# SOLVENCY AND FINANCIAL CONDITION REPORT

# 2018

ČESKÁ POJIŠŤOVNA

# Index

# Introduction

Česká pojišťovna a.s. (the Company), falling under the scope of Solvency II Directive reporting, is required to prepare its own Solvency and Financial Condition Report (SFCR). This is in accordance with Directive 2009/138/EC (the Solvency II Directive) as well as with Delegated Regulation 2015/35/EC (the Delegated Regulation) and the related Guidelines.

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

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

When disclosing the information referred to in this Report, figures reflecting monetary amounts shall be disclosed in thousands of Czech Crowns (CZK), which is the Company's functional currency, unless otherwise stated. Negligible differences can arise due to rounding.

The document was approved by the Company's Board of Directors on 23 April 2019.

# Glossary

| | |
|---|---|
| AFS | Available For Sale |
| AHD | Accident, Health and Disability |
| ALAE | Allocated Loss Adjustment Expenses |
| ALM | Asset Liability Management |
| AMSB | Administrative, Management and Supervisory Body |
| BEL | Discounted Best Estimate of Liabilities |
| BoD | Board of Directors |
| BOF | Basic Own Funds |
| BSCR | Basic Solvency Capital Ratio |
| CAT | CATastrophe reinsurance contract |
| CAT XL | CATastrophe eXcess of Loss reinsurance contract |
| CB | Contract Boundaries |
| CDA | Counterparty Default Adjustment |
| CEE | Central and Eastern Europe |
| CEO | Chief Executive Officer |
| CFO | Chief Financial Officer |
| CIB | Czech Insurers' Bureau |
| CMP | Capital Management Plan |
| CoC | Cost of Capital |
| COR | Combined Ratio |
| CRO | Chief Risk Officer |
| CV | Curriculum Vitae |
| CZK | Czech crowns |
| CzNIP | Czech Nuclear Insurance Pool |
| D&O | Directors and Officers Liability |
| DFM | Development Factor Models |
| DTA | Deferred Tax Asset |
| DTL | Deferred Tax Liability |
| EC | European Community |
| EIOPA | European Insurance and Occupational Pensions Authority |
| EPIFP | Expected Profit Included in Future Premiums |
| EU countries | Countries of the European Union |
| EUR | Euro |
| FV | Fair Value |
| FVTPL | Fair Value Through Profit or Loss |
| FX derivates | Foreign eXchange derivates |
| FY | Financial Year |
| GCRO | Group Chief Risk Officer |
| Generali | Assicurazioni Generali S.p.A. - the ultimate parent company of the Company |
| GIGP | Group Investment Governance Policy |
| GIRG | Group Investment Risk Guidelines |
| IAS | International Accounting Standards |
| IBNR | Incurred But Not Reported |
| ICS | Internal Control System |
| ID number | IDentification number |
| IFRS | International Financial and Accounting Standards |
| IT | Information Technology |
| L | Life insurance |
| LAE | Lost Adjustment Expenses |
| LAF | Life Actuarial Function |
| LDC | Loss Data Collection |
| LoB | Line of Business |
| LTI | Long Term Incentive programs |
| MCR | Minimum Capital Requirement |
| MCZK | Millions of Czech crowns |
| MTPL | Motor Third Party Liability |
| MVBS | Market Value Balance Sheet |
| MVM | Market Value Margin |
| NAT CAT | Natural Catastrophe excess of loss reinsurance contract |
| NCC | New Civil Code |
| NG | Percentage of IFRS Net Outstanding Claims Reserve on IFRS Gross Outstanding Claims Reserve for each accident year |
| NL | Non-life Insurance |
| No | Number |
| OCR | Outlstanding Claims Reserve |
| ORSA | Own Risk and Solency Assessment |
| P&C | Property & Casualty, Non-life insurance |
| P&L | Profit and Loss |
| PDF | Probability Distribution Forecast |
| PIM | Partial Internal Model |
| QRT | Quantitative Reporting Template |
| RA | Risk Adjustement |
| RAF | Risk Appetite Framework |
| RBNS | Reported But Not Settled |
| ResQ | Group Reserving Tool |
| RFF | Ring Fenced Funds |
| RM | Risk Margin |
| RSR | Regular Supervisory Report |
| RUB | Russian ruble |
| SAA | Strategic Asset Allocation |
| SCR | Solvency Capital Requirement |
| SFCR | Solvency and Financial Condition Report |
| SII | Solvency II: the set of legislative and regulatory provisions introduced following the issue of Directive 2009/138/EC of the European Parliament and the Council of 25 November 2009 |
| SLT | Similar to Life Techniques |
| SME business | Small and Medium-Sized Enterprise business |
| SPV | Special Purpose Vehicle |
| STI | Short Term variable Incentives |

| | |
|---|---|
| TCZK | Thousands of Czech crowns |
| the Bureau | Czech Insurers' Bureau |
| the Company | Česká pojišťovna, a.s. |
| TP | Technical Provisions |
| TPL | Third Party Liability |
| TRCR | Technical Reserves Coverage Requirement |
| UBEL | Undiscounted Best Estimate of Liabilities |
| UL (products) | Unit Linked products |
| ULAE | Unallocated Loss Adjustment Expenses |
| UW | Underwriting |
| VaR calculation | Value at Risk calculation |
| XL | Excess of Loss reinsurance |
| YE | Year End |

# Summary

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

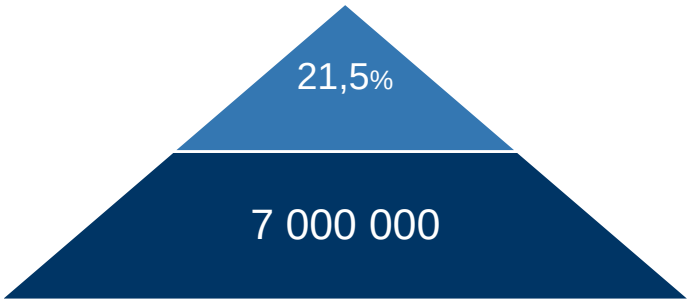
## BUSINESS AND PERFORMANCE (SECTION A)

Česká pojišťovna is a composite insurance company providing individual life and non-life insurance as well as insurance for small, medium and large clients covering risks in industry, business and agriculture.

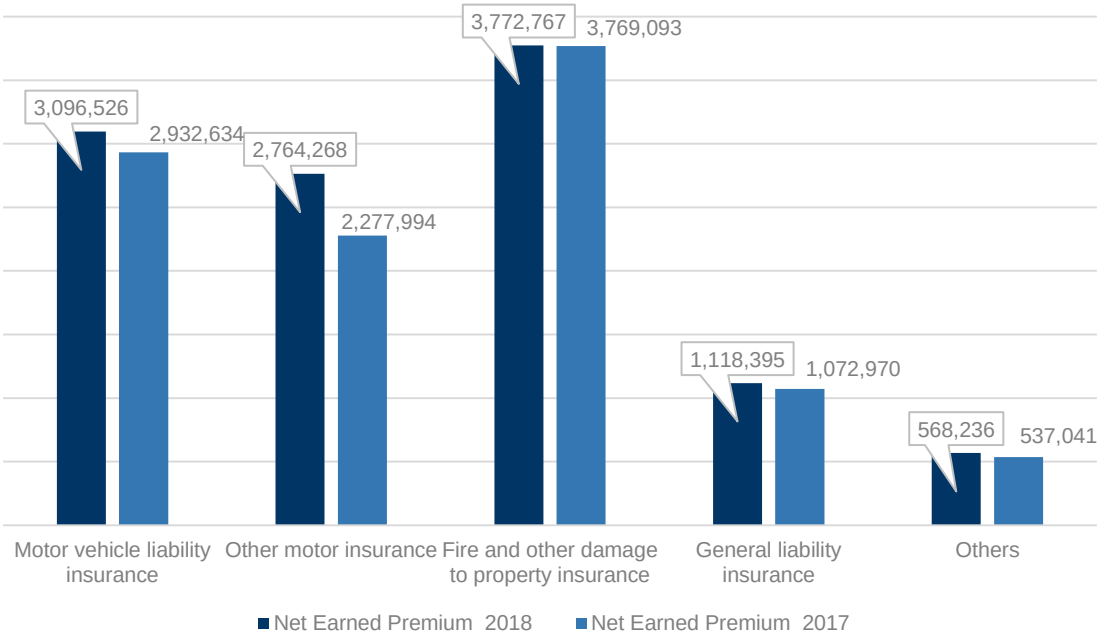
On 10 January 2019, A.M. Best, an international rating agency specializing in the insurance sector, confirmed an ‘A‘ (Excellent) financial strength rating for Česká pojišťovna with a stable outlook and improved the credit rating from "a" with a positive outlook to "a+" with a positive outlook. The upgrade of the Long-Term Issuer Credit Rating is a result of consistently strong profitability in challenging market conditions, reflecting the successful execution of the strategic plan, the focus on technical discipline and adaptation to a persistent low interest rate environment. The A.M. Best ratings reflect the strong operating performance, very favourable business profile and appropriate risk management of Česká pojišťovna.

The Česká pojišťovna rating has a long tradition. Česká pojišťovna received its first rating in 1998 from DCR (Duff and Phelps, today Fitch). In the years that followed, Česká pojišťovna was evaluated by Moody’s and Standard and Poor’s. In the past three years, Česká pojišťovna has been rated by A. M. Best, which specializes in the insurance sector.

Česká pojišťovna manages more than seven million insurance policies, and its market share in the home insurance market is 21.5%.

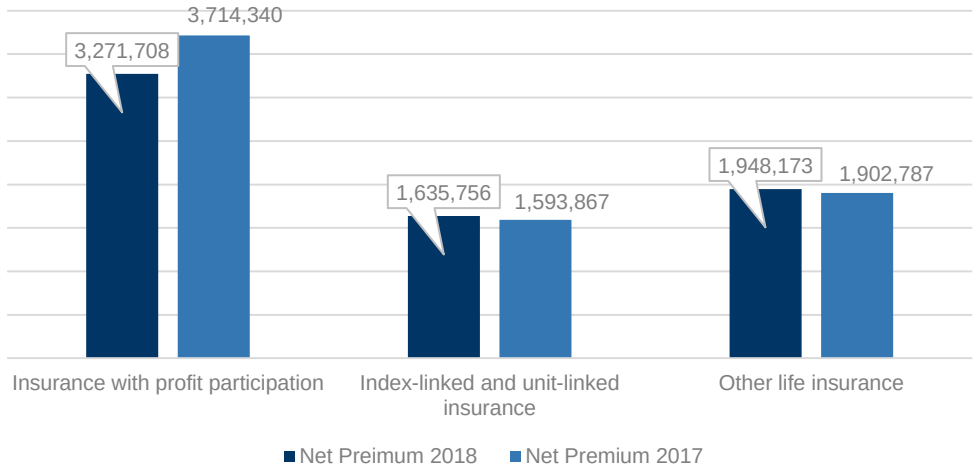


## Non-life Insurance




Česká pojišťovna remained the leading non-life insurance service provider in 2017 with a 23.7% market share. The results of non-life insurance on the Czech market echo the overall economic upswing. Non-life premiums grew mainly in the MTPL and Casco businesses, while other lines were flat.

## Life Insurance




In life insurance, regular gross written premium fell by CZK 355 million due to continuing portfolio diminution. New business was not able to compensate for the fall in the life insurance portfolio. On the other hand, lapses were very low in 2018, demonstrating the high quality of new business.

## SYSTEM OF GOVERNANCE (SECTION B)

The Company's System of Governance has been set up to ensure operational effectiveness and efficiency, financial reporting reliability, compliance with laws and regulations, development of and compliance with the Company's strategies, and the detection and prevention of conflicts of interest and internal fraud. The adequacy of the System of Governance is subject to independent review on a yearly basis by the Internal Audit Function. There have been no material changes to the System of Governance since the last report.

## RISK PROFILE (SECTION C)

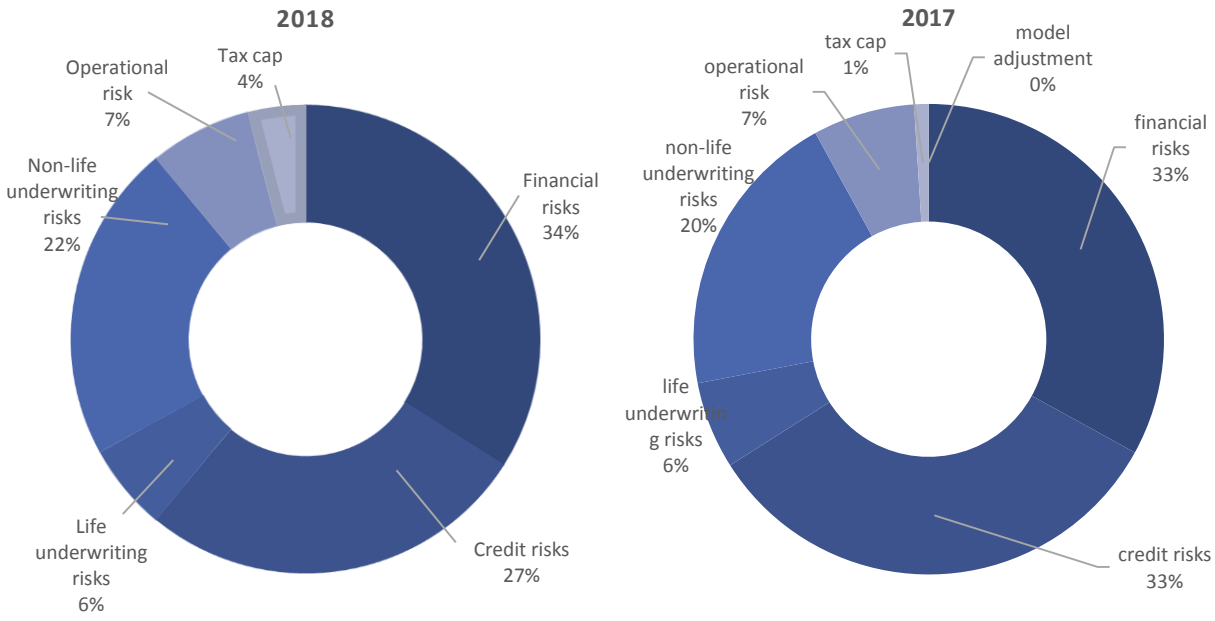
Česká pojišťovna is a member of Generali Group and applies an internal approach to determine the available financial resources and capital requirements for the risks to which it is exposed (Internal Model), while maintaining consistency with the basic Solvency II framework. On 7 March 2016, the Company received regulatory approval to use its own Internal Model for regulatory Solvency Capital Requirement calculations.

The Risk Management System is based on three main pillars:

i. the risk assessment process: aimed at identifying and evaluating the risks and the solvency position of the Company;
ii. the risk governance process: aimed at defining and controlling managerial decisions in relation to the relevant risks;
iii. the risk management culture: aimed at embedding risk awareness in decision-making processes and increasing value creation.

Česká pojišťovna has implemented a Risk Management System that aims to identify, evaluate, monitor and manage the most important risks to which the Company is exposed. There was a significant increase of CAT SCR in 2018 caused by the fact that the aggregate XoL reinsurance program covering small and medium events was cancelled for 2019 due to low efficiency.

**Solvency Capital Requirement (SCR) by type of risk before diversification**



## VALUATION FOR SOLVENCY PURPOSES (SECTION D)

Section D includes a complete overview of the valuation of Solvency II assets and liabilities. The general principle for the valuation is an economic, market-consistent approach using assumptions that market participants would use in valuing the same asset or liability (Article 75 of the Solvency II Directive). In particular, assets and liabilities other than Technical Provisions are recognized in compliance with IFRS standards and interpretations by the IFRS Interpretations Committee approved by the European Union before the balance sheet date, provided they include valuation methods that are consistent with the market approach.

Technical Provisions under Solvency II are calculated as the sum of Best Estimate Liabilities plus Risk Margin. °Since 2018, accident riders sold as part of life insurance contracts have been newly included in the revaluation of Outstanding Claims Reserves using non-life techniques.

The significant methods and assumptions used are detailed in chapter D.2. and remain stable.

## CAPITAL MANAGEMENT (SECTION E)

The Company regularly assesses its statutory solvency position, which is derived from the ratio of its available capital and the capital requirement. Česká pojišťovna has a very strong capital position. At the end of 2017, the ratio of total Eligible Own Funds to SCR reached 275%, i.e. Eligible Own Funds amounted to more than double the level required by Solvency II. The strong capital position should enable the Company to face any adverse external events or events with an impact higher than required by Solvency II (for instance catastrophic floods) and to be able to fully meet its liabilities towards clients while continuing to fulfil all statutory capital requirements.

Česká pojišťovna is a composite insurer providing a comprehensive range of services, encompassing life and non-life personal lines, insurance for small, medium-sized and large customers, covering industrial and business risks and agriculture. The wide range of products and large portfolio allow significant risk diversification, and thus Česká pojišťovna achieves long-term stable financial results and a strong capital position. Customers benefit from this diversification by having a strong and reliable partner that is able to help under all circumstances, even under unfavorable economic conditions.

Regulatory capital requirements in respect of the Solvency position, base scenario

| (CZK million) | SCR | Eligible Own Funds | Solvency Ratio |
|---|---|---|---|
| 2018 | 8,538 | 23,509 | 275 % |
| 2017 | 8,635 | 27,791 | 322 % |

The solvency position of the Company decreased compared to last year by 47% due to planned distribution of retained earnings to the shareholder, reducing Eligible Own Funds. Further effects are a drop in the value of investment assets and growth in non-life Technical Provisions arising from newly underwritten business. This movement is partially offset by a drop in life Technical Provisions. These diminish as a consequence of maturities in the current portfolio, while at the same time the new profitable protection business is growing.

Outside the basic framework of the solvency position, the Company has defined hypothetical adverse events (or sensitivities) and continues to manage the risks arising from these scenarios while quantifying their potential impact on the Company's solvency position (see for instance Section E.6.) Should such additional adverse situations occur, the Company will be fully able to meet the regulatory requirements on equity.

# A. Business and Performance

## A.1. BUSINESS

### A.1.1. BASIC COMPANY INFORMATION

| | |
|---|---|
| *Company name* | Česká pojišťovna a.s. |
| *Legal form* | Joint stock company |
| *Registered office* | Spálená 75/16, Nové Město, 110 00, Prague 1 |
| *ID number* | 452 72 956 |
| *Tax ID number* | CZ 4527 2956 |
| *Date of inception* | 1 May 1992 |
| *Legal regulation* | The Company was founded pursuant to Section 11(3) of Act No 92/1991, on the Conditions for the Transfer of State Property to Other Entities, as amended, by the National Property Fund of the Czech Republic under a founder's deed dated 28 April 1992, and was incorporated by registration in the Commercial Register on 1 May 1992. |
| *Incorporation in Commercial Register* | Prague Municipal Court<br>Section B, File number 1464 |
| *Date of incorporation in the Commercial Register* | 1 May 1992 |
| *Share capital* | CZK 4,000,000,000<br>Paid up: 100% |

**Information about Holders of Qualifying Holdings in the Undertaking**

The Company's sole shareholder is CZI Holdings N.V., with its registered office at De Entree 91, Amsterdam 1101 BH, the Netherlands; registered on 5 April 2006, identification number 34245976.

