in 3rd country regimes, which are deemed equivalent when S2 becomes effective.	Noted.
1541	IE	Question 6 – Option 1	See above	Noted.
1542	CFOF_CROF	Question 6 – Option 2	We do not support Option 2, as this provides too much discretion to National Supervisors raising the risk inconsistent application of Equivalence across the EEA and that potentially we implement and apply Solvency II accounting rules in respect of subsidiaries in 3rd country regimes, which are deemed equivalent when S2 becomes effective.	See comment 5.
1543	Gard Group	Question 6 – Option 2	Like EIOPA Gard believes that option 2 is the best approach for the purposes of dealing with third country equivalence issues and allows groups to use calculations under local rules: Group supervisors may allow groups to use calculations under local rules for their third country undertakings, as necessary, where the deduction and aggregation method is applied. Comment: We believe this option to be the most beneficial because of the flexible approach during the preparatory phase.	See comment 5.
1544	IE	Question 6 – Option 2	See above	Noted.
1545	CFOF_CROF	Question 6 – Option 3	While we understand EIOPA's wish not to prejudice the European Commission's future deliberations on equivalence, it is crucial that 1 year before Solvency II implementation we have clarity on which 3rd country regimes are deemed equivalent to avoid unnecessary expenditure on implementation.	Noted. EIOPA can not make a decision on equivalence in advance of the EC determination.
1546	IE	Question 6 – Option 3	See above	Noted.
1547	CFOF_CROF	Question 6 – Option 4	We do not support this option as it will be burdensome to provide calculations on two separate bases, and an unnecessary if one of these bases is not used for Solvency 2 reporting depending on the final equivalence decision.	Noted.
1548	IE	Question 6 – Option 4	See above	Noted.

No.	Name	Reference	Comment	Resolution
1549	CFOF_CROF	Question 7	We would favour Option 1. If the purpose of submitting information to NCAs in the interim period before Solvency 2 is effective is to help NCAs assess firms preparedness for S2 P3 reporting, then it would be most appropriate if firms prepared their submissions to Regulators on their best view of what ancillary own funds and USPs they expected to be approved. This should not in our view prejudice NCAs final decision on whether to approve these items or not. Indeed it will be of benefit to NCAs as it will help identify all ancillary own funds and USPs which firms are seeking approval.	Noted. Disagree regarding a use of USPs during preparatory phase, as there is no pre- application approval process envisage
1550	Deloitte	Question 7	We favor option 1. We believe that part of the value of interim reporting will be in assessing how models work and the granularity and quality of the output, therefore reporting should be based on all current models being approved in their current state. Moreover, as stated under 1.10 the preparation phase presents an opportunity for national authorities to enter into a dialogue with insurance undertakings and gain experience for Solvency II. It would thus make sense to allow the inclusion of items requiring approval and give undertakings the opportunity to profit from this dialogue with national authorities. In case authorities would be reticent on the use of these items, this would give undertakings more time to develop new methods or consider new items.	Noted. See response to the comment 122
1551	Gard Group	Question 7	What should be the approach on items requiring approval i.e. ancillary own funds, undertaking specific parameters and diversification between ring-fenced funds?	
1552	IE	Question 7	We support Option 1 as provide insurance and reinsurance with a better picture of their possible solvency position and may allow them to prepare on reporting such items, approval of ancillary own funds, undertaking specific parameters and diversification between ring-fenced	Noted. Disagree regarding a use of ancillary own funds during preparatory phase, as there is no pre- application approval process envisage
1553	ROAM	Question 7	Question 7: What should be the approach on items requiring approval i.e ancillary own funds, undertakings specific parameters and diversification between ring-fenced funds?	
1554	AMICE	Question 7 – Option 1	We would favour this option.	Noted
1554	CFOF_CROF	Question 7 – Option 1	We support this option.	Noted
1555	IE	Question 7 – Option 1	See above	Noted
1556	ROAM	Question 7 – Option 1	Option 1: Allow the inclusion of items in the preparatory phase, which are subject to approval under Solvency II, assuming approval has been given.	
1557	CFOF_CROF	Question 7 – Option 2	See response to Question 7	See response to the comment 1549
1558	Gard Group	Question 7 – Option 2	Like EIOPA Gard believes option 2 is the best approach for the preparatory phase submission: Allow the inclusion of items in the preparatory phase which are subject to approval under Solvency II but only in case they are already permitted under Solvency I (some of which are subject to approval under Solvency I). Comment: We find this question a bit difficult to answer in this early phase. However, for continuity reasons, with the approach taken in QIS5 as well as in the Long Term Guarantee Assessment regarding ancillary own funds and no new items being introduced, we believe option 2 would provide a more gradual adjustment to Solvency II. In addition we believe it could be helpful to have some guidelines on how to obtain pre-approval of items for use in the preparatory phase.	Noted. Disagree regarding a use of USPs or ancillary own funds during preparatory phase, as there is no pre- application approval process envisage
1559	IE	Question 7 – Option 2	See above	Noted. See above
1560	ROAM	Question 7 – Option 2	Option 2: Allow the inclusion of items in the preparatory phase, which are subject to approval under Solvency II but only in case they are already permitted under Solvency 1 (some of which are subject to approval under Solvency 1).	