CZI Holdings N.V. is an integral part of Generali CEE Holding B.V., a company fully owned by Assicurazioni Generali S.p.A. (Generali), which is the ultimate parent company of the Company. The financial statements of Generali Group are publicly available at www.generali.com

**CZI Holdings N.V.**

| | |
|---|---|
| *Legal form:* | joint stock company |
| *Registered office:* | De Entree 91, Amsterdam 1101 BH, Netherlands |
| *File number in the Register of the Amsterdam* | |
| *Chamber of Commerce and Industry:* | 34245976 |
| *Share capital:* | EUR 100 000 000 |
| *Stake in the voting rights:* | 100% |
| *Date of inception:* | 6 April 2006 |
| *Principal businesses:* | financial holding |

**Generali CEE Holding B.V.**

| | |
|---|---|
| *Legal form:* | limited company |
| *Registered office:* | De Entree 91, Amsterdam 1101 BH, Netherlands |
| *File number in the Register of the Amsterdam* | |
| *Chamber of Commerce and Industry:* | 34275688 |
| *Share capital:* | EUR 100 000 |
| *Stake in the voting rights:* | 100% (indirect) |
| *Share of share capital:* | 100% (indirect) |
| *Date of inception:* | 8 June 2007 |
| *Principal businesses:* | holding activities |

**Assicurazioni Generali S.p.A**

| | |
|---|---|
| *Legal form:* | joint stock company |
| *Registered office:* | Piazza Duca degli Abruzzi 2, TS 34132 Trieste, Italy |
| *Trieste Companies' Register number:* | 00079760328 |
| *Share capital:* | EUR 1 565 165 364 |
| *Stake in the voting rights:* | 100% (indirect) |
| *Share of share capital:* | 100% (indirect) |
| *Date of inception:* | 26 December 1831 |
| *Principal businesses:* | providing insurance and finance products |

**Supervisory Authority for the Entity**

| | |
|---|---|
| *Name:* | CZECH NATIONAL BANK |
| *Registered office:* | Na Příkopě 864/28, 115 03 Prague 1 - Nové Město |
| *ID Number* : | 48136450 |
| *Telephone:* | +420 224 411 111 |
| *Fax:* | +420 224 412 404 |

**Supervisory Authority for the Group**

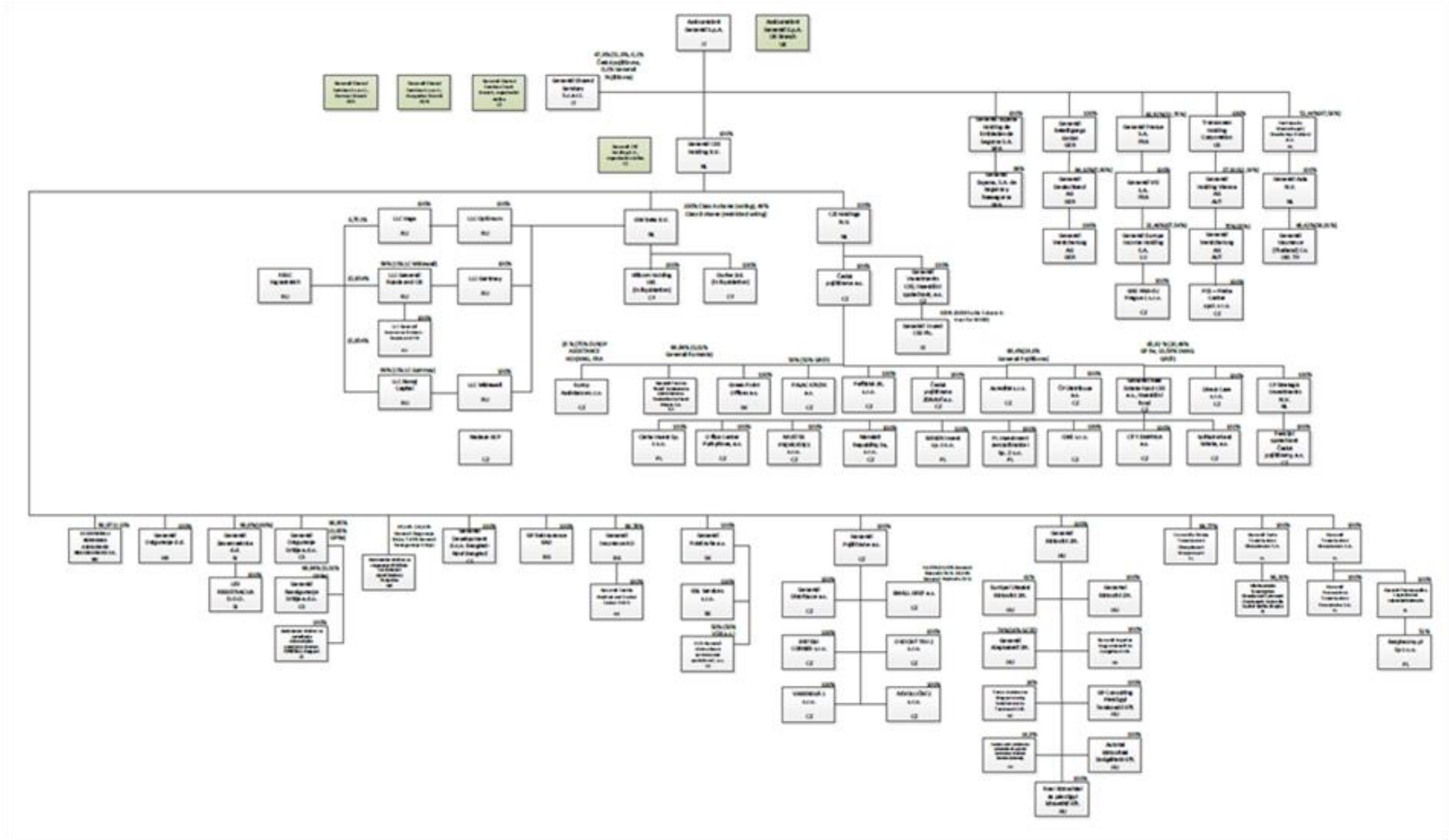
| | |
|---|---|
| *Name:* | IVASS - Istituto per la Vigilanza sulle Assicurazioni |
| *Registered office:* | Via del Quirinale 21, 00187 Rome, Italy |
| *ID Number:* | 97730600588 |
| *Telephone:* | +39.06.42133.1 |
| *Fax:* | +39.06.42133.206 |
| *Email:* | ivass@pec.ivass.it |

### Information about the External Auditor

Since 2012, the financial statements have been audited by Ernst & Young Audit, s.r.o. The financial statements of Česká pojišťovna were audited on 26 March 2019.

| | |
|---|---|
| *Registration number:* | 267 04 153 |
| *Registered office:* | Na Florenci 2116/15, Nové Město, 110 00 Prague 1 |
| *Statutory audit licence number:* | 401 |
| *Auditor-in-charge:* | Lenka Bízová |
| *Authorisation number:* | 2331 |

## Group Structure Chart as at 31 December 2018



## A.1.2. SUBSIDIARIES AND ASSOCIATES

The following table provides details about the Company's subsidiaries and associates as at 31 December 2018:

| Name | Country | Proportion of ownership interest (%) | Proportion of voting rights (%) | Note |
|---|---|---|---|---|
| Direct Care s.r.o. | Czech Republic | 100.00 | 100.00 | 1 |
| Česká pojišťovna ZDRAVÍ a.s. | Czech Republic | 100.00 | 100.00 | |
| Generali Real Estate Fund CEE a.s., investiční fond | Czech Republic | 65.92 | 65.92 | 2 |
| Nadace GCP | Czech Republic | | | |
| Acredité s.r.o. | Czech Republic | 80.40 | 80.40 | |
| CP Strategic Investments N.V. | Netherlands | 100.00 | 100.00 | |
| Generali SAF de Pensii Private S.A. | Romania | 99.90 | 99.90 | |
| Green Point Offices a.s. | Slovakia | 100.00 | 100.00 | 3 |
| Pařížská 26, s.r.o. | Czech Republic | 100.00 | 100.00 | |
| PALAC KRIZIK a.s. | Czech Republic | 50.00 | 50.00 | |
| Europ Assistance s.r.o. | Czech Republic | 25.00 | 25.00 | |
| ČP Distribuce s.r.o. | Czech Republic | 100.00 | 100.00 | |

The following table provides details about the Company's subsidiaries and associates as at 31 December 2017:

| Name | Country | Proportion of ownership interest (%) | Proportion of voting rights (%) |
|---|---|---|---|
| Direct Care s.r.o. | Czech Republic | 31.00 | 31.00 |
| Česká pojišťovna ZDRAVÍ a.s. | Czech Republic | 100.00 | 100.00 |
| Generali Real Estate Fund CEE a.s., investiční fond | Czech Republic | 61.85 | 61.85 |
| FINHAUS a.s. | Czech Republic | 100.00 | 100.00 |
| Nadace GCP | Czech Republic | | |
| Acredité s.r.o. | Czech Republic | 80.40 | 80.40 |
| CP Strategic Investments N.V. | Netherlands | 100.00 | 100.00 |
| Generali SAF de Pensii Private S.A. | Romania | 99.90 | 99.90 |
| Green Point Offices a.s. | Slovakia | 100.00 | 100.00 |
| Pařížská 26, s.r.o. | Czech Republic | 100.00 | 100.00 |
| PALAC KRIZIK a.s. | Czech Republic | 50.00 | 50.00 |
| Europ Assistance s.r.o. | Czech Republic | 25.00 | 25.00 |
| ČP Distribuce s.r.o. | Czech Republic | 100.00 | 100.00 |

Detailed information about transactions with subsidiaries of the Company is provided below.

**1. Direct Care s.r.o.**

In order to consolidate its insurance activities, on 19 November 2018 the Company acquired from Generali Pojišťovna a 72% share in Direct Care s.r.o. to become the sole shareholder. The purchase price was CZK 35 million. Subsequently, as at 31 December 2018, an impairment of CZK 17 million was booked.

**2. Capital increase of Generali Real Estate Fund CEE a.s.**

The shareholder meeting approved an increase in the share capital by CZK 48 million on 16 October 2018. In total, 48 shares have been issued with a nominal value CZK 1 million per share. A price for the share was set at CZK 17.79 million, of which CZK 16.79 million represented the issue premium. Česká pojišťovna subscribed 48 shares for a total amount of CZK 853.92 million.

**3. Green Point Offices**

Before the year end, the Company made the decision to sell its investment in Green Point Offices a.s. and has started all the necessary steps to conclude the transaction. As a result, the investment was reclassified to the held-for-sale category as at 31 December 2018.

**4. Sale of FINHAUS a.s.**

As part of the consolidation of intermediary activities (see note 1.) Česká pojišťovna sold its whole share in FINHAUS a.s. to Generali Pojišťovna on 19 November 2018. The sale price was agreed (based on an expert opinion) as CZK 72 million.

## A.1.3. MATERIAL LINES OF BUSINESS AND MATERIAL GEOGRAPHICAL AREAS

| Gross earned premiums revenue | 2018 | 2017 |
|---|---|---|
| Motor vehicle liability insurance | 5,108,306 | 4,827,022 |
| Other motor insurance | 4,709,478 | 3,893,374 |
| Fire and other damage to property insurance | 7,315,458 | 7,482,781 |
| General liability insurance | 2,296,480 | 2,226,174 |
| Other lines of business | 1,220,143 | 1,164,934 |
| **Total Non-life** | **20,649,865** | **19,594,285** |
| Insurance with profit participation | 3,271,708 | 3,714,340 |
| Index-linked and unit-linked insurance | 1,635,756 | 1,593,867 |
| Other life insurance | 3,167,848 | 3,100,044 |
| **Total life** | **8,075,312** | **8,408,251** |

All segment revenues are generated from sales to external customers. No single external customer amounts to 10% or more of the Company's revenues.

In 2018 and 2017, the Company mainly operated in the Czech Republic and in other EU countries. More than 99% of the income from insurance contracts came from clients in the Czech Republic.

## A.1.4. SIGNIFICANT BUSINESS OR OTHER EVENTS THAT HAVE OCCURRED OVER THE REPORTING PERIOD

**External Rating of the Company**

The Company has a Financial Strength Rating of A (Excellent) with stable outlook and a Long-Term Issuer Credit Rating improved from "a" with positive outlook to "a+" with stable outlook, assigned by A.M. Best on 10 January 2019.

In its regular and single premium life insurance, Česká pojišťovna worked hard in 2018 to incorporate measures and requirements stemming from the regulation of the distribution of insurance companies and insurance intermediaries under Directive (EU) 2016/97 of the European Parliament and of the Council on insurance distribution (the Insurance Distribution Directive – IDD) and Act No 170/2018 on the distribution of insurance and reinsurance (the Distribution Act). Building on previously applicable regulatory requirements for life insurance sales, there was continued emphasis on the quality of professional care in the sale process and the incorporation of significant changes to policies. Specifically, this concerned process-related and technological changes concerning information collection, evaluations of customer needs, and the provision of recommendations or advice.

The Company now participates in the Generali Group international project known as The Human Safety Net. Here, the Company has become actively engaged in assistance for newborns suffering from asphyxia.

Otherwise, the Company continued with its ordinary business during the year and there were no other significant business or other events to be disclosed.

## A.2. UNDERWRITING PERFORMANCE

### A.2.1. NON-LIFE

| 2018 | Motor vehicle liability insurance | Other motor insurance | Fire and other damage to property insurance | General liability insurance | Other | Total |
|---|---|---|---|---|---|---|
| **Premium written** | | | | | | |
| Gross - Direct Business | 5,128,068 | 4,718,435 | 6,810,027 | 2,164,408 | 998,206 | **19,819,144** |
| Gross - Proportional reinsurance accepted | 0 | 75,497 | 495,844 | 156,883 | 39,829 | **768,054** |
| Gross - Non-proportional reinsurance accepted | 0 | 0 | 0 | 0 | 138,498 | **138,498** |
| Reinsurers' share | 2,019,685 | 1,978,992 | 3,535,324 | 1,192,301 | 648,383 | **9,374,684** |
| Net | **3,108,383** | **2,814,941** | **3,770,548** | **1,128,990** | **528,150** | **11,351,012** |
| **Premiums earned** | | | | | | |
| Gross - Direct Business | 5,108,306 | 4,633,981 | 6,816,879 | 2,138,118 | 1,041,828 | **19,739,111** |
| Gross - Proportional reinsurance accepted | 0 | 75,497 | 498,579 | 158,363 | 39,757 | **772,196** |
| Gross - Non-proportional reinsurance accepted | 0 | 0 | 0 | 0 | 138,558 | **138,558** |
| Reinsurers' share | 2,011,780 | 1,945,210 | 3,542,691 | 1,178,085 | 651,907 | **9,329,673** |
| Net | **3,096,526** | **2,764,268** | **3,772,767** | **1,118,395** | **568,236** | **11,320,193** |
| **Claims incurred** | | | | | | |
| Gross - Direct Business | 2,569,793 | 3,165,774 | 2,658,504 | 960,966 | 328,357 | **9,683,393** |
| Gross - Proportional reinsurance accepted | 0 | 34,153 | 371,189 | 81,773 | 8,403 | **495,518** |
| Gross - Non-proportional reinsurance accepted | 0 | 0 | 0 | 0 | 115,497 | **115,497** |
| Reinsurers' share | 1,023,653 | 1,234,771 | 1,550,595 | 562,721 | 320,384 | **4,692,124** |
| Net | **1,546,140** | **1,965,155** | **1,479,097** | **480,018** | **131,873** | **5,602,284** |
| Administrative expenses | 163,693 | 107,624 | 224,535 | 69,048 | 25,974 | **590,874** |
| Investment management expenses | 29,541 | | | | | **29,541** |
| Claims management expenses | 269,479 | 243,210 | 122,565 | 112,565 | 31,202 | **779,021** |
| Acquisition expenses | 561,970 | 380,468 | 895,895 | 214,508 | 233,439 | **2,286,280** |
| Overhead expenses | 139,109 | 101,036 | 176,119 | 58,216 | 28,267 | **502,747** |
| Other expenses | | | | | | **158,101** |
| **Total expenses** | | | | | | **4,346,564** |

| 2017 | Motor vehicle liability insurance | Other motor insurance | Fire and other damage to property insurance | General liability insurance | Other | Total |
|---|---|---|---|---|---|---|
| **Premium written** | | | | | | |
| Gross - Direct Business | 4,858,378 | 3,934,042 | 6,776,427 | 2,085,805 | 1,112,420 | **18,767,072** |
| Gross - Proportional reinsurance accepted | 0, | 36,211 | 711,666 | 164,983 | 43,269 | **956,129** |
| Gross - Non-proportional reinsurance accepted | | | | | 132,467 | **132,467** |
| Reinsurers' share | 1,906,930 | 1,646,012 | 3,722,639 | 1,161,780 | 621,716 | **9,059,077** |
| Net | **2,951,448** | **2,324,241** | **3,765,454** | **1,089,008** | **666,440** | **10,796,591** |
| **Premiums earned** | | | | | | |
| Gross - Direct Business | 4,827,022 | 3,857,163 | 6,763,300 | 2,058,990 | 989,130 | **18,495,605** |
| Gross - Proportional reinsurance accepted | 0 | 36,211 | 719,481 | 167,184 | 43,399 | **966,275** |
| Gross - Non-proportional reinsurance accepted | | | | | 132,406 | **132,406** |
| Reinsurers' share | 1,894,388 | 1,615,380 | 3,713,688 | 1,153,204 | 627,894 | **9,004,554** |
| Net | **2,932,634** | **2,277,994** | **3,769,093** | **1,072,970** | **537,041** | **10,589,732** |
| **Claims incurred** | | | | | | |
| Gross - Direct Business | 2,275,404 | 2,693,402 | 2,979,284 | 814,567 | 343,589 | **9,106,246** |
| Gross - Proportional reinsurance accepted | 0 | 70,241 | 468,895 | 77,374 | 11,471 | **627,981** |
| Gross - Non-proportional reinsurance accepted | | | | | 38,374 | **38,374** |
| Reinsurers' share | 891,445 | 1,070,139 | 1,604,469 | 466,720 | 242,550 | **4,275,323** |
| Net | **1,383,959** | **1,693,504** | **1,843,710** | **425,221** | **150,884** | **5,497,278** |
| Administrative expenses | 132,694 | 67,154 | 218,902 | 98,023 | 42,064 | **558,837** |
| Investment management expenses | 24,036 | | | | | **24,036** |
| Claims management expenses | 247,714 | 191,461 | 114,457 | 109,030 | 14,535 | **677,198** |
| Acquisition expenses | 592,410 | 409,809 | 735,053 | 182,698 | 163,532 | **2,083,502** |
| Overheads expenses | 158,249 | 108 968 | 204 246 | 67 054 | 36 292 | **575 409** |
| Other expenses | | | | | | **150,357** |
| **Total expenses** | | | | | | **4,069,338** |

# ANALYSIS OF THE UNDERTAKING'S OVERALL UNDERWRITING PERFORMANCE

### Motor vehicle liability insurance (MTPL - Motor Third Party Liability insurance)

Premiums written grew significantly by 5.6%. The increase was primarily thanks to leasing with a contribution of 55% (through increases in premium prices and more intensive cooperation with VW FS) and fleets with a contribution of 7%. Despite the growth in average premiums, retail stagnated in 2018.

Claims paid increased mainly due to increased average claims (higher indemnity for bodily injuries, prices of spare parts and car painting). Česká pojišťovna has the means to minimize the impact of this development. The solution is primarily to adjust the prices of new business and work with unprofitable clients.

The increase in acquisition expenses and administrative expenses is related to the increase in premiums written and the transfer of expenses from the life to the non-life business. Staff expenses are concurrently increasing.

### Other motor insurance

Premiums written grew significantly by 19.9%. Similarly as with MTPL, the growth was primarily thanks to leasing (+62% through increases in premium prices and more intensive cooperation with VW FS) and fleets with a contribution of 20%. Retail increased moderately in 2018 by 6%, while market share increased by 1.9%. Claims management expenses were stable, while the increase was driven by the increase in premiums written.

Acquisition expenses increased and administrative expenses were driven by the increase in premiums written and the transfer of the expenses from the life to the non-life business. Staff expenses are concurrently increasing.

### Fire and other damage to property insurance

Premiums written in 2018 were influenced by e.g. the implementation of anti-Russian sanctions. Due to this, Česká pojišťovna terminated the insurance of some entities, resulting in a decrease of CZK 30 million. This decrease was compensated through the comprehensive insurance of construction companies and their CAR/EAR projects. Another significant decrease in premiums written was caused by the termination of the Thailand - ČP Hong Kong business, but this had no impact on the net results (fully ceded)

In property insurance, the overall result was influenced by several individual fire claims in 2018 – fires at warehouses in Mochov (approx. CZK 90 million) and the Ravak fire (approx. CZK 80 million). Moreover, there was an increase in claims (provisions) for the already existing Dětmarovice power plant claim (an increase of CZK 170 million in 2018. In the area of property insurance for large risks with high exposure (higher maximum possible damage and risk), Česká pojišťovna also uses reinsurance on the domestic market, while it participates as an active reinsurer for similar risks of other insurers. Unlike in 2017, no significant catastrophic event influenced the overall results (2017 saw the Herwart storm with a total impact of CZK 440 million - CZK 121 million in corporate, CZK 156 million in SME and the rest in retail insurance).

The increase in acquisition expenses and administrative expenses was related to the increase in indirect commissions for brokers (also in connection with the increasing quality and scope of their services provided to clients), the increase in commissions for the direct SME sector and the increase in staff expenses.

### General Liability Insurance

The increase in premiums written was influenced by the increase in volume connected with larger provision of civil liability insurance (in connection with the requirements of the New Civil Code). The claims were stable and the results were good for 2018. Individual claims in the range of CZK 1 million to CZK 10 million are increasing in frequency, especially in professional liability insurance (PI) and the liability of medical entities (MEDMAL).

The increase in acquisition expenses and administrative expenses was related to the increase in indirect commissions for brokers (also in connection with the increasing quality and scope of their services provided to clients), the increase in commissions for the direct SME sector and the increase in staff expenses.

### Others

In the area of financial risk insurance, the overall result was strongly influenced by the release of a provision of CZK 50 million – the Intertrans travel agency insolvency insurance.

## A.2.2. LIFE

| 2018 | Insurance with profit participation | Index-linked and unit-linked insurance | Other life insurance | Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations | Life reinsurance | Total |
|---|---|---|---|---|---|---|
| **Premium written** | | | | | | |
| Gross | 3,271,708 | 1,635,756 | 3,167,215 | 0 | 632 | 8,075,312 |
| Reinsurers' share | 0 | 0 | 1,219,043 | 0 | 632 | 1,219,675 |
| Net | **3,271,708** | **1,635,756** | **1,948,173** | **0** | **0** | **6,855,637** |
| **Premium earned** | | | | | | |
| Gross | 3,271,708 | 1,635,756 | 3,167,215 | 0 | 632 | 8,075,312 |
| Reinsurers' share | 0 | 0 | 1,219,043 | 0 | 632 | 1,219,675 |
| Net | **3,271,708** | **1,635,756** | **1,948,173** | **0** | **0** | **6,855,637** |
| **Claims incurred** | | | | | | |
| Gross | 4,640,568 | 1,251,725 | 1,154,423 | (84,258) | (76) | 6,962,382 |
| Reinsurers' share | 0 | 0 | 411,409 | (18,716) | (76) | 392,617 |
| Net | **4,640,568** | **1,251,725** | **743,014** | **(65,542)** | **0** | **6,569,765** |
| **Changes in other technical provisions** | | | | | | |
| Gross | 2,539,468 | 160,553 | 1,844 | 0 | 16 | 2,701,880 |
| Reinsurers' share | 0 | 0 | (6,764) | 0 | 16 | (6,748) |
| Net | **2,539,468** | **160,553** | **8,607** | **0** | **0** | **2,708,628** |
| Administrative expenses | 127,706 | | 151,366 | | | 279,072 |
| Investment management expenses | 57,328 | | | | | 57,328 |
| Claims management expenses | 32,878 | | 25,685 | | | 58,563 |
| Acquisition expenses | 289,270 | 50,533 | 196,260 | | | 536,063 |
| Overhead expenses | 162,837 | | 128,651 | | | 291,488 |
| Other expenses | | | | | | 100,737 |
| **Total expenses** | | | | | | **1,323,251** |

| 2017 | Insurance with profit participation | Index-linked and unit-linked insurance | Other life insurance | Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations | Life reinsurance | Total |
|---|---|---|---|---|---|---|
| **Premium written** | | | | | | |
| Gross | 3,714,340 | 1,593,867 | 3,099,365 | 0 | 679 | 8,408,251 |
| Reinsurers' share | 0 | 0 | 1,196,578 | 0 | 679 | 1,197,257 |
| Net | **3,714,340** | **1,593,867** | **1,902,787** | **0** | **0** | **7,210,994** |
| **Premium earned** | | | | | | |
| Gross | 3,714,340 | 1,593,867 | 3,099,365 | 0 | 679 | 8,408,251 |
| Reinsurers' share | 0 | 0 | 1,196,578 | 0 | 679 | 1,197,257 |
| Net | **3,714,340** | **1,593,867** | **1,902,787** | **0** | **0** | **7,210,994** |
| **Claims incurred** | | | | | | |
| Gross | 4,923,721 | 1,766,114 | 1,105,483 | (193,228) | -212 | 7,601,878 |
| Reinsurers' share | 0 | 0 | 424,092 | (65,961) | 212 | 357,919 |
| Net | **4,923,721** | **1,766,114** | **681,391** | **(127,267)** | **0** | **7,243,959** |
| **Changes in other technical provisions** | | | | | | |
| Gross | 2,463,613 | (369,924) | 11,907 | 0 | 0 | 2,105,596 |
| Reinsurers' share | 0 | 0 | 2,844 | 0 | 0 | 2,844 |
| Net | **2,463,613** | **(369,924)** | **9,063** | **0** | **0** | **2,102,752** |
| Administrative expenses | 129,974 | | 159,215 | | | 289,189 |
| Investment management expenses | 58,816 | | | | | 58,816 |
| Claims management expenses | 32,233 | | 26,683 | | | 58,916 |
| Acquisition expenses | 463,661 | 24 | 99,722 | | | 563,408 |
| Overhead expenses | 186,321 | | 149,988 | | | 336,309 |
| Other expenses | | | | | | 113,115 |
| **Total expenses** | | | | | | **1,419,752** |

### ANALYSIS OF THE UNDERTAKING'S OVERALL UNDERWRITING PERFORMANCE

Premiums decreased mainly due to diminution of the insurance portfolio. The regular written premium decreased by 4% between 2017 and 2016. Claims paid also decreased, payback remained high. Expenses decreased mainly in the non-commission area.

Regular gross written premiums decreased by CZK 310 million in 2018 in comparison with the prior year due to the continuing diminution of the portfolio. The actual development of gross written premium is at the projections level. In 2018, new business (+CZK 650 million) was not able to compensate for the decrease in the portfolio (maturities -CZK 440 million and lapses -CZK 580 million). The value of new business in 2018 is actually slightly worse than originally forecasted.

Claims paid decreased by CZK 640 million (9%) with the main movements on maturities (CZK 700 million) and accident rider claims (CZK 50 million). However, there was a lower year-on-year usage of provisions from non-life annuities. 2018 claims paid were at the level we expected in all areas.

The development of reserves was influenced by the volume development portfolio (see above) and lower performance from UL reserves (-CZK 1.090 billion). Traditional reserves met expectations, while UL reserves did not meet expectations because funds performed worse than expected.

Total expenses decreased by CZK 80 million (6%) in 2018 in comparison with 2017 due to savings in non-commission costs. Commission costs were at the same level in 2018 as in 2017. Real expenses in 2018 were lower than projected. The main reasons were lower non-commission costs (influenced by the transfer of expenses from the life to the non-life business caused by the decrease in regular written premiums in the life business in 2018 compared to 2017).

## A.3. INVESTMENT PERFORMANCE

Financial investments stand alongside insurance and reinsurance as another important area of operations for the Company, as they contribute significantly to the Company's overall assets and are financed primarily from insurance provisions and equity.

The Company´s investment strategy complies with the 'Prudent Person Principle' requirements. The objective of the strategy is to establish appropriate return potential while ensuring that the Company can always meet its obligations without undue costs and in accordance with its internal and external Regulatory Capital Requirements.

There are no investments in securitization.

The Company's investment portfolio performance in FY 2018 was as follows:

Subsidiaries and associates

| | 2018 | 2017 |
|---|---|---|
| Dividends and other income | 846,911 | 835,628 |
| **Total** | **846,911** | **835,628** |

Financial instruments at fair value through profit or loss

| | | | 2018 | 2017 |
|---|---|---|---|---|
| Financial assets | | | | |
| Interests and other income | | | 29,048 | 62,685 |
| (a) bonds | | | 62,402 | 84,393 |
| (b) derivatives | | | (34,437) | (22,528) |
| (c) unit link investments | | | 1,083 | 820 |
| Realised | – | gains | 178,605 | 140,683 |
| (a) derivatives | | | 119,646 | 42,591 |
| (b) unit link investments | | | 58,959 | 98,092 |
| | – | losses | (219,021) | (36,045) |
| (a) bonds | | | (77,164) | 0 |
| (b) derivatives | | | (39,883) | (7,073) |
| (c) unit link investments | | | (101,974) | (28,972) |
| Unrealised | – | gains | 120,850 | 830,238 |
| (a) derivatives | | | 115,265 | 337,600 |
| (b) unit link investments | | | 5,585 | 492,638 |
| | – | losses | (753,342) | (170,780) |
| (a) bonds | | | 0 | (139,369) |
| (b) derivatives | | | (253,703) | (15,934) |
| (c) unit link investments | | | (499,639) | (15,477) |
| Financial liabilities | | | | |
| Interest expenses | | | (147,787) | (205,440) |
| Realised | – | gains | 5,636 | 0 |
| | – | losses | (90,939) | (64,634) |
| Unrealised | – | gains | 200,894 | 400,838 |
| | – | losses | (188,407) | (67,874) |
| Other income | | | 82,051 | 16,257 |
| **Total** | | | **(782,412)** | **905,928** |

The year-on-year decline in the FVTPL segment was caused by negative sentiment on financial markets and its subsequent impact on the fair value of unit-linked assets.

The negative revaluation of interest rate hedging derivatives also contributed to worse results in this segment.

Other financial instruments

Incomes

| | 2018 | 2017 |
|---|---|---|
| ***Interest income*** | **1,653,004** | **1,490,079** |
| Interest income from loans and receivables | 379,405 | 174,825 |
| Interest income from available-for-sale financial assets | 1,266,442 | 1,313,990 |
| (a) bonds | 1,266,442 | 1,313,990 |
| Interest income from cash and cash equivalents | 7,130 | 1,263 |
| Other interest income | 27 | 1 |
| ***Other income*** | **195,667** | **219,890** |
| Income from land and buildings (investment properties) | 42 | 40 |
| Income from equities available-for-sale | 88,001 | 83,438 |
| Other income from investment fund units | 107,624 | 136,412 |
| **Interests and other investment income** | **1,848,671** | **1,709,969** |
| ***Realised gains*** | **398,276** | **598,014** |
| Realised gains on land and buildings (investment properties) | 3,631 | 0 |
| Realised gains on loans and receivables | 0 | 0 |
| Realised gains on available-for-sale financial assets | 394,645 | 598,014 |
| (a) bonds | 161,967 | 344,199 |
| (b) equities | 54,951 | 80,606 |
| (c) investment fund units | 177,727 | 173,210 |
| ***Unrealised gains*** | **325,331** | **2,269** |
| Unrealised gains on hedged instruments | 325,331 | 2,269 |
| ***Reversal of impairment*** | **61,200** | **938** |
| Reversal of impairment of loans and receivables | 0 | 0 |
| Reversal of impairment on other receivables from reinsurers | 50,449 | 0 |
| Reversal of impairment of other receivables | 10,751 | 938 |
| **Other income from financial instruments and other investments** | **784,807** | **601,221** |
| **Total** | **2,633,478** | **2,311,190** |

Interest income from bonds contributed significantly to the total investment income of the Company. The year-on-year increase was caused by higher interest income from reverse repo operations.

Total investment income also increased thanks to higher unrealized gains from hedged items as a consequence of interest rate increases.

Expenses

| | 2018 | 2017 |
|---|---|---|
| **Interest expense** | **252,671** | **174,459** |
| Interest expense on loans, bonds and other payables | 237,026 | 166,759 |
| Interest expense on deposits received from reinsurers | 15,642 | 7,695 |
| Other interest expense | 3 | 5 |
| **Other expenses** | **87,595** | **85,361** |
| Expenses from land and buildings (investment properties) | 726 | 2,435 |
| Other expenses on investments | 86,869 | 82,926 |
| **Realised losses** | **173,998** | **138,718** |
| Realised losses on land and buildings (investment properties) | 0 | 0 |
| Realised losses on available-for-sale financial assets | 173,998 | 138,714 |
| (a) bonds | 112,383 | 138,714 |
| (b) equities | 6,502 | 0 |
| (c) investment fund units | 55,113 | 0 |
| Realised losses on other receivables | 0 | 4 |
| **Unrealised losses** | **120,890** | **440,043** |
| Unrealised losses on hedged instruments | 120,890 | 440,043 |
| **Impairment losses** | **123,861** | **84,059** |
| Impairment of land and buildings (investment properties) | 0 | 0 |
| Impairment of loans and receivables | 22,483 | 28,359 |
| Impairment of available-for-sale financial assets | 101,378 | 29,858 |
| Impairment on receivables from reinsurers | 0 | 25,842 |
| Impairment of other receivables | 0 | 0 |
| **Total** | **759,015** | **922,640** |

The lower investment expenses in the y/y comparison were driven by lower unrealized losses on hedged instruments. This effect is linked to the application of interest rate hedge accounting and is offset through revaluation of interest rate derivatives.

Booked impairments were higher compared to 2017 due to negative performance on equity markets.

Gains and losses recognized directly in equity

| | 2018 | 2017 |
|---|---|---|
| Balance as at 1 January | **3,590,473** | **5,874,980** |
| **Gross revaluation as at the beginning of the year** | **4,427,131** | **7,247,510** |
| **Tax on revaluation as at the beginning of the year** | **(836,658)** | **(1,372,531)** |
| Exchange rate differences in equity | (1,389) | (2) |
| Revaluation gain/loss in equity – gross | (2,210,503) | (2,390,934) |
| Revaluation gain/loss on realisation in income statement – gross | (220,647) | (459,301) |
| Impairment losses – gross | 101,378 | 29,858 |
| Tax on revaluation | 461,919 | 535,872 |
| **Gross revaluation as at the end of the year** | **2,095,970** | **4,427,131** |
| **Tax on revaluation as at the end of the year** | **(374,740)** | **(836,658)** |
| Balance as at 31 December | **1,721,230** | **3,590,473** |

The gross revaluation of gain/loss in equity was most significantly affected by interest rate movements, which continued to rise in 2018.

Realisations caused the move from other comprehensive income to the profit and loss statement lowering the gross revaluation.

Other

| | 2018 | 2017 |
|---|---|---|
| Gains on foreign currency | 1,574,559 | 3,574,160 |
| Losses on foreign currency | (1,574,032) | (3,641,519) |
| **Total** | **527** | **(67,359)** |

The foreign currency net gains/losses remained low thanks to FX hedging on investments denominated in foreign currencies.

## A.4. PERFORMANCE OF OTHER ACTIVITIES

Other material income and expenses are analyzed in the following tables.

Other income

| | 2018 | 2017 |
|---|---|---|
| Reversal of other provisions | 57,639 | 125,519 |
| Income from services and assistance activities and recovery of charges | 1,179,018 | 1,127,266 |
| Income from sale of assets | 0 | 0 |
| Other technical income | 127,380 | 115,183 |

Other Expenses

| | 2018 | 2017 |
|---|---|---|
| Amortisation of intangible assets | 272,431 | 253,822 |
| Depreciation of tangible assets | 35,834 | 41,292 |
| Restructuring charges and allocation to other provisions | 16,307 | 14,178 |
| Expense from service and assistance activities and charges incurred on behalf of third parties | 1,233,430 | 1,117,341 |
| Other technical expenses | 258,837 | 263,473 |
| Other expenses | 0 | 73 |
| Staff costs | 2,469,887 | 2,483,652 |

## A.5. ANY OTHER INFORMATION

All the significant information about business and performance has been mentioned in the above sections.

# B. System of Governance

## B.1. GENERAL INFORMATION ON THE SYSTEM OF GOVERNANCE

The System of Governance of the Company is adequate to the nature, scale and complexity of the risks inherent in its business. Details on the System of Governance are provided in the following chapters.

### B.1.1. INFORMATION ON GENERAL GOVERNANCE

**Board of Directors**
(as at 31 December 2018)

| | |
|---|---|
| Chairman: | Marek Jankovič, Chief Executive Officer |
| Vice Chairman: | Petr Bohumský, Chief Financial Officer |
| Member: | Karel Bláha, Chief Corporate Business Officer |
| Member: | Pavol Pitoňák, Chief Insurance Officer |
| Member: | Tomáš Vysoudil, Chief Sales Officer |

**Supervisory Board**
(as at 31 December 2018)

| | |
|---|---|
| Chairman: | Miroslav Singer |
| Member: | Luciano Cirinà |
| Member: | Walter Kupec |
| Member: | Gregor Pilgram |

**The Audit Committee**
(as at 31 December 2018)

| | |
|---|---|
| Chairman: | Martin Mančík |
| Member: | Beáta Petrušová |
| Member: | Roman Smetana |

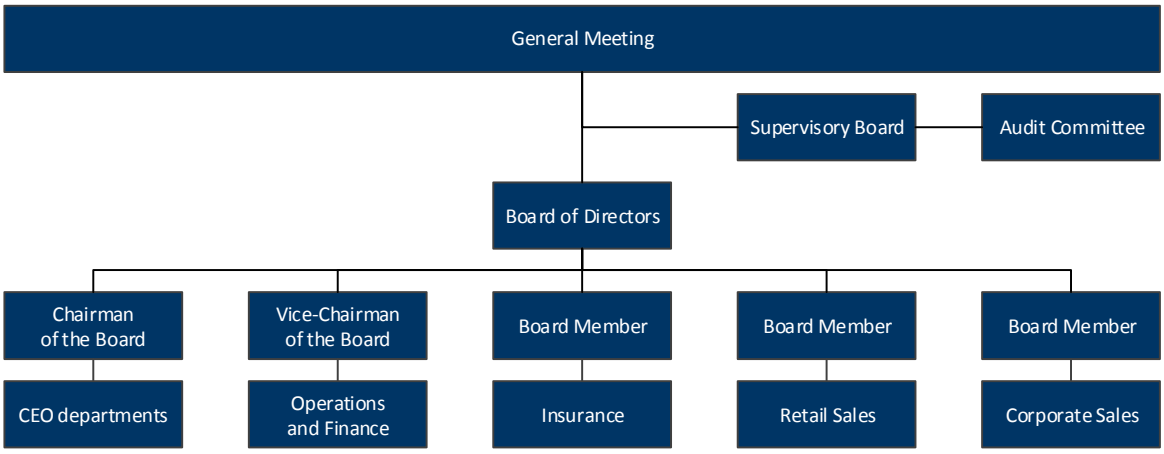
Česká pojišťovna a.s. is governed by the Board of Directors (the “Board”). The Board is responsible for the performance and strategy of the Company. Governance requirements are largely set through regulatory and legal requirements. Members of the Board are responsible within the following fields of competencies:

**Field of Competencies:**

| | |
|---|---|
| CEO Organizational Units: | Chief Executive Officer |
| Operations & Finance: | Chief Financial Officer |
| Corporate Sales: | Chief Corporate Business Officer |
| Insurance & Claims: | Chief Insurance Officer |
| Retail Sales: | Chief Sales Officer |

Detailed information on the segregation of responsibilities in the specific fields is provided in the dedicated paragraphs of this report.

**BASIC ORGANISATION CHART OF ČESKÁ POJIŠŤOVNA**




Other main committees supporting the Board of Directors are the Risk Committee, Internal Model Committee, Financials Committee, Business Architecture Committee (1st and 2nd Level), and Non-Life Committee.

## B.1.2. CHANGES IN THE SYSTEM OF GOVERNANCE

**Board of Directors**
(as at 31 December 2018)

No changes occurred in the Board of Directors during 2018.

**Supervisory Board**
(as at 31 December 2018)

Walter Kupec became a member of the Supervisory Board on 5 June 2018.

**The Audit Committee**
(as at 31 December 2018)

No changes occurred in the Audit Committee during 2018.

The Board of directors (the "Board") or the members of the Board within their field of competencies approve any organizational changes in the Company on a monthly basis. Rules pertaining to organizational changes are set by the Company's organizational code.

There were no other significant changes in the management and control system during the last reporting period.

## B.1.3. REMUNERATION POLICY

The Company's remuneration policy is intended to attract, hire and retain employees whose values are aligned to our culture and values.

We primarily focus on high performance motivation so that all employees can positively contribute to the Company's strategy and business objectives.

The Company aims to continuously improve the performance management principles based on positive motivation and identification and use of the individual employees' strengths. Our training and development strategy and remuneration systems are tightly bound to the performance management principles.

The Company´s remuneration policy is regularly revised to ensure its external competitiveness and internal fairness.

**Compensation Structure**

Fixed remuneration

Fixed remuneration is the compensation paid to an employee for performing a specific job.

The foundation of the Company's remuneration policy is the job family structure division of all specific jobs according to their contribution, difficulty and responsibility into an internal band structure. All jobs are regularly benchmarked against market data. Each salary band has a minimum level that is defined by the Collective Agreement. The position within a salary band range takes into account the long-term performance, experience and potential of our employees.

### Variable remuneration

Variable remuneration is compensation contingent on performance, discretion and the results achieved. Variable remuneration seeks to motivate employees to achieve business targets by creating a direct link between incentives and quantitative and qualitative goals set at Company, team and individual level.

*Short-term variable incentives (STI)*

Short-term variable incentives consist of the yearly bonuses paid to management at all levels and to senior professionals. The total budget for the payment of bonuses of this group is related to the Company results and amended based on the fulfilment of Company criteria. Short-term variable opportunities depend on the organizational level and the impact of the individual's role on the business.

For the remaining employees, incentives are paid in an accounting period (month or quarter) or upon an event (reaching an objective, completing a project etc.)

For the sales force, the Company has commissions in place that are paid in addition to the fixed salary.

*Long-term incentive programs (LTI)*

The long-term incentive programs for the executive management and key employees are in place to deliver improvements in performance and align their performance with the long-term strategic goals of the Company.

Members of the Board of Directors (the people who effectively run the Company) are governed by on agreement on the performance of their function. On the basis of this agreement they receive fixed and variable remuneration, meaning a combination of STI and LTI, which is annually set in the individual agreement. LTI is granted in the form of shares. The variable part is based on KPIs set in the balanced scorecard. The balanced scorecard consists of a balanced proportion of quantitative (e.g. gross written premium) and qualitative criteria. The risk metrics (RORC) are an integral part of the KPIs. The minimal solvency ratio target is the entry condition for the payout of all variable parts of remuneration. A significant part of variable remuneration is deferred. The payout of the deferred part of remuneration is based on the permanency of the achieved results and actual solvency ratio.

Members of the Supervisory Board and Audit Committee can only receive fixed remuneration based on their agreement on the performance of their function.

Key persons with a significant impact on the risk profile and decisions of the Company receive fixed and variable remuneration. The variable part consists of the STI only. The STI is linked to both qualitative and quantitative KPIs. The KPIs structure consists of a combination of company and individual criteria evaluated after the end of the current year and then consequently after 3 years. The variable remuneration is deferred for a period of 3 years. The risk metrics (RORC) are an integral part of the KPIs. The minimal solvency ratio target is the entry condition for the payout of all variable parts of remuneration.

### Supplementary Pensions

The Company has a defined contribution plan in place based on employees' length of service. Supplementary pension schemes have not been introduced.

No material changes to this area have occurred since the last reporting period.

## B.1.4. TRANSACTIONS WITH SHAREHOLDERS, WITH PERSONS WHO EXERCISE A SIGNIFICANT INFLUENCE ON THE UNDERTAKING, AND WITH MEMBERS OF THE ADMINISTRATIVE, MANAGEMENT OR SUPERVISORY BODY

During the reporting period, no material transactions with shareholders, with persons who exercise a significant influence on the undertaking, or with members of the administrative, management or supervisory body took place.

## B.1.5. INFORMATION ON RISK MANAGEMENT, INTERNAL AUDIT, COMPLIANCE AND ACTUARIAL FUNCTIONS

The Company has established key Control Functions as independent departments without any responsibility for operational areas. The functions are organized as follows:

- Risk Management, Compliance and Internal Audit Functions: Report hierarchically to the Chief Executive Officer and functionally to the BoD.
- Actuarial Function: Reports hierarchically to the Chief Financial Officer and functionally to the BoD

To ensure proper coordination and direction from the Generali head office/Generali CEE holding, all Control Functions also report to the respective Group /Regional functions.

More details on organization, responsibilities and resources can be found in the dedicated sections of this report.

### B.1.6. INFORMATION ON AUTHORITIES, RESOURCES, PROFESSIONAL QUALIFICATIONS, KNOWLEDGE, EXPERIENCE AND OPERATIONAL INDEPENDENCE OF THE FUNCTIONS AND HOW THEY REPORT TO AND ADVISE THE ADMINISTRATIVE, MANAGEMENT OR SUPERVISORY BODY OF THE INSURANCE OR REINSURANCE UNDERTAKING

Details for the individual Control Functions can be found in the dedicated sections of this report.