1561	CFOF_CROF	Question 7 – Option 3	See response to Question 7	See response to the comment 1549
1562	IE	Question 7 – Option 3	See above	Noted. See above
1563	ROAM	Question 7 – Option 3	Option 3: Do not allow the inclusion of items in the preparatory phase, which are subject to approval under Solvency II. Les membres de la ROAM sont en faveur de cette option.	Noted
1564	ROAM	2,18	Les membres de la ROAM sont d'accord mais ne souhaitent pas qu'il y ait un reporting narratif durant la phase de préparation. Une partie des informations qualitatives sera dans le rapport ORSA.	The objective of introducing narrative reporting during preparatory phase is for undertakings to prepare for the narrative reporting (i.e to set up systems and procedures in order to gather necessary information and to prepare reports) and for supervisors to assess undertakings preparedness (for example, whether the narrative reporting is sufficient in terms of a scope and details). In addition, supervisors may use this information contained in the narrative reporting, for example, with regard to SoG, to assist them in assessing progress made by undertakings in preparation for Solvency 2 SoG requirements.
1566	GDV	2,22	We presume it refers to those undertakings who fall within the scope of the preparatory phase reporting.	See revised text.
1567	IE	2,22	We presume it refers to those undertakings who fall within the scope of the preparatory phase reporting.	See revised text.
1568	RSA	2,22	This does not read clearly: we presume it refers to those undertakings who fall within the scope of the preparatory phase reporting.	Please see comment 1566
			The negative effects listed may need further analysis: a) There will be a divergence at the national level in result of the application of the thresholds.	

No.	Name	Reference	Comment	Resolution
1569	GDV	2,23	Further, cross-border groups will require data from all undertakings around the group, even if some of them fall outside the scope of the preparatory phase reporting. b) The Solvency II timeline is ultimately dictated by the progress made with OMDII, not the preparatory Guidelines. c) This is only partly mitigated by the Guidelines: the fact that a number of templates and the full extent of narrative reporting is not covered by these Guidelines means that NCAs will have to deal with such data submissions post-implementation anyway. d) Due to the above, including the undertakings not within the thresholds, this risk may not be mitigated by these proposed Guidelines.	See revised text. EIOPA is aware that not all negative effects can be completely mitigated by the Guidelines. Proportionality principle has been taken in to the account when developing the Guidelines
1570	IE	2,23	The negative effects listed may need further analysis: a) There will be a divergence at the national level in result of the application of the thresholds. Further, cross-border groups will require data from all undertakings around the group, even if some of them fall outside the scope of the preparatory phase reporting. b) The Solvency II timeline is ultimately dictated by the progress made with OMDII, not the preparatory Guidelines. c) This is only partly mitigated by the Guidelines: the fact that a number of templates and the full extent of narrative reporting is not covered by these Guidelines means that NCAs will have to deal with such data submissions post-implementation anyway. d) Due to the above, including the undertakings not within the thresholds, this risk may not be mitigated by these proposed Guidelines.	Please see comment 1569
1571	MetLife	2,23	As firm supporters of the European Single Market, we strongly advocate harmonisation across the EU. As expressed in the Solvency II text, harmonisation is about mutual recognition of authorisations and supervisory systems, allowing an entity to operate across the EU with a single authorisation. We support this principle as it makes compliance more effective and cost-efficient and provides clarity and consistency of expectations for Solvency II. We therefore agree with EIOPA that it is vital for joint and consistent preparatory actions to be taken at a European level to maximize the benefits of a harmonized approach.	Noted and welcomed.
1572	RSA	2,23	The so-called negative effects listed here are not correct. a) With the proposed thresholds, there will be a divergence at the national level anyway. Further, cross-border groups, like ours, will require data from all undertakings around the group, even if some of them fall outside the scope of the preparatory phase reporting. b) This point is irrelevant: the Solvency II timeline is ultimately dictated by the progress made with OMDII, not the preparatory Guidelines. c) This is only partly mitigated by the Guidelines: the fact that a number of templates and the full extent of narrative reporting is not covered by these Guidelines means that NCAs will have to deal with such data submissions post-implementation anyway. d) Due to the above, as well as the proposed use of thresholds, this risk has not been mitigated by these proposed Guidelines.	See response to the comment 1569
1573	GDV	2,24	The points underlined the benefits of having a period of preparation whereby undertakings take steps to be ready for submission post-implementation and the NCAs work with local industry to enable the receipt of information. However,, these Guidelines may go significantly above that.	Noted Noted. Proportionality principle has been taken into account and only a subset of the final package is being required during preparatory phase.
1574	IE	2,24	The points underlined the benefits of having a period of preparation whereby undertakings take steps to be ready for submission post-implementation and the NCAs work with local industry to enable the receipt of information. However,, these Guidelines may go significantly above that.	Please see comment 1573
1575	ROAM	2,24	La ROAM souhaite savoir si la date de livraison de l'outil de conversion XBRL sera disponible pour la phase de préparation.	The XBRL package for the preparatory phase will be the full XBRL package. i.e. covering all templates.
1576	RSA	2,24	The points made here by EIOPA are noted and accepted; however, they do not make the case for anything other than a period of preparation whereby undertakings take steps to be ready for submission post-implementation and the NCAs work with local industry to enable the receipt of information. Instead, these Guidelines go significantly above that.	The XBRL package for the preparatory phase will be the full XBRL package, i.e. covering all templates. Furthermore, the method to be used to transmit the information to the NCA will depend on NCA discretion.
1577	GDV	2,25	The avoidance of having to submit information earlier than what is required under Solvency II can be identified as a benefit.	Noted
1578	IE	2,25	The avoidance of having to submit information earlier than what is required under Solvency II can be identified as a benefit.	Please see comment 1577
1579	RSA	2,25	Contrary to what is stated, there is clearly one benefit: the avoidance of having to submit information earlier than what is required under Solvency II.	Noted.
1580	ACORD	2,27	"Promotion of reporting standards technologies and reduction of the risk of having less harmonisation. The use of reporting standards brings benefits of economies of scale incrementing the quality and reducing the costs." ACORD would like to respectfully again remind that both ACORD global XML data standards, and certain EU member country insurance data standards may be of use in supporting the aggregation of claims, policy, and exposure data on the liability side of the balance sheet, particularly for reinsurers, and, may help supervisory authorities be more assured that company to company and year to year reports were comparable, and traceable to policy administration, underwriting, and other systems. ACORD and XBRL International have been working together to examine in depth those points of commonality, and intend to continue to keep EIOPA informed as to their progress.	Noted
1581	DublinIMA	2,27	Paragraph 2.27 d) mentions that EIOPA will develop a free reporting tool for insurance and reinsurance undertakings in order to help them with the preparatory reporting and the XBRL technology. When will this tool be made available?	The XBRL tool will be made available in time for the preparatory phase .

No.	Name	Reference	Comment	Resolution
1583	GDV	2,27	Part (b) refers to resources. For undertakings may however be costlier to keep resources partly-employed on a project over an extended period instead of fully-employed over a shorter period. We also would welcome further clarification on the tool to be developed by EIOPA	Noted The XBRL tool will be made available in time for the preparatory phase .
1584	IE	2,27	Part (b) refers to resources. For undertakings may however be costlier to keep resources partly-employed on a project over an extended period instead of fully-employed over a shorter period. We also would welcome further clarification on the tool to be developed by EIOPA	Noted Please see comment 1581
1585	If P&C	2,27	Will EIOPA develop a tool as specified in 2.27, Annex 1 - Impact Assessment? If so, when and how is that supposed to function?	Please see comment 1581
1586	MetLife	2,27	We welcome the decision to stagger the reporting requirements, rather than mandating a “big bang” approach to implementation of qualitative and quantitative disclosures. However, we have concerns on the level of disclosures (more particularly, qualitative disclosures) many of which are significantly onerous. For example, description of the level of uncertainty in determination of technical provisions, explanation of material difference between Solvency I and Solvency II measurement basis for technical provisions at a line of business level. We believe the objective of any disclosure requirement should be to strike the appropriate balance between cost and potential benefits.	The guidelines do not envisage public disclosure of the information received by the NCAs.
1587	RSA	2,27	Part (b) refers to resources, but whose? Perhaps this argument holds true for NCAs but, for undertakings, it is actually costlier to keep resources partly-employed on a project over an extended period instead of fully-employed over a shorter period. Re part (d), any XBRL costs would not be mitigated, as firms would have to incur such costs twice: once for interim reporting; and once again when the full package and taxonomy is released. For this reason, it is highly unlikely that firms will choose to adopt XBRL prior to the release of the full reporting package.	Noted
				The XBRL package for the preparatory phase will be the full XBRL package, i.e. covering all templates. Furthermore, the method to be used to transmit the information to the NCA will depend on NCA discretion.