## B.2. FIT AND PROPER REQUIREMENTS

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

**Professional Adequacy of Members of the Board of Directors and Supervisory Board:**

The Board of Directors and the Supervisory Board of the Company and their members shall collectively possess appropriate experience and knowledge in the fields indicated below:

- Market knowledge: this means an awareness and understanding of the wider relevant business, economic and market environment in which the Company operates, and an awareness of customers' level of knowledge and needs.
- Business strategy and business model knowledge: this refers to a thorough understanding of the Company's business strategy and model.
- Knowledge of the System of Governance refers to the awareness and understanding of the risks that the Company is facing and its ability to manage them. Furthermore, this includes the ability to assess the effectiveness of the Company's arrangements to deliver effective governance, oversight and controls in the business and, if necessary, oversee changes in these areas.
- Actuarial and financial analysis capability concerns the ability to interpret the Company's actuarial and financial information, identify and assess key issues, and take any necessary measures (including appropriate controls) based on this information.
- Regulatory framework and requirements: this means an awareness and understanding of the regulatory framework in which the Company operates, in terms of both the regulatory requirements and expectations, and the capacity to adapt to changes in the regulatory framework without delay.

**Other Highly Responsible Persons:**

Other highly responsible persons (also called relevant persons) who are assessed in relation to the jobs they perform according to internal standards. The Company primarily takes into account their job experience declared in their professional CV, their education and up-to-date performance (if this person is already working for the Company).

No formalised minimum qualification requirements have been defined for the persons being assessed. According to the long-term experience, no formalised criteria are efficient; competence – professional prerequisites of the person being assessed are always assessed as a whole and in relation to the particular responsibilities for the assigned areas. The assessing is periodically repeated so that variability of the requirements (according to operational needs) for competent / assessed persons can be taken into account.

**Personal credibility:**

Both the above-mentioned groups of persons are also assessed from the perspective of their personal credibility. The assessment of whether any person is credible (trustworthy) or not shall include an assessment of their honesty based on relevant evidence regarding their character and personal behavior.

The prerequisites for credibility pursuant to internal guidelines shall include:

- the full legal capacity of the persons being assessed, in accordance with the law;
- the credibility of the persons being assessed; a person shall not be considered a credible (trustworthy) person if this person has been convicted of a crime committed intentionally, if this crime was committed in connection with business or with the employer's subject of business, unless this person is considered a non-convicted person (the person shall demonstrate all these circumstances through an extract from the criminal records); furthermore, a person shall not be considered a credible (trustworthy) person if this person has been convicted of any crime against property, of an economic offense (crime) or of any other crime committed intentionally, unless such convictions have been expunged from the criminal records or unless this person is considered, for any other reason, a non-convicted person; an offense under this provision shall also mean any crime according to acts governing banking, financial or insurance activities, or related to securities markets or payment instruments, including legal regulations governing money laundering, market manipulation or usury, as well as insider trading, or crimes of dishonesty such as frauds or financial offenses, as well as any other serious criminal offense under acts relating to companies, bankruptcy, and insolvency or consumer protection;
- the fact that the person being assessed has not committed any serious administrative or disciplinary infringement (delict) in the sphere of finance, company governance, banking, bankruptcy, and insolvency or consumer protection;

- the fact that no legal decision concerning insolvency has been taken in respect of the property of the Selected person;
- the fact that the person being assessed was not, throughout previous five years, a member of a statutory body or any other body of a legal entity declared bankrupt, or the insolvency petition for such legal entity was rejected since the assets of that legal entity failed to cover the costs of the insolvency proceedings, or bankruptcy was cancelled because the property of such legal entity was completely inadequate;
- the fact that the person being assessed did not hold any comparable office (function) in a legal entity declared bankrupt within the preceding 3 years;
- the fact that there was no judicial decision that would exclude the member of the statutory body of a business corporation from holding an office (performing a function);
- the fact that there is no justified suspicion of an existing conflict of interest related to the office held by the person being assessed;
- the fact that all information related to the person being evaluated was provided through a personal questionnaire requested by the employer, and that no false information (provided by the Selected person) was revealed as part of the pre-employment Screening pursuant to the internal guidelines of the employer.

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

The assessment of the professional fitness/adequacy and personal credibility of persons with high responsibility in the Company (including members of the Boards) is essentially based on two internal standards:

- The Group Fit and Proper Policy implemented worldwide by Generali Group.
- This policy is complemented by the Company's interpretational standard policy respecting and implementing particular local conditions.

Assessment of the relevant persons is first performed before the persons are appointed to their positions and thereafter periodically. The Company standard includes seven assessment categories and four assessment systems:

- Members of the Boards of Directors: The Board of Directors as a group assesses the professional fitness/adequacy and personal credibility of its members.
- Members of the Supervisory Board: The Supervisory Board as a group assesses the professional fitness/adequacy and the personal credibility of its members.
- The professional fitness/adequacy and the personal credibility of the members of the Audit Committee are assessed by the Board of Directors.
- Key employees that manage Control Functions are assessed by the Board of Directors and the respective Group Control Functions in regard to their professional fitness/adequacy and personal credibility.
- The professional fitness/adequacy and personal credibility of employees with a significant impact on the risk profile of the Company as defined by Company standards is assessed by the Board of Directors.
- Other highly responsible persons defined through internal standards (within the scope of the assessed group) are assessed by the Board of Directors as regards their professional fitness/adequacy and personal credibility.
- The professional fitness/adequacy and the personal credibility of employees performing their work inside departments/units focusing on Company Control Functions is assessed by the heads of their departments.

No material changes to this area have occurred since the last reporting period.

## B.3. RISK MANAGEMENT SYSTEM

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

The principles defining the Risk Management System are provided in the Risk Management Policy[1], which is the cornerstone of all risk-related policies and guidelines. The Risk Management Policy covers all risks the Company is exposed to, both on a current and on a forward-looking basis.

The risk management process is defined within the following phases:


### 1. Risk Identification

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

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

Risk Map

| Risks Covered by the Partial Internal Model | | | | |
|---|---|---|---|---|
| Internal Model | | | | Standard Formula |
| **Financial Risk** | **Credit Risk** | **Insurance Risk Non-life** | **Insurance Risk Life & Health** | **Operational Risk** |
| Interest Rate Yields | Spread Widening | Pricing | CAT Mortality | |
| Interest Rate Volatility | Credit Default | Reserving | Non-CAT Mortality | |
| Equity Price | Counterparty Default | CAT | Longevity | |
| Equity Volatility | | Non-life Lapse | Morbidity/Disability | |
| Property | | | Life Lapse | |
| Currency | | | Expense | |
| Concentration | | | CAT Health | |
| | | | Health Claim | |

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

Please see Sections C.4 Liquidity Risk and C.6 Other Risk.

### 2. Risk Measurement

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

The SCR is calculated by using the Generali Group Partial Internal Model approved by the College of Supervisors covering Financial, Credit, Life and Non-life Underwriting Risk. Operational Risk is measured by means of the EIOPA Standard Formula complemented by quantitative and qualitative risk assessments. The Generali Partial Internal Model provides an accurate representation of the main risks

[1] The Risk Management Policy covers all Solvency II risk categories and, to adequately deal with each specific risk category and underlying business process, is complemented by the following Risk Policies:
- Investment Governance Policy;
- P&C and Reserving Policy;
- Life and Reserving Policy;
- Operational Risk Management Policy;
- Liquidity Risk Management Policy;
- Other risk-related policies, such as the Capital Management Policy.

to which the Company is exposed to, measuring not only the impact of each risk taken individually but also their combined impact on the Own Funds of the Company.

More details on Partial Internal Model governance framework are provided in Section B.3.2., while the main differences between the Partial Internal Model assumptions and the Standard Formula are described in Section E.4.

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

### 3. Risk Management and Control

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

The purpose of the RAF is to set the desired level of risk (in terms of Risk Appetite and Risk Preferences) and limit excessive risk-taking. Tolerance levels based on capital and liquidity metrics are set accordingly. Should an indicator approach or breach the defined tolerance levels, escalation mechanisms are activated.

### 4. Risk Reporting

Risk Monitoring and Reporting is a key Risk Management process that helps keep Business Functions, Top Management, BoD and also the Supervisory Authority aware and informed of the risk profile development, risk trends and breaches of risk tolerances.

The Own Risk and Solvency Assessment (ORSA) is the main risk reporting process, coordinated by the Risk Management Function. Its purpose is to provide the assessment of risks and of overall solvency needs on a current and forward-looking basis. The ORSA process ensures ongoing assessment of the solvency position in line with the Strategic Plan and Capital Management Plan, followed by regular communication of the ORSA results to the Supervisory Authority after BoD approval. More details are provided in Section B.3.3.

#### Risk Management Function

The Risk Management Function ensures the Risk Management process as described in B.3. complies with Solvency II and the principles set in the Risk Policies, and supports the BoD and Top Management in ensuring the effectiveness of the Risk Management System.

The Risk Management Function coordinates the ORSA process and reports the most significant risks it identifies to the Board. The Risk Management Function is responsible for:

- assisting the Board of Directors and Supervisory Board and other functions in the effective operation of the Risk Management System;
- monitoring the Risk Management System and the implementation of the Risk Management Policy;
- monitoring the general risk profile of the Company and coordinate the risk reporting, including reporting any tolerances breaches;
- advising the Board of Directors and Supervisory Board, and supporting the main business decision-making processes, including those related to strategic affairs such as corporate strategy, mergers and acquisitions, and major projects and investments.

The Risk Management Function is an independent function within the organizational structure and is not responsible for any operational area. The head of the Risk Management Function (Chief Risk Officer - CRO) reports hierarchically to the Chief Executive Officer (CEO) and functionally to the BoD. To ensure a proper coordination and direction from Head Office, he also reports to the Group Chief Risk Officer (GCRO). In accordance with local laws and regulations, the Risk Management Function has full access to all information, systems and documentation related to activities within risk management. The function is also involved in all key committees of the Company.

The Risk Management Function also chairs the Risk Committee, where the representatives of Risk Management, key Risk Owners and Control Functions discuss current risk topics and the results of risk assessments, and advise the BoD on risk-related matters.

The Risk Management Function has financial and human resources, as well as access to external advisory services and specialized skills.

The head of the Risk Management Function shall have the necessary qualifications, knowledge, experience and professional and personal skills to carry out the function's duties effectively. The head shall have solid relevant experience in the insurance (or financial) industry, in risk management practices and risk-related regulations. He shall also have the capacity to relate to the commercial mindset of the business and develop an overall understanding of the organization from the operational and strategic points of view. The head of the Function shall follow applicable risk policies that set out the relevant responsibilities, goals, processes and reporting procedures to be applied.

All personnel carrying out risk management functions shall fulfil the above requirements and characteristics to a degree commensurate to the complexity of the activities to be carried out. These requirements must be maintained at an appropriate and adequate level at all times.

Compliance with the above requirements is assessed at least on a yearly basis and also during the year in the event of changes in the staffing of the Risk Management Function.

No material changes to this area have occurred since the last reporting period.

## B.3.1. INTERNAL MODEL FRAMEWORK: GOVERNANCE, DATA AND VALIDATION

## INTERNAL MODEL GOVERNANCE

### Processes and Procedures

The governance of the Internal Model is aimed at guaranteeing full compliance of the Internal Model with a set of principles, while respecting Articles 120 to 126 of the Solvency II Directive.

The Company, following the Group Internal Model Governance Policy, sets the model governance to ensure that models are transparent, robust and consistent both internally and across Group companies, and that the models are of sufficient quality and reliability to meet the needs of the users that use them.

The governance requirements apply to all phases of the model lifecycle, i.e. both regular use and model change processes.

The main processes contained within each of the above phases include model definition and implementation, model run including assumption setting and calibration, model validation and model review.

### Organizational Structure

The Board of Directors is responsible for implementing systems that ensure that the Group Partial Internal Model operates properly and continuously at Company level. With the support of the Local Risk Committee, the Board of Directors reviews the relevant supporting information submitted by the Company´s CRO.

The Company CRO must ensure that all models function properly at Company level and, if necessary, escalates model-related issues to the Board of Directors, supported by the Risk Committee. The Company CRO decides, on the basis of all the Internal Model Committee proposals, on the appropriate model component methodologies, and signs off on the results of calculations of Company capital requirements.

The Company Internal Model Committee is in charge of providing proposals on matters related to the Internal Model before submission to the Company CRO.

Company Model Owners are assigned to each component of the Model and are responsible for ensuring that the Group Partial Internal Model and its outputs meet local needs and conform to the Group Internal Model Governance Policy as well as to the Group Methodology Framework.

#### MATERIAL CHANGES TO INTERNAL MODEL GOVERNANCE

No material changes occurred in Internal Model Governance during the reporting calendar year.

#### INTERNAL MODEL DATA

The Company has implemented a data quality framework to ensure that the data used for the SCR calculation and the evaluation of Technical Provisions are accurate, complete and appropriate. For this purpose, all data used are recognized, data flows are tracked to the level of primary systems, any risks of potential non-quality of data are identified and evaluated. Adequate controls are implemented and their results are monitored and documented.

#### INTERNAL MODEL VALIDATION

The SCR calculation is subject to an annual independent validation, as required by Article 124 of the Solvency II Directive and based on the principles defined in the Group Validation Policy and the Group Validation Guidelines.

The Validation exercise is aimed at gaining independent assurance of the completeness, robustness and reliability of the processes and results which comprise the Internal Model, as well as their compliance with the Solvency II regulatory requirements. In particular, the Validation output aims to support the Senior Management and Board of Directors in understanding the Internal Model appropriateness and areas where the Internal Model has weaknesses and limitations, especially with regard to its use in day-to-day decision-making processes.

The scope of the Validation covers contains both the quantitative and qualitative aspects of the Model, including the data, methodology, assumptions and expert judgments, governance and processes, calibration of risks, model outputs and results. The scope of the Validation considers the materiality of the risk components and is subject to regular challenges from the Internal Model Committee.

Within the Validation process, both quantitative tests (including analyses of profit & loss attribution, sensitivity analyses, stress and reverse stress tests, SCR point estimates) and qualitative analyses (including reviews of documentation, walkthrough analyses and interviews) are performed.

To ensure an adequate level of independence, the resources performing the Validation activities are not involved in the development and calculation of the Internal Model.

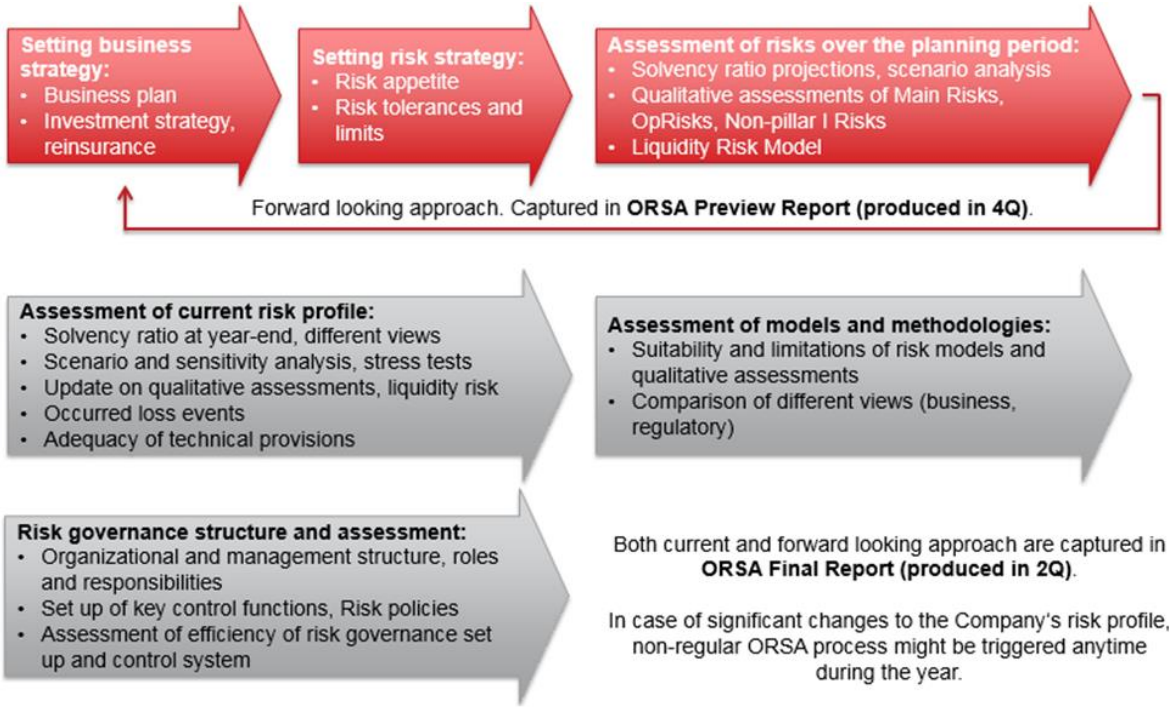
Although the Validation process is understood as a regular exercise, there are specific elements that can trigger additional Validation (e.g. requests for Major Model Changes or requests from Senior Management or regulatory bodies).

## B.3.2. ORSA PROCESS

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

The ORSA process documents and properly assesses the main risks the Company is or may be exposed in light of its strategic plan. It includes the assessment of the risks within scope of the SCR calculation, but also of the other risks not included in the SCR calculation. In terms of risk assessment techniques, both quantitative and qualitative assessments are performed, incl. stress tests and sensitivity analysis. Adverse scenarios are defined together with key Risk Owners and Board in order to assess the resilience of the Company solvency position to changed market conditions or specific internal or external risk factors over the business planning period.

The ORSA report is produced on an annual basis and split in 2 phases: In 4Q, ORSA Preview Report is produced focusing mainly on forward looking assessments in line with business strategy and business planning. In 2Q of consequent year, ORSA Final Report is produced compiling ORSA Preview with assessments of the current risk profile as of year-end and some more views on risk profile and system of governance.




In addition to the annual ORSA reporting, non-regular ORSA reports can be produced if the risk profile changes significantly. Triggers for non-regular ORSA might be e.g. changed assumptions underlying SCR calculations, breaches of defined solvency limits, significant changes to the structure, amount or quality of Own Funds, significant changes in business model, legal environment.

All results are properly documented in the ORSA report and discussed during meetings of the Company Risk Committee. After discussion and approval by the Board, the report is submitted to the supervisory authority. Generally, the information included in the ORSA report is sufficiently detailed to ensure that the relevant results can be used in the decision-making and business planning processes.

The results of the ORSA process at the Company level are also reported to the parent Company as an input to the ORSA process of Generali Group. For this reason the Company follows the principles set in the Risk Management Policy and additional operating procedures. These are issued by the Generali Head office to assure the consistency of the ORSA process across the companies of Generali Group.

No material changes to this area have occurred since the last reporting period.

## B.3.3. RISK EMBEDDING IN CAPITAL MANAGEMENT PROCESS

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

By means of the ORSA Process, the projection of the capital position and the forward-looking risk profile assessment contribute to the Strategic Planning and capital management processes.

The ORSA Report also relies on the Capital Management Plan to verify the adequacy and the quality of the Eligible Own Funds to cover the overall solvency needs based on the plan's assumptions.

To ensure ongoing alignment of the risk and business strategies, Risk Management actively supports the Strategic Planning Process.

No material changes to this area have occurred since the last reporting period.

## B.4. INTERNAL CONTROL SYSTEM

The Company fully adopted the Group Directives on the Internal Control and Risk Management system. These directives included the key elements of the Internal Control System and risk management framework, in particular, their activities, roles and responsibilities. Accordingly, the Company set up an organizational and operational structure aimed at supporting its strategic objectives, operations and internal control and Risk Management Systems.

The Internal Control Environment includes personnel development in terms of integrity, ethical values and competence, the management philosophy and operating style, the way roles and responsibilities are assigned, how the organization is set up, and governance.

The Internal Control System ensures compliance with applicable laws, regulations and administrative provisions and the effectiveness and the efficiency of the operations in light of objectives. It also ensures the availability and reliability of financial and non-financial information.

The Internal Control and Risk Management System is founded on the establishment of three lines of defense:

I. The Operating functions (the risk owners) represent the first line of defense and have ultimate responsibility for risks relating to their area of expertise;
II. The Actuarial, Compliance and Risk Management functions represent the second line of defense;
III. The Internal Audit function represents the third line of defense, and together with the Actuarial, Compliance and Risk Management functions, represents the control functions.

Monitoring and reporting mechanisms within the Internal Control System and the control functions are established to provide senior management and the Board of Directors with relevant information essential for their decision-making processes.

No material changes to this area have occurred since the last reporting period.

### B.4.1. COMPLIANCE FUNCTION

#### INFORMATION ON COMPLIANCE FUNCTION: ORGANIZATIONAL STRUCTURE AND THE DECISION MAKING PROCESSES OF THE UNDERTAKING. STATUS AND RESOURCES OF COMPLIANCE FUNCTION WITHIN THE UNDERTAKING

The Company established the Compliance function as an independent department and part of the Internal Control System and its second line of defense. The head of the Compliance department reports to the Board of Directors.

The Company fully adopted the Group Compliance policy, approved by the Board of Directors of Assicurazioni Generali S.p.A, and which is periodically reviewed. The Compliance department follows the policy, while its roles and responsibilities are specified by the Internal Compliance Statute of Compliance.

The resources of the Compliance department include financial and human resources, as well as access to external advisory services and specialized skills, the organizational infrastructure, contemporary reference material on compliance management and legal obligations, professional development, and technology.

The reporting process aims to ensure that appropriate information on the performance of the Compliance function and the Compliance Management system, its continuing adequacy and all relevant instances of non-compliance, is provided to senior management and the Board of Directors as well as to the Group Compliance function.

The Compliance department submits the Annual Plan of Activities together with the Annual Budget of the Compliance function to the Board of Directors for approval. The Annual Plan is drafted taking into account the results of the risk assessment activities. At least twice a year, the Compliance department reports to the Board of Directors on the state of realization of the Annual Plan of Activities. The Compliance department also provides regular updates to the Board of Directors and senior management. It informs the Board of Directors of any material changes in the compliance risk profile of the Company without undue delay.

No material changes to this area have occurred since the last reporting period.