1588	PZU	2,27	In our opinion the introduction of XBRL taxonomy should be excluded from implementation phase. The application of XBRL taxonomy will result in additional costs of implementation and, as the reporting in XBRL format is required only in terms of local NCAs, the undertakings should not be required to use XBRL during implementation phase.	The method to be used to transmit the information to the NCA depends on NCA discretion.
1589	RSA	2,28	See 2.27.	
1590	GDV	2,29	In part (b), EIOPA states that double reporting does not necessarily represent additional costs. On this point we highlight the fact that the extra resources required during the reporting process (reconciling, verifying, sign-off, etc) imply extra costs. Contrarily to what is referred, the systems are not automatically prepared. We disagree with the argumentation used: that such cost would be incurred anyway as the Guidelines do not seek all the information that is to be produced under Pillar III.	EIOPA considers some period of parallel reporting is unavoidable when introducing a new set of regulatory reporting that differs significantly from the existing one; EIOPA recognises the costs implication and this is why only a subset of the final package has been introduced during preparatory phase.
1591	IE	2,29	In part (b), EIOPA states that double reporting does not necessarily represent additional costs. On this point we highlight the fact that the extra resources required during the reporting process (reconciling, verifying, sign-off, etc) imply extra costs. Contrarily to what is referred, the systems are not automatically prepared. We disagree with the argumentation used: that such cost would be incurred anyway as the Guidelines do not seek all the information that is to be produced under Pillar III.	Please see comment 1591
1592	MetLife	2,29	We fully agree that testing will inevitably be required when implementing a new system. However this testing could be performed off cycle or incorporate greater flexibility around deadlines, so as not to unnecessarily impact the existing reporting process. See Comment 1.9	Noted
1593	RSA	2,29	In part (b), EIOPA clearly does not acknowledge the fact that the extra resources required during the reporting process (reconciling, verifying, sign-off, etc) mean extra costs. “The systems need to be prepared”: this does not happen by itself! In any case, such costs would be partially mitigated if the objective was compliance with the final overall package, not with an interim stage of development with an incomplete set of reporting requirements. We believe the reasoning used by EIOPA when mandating such proposals fails to take into account the fact that only part of the final package is being considered: this part is subject to various requirements during the preparatory phase; however the remaining (majority) part of the final reporting requirements will not be subject to any interim requirements, despite the fact that firms will still need to be ready for them. We therefore conclude that EIOPA is content for firms to develop their own internal procedures with respect to such excluded information, despite the potential for there to be difficulties when sourcing such data. Hence, we fail to understand why such prescription is being proposed for the information requested under these Guidelines, given the implied flexibility that is being given with regards to the rest of the final reporting package. Presumably EIOPA is content for NCAs to come to some arrangement with local undertakings regarding the information outside the scope of these Guidelines; if this is the case, EIOPA ought to have restricted these Guidelines to advising NCAs to do just that but with all Pillar III data, not simply a part thereof.	EIOPA confirms that the requirements under the final preparatory guidelines are the ones envisaged for the final reporting package.
				EIOPA envisages a subset of the final reporting package for the preparatory phase ... And of course, undertakings do have to prepare for the full set of reporting information to be ready if Solvency II comes into force.
1594	GDV	2,31	We believe the benefits stated here for firms outside scope are overstated: they will face a huge learning curve post-implementation, notwithstanding the fact that (according to 2.27) 70% of the templates will not have been tested at all.	Noted.
1595	IE	2,31	We believe the benefits stated here for undertakings outside scope are overstated: they will face a huge learning curve post-implementation, notwithstanding the fact that (according to 2.27) 70% of the templates will not have been tested at all.	Please see comment 1594

No.	Name	Reference	Comment	Resolution
1596	RSA	2,31	We believe the benefits stated here for firms outside scope are overstated: they will still face a huge learning curve post-implementation, notwithstanding the fact that (according to 2.27) 70% of the templates will not have been tested at all during the preparatory phase.	Please see comment 1595
1597	GDV	2,32	The reporting envisaged under these Guidelines with regards to the internal model will have no bearing on the model approval process or particularly on the information NCAs will need to review as part of that process. The purpose of the pre-application process is precisely to facilitate earlier familiarisation of the model by NCAs; the reporting proposed here would not assist with this in any way.	Noted
1598	IE	2,32	The reporting envisaged under these Guidelines with regards to the internal model will have no bearing on the model approval process or particularly on the information NCAs will need to review as part of that process. The purpose of the pre-application process is precisely to facilitate earlier familiarisation of the model by NCAs; the reporting proposed here would not assist with this in any way.	Please see comment 1597
1599	RSA	2,32	The reporting envisaged under these Guidelines with regards to the internal model will have no bearing on the model approval process or particularly on the information NCAs will need to review as part of that process. The purpose of the pre-application process is precisely to facilitate earlier familiarisation of the model by NCAs; the reporting proposed here would not assist with this in any way.	Please see comment 1597
1600	GDV	2,33	See 2.31 – we believe this is overstated.	Noted
1601	IE	2,33	See 2.31 – we believe this is overstated.	See comment 1600
1602	RSA	2,33	See 2.31 – we believe this is overstated.	See comment 1600
1604	GDV	2,35	We concur with these potential benefits, but we believe this ought to have been the focus of any Pillar III-related preparatory Guidelines. NCAs ought to decide individually how they wish to do this. Although this will lead to a lack of harmonisation pre-implementation, this will happen anyway as it is already well-known that a number of NCAs plan to implement Pillar III reporting in full very soon, despite the OMDII limbo. EIOPA ought therefore to have proposed the minimum and let NCAs decide if they need anything in addition locally.	Noted. EIOPA decided for a harmonized approach to aim for convergence during the preparatory phase.
1605	IE	2,35	We concur with these potential benefits, but we believe this ought to have been the focus of any Pillar III-related preparatory Guidelines. NCAs ought to decide individually how they wish to do this. Although this will lead to a lack of harmonisation pre-implementation, this will happen anyway as it is already well-known that a number of NCAs plan to implement Pillar III reporting in full very soon, despite the OMDII limbo.	Please see comment 1604
1606	RSA	2,35	We concur with these potential benefits, but we believe this ought to have been the focus of any Pillar III-related preparatory Guidelines. NCAs ought to decide individually how they wish to do this. Although this will lead to a lack of harmonisation pre-implementation, this will happen anyway as it is already well-known that a number of NCAs plan to implement Pillar III reporting in full very soon, despite the OMDII limbo. EIOPA ought therefore to have proposed the minimum, as suggested above, and let NCAs decide if they need anything in addition locally.	Please see comment 1604
1607	GDV	2,39	See 2.35 above: we believe EIOPA has not considered other feasible options. EIOPA does not explain why it has chosen to ask undertakings to provide narrative reporting, let alone narrative that describes the current system of governance, as opposed to the system that is expected to exist after SII implementation. Allocating time and resource producing narrative that will merely describe a situation that is in a state of flux due to the transition towards SII compliance will not add value to undertakings or NCAs. Considering that separate Guidelines exist concerning the system of governance, no narrative reporting ought to be requested for this area, certainly none that requests a description of a pre-Solvency II environment.	Noted. The objective of introducing narrative reporting during preparatory phase is for undertakings to prepare for the narrative reporting (i.e to set up systems and procedures in order to gather necessary information and to prepare reports) and for supervisors to assess undertakings preparedness (for example, whether the narrative reporting is sufficient in terms of a scope and details). In addition, supervisors may use this information contained in the narrative reporting, for example, with regard to SoG, to assist them in assessing progress made by undertakings in preparation for Solvency 2 SoG requirements.
1608	IE	2,39	See 2.35 above: we believe EIOPA has not considered other feasible options. EIOPA does not explain why it has chosen to ask undertakings to provide narrative reporting, let alone narrative that describes the current system of governance, as opposed to the system that is expected to exist after SII implementation. Allocating time and resource producing narrative that will merely describe a situation that is in a state of flux due to the transition towards SII compliance will not add value to undertakings or NCAs. Considering that separate Guidelines exist concerning the system of governance, no narrative reporting ought to be requested for this area, certainly none that requests a description of a pre-Solvency II environment.	Please see comment 1607
1609	RSA	2,39	See 2.35 above: we believe EIOPA has focussed too much on the wrong thing in making its proposals. Nowhere here does EIOPA explain why it has chosen to ask firms to provide narrative reporting at all, let alone narrative that describes the current system of governance, as opposed to the system that is expected to exist after SII implementation. Spending time and resource producing narrative that will merely describe a situation that is in a state of flux due to the transition towards SII compliance cannot add any value to anyone, firms, or NCAs. Considering that separate Guidelines exist concerning the system of governance, no narrative reporting ought to be requested for this area, certainly none that requests a description of a pre-Solvency II environment.	Please see comment 1607
1610	MetLife	2.40	The IGT and RC templates are onerous. Whilst we welcome the proposal to introduce thresholds, there needs to be explicit and consistent guidance on these thresholds. We believe these templates should only comprise of material IGTs. There should be flexibility to allow for the aggregation of transactions that are similar in nature.	Please see EIOPA answer to this issue in July 2012 Final Report. And note that RC and IGT templates are not within the scope of preparatory reporting.