### INFORMATION ON AUTHORITIES, RESOURCES, PROFESSIONAL QUALIFICATIONS, KNOWLEDGE, EXPERIENCE AND OPERATIONAL INDEPENDENCE OF THE COMPLIANCE FUNCTION

The employees of the Compliance function have the necessary qualifications, knowledge, experience and professional and personal skills to enable them to carry out their duties effectively. Such requirements are defined for each control function position. Compliance officers must understand the obligations, legislation, standards and rules that affect the business, and be familiar with the methodologies of Compliance Risk Management.

The Compliance function is independent of the functions in the organizational structure. It is not responsible for any operational areas. The head of the Compliance function reports directly to the Board of Directors, which confers the necessary authority to the function.

In accordance with local laws and regulations, the Compliance department has complete access to all information, systems and documentation related to activities within the scope of Compliance. The Compliance officer may attend relevant AMSB and committee meetings (e.g. Risk Committee) to raise compliance risk related matters, whenever appropriate. All accessed information and documents are handled in a prudent and confidential manner.

No material changes to this area have occurred since the last reporting period.

## B.5. INTERNAL AUDIT FUNCTION

### B.5.1. INFORMATION ON INTERNAL AUDIT FUNCTION: ORGANIZATIONAL STRUCTURE, THE DECISION MAKING PROCESSES, STATUS AND RESOURCES OF THE INTERNAL AUDIT FUNCTION

The organizational structure is described in Section B.1.

As part of the internal regulations, the current Internal Audit Charter was approved and issued on 31 March 2016. It contains a definition of Internal Auditing, the mission of the Internal Audit department, its area of responsibility, duties (audit planning, execution of the audit engagement, reporting and comments processing, information flows and other tasks), powers and responsibilities, assurance and consulting engagements characteristics (assurance and audit engagements, consulting engagements, implementation assistance) and information flow management.

The head of Internal Audit creates a Strategic Plan of Internal Audit activities, which is updated at least annually and approved by the Board of Directors with positive advice from the Audit Committee. The periodic (annual) Internal Audit Function's plan of engagements must be based on a documented risk assessment. The Internal Audit Function shall remain fully independent of decisions regarding risk extent and inclusion of the given process or area in the Audit Plan. The chief audit executive considers accepting proposed consulting engagements based on the engagement's potential to improve the management of risks, add value, and improve Company operations. Accepted engagements must be included in the Annual Audit Plan. The Annual Audit Plan should clearly indicate the skills of the personnel in charge of each audit, the timing, and the time expected to be spent on the engagement. The chief audit executive must ensure that Internal Audit resources are appropriate, sufficient, and effectively deployed to achieve the approved Plan. To carry out the Internal Audit's activities as effectively and efficiently as possible, the personnel of the Internal Audit Function is to be put in close contact with the areas of the business whose processes are to be reviewed. This will avoid the Internal Audit function being entirely extraneous to the context in which it operates. Audits are hence performed onsite with more in-depth and comprehensive operational analysis.

### B.5.2. INFORMATION ON AUTHORITIES, RESOURCES, PROFESSIONAL QUALIFICATIONS, KNOWLEDGE, EXPERIENCE AND OPERATIONAL INDEPENDENCE OF THE INTERNAL AUDIT FUNCTION

The Company implemented the Internal Audit Policy clearly setting out the relevant responsibilities, objectives, processes and reporting procedures to be applied, in accordance with Company strategy.

As defined in the Policy, the Internal Audit Function is an independent, effective and objective function established by the AMSB (Administrative, Management or Supervisory Body) to examine and evaluate the adequacy, functioning, effectiveness and efficiency of the Internal Control System and all other elements of the System of Governance, with a view to improving the efficacy and efficiency of the Internal Control System of the organization and of the governance processes. The Internal Audit Function supports the AMSB in identifying the strategies and guidelines on internal control and risk management, ensuring they are appropriate and valid over time. It provides the AMSB with analysis, appraisals, recommendations and information concerning the activities reviewed, and also carries out assurance and advisory activities for the benefit of the AMSB, the top management and other departments.

The Internal Audit Function is governed by the Institute of Internal Auditors' mandatory guidance, including the Definition of Internal Auditing, the Code of Ethics, and the International Standards for the Professional Practice of Internal Auditing. This mandatory guidance constitutes the principles and fundamental requirements for the professional practice of auditing and for evaluating the effectiveness of the audit activity's performance. Internal audit activities are overseen by the Audit Committee, which is an independent control body of the Company.

The Internal Audit Function shall be provided with an appropriate budget and resources, and the Internal Audit Function staff must possess the knowledge, skills and competencies required to carry out their work with proficiency and due professional care.

The head of the Internal Audit Function is a person meeting the requirements of the local regulation authority's regime, the Solvency II regulation and Generali Group requirements. The head of the Function must have solid relevant experience in audit, control, insurance, finance, risk or in the auditing of financial statements.

The head of the Internal Audit Function shall not assume any responsibility for any other operational function and should have an open, constructive and cooperative relationship with regulators, supporting the sharing of information relevant to carrying out their respective responsibilities.

Other personnel belonging to the Internal Audit Function should also have the skills and proven records of accomplishment commensurate with the degree of complexity of the activities to be carried out. The Internal Audit Function must include employees with high professional development potential. Internal Audit staff are expected to avoid, to the maximum extent possible, activities that could create conflicts of interest or the appearance of conflicts of interest. They must behave in an impeccable manner at all times, and information coming to their knowledge when carrying out their tasks and duties must always be kept completely confidential.

No material changes to this area have occurred since the last reporting period.

## B.6. ACTUARIAL FUNCTION

The Actuarial Function (AF) in Česká pojišťovna is based on the Group Actuarial Function Policy and is amended to meet the Supervisory requirements and specifics of the Czech insurance market:

To strengthen the independency of Actuarial Function, on top of the content of the Group Actuarial Function Policy:

- The calculation and validation activities are organizationally separated to ensure full independency and Heads of these activities reports directly to CFO. Head of the Validation activities is titled "Aktuárská Validační funkce" (Actuarial Validation Function), this function is considered mainly as a validation function and consequently the validation activities and the expression of the independent opinion is a main focus of the function. To this extent the Actuarial Validation Function submits at least yearly an opinion on the technical provision, as well as on the underwriting policy and on reinsurance arrangements to the BoD/AMSB. To support his/her role, the Actuarial Validation Function is granted unrestricted access to the information necessary to carry out his/her responsibilities, to the extent legally permitted, and has also access to Heads of responsible functions and committees. Head of Validation activities is responsible to report all validation finding to Head of Actuarial Function based on agreed schedule in order to ensure full alignment with Group requirement and deadlines.
- In cases of any fundamental issues in areas of his/her interest (the technical provisions, the underwriting policy and reinsurance arrangements), the Actuarial Validation function is obliged to report the finding directly to the BoD/AMSB to which he/she has an independent and direct access.
- The Actuarial Validation Function is appointed by local BoD/AMSB.

To respect historical set up and experience, Česká pojišťovna has separated both function for Life and Non-life. In detailed there are these key roles:

- Head of Actuarial Function Life,
- Head of Actuarial Function Non-life,
- Head of Actuarial Validation Function Life,
- Head of Actuarial Validation Function Non-life.

There are regular meetings to ensure full consistency and alignment as well as sharing information between both Life and Non-life functions and both calculation and validation activities. Above mentioned amendments were confirmed by Head of Group Actuarial Function.

In terms of resources, the Actuarial Function currently consists of 12 people (Life /NonLife; senior, standard, junior). Employees involved in the AF possess an actuarial background with a degree in actuarial sciences, statistics or mathematics, or other specific finance/insurance post degree qualifications.

The objectiveness of Actuarial Function is supported by Fit and Proper requirement (Group Fit and proper Policy) and professional responsibility of Heads of Actuarial Function and Validation Function (full members of professional organization IAA). All actuaries participate on various seminars and trainings to fulfill qualification requirements.

The Actuarial Function closely cooperates with other technical departments in the company to support other control functions and business activities. It shares outputs of actuarial valuations and provides additional ad hoc analysis and expertise. The main partners are the Risk Management, Product Management, Controlling, Reinsurance and ALM Departments.

The main responsibilities and roles of the Actuarial Function, as required by Solvency II principles (Article 48 of Directive 2009/138/EC), are the following:

- all the tasks included in the calculation and validation of the technical provisions and their coordination,
- expressing an opinion on overall underwriting policy,
- expressing an opinion on the adequacy of reinsurance arrangements,
- contributing to the effective implementation of the risk-management system,
- assessing of the local technical provisions (TP) data quality process,

as well as tasks which are not expressively required by Solvency II principles:

- tasks related to the maintenance and update of the actuarial IT platform,
- calculation of IFRS technical provisions, including statutory actuarial reporting,
- carrying out the adequacy test of IFRS technical provision, run-off analysis, and reserve adequacy movement analysis,
- contribution to the calculation of SCRs for life and non-life underwriting risks and market risks for liabilities,
- provide reinsurance efficiency analysis,
- calculation of life new business value,
- profitability reviews within the product analysis and approval,
- contribution to the business plan process.

With regards to above mentioned tasks, the actuaries prepare the data needed for each calculation. This process is in line with the Group Data Quality Policy and reviews the appropriateness, accuracy and completeness of data. The AF is also responsible for choosing the proper methods for calculation based on data history and the type of business.

No material changes to this area have occurred since the last reporting period.

## B.7. OUTSOURCING

### B.7.1. INFORMATION ON OUTSOURCING POLICY

The Company has fully adopted the **Group Outsourcing Policy**, which sets consistent minimum mandatory outsourcing standards, assigns the main outsourcing responsibilities, and ensures that appropriate controls and governance structures are established within any outsourcing initiative.

The Policy introduces a risk-based approach, distinguishing between critical and non-critical outsourcing, the materiality of each outsourcing agreement and the extent to which the Company controls the service providers.

The Company also adopted **local outsourcing rules** that specify all the rules and obligations for the proper set up and management of outsourcing relationships both within and outside the Group, the criteria for the classification of outsourcing significance, roles and responsibilities, contract content, internal processes, evidence and the monitoring of outsourcing. The Company considers as significant following functions: Risk management, Compliance function, Internal audit and Actuarial function. The Company considers as important following activities: Administration of insurance, Claims settlement, Investments, Calculation of provisions, Underwriting, Product development, Actuarial.

Outsourcing of functions or activities which are considered as critical or significant by the Company shall not be undertaken in such a way as to lead to any of the following: materially impairing the quality of the system governance of the Company, unduly increasing the operational risk, impairing the ability of the supervisory authorities to monitor the compliance of the undertaking with its obligation, undermining continuous and satisfactory service to policy holders. The outsourcing agreements of critical and important activities must be submitted to Board of Directors for approval.

An **outsourcing business officer** is appointed for each outsourcing contract. This person is responsible for the overall execution of the outsourcing lifecycle, from risk assessment to final management. The officer also monitors the service level agreements defined in the contracts as well as the quality of the provided service.

The Company has providers of outsourced functions or activities in the Czech Republic, Italy and Netherlands.
The outsourcing agreements have been updated in compliance with GDPR regulation.

## B.8. ANY OTHER INFORMATION

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

At least once a year, the Internal Audit department performs an independent overall evaluation of the Internal Control System of the Company. The evaluation reflects the main requirements of local regulations and general corporate governance principles. It is one of the inputs provided to the Supervisory Board so that it may perform its supervision of the Internal Control System. In addition, it is also an independent source of information for the Board of Directors in the ICS management process.

The annual internal audit assessment of the internal control system effectiveness involves an overall assessment of the risk of each process, which is also the input for planning of future audit engagements. According to the audit methodology, the most risky processes are audited at least every 18 months and the results of these audits are then the input for an overall assessment of the internal control system. The evaluation of the internal control system itself is done through interviews with key management and control functions, verifying of the effectiveness of the key controls on the sample test, taking into account the findings and remedial actions of the particular engagements.

The internal management and control system was found to be adequate in the reported period and no serious deficiencies were identified that could negatively affect the functioning of the company. Partial findings were communicated to the Supervisory Board and the Board of Directors and other responsible functions.

The Internal Control System is broadly defined as a process effected by the Company's Board of Directors, management and other personnel, designed to provide reasonable assurance regarding the achievement of objectives in the following categories:

- Effectiveness and efficiency of operations;
- Reliability of financial reporting;
- Compliance with laws and regulations;
- Developing and following of strategies;
- Principles for detecting and preventing conflicts of interests and internal fraud.

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

There is no other relevant information.

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# C. Risk Profile

Within the Company risk profile, no risk exposure arises from off-balance sheet positions and no transfer of risk to special purpose vehicles takes place.

## C.1. UNDERWRITING RISK

### C.1.1. LIFE UNDERWRITING RISK

## RISK EXPOSURE AND ASSESSMENT

Life and Health Underwriting Risk includes biometric and operating risks embedded in life and health insurance policies. Biometric Risk derives from the uncertainty in assumptions regarding mortality, longevity, health, morbidity and disability rates taken into account in insurance liability valuations. Operating Risk derives from the uncertainty regarding the amount of expenses and from the behavior of policyholders in respect to their contractual options. Along with premiums payment, the option to surrender a policy is the most significant contractual option held by policyholders.

### Life and Health Underwriting Risk identified in the Company's Risk Map includes:

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

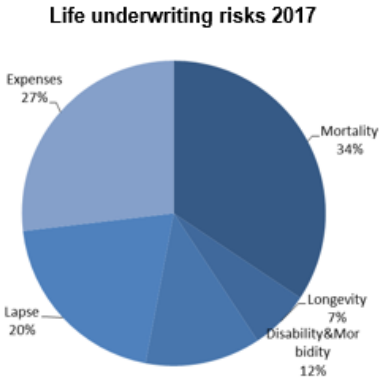
The following table briefly summarizes the interactions between products and risks:

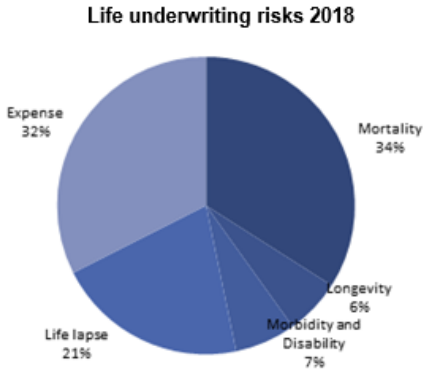
| Products | Mortality Risk | Longevity Risk | Morbidity/Disability Risk | Lapse Risk | Expense Risk | Health |
|---|---|---|---|---|---|---|
| Accident and Disability | ✓ | | ✓ | ✓ | ✓ | |
| Pure Risk | ✓ | | ✓ | ✓ | ✓ | |
| Annuity in Payment | | ✓ | | | ✓ | |
| Annuity in Accumulation | ✓ | ✓ | ✓ | ✓ | ✓ | |
| Capitalization | | | | ✓ | ✓ | |
| Endowment and Others | ✓ | | ✓ | ✓ | ✓ | |
| Non-life Annuities in Payment | | ✓ | | | ✓ | |

The following table shows valuation of the life underwriting risks when a negative event occurs with a 1:200 probability and when each risk is valued independently to each other:

| | Total YE18 | Total YE17 | Delta % |
|---|---|---|---|
| **Life UW Risk** | **1,705,732** | **1,683,687** | **1%** |
| Longevity | 103,995 | 107,065 | -3% |
| Life Lapse | 354,490 | 336,451 | 5% |
| Morbidity Disability | 113,280 | 209,256 | -46% |
| Mortality | 580,197 | 579,162 | 0% |
| Expense | 553,769 | 451,753 | 23% |

The following charts show the share of individual risks in total Life UW Risk:




The main Life Underwriting Risks in the Company's portfolio are Expense, Mortality, and Lapse Risks.

Longevity, Mortality and Life Lapse Risks are comparable to last year's values. Morbidity and Disability Risk decreased thanks to an update of conservatively set future assumptions for the last generation of products/risks. Now the assumptions are based on real claims incurred by the Company. At the same time those data are less volatile. Expense Risk increased on the contrary. The reasons are higher risk exposure (higher projected administrative expenses) and higher inflation spread in the stressed scenario.

The approach underlying the Life Underwriting Risk measurement is based on calculation of the loss for the Company resulting from unexpected changes in biometric/operating assumptions. In particular, the capital requirements for Life Underwriting Risk are calculated on the basis of the difference between the Solvency II Technical Provisions after the application of stress to the biometric/operating assumptions and the Solvency II Technical Provisions under best-estimate expected conditions.

Life Underwriting Risk is measured using a quantitative model aimed at determining the SCR, based on the Generali Group Partial Internal Model methodology.

The risk measurement process consists of two main steps:

- Risk Calibration, aiming to derive Life Underwriting Risk factor distributions and consequently the stress to be applied to the best estimate biometric/operating assumptions with a certain probability of occurrence equal to 0.5%;
- Loss Modelling, aiming to measure the loss for the Company resulting from the stress on biometric/operating assumptions.

For Mortality and Longevity Risk, the uncertainty in insured population mortality and its impact on the Company are measured by applying stresses to the policyholders' death rates.

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

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

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

The Company performs specific tests and follows Generali Group methodology, aimed at ensuring the reliability of the results obtained and their actual use in business decision-making processes, as prescribed by the Solvency II Directive.

No significant changes in risk measurement occurred over the reporting period.

## RISK MANAGEMENT AND MITIGATION

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

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

### Product Pricing

Effective product pricing consists of setting product features and assumptions regarding expenses, biometrics and policyholder behavior to allow the Company to withstand any adverse developments in the trends in these assumptions.

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

For insurance portfolios with a Biometric Risk component, the mortality tables used in pricing include reasonable prudential margins. For these portfolios, comprehensive reviews of mortality are also performed at Head Office level every year, involving a comparison with the expected portfolio mortality determined according to the most up-to-date mortality tables available in each market. This analysis allows the continuous checking of the adequacy of the mortality assumptions taken into account in product pricing, and addressing the misestimation of risks for the next underwriting years.

Similarly as for Mortality Risk, for Longevity Risk an annual assessment of the adequacy of the mortality tables used in pricing is performed. This assessment not only considers Biometric Risk but also Financial Risk related to the minimum interest rate guarantee and any potential mismatch between the liabilities and the corresponding assets. In this case as well, the analysis allows continuous checking of the adequacy of the longevity assumptions considered in product pricing and the addressing of the misestimation risk for the next underwriting years.

All operating assumptions used in the pricing phase of products or for the valuation of new business are derived from the Company's own experience in line with the underwriting policy. They are consistent with the assumptions used for Technical Provisions (TP) valuation. Furthermore, to ensure full alignment with the Company's strategy on product approval, the process includes on-going monitoring of the products to be launched by the Company and a biannual update of the profitability review at Parent Company level.

**Underwriting Process**

The Company follows the underwriting guidelines of Generali Group that determine operating limits and the standard process to request exemptions to maintain risk exposure between pre-set limits and ensure a coherent use of capital.

Particular emphasis is put on the underwriting of new contracts, considering both the Medical and Financial Risks. The Company follows the clear underwriting standards issued through manuals, forms, and medical and financial underwriting requirements.

For insurance riders most exposed to moral hazard, maximum insurability levels are set by the Company. To further mitigate these risks, policy exclusions and financial underwriting rules are also defined.

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

**Role of Risk Management in the Pricing and Product Approval Processes**

As a member of the product and underwriting committees, the Company CRO supports the pricing process.

The product approval process includes a review by the Risk Management Function that new products are in line with the Risk Appetite Framework (both quantitative and qualitative dimensions) and that risk capital is considered within the risk-adjusted performance management.

Underwriting Risk can also be transferred through reinsurance to another (re)insurance undertaking to reduce the financial impact of these risks on the Company. This effectively reduces the SCR needed to be held to cover them.

The Life Reinsurance Function at Group level supports, steers and coordinates the reinsurance activity by the Company by defining appropriate guidelines aimed at ensuring tight risk control, in line with Group and Company Risk Appetite. The guidelines are also intended to fully take advantage of all opportunities that reinsurance offers in each market.

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

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

The reinsurance program is subject to the Life Actuarial Function's (LAF) opinion regarding adequacy in accordance with the Group Actuarial Function Policy and related guidelines. The Actuarial Function should consider whether the reinsurance arrangements are sufficient and adequate, and ascertain that own retention limits have been adequately set. Companies to whom contracts are ceded usually belong to Generali Group; hence there is minimum risk of potential unavailability of reinsurance cover.

### C.1.2. NON-LIFE UNDERWRITING RISK

## RISK EXPOSURE AND ASSESSMENT

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

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

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

The business underwritten by the Company is a mix of retail, commercial and industrial risks. Motor insurance is the most important, followed by property, liability and other segments.

The Company exposures to underwritten risks are described in Section D.2.2 of this report, related to Technical Provisions and the market value balance sheet.

The vast majority of exposure underwritten by the Company is located in the Czech Republic. This location includes NAT CAT risks exposed mainly to flood, wind, hailstorm and snow perils.

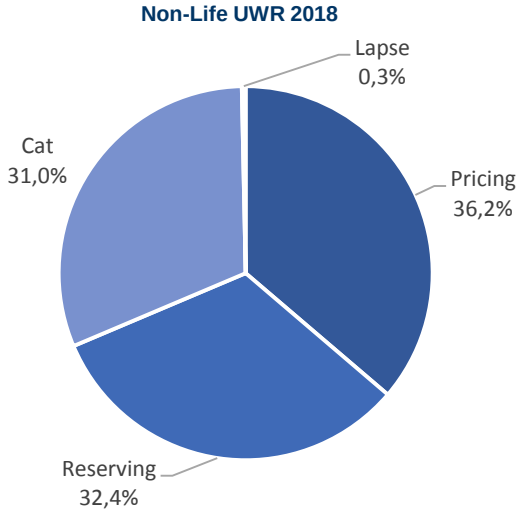
The SCR for Non-life Underwriting Risk is measured by means of the Partial Internal Model (PIM). This covers the following risks:

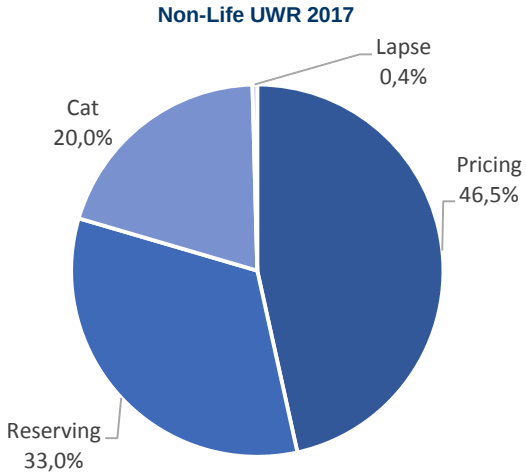
- Pricing and Catastrophe Risk: the possibility that premiums are not sufficient to cover future claims, contract expenses and extremely volatile events;
- Reserving Risk: the uncertainty of the claims reserves run-off around its expected value, in a one-year time horizon;
- Lapse Risk: related to the uncertainty that customers may cancel their existing policies in larger numbers than expected.