1611	GDV	2,44	Whilst the ability to calculate and submit information on the SCR is “crucial”, this will already be covered (for internal model firms) as part of the model application process. Making such firms report data also (as well as standard formula data) is duplicative and unnecessary.	see response to the comment 122
1612	IE	2,44	Whilst the ability to calculate and submit information on the SCR is “crucial”, this will already be covered (for internal model firms) as part of the model application process. Making such undertakings report data also (as well as standard formula data) is duplicative and unnecessary.	Please see comment 1611

No.	Name	Reference	Comment	Resolution
1613	MetLife	2,44	We appreciate the exemption from presenting the Statutory Accounts balances on BS-C1 for those undertakings not generating Group Financial Statements (availing of the exemption under EU Directive) . We believe this exemption should also apply to the Profit or Loss required under Financial Stability reporting - as this would also be burdensome and costly to produce, particularly where different GAAPs are in use.	See response to the comment 503
1614	RSA	2,44	Whilst the ability to calculate and submit information on the SCR is "crucial", this will already be covered (for internal model firms) as part of the model application process. Making such firms report data also (as well as standard formula data) is duplicative and unnecessary.	Please see comment 1614
1615	GDV	2,45	This assumption is incorrect: internal model applicants are not making preparations to report using standard formula templates (QRT-B3X series). No procedures are set up in respect of these templates.	Regarding IMAP reporting, see response to the comment 122
1616	IE	2,45	This assumption is incorrect: internal model applicants are not making preparations to report using standard formula templates (QRT-B3X series). No procedures are set up in respect of these templates.	Please see comment 1615
1617	RSA	2,45	This assumption is incorrect: internal model applicants are not making preparations to report using standard formula templates (QRT-B3X series). No procedures are set up in respect of these templates.	Please see comment 1616
1618	GDV	2,46	See 2.46: it is left deciding how much reporting is required, instead of letting NCAs decide (which is what the latter are doing). We reject all options; because any pillar I connection is critical. In our view Option 4 is the most probable option which undertakings could handle in 2015.	See response to the comment 13
1619	IE	2,46	See 2.46: it is left deciding how much reporting is required, instead of letting NCAs decide (which is what the latter are doing). We reject all options; because any pillar I connection is critical. See our comments on question 2	Please see comment 1618
1620	RSA	2,46	See 2.29 and 2.35: we believe the fact that the majority of the final reporting package is outside the scope of the preparatory phase means emphasis is being misplaced. Rather, NCAs ought to be allowed to decide (which is what the latter are doing anyway, with some reportedly seeking to go above and beyond the EIOPA proposals).	Please see comment 1618
1621	GDV	2,53	We fail to see the difference between the points laid out in this paragraph and those laid out in 2.50 above. All the points EIOPA makes in 2.50 apply equally here.	Noted
1622	GDV	2,53	The point about ECB requirements is also noted, but EIOPA has not taken account of the fact that the latter applies only to Euro-area member states; whereas these preparatory Guidelines apply to NCAs in the whole Union. We do not believe it is appropriate for SII policy to be formulated based on developments that do not affect all member states.	EIOPA's cooperation with the ECB has ensured that the reporting package proposed by the Guidelines is sufficient to meet ECB's initial requirements. EIOPA will continue to engage in a dialogue with the ECB aiming as much as possible to avoid undue costs to the undertakings arising from different requirements. However, the set of the Solvency II reporting requirements aim the information needed for the supervisory review process.
1623	IE	2,53	We fail to see the difference between the points laid out in this paragraph and those laid out in 2.50 above. All the points EIOPA makes in 2.50 apply equally here. The point about ECB requirements is also noted, but EIOPA has not taken account of the fact that the latter applies only to Euro-area member states; whereas these preparatory Guidelines apply to NCAs in the whole Union. We do not believe it is appropriate for SII policy to be formulated based on developments that do not affect all member states.	Please see comment 1622
1624	RSA	2,53	We fail to see the difference between the points laid out in this paragraph and those laid out in 2.50 above. All the points EIOPA makes in 2.50 apply equally here. The point about ECB requirements is also noted, but EIOPA has not taken account of the fact that the latter applies only to Euro-area member states; whereas these preparatory Guidelines apply to NCAs in the whole Union. We do not believe it is appropriate for SII policy to be formulated based on developments that do not affect all member states.	Please see comment 1622 and 1623
1625	GDV	2,55	See 2.53 above.	Please refer to comment 1622
1626	IE	2,55	See 2.53 above.	Please refer to comment 1622
1627	RSA	2,55	See 2.53 above.	Please refer to comment 1622
1628	GDV	2,56	We disagree with this assertion, for the reasons set out in 2.46.	Noted
1629	IE	2,56	We disagree with this assertion, for the reasons set out in 2.46.	Noted
1630	RSA	2,56	We disagree with this assertion, for the reasons set out in 2.46.	Noted
1631	GDV	2,58	The proposed thresholds introduce the risk that certain firms due to report post-implementation will not do so under these Guidelines, meaning they will not be prepared.	EIOPA message is still that all participants should be preparing for SII, the difference is that it was not considered proportionate to have the same expectations, therefore the threshold.