The following table shows the development of Non-life Risk:

| | 2018 | 2017 | Change % |
|---|---|---|---|
| **Non-Life UW Risks** | **2,771,401** | **2,526,837** | **10%** |
| Pricing | 1,464,076 | 1,515,440 | -3% |
| Reserving | 1,307,615 | 1,074,368 | 22% |
| Cat | 1,253,834 | 652,720 | 92% |
| Lapse | 13,330 | 13,576 | -2% |

The following charts show the shares of individual risks in total Non-life UW Risk:




The most relevant movement can be seen in the case of Catastrophe Risk. The main reason is a cancellation of the aggregate XoL program for 2019 due to low efficiency. Individual XoL reinsurance remains an important part of the Company reinsurance structure and significantly contributes to mitigation of Catastrophe Risk.

The increase in Reserving Risk was mainly driven by higher Undiscounted Best Estimate of Liabilities as described in Section D.2.2. In particular, this change is connected to the inclusion of accident life riders into the revaluation of liabilities and calculation of Reserving Risk

Pricing and Lapse Risks are quite stable with only a small decrease compared to 2017.

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

### RISK MANAGEMENT AND MITIGATION

P&C Risk Selection starts with a general proposal in terms of the underwriting strategy and corresponding business selection criteria in agreement with the Group. The underwriting strategy is formulated consistently with the risk preferences defined by the Board within the Risk Appetite Framework.

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

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

The Company transfers reinsurance contracts to Head Office through the Bulgaria-based company GP Reinsurance EAD, which serves as a captive reinsurer for the Generali companies from the CEE region.

The Property Catastrophe Reinsurance Program for 2018 is designed as follows:

- protection aims to cover single-occurrence losses up to a return period of at least 250 years;
- protection has proved capable in all recent major catastrophic losses;
- substantial risk capital is saved through protection.

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

The main change in reinsurance structure for 2019 affects the CAT program. The aggregate XoL treaty protecting the Company from multiple small and medium-sized events was not renewed due to low efficiency in terms of economic value, probability of profit and impact on the Solvency Ratio.

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

The Risk Management Function confirms the adequacy of the risk mitigation techniques on an annual basis. An analysis of several alternative reinsurance programs with a focus on indicators such as solvency ratio, profitability and economic value is provided to test the suitability of the current setup.

The current reinsurance program has significantly improved the risk position of the Company. The mitigation effect is most significant in the case of CAT Risk, where more than 90% of the SCR is ceded out of the Company. The effect is also favorable in the case of other Non-life Underwriting Risk – the decrease of 79% in Lapse Risk, 51% in Pricing Risk and 40% in Reserving Risk has been driven by the current reinsurance structure.

## C.2. MARKET RISK

As a composite insurer, the Company collects premiums from policyholders in exchange for payment promises contingent on pre-determined events. The Company invests the collected premiums in a wide variety of financial assets, with the purpose of honoring future promises to policyholders and generating value for its shareholders.

The Company might then be exposed to the following Market & Credit Risk that:

- Invested assets may not perform as expected because of falling or volatile market prices;
- Cash from maturing bonds may be reinvested at unfavorable market conditions, typically lower interest rates;
- Invested assets may not perform as expected because of perceived or actual deterioration of the creditworthiness of the issuer;
- Derivative or reinsurance contracts may not perform as expected because of a perceived or actual deterioration of the creditworthiness of the counterparty.

Regarding its invested assets, the Company is a long-term liability-driven investor, and holds assets until they are needed to redeem the promises to policyholders. It is therefore fairly immune to any short-term decrease and fluctuations in their market values.

Nonetheless, the Company is required by the Solvency II Regulation to hold a capital buffer with the purpose of maintaining a sound solvency position even under adverse market movements. For more information, please refer to Section E.2.

For this purpose, the Company manages its investments in a prudent way according to the prudent person principle, and strives to optimize the return of its assets while minimizing the negative impact of short-term market fluctuations on its solvency. The company achieves this

optimization by investing only in assets and instruments whose risks can be properly identified, measured, monitored, managed and appropriately taken into account when assessing solvency needs.

The Company invests the premiums collected in financial instruments ensuring that benefits to policyholders can be paid on time. If the value of the financial investments substantially decreases when claims to policyholders need to be paid, the Company may fail to maintain its promises to policyholders. Therefore, the Company must ensure that the value of the financial investments backing up the insurance contracts does not fall below the value of its obligations.

In the case of its unit-linked business, the Company typically invests the collected premiums in financial instruments but does not bear any market or Credit Risk. However, with respect to its earnings the Company is exposed because fees are the main source of profits for the Company and are directly linked to the performance of the underlying assets. Therefore, adverse developments in the markets could directly affect the profitability of the Company should contract fees become insufficient to cover costs.

In more detail, the Company is exposed to the following main asset classes:

| Asset Allocation | Market Value 2018 | Market Value 2017 |
|---|---|---|
| Government Bonds | 27,446,910 | 31,775,021 |
| Corporate Bonds | 21,195,348 | 45,188,652 |
| Investment Funds | 11,966,564 | 12,972,220 |
| Equity | 12,365,384 | 11,474,277 |
| Structured Notes | 632,952 | 654,969 |
| Cash and Deposits | 1,370,487 | 1,751,885 |
| Mortgages and Loans | 23,273,855 | 956,640 |
| Property | 87,225 | 119,546 |
| Derivatives | (539) | (700) |
| **Total** | **98,338,186** | **104,892,511** |

The total market value of assets fell by 6.2 percent in 2018. The biggest contributor to this change was the reduction in government bonds and the reclassification of repo operations from corporate bonds to loan classes.

## C.2.1. RISK EXPOSURE AND ASSESSMENT

The Market Risk included in the Company Risk Map are the following:

- Equity Risk: the risk of adverse changes in the market value of the assets or in the value of liabilities due to changes in the level of equity market prices that may lead to financial losses.
- Equity Volatility Risk: the risk of adverse changes in the market value of the assets or in the value of liabilities due to changes in the volatility of equity markets.
- Interest Rate Risk: the risk of adverse changes in the market value of the assets or in the value of liabilities due to changes in the level of interest rates in the market. The Company is mostly exposed to upward changes in interest rates as higher interest rates can decrease the present value of the promises made to policyholders to less than the value of the assets backing those promises.
- Concentration Risk: the risk of incurring significant financial losses because the asset portfolio is concentrated on a small number of counterparties, thus increasing the possibility that a negative event hitting only a small number or even a single counterparty can produce large losses.
- Currency Risk: the possibility of adverse changes in the market value of the assets or the value of liabilities due to changes in exchange rates.
- Interest Rate Volatility Risk: the risk of adverse changes in the market value of the assets or the value of liabilities due to changes in the level of interest rate implied volatilities.
- Property Risk: the possibility of adverse changes in the market value of the assets or the value of liabilities due to changes in the level of property market prices.

The current allocation to Market Risk is as follows:

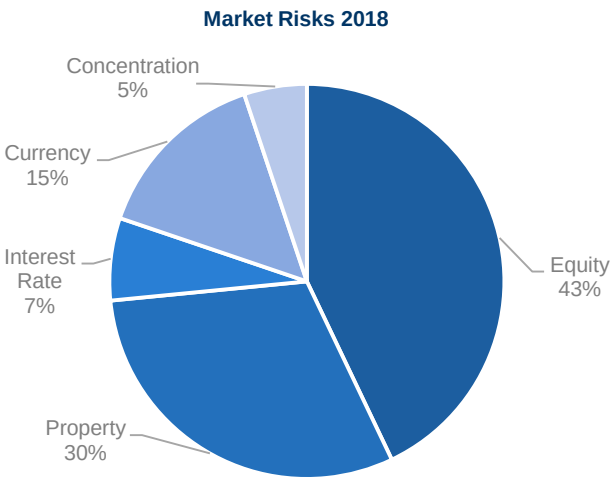
| Exposure to risk type | Market Value 2018 | Market Value 2017 |
|---|---|---|
| Equity Risk | 12,323,971 | 12,622,591 |
| Equity Volatility Risk | 0 | 0 |
| Interest Rate Risk | 51,076,734 | 55,049,992 |
| Concentration Risk | 78,233,013 | 81,122,617 |
| Currency Risk | 8,559,910 | 6,276,105 |
| Interest Rate Volatility Risk | 1,363,296 | 4,491,151 |
| Property Risk | 10,574,497 | 8,067,366 |

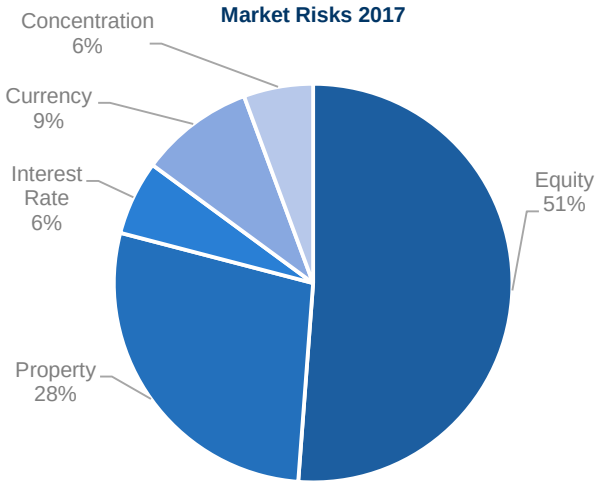
The biggest shifts in Market Risk exposures are mainly driven by a lower investment portfolio volume reflecting maturities in traditional Life (Interest Rate Risk, Concentration Risk) or by a change in risk profile (Currency Risk, Interest Rate Volatility Risk).

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

The Company evaluates its Market Risk using the Generali Group Internal Model used for the SCR calculation. A breakdown of the SCR according to this methodology and originating from Market Risk can be seen in the table and charts below and in Section E.

| Market Risks | Value 2018 | Value 2017 |
|---|---|---|
| Equity | 3,002,017 | 3,200,018 |
| Property | 2,135,475 | 1,741,858 |
| Interest Rate | 472,082 | 376,986 |
| Currency | 1,025,510 | 579,442 |
| Concentration | 359,674 | 352,441 |




To ensure the ongoing appropriateness of the Internal Model methodology, Market Risk calibrations are reviewed on a yearly basis. No material changes have occurred since the last reporting period.

Market Risk Concentration is explicitly modelled by the Internal Model. According to the results of the model and the composition of the balance sheet, the Company is exposed to Concentration Property Risk driven by the fact that the Company started to invest into properties only recently and thus the number of owned buildings is limited.

## C.2.2. RISK MANAGEMENT AND MITIGATION

The 'Prudent Person Principle' is the main cornerstone of the Company's investment management process. To ensure the comprehensive management of the effect of Market Risk on assets and liabilities, the Company's Strategic Asset Allocation (SAA) Process needs to be liability-driven and strongly linked with insurance-specific targets and constraints. Following the Generali Group approach, the Company has integrated its strategic asset allocation (SAA) and asset liability management (ALM) within the same process.

One of the main risk-mitigation techniques used by the Company is liability-driven management of the assets, which aims at enabling the comprehensive management of assets taking into account the Company's liabilities structure.

The asset portfolio is invested and rebalanced according to asset class, and duration weightings are defined through the Investment Management Process and based on the 'Prudent Person Principle'. The aim is not just to eliminate risk but to define an optimal risk-return profile to satisfy the return target and the risk appetite of the Company over the business planning period.

The Company also uses derivatives to mitigate the risks present in the asset or/and liability portfolios. The derivatives help the Company improve the quality, liquidity and profitability of the portfolio, according to the Business Planning Targets.

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

The ALM and SAA Process relies on close interaction between Investment, Finance, Actuarial, Treasury and Risk Management Functions. The inputs and targets received from these functions guarantee that the ALM and SAA Process is consistent with the Risk Appetite Framework, Strategic Planning and Capital Allocation Processes.

The aim of the Strategic Asset Allocation Process is to define the most efficient combination of asset classes that, according to the 'Prudent Person Principle' and related relevant implementation measures, maximizes the investment contribution to value creation, taking into account solvency, actuarial and accounting indicators.

The annual SAA proposal:

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

The Group has centralized the management and monitoring of specific asset classes (private equity, alternative fixed income, etc.). These kinds of investments are subject to accurate due diligence aiming at assessing the quality of the investment, the level of risk related to the investment, and its consistency with the approved liability-driven SAA.

In addition to risk tolerance limits set for the Company solvency position defined within the RAF, the current risk monitoring process of the Company is also integrated into the System Of Investment Risk Limits through the adoption of the Generali Group Investments Risk Guidelines (GIRG) provided by the Head Office. This includes general principles, quantitative risk limits (with a strong focus on credit and market concentration), authorization processes and prohibitions.

Furthermore, the Company is also actively implementing market risk mitigation strategies:

Currency Risk

The Company's functional currency is the Czech crown (CZK). However, the investment portfolios also contain instruments denominated in foreign currencies. According to the general policy, all these instruments are either dynamically hedged into CZK via FX or assigned to foreign currency technical reserves at a corresponding value. FX hedging is implemented either through FX derivatives (i.e. FX swaps, forward transactions and cross currency swaps) or through cross-currency REPO operations (used since 2016). The process in place guarantees high effectiveness of the hedging.

Interest Rate Risk

The Company concludes derivative trades to manage the interest rate risk position of the asset portfolio as part of this risk management strategy.

The objective of the investment and hedging strategy is to manage the overall interest rate risk position on a continuous basis. The Company achieves this objective using a dynamic strategy. The asset manager dynamically adjusts the positions within the fixed income portfolio and hedging derivatives that are used to adjust and hedge the interest rate sensitivity of the overall portfolio.

The positions of individual instruments within the portfolio, whether the underlying assets or the hedging derivatives, are opened, adjusted or terminated even before the maturity date of the instrument, based on the actual state of the Company's risk capacity or risk appetite, the development of the credit quality of the instrument's issuer, or a change in the instrument's liquidity or in its relative risk/return profile. The asset manager monitors the development of the overall interest rate position on an ongoing basis.

The Company implements hedge accounting to reflect its hedging strategy within the financial statements. As part of hedge accounting activities, the effectiveness of hedging is measured as a ratio of gains/losses on hedged items to the profit or loss result of the hedging instrument. An effectiveness test is regularly performed each month, and compliance with the 80-125% rule is verified.

## C.3. CREDIT RISK

For general information on the Market and Credit Risk context, see the previous section on Market Risk.

### C.3.1. RISK EXPOSURE AND ASSESSMENT

The Credit Risk included in the Company Risk Map:

- Spread Widening Risk is the risk of adverse changes in the market value of the assets due to changes in the market value of non-defaulted credit assets. The market value of an asset can decrease because of Spread Widening Risk either because the market's assessment of the creditworthiness of the specific obligor decreases, which is typically accompanied by a credit rating downgrade, or because there is a market-wide systemic reduction in the price of credit assets.
- Default Risk refers to the risk of incurring losses because of the inability of a counterparty to honor its financial obligations.

Allocation to Credit Risk

| Exposure to risk type | Market Value 2018 | Market Value 2017 |
|---|---|---|
| Spread Widening Risk | 55,334,545 | 60,451,734 |
| Credit Default Risk | 55,334,545 | 60,451,734 |
| Counterparty Default Risk | 17,872,745 | 23,618,335 |

The lower investment portfolio volume, reflecting maturities in traditional Life, explains the year-on-year movement in the Spread Widening Risk and Credit Default Risk. The biggest change occurred in the Counterparty Default Risk exposure, which decreased mainly due to decrease in the derivative position.

We do not expect any substantial changes in the relationship to risk exposure in the foreseeable future.

To ensure that the level of Credit Risk deriving from invested assets is adequate to the business run by the Company and the obligations undertaken with the policyholders, the investment activity is performed in a sound and prudent manner in accordance with the 'Prudent Person Principle' set out in Article 132 of Directive 2009/138/EC, as ruled in the Group Investment Governance Policy (GIGP) approved by Head Office and subsequently approved by the Company BoD.

The 'Prudent Person Principle' is applied independently of the fact that assets are subject to either Market Risk or Credit Risk or both.

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

The Company evaluates its Credit Risk using the Generali Group Internal Model used for the SCR calculation. The breakdown of the SCR originating from Credit Risk according to this methodology can be seen in Section E.

To ensure the continuous appropriateness of the Internal Model methodology, Credit Risk calibrations are reviewed on a yearly basis. No material changes have occurred since the last reporting period.

Credit Risk concentration is explicitly modelled by the Internal Model. According to the results of the Model and the composition of the balance sheet, the Company has no material risk concentrations.

### C.3.2. RISK MANAGEMENT AND MITIGATION

Credit Risk borne by the Company is managed in many concurrent ways.

One of the main risk mitigation techniques used by the Company consists in the liability-driven management of the assets. The asset portfolio is invested and rebalanced according to asset class and duration weightings defined through the Investment Management Process described above and based on the 'Prudent Person Principle'. The aim is not just to eliminate risk but to define an optimal risk-return profile satisfying the return target and the Risk Appetite of the Company over the Business Planning Period.

Moreover, the application of the Internal Model produces a set of quantitative Risk Metrics that allow the definition of risk tolerance levels and the performance of sensitivity analysis on selected risk scenarios.

In addition to the framework illustrated above, the current risk monitoring process of the Company is also integrated through the adoption of the Generali Group Investments Risk Guidelines (GIRG) provided by Group Head Office. The GIRG include general principles, quantitative risk limits (with a strong focus on credit and market concentration), authorization processes and prohibitions.

## C.4. LIQUIDITY RISK

### C.4.1. RISK EXPOSURE AND ASSESSMENT

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

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

The Company's Liquidity Risk assessment relies on projecting cash obligations and available cash resources into the future to ensure that available liquid resources are always sufficient to cover cash obligations that will come due in the same period.

For this purpose, a set of Liquidity Risk metrics has been defined and is used to regularly monitor the liquidity situation. All such metrics are forward-looking, i.e. they are calculated at a future date based on projections of cash flows, assets and liabilities, and an estimation of the level of liquidity of the asset portfolio.

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

Liquidity risk limits are defined in terms of values of the above-mentioned metrics not to be exceeded by the Company. The limit framework is designed to ensure that the Company holds a buffer of liquidity in excess of the amount required to withstand the adverse circumstances depicted in the stress scenarios.

In addition to regularly monitored and reported quantitative liquidity metrics, the Company is supported by qualitative liquidity indications (like setting limits on business activities, early warning indicators, stress testing) that complement the comprehensive assessment of Liquidity Risk and provide information on corrective actions when needed.

The liquidity metrics show a stable liquidity position. No material changes to this area which could have occurred breaches within stipulated liquidity thresholds since the last reporting period.

Material Liquidity Risk concentrations could arise from large exposures to individual counterparties or groups. In fact, in the event of default or another liquidity issue of a counterparty where there is a significant risk concentration, this may negatively affect the value or the liquidity of the Company's investment portfolio and hence its ability to promptly raise cash by selling the portfolio on the market in case of need. For this purpose, the Company has a set of investment risk limits that manage the concentration risk taking a number of dimensions, including asset class, counterparty and credit rating into consideration.

## C.4.2. RISK MANAGEMENT AND MITIGATION

The Company manages and mitigates Liquidity Risk in accordance with the framework set in the Group's internal regulations. The Company also aims to ensure its capacity to meet its commitments in adverse scenarios, while achieving its profitability and growth objectives. To this end, it manages expected cash inflows and outflows to maintain a sufficient available cash level to meet short- and medium-term needs, and by investing in instruments that can be quickly and easily converted into cash with minimum capital losses. The Company considers its prospective liquidity situation under plausible market conditions as well as under stressed scenarios.

The Company has established clear governance guidelines for Liquidity Risk measurement, management, mitigation and reporting in accordance with Group regulations. This includes the setting of specific limits and escalation processes should limits be breached or other liquidity issues arise.

The principles for Liquidity Risk management designed in the Liquidity Risk Management Policy and the Risk Appetite Framework are fully embedded in the Company's Strategic Planning as well as in business processes, including investments and product development. As far as the investment process is concerned, the Company has explicitly identified Liquidity Risk as one of the main risks connected with investments, and has stipulated that the strategic asset allocation process must rely on indicators strictly related to Liquidity Risk, including the mismatch of duration and cash flows between assets and liabilities. Investment limits have been imposed on the Company to ensure that the share of illiquid assets is kept within a level that does not impair the Company's asset liquidity. As far as product development is concerned, the Company follows the Life and P&C underwriting policies defining the principles to be applied to mitigate the impact on liquidity from lapses and surrenders in respect of the Life business and claims in respect of the Non-life business. No material changes occurred in this area in the last monitored period.

## C.4.3. EXPECTED PROFIT INCLUDED IN FUTURE PREMIUMS

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

The EPIFP amount underwritten by the Company has been calculated in accordance with Article 260(2) of the Delegated Acts and amounts to CZK 1.966 billion for Life business and CZK 1.162 billion for the P&C business at year-end 2017. In the case of Non-life

insurance, it is part of the premium provision discussed in Section D.2.2. The decrease in Non-life profit compared to last year (CZK 1.284 billion) is mainly driven by higher expenses and costs allocated to Non-life segments. The slight EPIFP increase for the Life business compared to last year (CZK 1.884 billion) was driven mainly by a risk-oriented portfolio increase.

## C.5. OPERATIONAL RISK

### C.5.1. RISK EXPOSURE AND ASSESSMENT

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

In line with industry practices, Generali Group has adopted the following classification categories:

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

Following best industry practices, the Company's framework for Operational Risk management includes its Loss Data Collection (LDC) and risk assessment and scenario analyses.

Loss Data Collection is the process of collecting losses from Operational Risk events and provides a backward-looking view on the Company's risk profile in Operational Risks.

Risk Assessment and Scenario Analysis provides a forward-looking view of the Company's risk profile in Operational Risk, and requires an analysis of the risks performed jointly with the business owners:

- Risk Assessment provides a high-level evaluation of the forward-looking inherent and residual risk exposure of the Company. The outcomes of the assessment drive the Scenario Analysis execution.
- Scenario Analysis is a recurring process that, considering the risk assessment results, provides a detailed evaluation of the Company's Operational Risk Exposure through the selection and evaluation of specific risk scenarios.

#### MAIN COMPANY RISKS

For the Company and the industry as a whole, one of the main Operational Risks arises from the implementation and correct interpretation of all requirements arising from new regulations that came into effect in 2018 or will come into effect in 2019. The Company is therefore strictly monitoring new requirements in customer data privacy and customer protection, and is taking the necessary actions to ensure full compliance with both regulatory requirements and security standards. The Company is also fully aware of Cyber Attack Risk, the relevance of which is increasing across the industry. Furthermore, the Company is aware of the significance of Client Fraud Risk, however thanks to a highly developed and structured detection system, the risk has been efficiently mitigated.

### C.5.2. RISK MANAGEMENT AND MITIGATION

To identify, measure, monitor and mitigate Operational Risk, a dedicated team within the Risk Management Function has been established with a mandate to steer the Operational Risk Framework. Risks related to non-compliance are monitored by the Compliance Function.

Furthermore, specific risks such as Financial Reporting Risk, IT Risk, Tax Risk, Fraud Risk and Corporate Security are investigated and managed jointly with specialized units within the first line of defense.

Overall, the Operational Risk Management System is primarily based on the assessment of risks by experts in different fields of Company operations, and collecting information on losses that have actually occurred. The outputs of these analyses are used to support investments in new or modified controls and mitigation actions to keep the level of Operational Risk within an acceptable range and to achieve better operational efficiency.

No material changes to this area have occurred since the last reporting period.

## C.6. OTHER MATERIAL RISK

As part of the Qualitative Risk Management Framework, the following risk categories are also considered:

- Reputational Risk refers to potential losses arising from deterioration in reputation or the negative perception of the Company among its customers, counterparties and supervisory authority. Processes in place to manage these risks are communication and media monitoring activities, corporate and social responsibility, customer relation and distribution management.
- Emerging Risk arises from new trends or risks difficult to perceive and quantify, although typically systemic. These usually include internal or external environment changes, social trends, regulatory developments, technological achievements, etc.
- Strategic Risk involves external changes and/or internal decisions that may influence the future risk profile of the Company.
- Contagion Risk derives from problems elsewhere within Generali Group that may affect the solvency or economic situation of the Company.

The above risks are identified and evaluated within the ORSA Process, in both current and forward-looking perspectives. These risks are not subject to the calculation of the SCR, however their impact on the financial and solvency conditions of the Company is estimated at least on a qualitative basis.

No material changes to this area have occurred since the last reporting period.

## C.7. ANY OTHER INFORMATION

To test the Company's solvency position and its resilience to adverse market conditions or shocks, a set of stress test and scenario analyses are performed within the ORSA Process. These are defined considering unexpected and potentially severe but plausible events across the risk categories. Examination of the potential effect on the Company's financial and capital position serves to outline appropriate management actions to take if such events were to materialize.

The Company also performs a sensitivity analysis that considers simple changes in specific risk drivers (e.g. interest rates, equity shock, credit spreads and interest rate volatility). Their main purpose is to measure the variability of the Own Funds and Solvency Ratio to variations in specific risk factors. The set chosen aims to provide an assessment of resilience to the most significant risks.

The impacts of the sensitivities are reported in Section E.

No material risks to this area have occurred since the last reporting period.

# D. Valuation for Solvency Purposes

## D.1. ASSETS

### D.1.1. GENERAL VALUATION FRAMEWORK

There were no material changes to the general valuation framework in comparison with the previous reporting period.

Solvency II clarifies the relationship between the SII valuation of assets and liabilities and the international accounting standards (IFRS) adopted by the European Commission. The primary objective for valuations as set out by Solvency II requires an economic, market-consistent approach to the valuation of assets and liabilities.

According to this approach, assets and liabilities are valued as follows:

i. Assets should be valued at the amount for which they could be exchanged between knowledgeable and willing parties in an arm's length transaction.
ii. Liabilities should be valued at the amount for which they could be transferred, or settled, between knowledgeable and willing parties in an arm's length transaction.

When valuing liabilities under point (ii), no adjustment to take account of the own credit standing of the insurance or reinsurance undertaking shall be made.

The IFRS accounting bases, such as the definitions of assets and liabilities and the recognition and derecognition criteria, are applicable as the default accounting framework, unless otherwise stated. The IFRS also refer to some basic presumptions that are equally applicable:

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

**Fair Value Measurement Approach**

Items shall be valued on an economic basis having IFRS as reference.

On this basis, the following hierarchy of high-level principles for the valuation of assets and liabilities is used:

Level 1 Inputs

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

A quoted instrument is an instrument negotiated on a regulated market or a multilateral trading facility. To assess whether a market is active or not, the Company carefully determines whether the quoted price really reflects the fair value. When the price has not changed for a long period or the Company has information about an important event that did not cause the price to change accordingly, the market is considered not active. An active market for an asset or liability is a market on which transactions for the asset or liability occur with sufficient frequency and volume to provide pricing information on an ongoing basis.

Level 2 Inputs

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

They include:

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

Level 3 Inputs

Level 3 inputs are commonly unobservable inputs for the asset or liability. Unobservable inputs are used to measure fair value to the extent that relevant market commonly observable market inputs are not available, thereby allowing for situations in which there is little, if any, market activity for the asset or liability at the measurement date. An entity develops unobservable inputs using the best information available in the circumstances, which might include the entity‘s own data, taking into account all information about market participant assumptions that is reasonably available.

Where possible, the Company tests the sensitivity of the fair values of Level 3 investments to changes in unobservable inputs to reasonable alternatives. Where possible, valuations for Level 3 investments are sourced from independent third parties and, where appropriate, validated against internally modelled valuations, third-party models or broker quotes.

**Valuation Techniques**

In some cases, a single valuation technique is sufficient, whereas in others, multiple valuation techniques are appropriate. The fair value of assets is determined using independent valuations provided by third parties. Exceptions are required or IFRS valuation methods are excluded only for some specific items.

Other information about methods and assumptions of financial assets valuation are disclosed in the Notes to the Financial Statements, Chapter C.

## Solvency II Specificities

In the Solvency II environment, fair valuations should generally be determined in accordance with the IFRS principles statement. Exceptions are required or IFRS valuation methods are excluded only for some specific items.

In particular, the exceptions refer to:

- goodwill and intangible assets;
- participations (or related undertakings);
- deferred taxes

### GOODWILL AND INTANGIBLE ASSETS

According to Solvency II, insurance and reinsurance undertakings shall value goodwill, deferred acquisition costs and intangible assets other than goodwill at zero, unless the intangible asset can be sold separately and the insurance and reinsurance undertaking can demonstrate that there is a quoted market price for the same or similar asset. Computer software tailored to the needs of the undertaking and ‘off the shelf’ software licenses that cannot be sold to another user shall also be valued at zero.

All intangible assets are valued at zero in the Company’s market value balance sheet.

### PARTICIPATIONS (OR RELATED UNDERTAKINGS)

Participation is constituted by share ownership or by the full use of a dominant or significant influence over another undertaking. The following paragraphs describe how participations can be identified. When classifying participation based on share ownership, directly or by way of control, the participating undertaking has to identify:

i. its percentage holding of voting rights, and whether this represents at least 20% of the potential related undertaking’s voting rights (paid-in ordinary share capital) and

ii. its percentage holding of all classes of share capital issued by the related undertaking and whether this represents at least 20% of the potential related undertaking’s issued share capital (paid-in ordinary share capital and paid-in preference shares).

Where the participating undertaking’s holding represents at least 20% in either case, its investment should be treated as a participation.

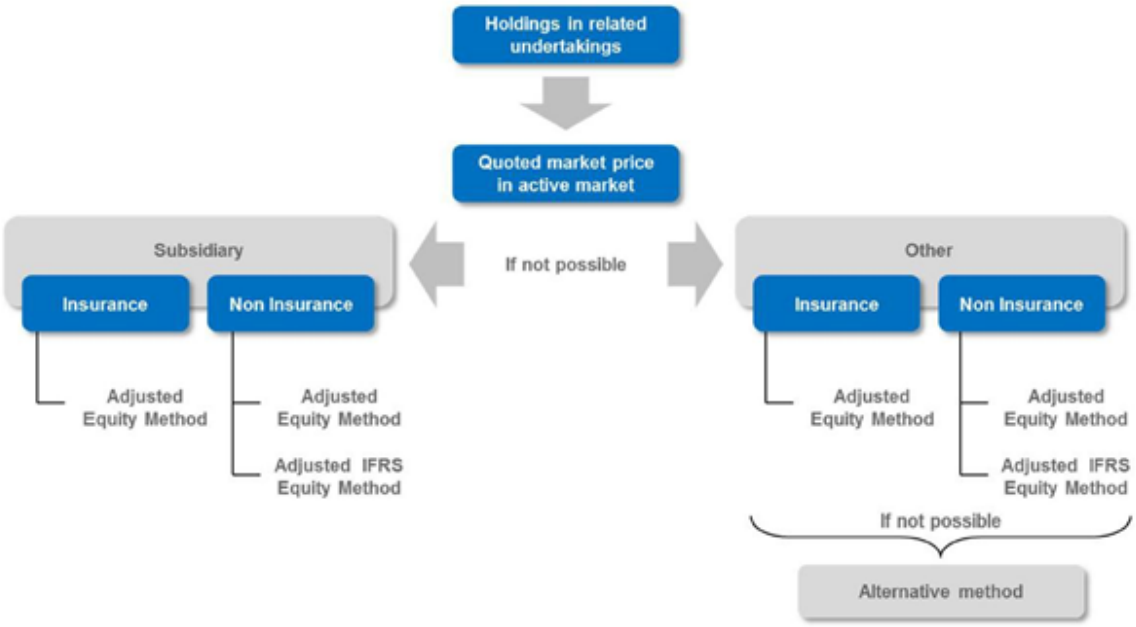
Valuation

For identification of participations, the IFRS concept of control and significant influence applies. As a result holdings are not limited to equity instruments. However, the measurement principles in IAS 27, IAS 28 and IAS 31 do not apply to the solvency balance sheet since they do not reflect the economic valuation required by the Solvency II Directive (Article 75).

Solvency II guidelines provide a hierarchy that shall be used to value holdings in related undertakings for Solvency purposes. The hierarchy consists of the following:

- quoted market price
- adjusted equity method (if no active market)
- IFRS equity method (if non-insurance)
- alternative techniques (if associates or joint-controlled entities)

The following figure shows the structure of this hierarchy.




## DEFERRED TAXES

In accordance with the IAS 12 statement, deferred tax liabilities are the income tax amounts payable in future periods in respect of taxable temporary differences, while deferred tax assets are the income tax amounts recoverable in future periods in respect of:

i. deductible temporary differences;
ii. the carry-forward of unused tax losses; and
iii. the carry-forward of unused tax credits.

### Valuation

The Solvency II regulatory framework states that in the SII balance sheet deferred tax assets and liabilities shall be recognized in accordance with International Accounting Standards (IAS 12).

In particular, deferred tax assets and liabilities - other than deferred tax assets (DTA) arising from the carry-forward of unused tax credits and the carry-forward of unused tax losses - should be determined on the basis of the difference between the values ascribed to assets and liabilities and the values ascribed to assets and liabilities as recognized and valued for tax purposes.

In other words, the deferred tax value has to be based on the difference in the value of the underlying assets and liabilities assumed in the valuation consistent with the Solvency II Directive and the value for tax purposes.

While a deferred tax liability (DTL) must be accounted for all temporary taxable differences, the recognition of a DTA is subject to conditions.

In particular, IAS 12 provides that the undertaking shall recognize a deferred tax asset for all deductible temporary differences to the extent that it is probable that taxable profit will be available against which the deductible temporary difference can be utilized.

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

In particular, with reference to investments in subsidiaries, associated companies, joint ventures and investment vehicles, and in accordance with IAS 12, Section 39, an enterprise shall recognize a deferred tax liability for all taxable temporary differences associated with investments in subsidiaries, branches and associates, and interests in joint ventures, except to the extent that both of the following conditions are satisfied:

The parent, investor or venturer is able to control the timing of the reversal of the temporary difference.

It is probable that the temporary difference will not reverse in the foreseeable future.

The table below presents the deferred tax assets and liabilities recognized by the Company.

| | DTA | | DTL | |
|---|---|---|---|---|
| | 2018 | 2017 | 2018 | 2017 |
| Intangible assets | 116,076 | 108,009 | 0 | 0 |
| Deferred acquisition costs | 231,464 | 209,356 | 0 | 0 |
| Insurance provisions and amount ceded to reinsurers from insurance provisions | 0 | 0 | 1,877,933 | 1,860,230 |
| Securities | 406,244 | 8,087 | 0 | 3,532 |
| Other | 73,595 | 73,080 | 14,372 | 69,842 |
| **Total** | **827,379** | **398,532** | **1,892,305** | **1,933,604** |

Since 1 January 2018, changes in the fair value of available-for-sale securities are newly recognized in equity following the amendment of Decree No. 502/2002. Newly there is therefore a deferred tax asset from AFS securities. Similarly as in prior years a material deferred tax asset was recognized from intangible assets, deferred acquisition costs and newly from securities. Deferred tax liabilities arise mostly from the difference between the tax value of Technical Provisions and the Technical Provisions calculated according to SII.

The deferred tax liability on receivables and payables relates mainly to the difference in reinsurance payables, which for SII purposes are adjusted to be consistent with the insurance provisions calculated according to SII principles.

No deferred tax asset relates to unused losses from the current or preceding period.

The expected time horizon for the reversal of temporary differences for intangible assets is three years (for which most of the intangible assets are amortized), one year for deferred acquisition costs and variable for securities. The expected time horizon for the reversal of temporary differences for insurance provision is the following:

| | Life | Non-life |
|---|---|---|
| Less than 1 year | 106,427 | 466,433 |
| 1-5 years | 253,322 | 275,819 |
| 5-10 years | 233,163 | 60,610 |
| More than 10 years | 406,616 | 75,543 |
| **Total** | **999,528** | **878,405** |

There are no unused losses from the current or preceding period to which the deferred tax relates. The probability of future taxable profits, to which the deferred tax asset can be utilized, is supported by the business plans, which are prepared for a three-year horizon and approved by the parent company.

## FINANCE AND OPERATING LEASING

Property and equipment holdings used by the Company under operating leases in which the risks and benefits relating to the ownership of the assets remain with the lessor are not recorded on the Company's statement of financial position. Payments made under operating leases to a lessor are recorded in the income statement on a straight-line basis over the lease term.

The Company does not use finance leases.

The table below shows details of operating lease agreements in which the Company is a lessee:

| Leasehold Assets Address | Start of Agreement | End of Agreement | Rent per Year 2018 | Rent per Year 2017 |
|---|---|---|---|---|
| Prague 4, Na Pankráci 1720/123 | 1.1.2009 | 31.12.2023 | 120,624 | 117,682 |
| Prague 4, Na Pankráci 1658/121 | 1.12.2008 | 31.12.2023 | 29,457 | 28,658 |
| Prague 4, Hráského 2231/25 | 21.8.2007 | 20.8.2019 | 7,378 | 7,371 |
| Brno, Purkyňova 2845/101 | 15.8.2007 | 31.12.2023 | 18,473 | 18,022 |
| Prague 4, Kaplanova 2252/8 | 10.8.2007 | 28.2..2020 | 3,709 | 3,218 |
| České Budějovice, Pražská 1280 | 13.8.2007 | 31.12.2023 | 5,245 | 10,235 |

The other 292 lease agreements (2017: 221 lease agreements) have rent per year lower than CZK 10 million, with total agreed rent of CZK 150 million (2017: CZK 137 million).

The table below shows details of operating lease agreements where the Company is the lessor:

| Address | Name | Start of Agreement | End of Agreement | Rent per Year 2018 | Rent per Year 2017 |
|---|---|---|---|---|---|
| Offices ČP | ČP Distribuce | 1.4.2017 | 31.12.2019 | 109,512 | 0 |
| Prague 4, Na Pankráci 1720/123 | Generali Pojišťovna a.s. | 1.10.2008 | 31.12.2018 | 5,049 | 5,049 |
| Prague 4, Na Pankráci 1658/121 | Generali CEE Holding B.V. | 18.10.2013 | 31.12.2018 | 6,394 | 6,394 |
| Prague 4, Hráského 2231/25 | Generali Shared Services Czech Branch | 1.6.2010 | 20.8.2019 | 3,749 | 6,804 |
| Prague 4, Na Pankráci 1720/123 | Penzijní společnost České pojišťovny, a.s. | 1.10.2012 | 31.12.2018 | 6,913 | 6,913 |

Another 87 lease agreements (2017: 310 lease agreements) have rent per year lower than CZK 6 million with total agreed rent of CZK 38 million (2017: CZK 136 million).

## D.1.2. DEVIATIONS FROM IFRS

By accepting the valuation methods defined in the IFRS, Solvency II anticipates that there are cases where IFRS valuation methods are not consistent with Solvency II requirements, requiring the valuation of balance sheet items at fair value. Solvency II excludes specific valuation methods such as cost or amortized cost, and models where value is determined at the lower of the carrying amount and fair value less costs to sell.

Furthermore, other valuation methods usually applied for specific assets or liabilities are to be excluded or are to be adjusted in the SII environment. The following applies:

- Properties, investment properties, plant and equipment shall not be valued at cost less depreciation and impairment.
- The net realizable value for inventories shall be adjusted by the estimated cost of completion and the estimated costs necessary to make the sale if these costs are material.
- Non-monetary grants shall not be valued at their nominal amount.

## D.1.3. RECONCILIATION OF SOLVENCY II VALUES AND FINANCIAL STATEMENTS

BALANCE SHEET

Year-on-year comparison of the Solvency II value

| Assets | 2018 | 2017 |
|---|---|---|
| Deferred acquisition costs | | |
| Intangible assets | | |
| Deferred tax assets | | |
| Property, plant and equipment held for own use | 87,225 | 113,176 |
| Investments (other than assets held for index-linked and unit-linked contracts) | 66,186,405 | 94,615,782 |
| Property (other than for own use) | | 6,369 |
| Holdings in related undertakings, including participations | 10,777,379 | 9,993,583 |
| Equities | 1,622,232 | 1,480,697 |
| Bonds | 49,389,108 | 77,722,093 |
| *Government bonds* | 27,446,909 | 31,774,101 |
| *Corporate bonds* | 21,195,348 | 45,188,652 |
| *Structured notes* | 506,353 | 527,127 |
| Collateralised securities | 240,498 | 232,213 |
| Collective Investments Undertakings | 4,128,862 | 4,945,700 |
| Derivatives | 268,824 | 467,340 |
| Deposits other than cash equivalents | | 0 |
| Assets held for index-linked and unit-linked contracts | 8,032,900 | 8,226,067 |
| Loans and mortgages | 23,273,855 | 956,640 |
| Reinsurance recoverables | 5,327,546 | 5,148,681 |
| Deposits to cedants | 562 | 1,308 |
| Insurance and intermediaries receivables | 1,067,288 | 1,102,873 |
| Reinsurance receivables | 295,295 | 202,041 |
| Receivables (trade, not insurance) | 903,551 | 1,414,581 |
| Cash and cash equivalents | 1,303,814 | 1,683,005 |
| Any other assets, not shown elsewhere | 3,796,369 | 4,382,053 |
| **Total assets** | **110,274,810** | **117,846,207** |

Movements on investments (other than assets held for index-linked and unit-linked contracts) reflects, apart from changes in holdings in undertakings, the investment activity driven by market conditions and investment policies. For details on changes in holdings in undertakings, including participations, please refer to Chapter A.1.

The significant increase in corporate bonds and, correspondingly, loans and mortgages is caused by the reclassification of reverse repo operations between these rows.