1632	IE	2,58	The proposed thresholds introduce the risk that certain firms due to report post-implementation will not do so under these Guidelines, meaning they will not be prepared.	Please refer to comment 1631
1633	RSA	2,58	If OMDII introduces proportionality to Pillar III reporting, these Guidelines ought to reflect that by ensuring all those who are due to report after SII implementation do so during the preparatory phase. It is important that any thresholds introduced by these proposed Guidelines do not conflict with OMDII.	EIOPA took that into consideration and expects that thresholds introduced will not conflict with Omnibus 2
1634	GDV	2,59	Given that the introduction of these preparatory-phase Guidelines will result in the need for increased resources at both undertakings and NCAs, this paragraph does not provide sufficient counterargument for this option.	Noted

No.	Name	Reference	Comment	Resolution
1635	IE	2,59	Given that the introduction of these preparatory-phase Guidelines will result in the need for increased resources at both undertakings and NCAs, this paragraph does not provide sufficient counterargument for this option.	Please refer to comment 1634
1636	RSA	2,59	Given that the introduction of these preparatory-phase Guidelines will result in the need for increased resources at both undertakings and NCAs, this paragraph does not provide sufficient counterargument for this option.	Please refer to comment 1634
1637	RSA	2,63	Considering the points made by EIOPA in 2.53 above and similar paragraphs regarding ECB reporting requirements, it is surprising EIOPA did not support this option, given the ECB's preference for a higher threshold for quarterly reporting. We do support a lower threshold, as chosen by EIOPA, but this resulting inconsistency only serves to reinforce the point we make in 2.53 above.	EIOPA's cooperation with the ECB has ensured that the reporting package proposed by the Guidelines is sufficient to meet ECB's initial requirements. EIOPA will continue to engage in a dialogue with the ECB aiming as much as possible to avoid undue costs to the undertakings arising from different requirements. However, the set of the Solvency II reporting requirements aim the information needed for the supervisory review process.
1638	GDV	2,64	EIOPA acknowledges in 2.62 that its preferred approach may lead to divergent outcomes during the preparatory phase. That, as well as the fact that groups will need to require reporting from operations that may fall outside the scope of the Guidelines, means a divergent approach is almost certain.	Noted . NCAs' will always be able to exercise some discretion.
1639	IE	2,64	EIOPA acknowledges in 2.62 that its preferred approach may lead to divergent outcomes during the preparatory phase. That, as well as the fact that groups will need to require reporting from operations that may fall outside the scope of the Guidelines, means a divergent approach is almost certain.	Please refer to comment 1638
1640	MetLife	2,64	EIOPA suggest that the Guidelines should be applied in a manner that is both proportionate and practical and allows for some flexibility. We would endorse this, noting that the Guidelines are meant to help prepare for Solvency II and not for its full implementation. MetLife is restructuring its European operations in such a way that most of our subsidiaries will become branches of MetLife Europe Limited and MetLife Europe Insurance Limited. This restructuring is expected to be complete prior to the effective date of Solvency II. Given that regulatory requirements differ for subsidiaries and branches, we would ask that that NCAs are mindful of EIOPA's flexible approach to the Guidelines and consider the structure of our operations upon full implementation of Solvency II.	Noted
1641	RSA	2,64	EIOPA already acknowledges in 2.62 that its preferred approach may lead to divergent outcomes during the preparatory phase. That, as well as the fact that groups will need to require reporting from operations that may fall outside the scope of the Guidelines, means a divergent approach is almost certain. We believe thresholds are not needed, save for any changes arising from the approval of OMDII.	Noted.
1642	GDV	2,66	If the intention of the Guidelines is early preparation, there is little benefit to be gained from asking undertakings to complete QRTs SCR-B3A-G. We note EIOPA's argument that model approval will not have been given as at the time of implementing these Guidelines and that such approval may never be given, meaning undertakings will need to prepare for the worst. We believe our counter-argument is justified based on the Guidelines EIOPA itself proposes regarding third-country equivalence: such equivalence may not eventually be granted in respect of certain countries, yet undertakings are not being asked to assume this and to report using the 'best-case' scenario whereby equivalence is granted. Similarly, internal model applicants ought to be able to report on the basis that their models will be approved. We do agree with EIOPA applying different standards. As for information needed by NCAs, they will obtain all the data they need via the model approval process.	See response to the comment 122
1643	IE	2,66	If the intention of the Guidelines is early preparation, there is little benefit to be gained from asking undertakings to complete QRTs SCR-B3A-G. We note EIOPA's argument that model approval will not have been given as at the time of implementing these Guidelines and that such approval may never be given, meaning undertakings will need to prepare for the worst. We believe our counter-argument is justified based on the Guidelines EIOPA itself proposes regarding third-country equivalence: such equivalence may not eventually be granted in respect of certain countries, yet undertakings are not being asked to assume this and to report using the 'best-case' scenario whereby equivalence is granted. Similarly, internal model applicants ought to be able to report on the basis that their models will be approved. We do agree with EIOPA applying different standards. As for information needed by NCAs, they will obtain all the data they need via the model approval process.	Please see comment 1642
1644	RSA	2,66	If the intention of the Guidelines is early preparation, there is little benefit to be gained from asking firms to complete QRTs SCR-B3A-G. We note EIOPA's argument that model approval will not have been given as at the time of implementing these Guidelines and that such approval may never be given, meaning firms will need to have contingency plans for operating on a standard formula basis. We believe our stance is justified based on the Guidelines EIOPA proposes regarding third-country equivalence: such equivalence may not eventually be granted in respect of certain countries, yet undertakings are not being asked to assume this and to report using the 'best-case' scenario whereby equivalence is granted. Similarly, internal model applicants ought to be able to report on the basis that their models will be approved. We do not understand why EIOPA is applying different standards. As for information needed by NCAs, they will obtain all the data they need via the model approval process.	Please see comment 1642
1646	GDV	2,67	See 2.66.	
1647	IE	2,67	See 2.66.	
1648	RSA	2,67	See 2.66.	
1650	GDV	2,68	Also, the SCR-B3 templates actually do not provide all the information needed by NCAs on the standard formula calculation, especially when comparing the differences in the result with that of the internal model. As such, the outcome may more bureaucracy than usefulness. See 2.66.	See response to the comment 122

No.	Name	Reference	Comment	Resolution
1651	IE	2,68	Also, the SCR-B3 templates actually do not provide all the information needed by NCAs on the standard formula calculation, especially when comparing the differences in the result with that of the internal model. As such, the outcome may more bureaucracy than usefulness.	Please see comment 1650
1652	RSA	2,68	See 2.66. See 2.66. Also, the SCR-B3 templates actually do not provide all the information needed by NCAs on the standard formula calculation, especially when comparing the differences in the result with that of the internal model, so all that is achieved by these Guidelines is bureaucracy, not usefulness.	Please see comment 1650
1654	GDV	2,75	Whilst we agree with EIOPA's decision here, the argument is puts forward against option 4 are the very same arguments to be made against its decision in Question 5. Put another way: the arguments EIOPA makes under Question 5 would equally lead to option 4 being chosen for Question 6. This may be seen as inconsistent logic, unhelpful to undertakings and very costly and burdensome.	Noted, however EIOPA believes that the two situations described are not comparable
1655	IE	2,75	Whilst we agree with EIOPA's decision here, the argument is puts forward against option 4 are the very same arguments to be made against its decision in Question 5. Put another way: the arguments EIOPA makes under Question 5 would equally lead to option 4 being chosen for Question 6. This may be seen as inconsistent logic, unhelpful to undertakings and very costly and burdensome.	See response to the comment 1654
1656	RSA	2,75	Whilst we agree with EIOPA's decision here, the argument it puts forward against option 4 are the very same arguments to be made against its decision in Question 5. Put another way: the arguments EIOPA makes under Question 5 would equally lead to option 4 being chosen for Question 6. This inconsistency is very unhelpful to firms and is very costly and burdensome.	See response to the comment 1654
1659	GDV	2,78	We support EIOPA's decision to choose the option which causes least disruption to firms.	Noted
1660	RSA	2,78	We support EIOPA's decision to choose the option which causes least disruption to firms.	Noted
1663	ROAM	Appendix 2	Pour la phase de préparation, les membres de la ROAM sont en faveur d'un reporting annuel uniquement. Le reporting trimestriel pourra être envisagé lorsque EIOPA nous fournira une liste de simplifications possibles.	EIOPA considers setting up systems and processes and procedures for quarterly reporting, as well as submitting quarterly information as defined in the guidelines, as an important part of the preparation process