The year-on-year decrease in trade receivables is caused by the settlement of advances in the amount CZK 445 million for IT services, which was recorded in receivables as at year-end 2017.

| Assets | Solvency II value | Statutory accounts value | Note | Amount per financial statements | Mapping |
|---|---|---|---|---|---|
| Deferred acquisition costs | | 1,217,575 | Deferred acquisition cost valued at zero for SII | 1,217,575 | |
| Intangible assets | | 1,026,823 | Intangible assets valued at zero for SII | 1,026,823 | |
| Deferred tax assets | | 417,008 | | 417,008 | |
| Property, plant and equipment held for own use | 87,225 | 87,225 | | 110,659 | Art works shown are presented in Any other assets not elsewhere shown in SII |
| Investments (other than assets held for index-linked and unit-linked contracts) | 66,186,405 | 65,156,347 | | 63,425,196 | |
| Property (other than for own use) | | | | | |
| Holdings in related undertakings, including participations | 10,777,379 | 9,793,033 | Participations are valued at fair value for SII | 9,037,500 | Participation in Green Point Offices a.s is reported in the financial statements in Assets held for sale (shown in any other assets, not elsewhere shown) |
| Equities | 1,622,232 | 1,618,895 | | 1,618,895 | |
| Bonds | 49,389,108 | 49,346,733 | | 48,371,115 | |
| *Government bonds* | 27,446,909 | 27,446,910 | | 27,446,910 | |
| *Corporate bonds* | 21,195,348 | 21,152,972 | Some instruments are classified in the financial statements in Loans and receivables and valued at amortized cost, at fair value for SII. | 20,177,354 | In the financial statements they are classified in the FVTPL, AFS and loans categories. Some instruments are classified in the financial statements in Loans and receivables and valued at amortized cost |
| *Structured notes* | 506,353 | 506,353 | | 506,353 | |
| Collateralised securities | 240,498 | 240,498 | | 240,498 | |
| Collective Investments Undertakings | 4,128,862 | 4,128,862 | | 4,128,862 | |
| Derivatives | 268,824 | 268,824 | | 268,824 | |
| Assets held for index-linked and unit-linked contracts | 8,032,900 | 8,032,900 | | 8,032,900 | |
| Loans and mortgages | 23,273,855 | 23,281,854 | | 24,258,033 | See below |
| *Other loans and mortgages* | 23,273,855 | 23,281,854 | | 24,258,033 | Part of the balance is reported as deposits to cedants arising out of reinsurance operations in the financial statements<br>One instrument is presented as Loans in the financial statements |
| Reinsurance recoverables | 5,327,546 | 10,502,709 | Different valuation methodology | 10,502,709 | |
| Deposits to cedants | 562 | 562 | | 0 | The balance is reported as Other loans and mortgages in SII |
| Insurance and intermediaries receivables | 1,067,288 | 1,067,288 | | 1,998,692 | The balance sum represents receivables in the statutory financial statements<br>The difference in receivables (trade, not insurance) represents prepaid income taxes reported as Any other assets not elsewhere shown in SII. |
| Reinsurance receivables | 295,295 | 295,295 | | 2,346,690 | |
| Receivables (trade, not insurance) | 903,551 | 903,551 | | 935,117 | |

| | | | | |
|---|---|---|---|---|
| | | | | The difference in insurance and intermediaries and reinsurance receivables represents receivables not past due which are shown in SII reported in Any other assets not elsewhere shown. |
| Cash and cash equivalents | 1,303,814 | 1,303,814 | 1,303,814 | |
| Any other assets, not shown elsewhere | 3,796,369 | 3,796,378 | 1,514,113 | Participation in Green Point Offices a.s is reported in the financial statements in Assets held for sale (shown in any other assets, not elsewhere shown)<br>In the financial statements, receivables (trade, not insurance) from prepaid income taxes are reported under Any other assets not elsewhere shown in SII.<br>The difference in insurance and intermediaries and reinsurance receivables represents receivables not past due which are reported in Any other assets not elsewhere shown in SII.<br>Art works shown are presented in Any other assets not elsewhere shown in SII |
| **Total assets** | **110,274,810** | **117,089,329** | **117,089,329** | |

# D.2. TECHNICAL PROVISIONS

## D.2.1. LIFE TECHNICAL PROVISIONS

### OVERVIEW OF LIFE TECHNICAL PROVISIONS

The Solvency II Life Technical Provisions at the end of 2018 were calculated according to Articles 77 to 83 of the Solvency II Directive 2009/138/EC. In line with the Solvency II rules and the policy conditions, contract boundaries are applied to regularly paid accident riders. No future cash flows from this segment are projected/considered in the Life TP calculation.

The following table shows the Life Technical Provisions split into their main components: the Best Estimate of Liabilities, reinsurance recoverables net of the counterparty default adjustment, and Risk Margin.

| | 2018 | 2017 |
|---|---|---|
| BEL gross of reinsurance | 33,285,207 | 37,945,884 |
| Recoverables from reinsurance (before CDA) | (511,043) | (1,115,028) |
| Counterparty Default Adjustment (CDA) | 29,453 | 31,554 |
| BEL net of reinsurance | 32,803,617 | 36,862,410 |
| Risk Margin (RM) | 495,600 | 431,091 |
| **TP Net of reinsurance regulatory view** | **33,299,216** | **37,293,501** |

*** *positive signs represent a liability*

The main drivers of the Life TP movement in 2018 were:

- relocation of accident RBNS/IBNR reserves in the amount of CZK 1.762 billion to the Non-life segment, where this part is properly evaluated with non-life techniques
- the expected release of CZK 2.645 billion due to maturities and other payouts
- the decrease of CZK 540 million due to the negative investment return on unit-linked funds
- the increase of CZK 301 million caused by lower than expected surrender rates in 2018
- the decrease by CZK 200 million due to the decrease in the best estimate of morbidity and disability rates.

The Best Estimate of Liabilities corresponds to the average of the present values of expected future cash flows generated from contracts present in the Company portfolio, and therefore includes both a probabilistic assessment of their occurrence and an appropriate assessment of the time value of money, obtained on the basis of the risk-free interest rates as at 31 December 2018, as observed on the market and officially communicated by EIOPA. This curve (derived for the main markets and from interbank swap rates) includes both an adjustment to consider the residual default risk of these instruments (the Credit Risk Adjustment, for CZK amounting to -10bps) and an adjustment to consider the excess return achieved in a risk-free manner by the assets covering the insurance liabilities (the Volatility Adjustment, equal to +17bps for CZK).

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

Depending on the type of portfolio and the risk inherent in it, the expected future cash flows have been assessed in a deterministic scenario (i.e. a certainty equivalent scenario) or as the mean value of a set of stochastic scenarios, to allow the calculation of the cost of financial guarantees and contractual options. In the latter case, specific assumptions on future management decisions were also implemented in the actuarial platforms (so-called management actions, relating e.g. to future profit sharing) and the rational behavior of the insured (the so-called dynamic policyholder's behavior, which can impact the propensity to exercise options such as the surrender option).

The Best Estimate of Liabilities for the residual part of the portfolio (the majority are either matured and lapsed policies whose reserves are still in the books just waiting to be paid out) was revaluated using a simplified approach and assumed equal to the IFRS reserves.

As shown in the above table, the Best Estimate of Liabilities gross of reinsurance amounted to CZK 33.29 billion and mainly consists of insurance with profit participation, mostly including old savings products in run-off and the traditional part of hybrid products.

Only 1.5% of gross BEL is transferred via reinsurance outside the Company, and the reinsurance recoverables net of the counterparty default adjustment related to these contracts amounted to CZK 482 million. The reinsurance recoverables were evaluated by means of appropriate projections of cash flows expected from reinsurance contracts and adjusted using the counterparty default adjustment to take account of the risk of default of the reinsurer.

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

The capital requirement needed to cover non-hedgeable risk was determined using the Internal Model. The rate used to determine the Cost of Capital is 6% per annum. The Cost of Capital for each projection year was discounted as at the valuation date using the term structure of interest rates without the Volatility Adjustment. The Risk Margin is calculated net of reinsurance in line with regulation. The future projection of the capital requirement needed to cover the non-hedgeable risks and its allocation by Line of Business was carried out by means of suitable risk drivers applied to the capital required in respect of each risk included in the Risk Margin calculation.

As at 31 December 2018, the Risk Margin associated with Česká pojišťovna life insurance contracts was CZK 496 million.

The total value of the Solvency II Life Technical Provisions of Česká pojišťovna as at 31 December 2018, calculated as the sum of the Best Estimate of Liabilities net of reinsurance and Risk Margin, amounted to CZK 33.3 billion.

The following table reports the amount of the Solvency II Life Technical Provisions split by Lines of Business:

- Insurance with profit participation
  - Traditional endowment products (including some Life risk riders)
  - A guaranteed savings part and Life risk riders unbundled from ‘hybrid‘ products
  - A declared interest rate part unbundled from ‘hybrid’ products
- Unit-linked - contracts without options and guarantees
  - Pure UL products (mostly single paid)
  - A UL part unbundled from ‘hybrid‘ products
- Other - contracts without options and guarantees
  - Pure risk products
  - All life risk riders unbundled from the new generation of hybrid products
  - Accident riders (with future premiums subject to contract boundaries)
- Annuities stemming from non-life obligations
  - MTPL and TPL annuities (RBNS reserve only).

Life Technical Provisions by Line of Business

| | 2018 | 2017 | % weight |
|---|---|---|---|
| **Total** | **33,299,216** | **37,293,501** | **100.0%** |
| Life | 33,299,216 | 37,293,501 | 100.0% |
| Health | 0 | 0 | 0.0% |

**** positive signs represent a liability*

| | 2018 | % weight | 2017 | % weight |
|---|---|---|---|---|
| **Total** | **33,299,216** | **100.0%** | **37,293,501** | **100.0%** |
| Insurance with profit participation | 25,173,050 | 75.6% | 27,314,682 | 73.2% |
| UL - Contracts without options and guarantees | 7,858,984 | 23.6% | 8,012,922 | 21.5% |
| UL - Contracts with options and guarantees | - | 0.0% | - | 0.0% |
| Other - Contacts without options and guarantees | (554,046) | -1.7% | 1,036,254 | 2.8% |
| Other - Contacts with options and guarantees | - | 0.0% | - | 0.0% |
| Annuities stemming from non-life obligations | 821,228 | 2.5% | 929,643 | 2.5% |
| Accepted reinsurance with profit participation | - | 0.0% | - | 0.0% |
| Accepted reinsurance UL contracts | - | 0.0% | - | 0.0% |
| Accepted reinsurance other contract | - | 0.0% | - | 0.0% |
| Accepted reinsurance annuities stemming from non-life obligations | - | 0.0% | - | 0.0% |
| SLT HEALTH - with options and guarantees | - | 0.0% | - | 0.0% |
| SLT HEALTH - without options and guarantees | - | 0.0% | - | 0.0% |
| SLT HEALTH - Annuities stemming from non-life obligations | - | 0.0% | - | 0.0% |
| SLT HEALTH - Accepted | - | 0.0% | - | 0.0% |

**** positive signs represent a liability*

Česka pojištovna’s Solvency II Life Technical Provisions net of reinsurance mainly consist of insurance with profit participation, which mostly includes old products in run-off and traditional parts of hybrid products (including some life risk riders).

The following table compares the Technical Provisions reported in the financial statements with the Solvency II Life Technical Provisions at the end of 2018.

| | IFRS | Solvency II | Delta |
|---|---|---|---|
| Gross reserves/BEL gross | 38,624,191 | 33,285,207 | 5,338,984 |
| Ceded reserves/Reinsurance recoverables | (481,233) | (481,591) | (385) |
| Risk Margin | | 495,600 | (495,600) |
| **Net Reserves/Net TP** | **38,142,958** | **33,299,216** | **4,843,769** |

The difference between the statutory reserves and Solvency II Life Technical Provisions is due to the substantial methodological differences between the two approaches, making a comparison between the two amounts not informative of the adequacy of the current reserving basis. The Solvency II assessment, in fact, considers the future cash flows projected taking account of best estimate assumptions, future profit sharing (financial and technical), and the financial cost of the guarantees, using the current structure of interest rates as the discount rate. Instead, the valuation of the technical liabilities in the statutory balance sheet uses the assessments of the Technical Provisions calculated in accordance with local accounting principles, and thus generally applies demographic pricing assumptions, discounts the contractual flows at the technical rate defined at the issue of the contract and, in general, does not consider any future financial profit share on unrealized gains/losses in force at the valuation date.

More specifically, the main differences between the two evaluations are attributable to the following items:

- Cash flows resulting from premiums, future expenses and contractual options:
  - Premiums: statutory reserves are usually calculated using pure premiums (i.e. loadings are excluded from the calculation); conversely, in the Solvency II valuation all premiums collected are considered;
  - Expenses: typically, future costs are excluded from the assessment of statutory reserves or, depending on the type of product, they are measured indirectly by means of the provision of loadings collected in the past (management reserves). In contrast, the Solvency II valuation includes the best estimate of the present value of the costs that will be incurred by the Company to fulfil all contractual obligations.
  - Contractual options: typically, the calculation of statutory reserves does not consider the probability of the insured's exercise of contractual options such as surrenders or failure to pay premiums; conversely, these elements are appropriately considered in Solvency II.
- Operating assumptions: the reserves reported in the statutory financial statements are generally valued using conservative operating assumptions (or first order), while the technical reserves of Solvency II are valued using best estimate assumptions (or second order).
- Economic assumptions: the Solvency II Technical Provisions are valued using the current economic framework both in terms of interest rate curves and the market values of backing assets. In practice, this affects:
  - projected economic returns and, consequently, future policyholder bonuses included in future cash flows;
  - interest rates used for discounting.
  - In contrast, financial statement reserve cash flows typically do not consider future policyholder bonuses and are discounted by means of technical interest rates defined at the inception of the contract.
- Methodology used to evaluate the business with profit sharing and guarantees: for this type of contract, Solvency II technical reserves are valued using stochastic actuarial platforms that capture a wide spectrum of possible financial scenarios and thus allow for the explicit assessment of the cost options and guarantees held by the insured. In contrast, statutory reserves do not include the assessment of that cost.
- Counterparty default adjustment: unlike statutory valuation, the amount of Solvency II reinsurance recoverables is adjusted to take into account the probability of default of the counterparty.
- Risk Margin: unlike statutory reserves, Solvency II includes an explicit assessment of the amount to be held against non-hedgeable risks.

The following table compares the gross Technical Provisions reported in the financial statements with the Solvency II gross Life best estimate at the end of 2018 in detail on Lines of Business.

| | IFRS | Solvency II | Delta |
|---|---|---|---|
| Insurance with profit participation | 28,795,107 | 24,876,518 | 3,918,589 |
| UL - Contracts without options and guarantees | 7,999,027 | 7,828,134 | 170,892 |
| Other - Contacts without options and guarantees | 607,225 | (621,858) | 1,229,083 |
| Annuities stemming from non-life obligations | 1,222,832 | 1,202,412 | 20,419 |

The difference between the Technical Provisions in the financial statements and the Solvency II Life Technical Provisions varies according to Line of Business. Almost all above described sources are relevant for insurance with profit participation (except those caused by the market value of assets covering reserves). Conversely, difference for UL – Contracts without options and guarantees is given only by the different costs and fees for fund management from/to the Company taken into account.

### SOURCES OF UNCERTAINTY

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

The assumptions used are stable in the long term and we did not experience any significant fluctuations during 2018. In recent years, we have seen improvements in surrender rates and increased stability in disability and morbidity rates assumptions (leading to the replacement of conservative estimates with actual claims data).

The following table shows the sensitivity of the gross Best Estimate of Liabilities under Solvency II at the end of 2018 to changes in individual assumptions.

| | Gross Best Estimate of Liabilities | Delta | Delta % |
|---|---|---|---|
| Expenses -10% | 32,750,973 | (534,234) | -1.6% |
| Expenses +10% | 33,819,441 | 534,234 | 1.6% |
| Life Lapse -10% | 33,150,455 | (134,752) | -0.4% |
| Life Lapse +10% | 33,414,883 | 129,676 | 0.4% |
| Mortality -10% | 33,135,866 | (149,341) | -0.4% |
| Mortality +10% | 33,433,360 | 148,154 | 0.4% |
| Longevity -10% | 33,338,986 | 53,779 | 0.2% |
| Longevity +10% | 33,235,820 | (49,387) | -0.1% |
| Morbidity and Disability -10% | 33,197,373 | (87,833) | -0.3% |
| Morbidity and Disability +10% | 33,373,019 | 87,812 | 0.3% |

The underwriting parameters only slightly affect the Česká pojišťovna portfolio. The most relevant operating factor is the Expense Risk, which affects the whole portfolio. A variation of 10% in the expense assumptions changes the Best Estimate of Liabilities by about 1.4%. The other operating assumptions have a relatively small effect on the TP due to the application of contract boundaries (CB) on accident and daily allowance riders. Without the application of CBs, the surrender assumptions and morbidity assumptions would generate a high material impact on the TP.

The changes in economic assumptions have a relatively high impact on the Best Estimate of Liabilities value, nevertheless the market value of assets covering life reserves is also affected at the same time. The absorption capacity of liabilities versus the change in assets value is 160% in the case of the interest rate and 62% in the case of the change in equity value. The final impact on the Solvency Capital Requirement is therefore lower. The impacts resulting from possible changes relating to the economic environment is reported in the dedicated Section E of this document.

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

The valuation of the Best Estimate of Liabilities has been performed using the Volatility Adjustment (as referred to in Article 77d of Directive 2014/51/EU) provided by EIOPA for CZK and equal to 17bps at year-end 2018. A change of the Volatility Adjustment to zero would correspond to an increase of CZK 306 million in the life Technical Provisions of Česká pojišťovna.

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

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

## D.2.2. P&C TECHNICAL PROVISIONS

### OVERVIEW OF P&C TECHNICAL PROVISIONS

The P&C Technical Provisions related to

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

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

$$TP = BEL + RM$$

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

**Outstanding Claims Reserve**

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

- The BEL of the un-modelled and semi-modelled business (the Line of Business or part of a Line of Business which, for various reasons, e.g. lack of adequate, appropriate and complete data or due to inhomogeneity of the business, has not been analyzed using actuarial methods) has been calculated using IFRS figures. Un-modelled and semi-modelled business represents approximately 10.9% of IFRS provisions and contains mainly provisions for bonuses and accepted reinsurance business.
- The BEL of the modelled business (the business which, thanks to the availability of adequate, appropriate and complete data, has been analyzed in detail using actuarial methods) has been assessed using the following steps:

*Claims and Grouping*

To perform an appropriate actuarial analysis of the Technical Provisions and to carry out ultimate cost projections, historical claims data on a paid and incurred basis (gross of contractual and facultative reinsurance) have been taken into account. The development data used for these purposes fulfil the appropriate quality attributes of proportionality, materiality and completeness.

Each portfolio is selected to identify homogeneous groups of risks, types of coverage and other specificities such as the length and the variability of the claims run-off. The minimum level of granularity adopted considers the split between types (direct business, proportional accepted business, non-proportional accepted business), and in each category identifies twelve Lines of Business (workers' compensation; medical expenses; income protection; motor vehicle liability; other motor; marine, aviation and transport; fire and other damage to property; general liability; credit and suretyship; legal expenses; assistance; miscellaneous financial loss). Where necessary, a more granular segmentation of the portfolio is used, especially in the case of property, liability and motor insurance. Where reasonable, claims have been split depending on their size and significance into attritional, large and extremely large claims, and the analysis has been done separately for each claims type. In addition, annuity claims are also treated separately.

Starting from 2018, Outstanding Claims Reserves coming from accident life riders are revaluated in Non-life as part of Solvency II LoB Income Protection using the standard non-life actuarial methods described below.

*Expenses*

The reserve for Loss Adjustment Expenses (LAE) consists of two parts. The reserve for expenses directly arising from a particular compensation case (Allocated Loss Adjustment Expenses (ALAE)) is treated as part of claims costs. The reserve for expenses not directly arising from a particular compensation case (Unallocated Loss Adjustment Expenses (ULAE)) is related to the whole package of services offered by an insurance company and is not automatically associated with a specific claim. A simplified approach is used to derive the ULAE reserve that is assumed to be proportional to the UBEL (Undiscounted Best Estimate of Liabilities) of the Line of Business (i.e., $ULAE\ reserve = R \cdot UBEL$), where *R* is estimated based on recent experience.

*Inflation*

Historical data on claims paid and outstanding include the outcomes of observed inflation, in its two exogenous and endogenous components. The inflation environment in the Czech Republic is considered stable enough to project UBEL from historical data, which means that inflation is already embedded in the projections.

Actuarial Methods

The actuarial methods used for projecting the experienced history of claims and provisions are the ones implemented in the Group reserving tool (ResQ) and described in the Generali Group methodology paper. The following methods have been considered for attritional and large claims in particular:

- The Link Ratio Method on paid (or Development Factor Models - DFM) is a generalization of the Chain Ladder method, based on an analysis of cumulative payments over years. This class of methods is based on the hypothesis that the settlement process is stable across origin periods;
- The Link Ratio Method on incurred technically works like the previous one but is based on incurred developments, i.e. the sum of cumulative paid and outstanding amounts;
- The Bornhuetter-Ferguson method on paid or incurred combines the projected ultimate (obtained e.g. by means of a Development Factor method) with an alternative (a priori) value using a weighted credibility approach;
- The Cape Cod method on paid or incurred which, similarly to the Bornhuetter-Fergusson method, combines already emerged claims with expected claims to be paid or reported late, is based on assumptions derived from the emerged proportion of claims;
- The Frequency Severity method combines projections of the expected number of claims and expected average claims, where ultimate claims are the product of these two items;
- The Incremental Loss Ratio method on paid or incurred, also known as the Additive method, expects stable development in the contribution to the loss ratio across origin periods.

An analysis using more than one of the methods listed above was performed to confirm the results.

The best estimate assessment for annuities stemming from P&C contracts is performed separately for annuities in payment (i.e. RBNS – reported but not settled - annuities), treated with life techniques, and for annuities that could emerge in the future from non-annuity claims (i.e. IBNR – incurred but not reported – annuities). The BEL for the IBNR annuities is assessed using the frequency/severity approach.

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

#### Net Evaluation

In general, less risky portfolios are covered by a 40% - and more risky portfolios by a 70% - quota share. In addition to this, Lines of Business exposed to the risk of large single claims, such as MTPL or large risk portfolios in property and liability insurance, are covered by XL treaties. The reinsurance share on IFRS claims provisions is mostly represented by a quota share, hence a feasible simplification is used for the net evaluation of UBEL. For each homogeneous group of risks, UBEL net of reinsurance is calculated adopting the following simplified approach:

$$UBEL_{net}^{OC} = UBEL_{gross}^{OC} \cdot \%NG$$

where %NG indicates the percentage of the IFRS net Outstanding Claims Reserve on the IFRS gross Outstanding Claims Reserve.

The valuation of the best estimate net of reinsurance is performed taking into account an adjustment for the expected losses due to default of the reinsurance counterparties (counterparty default risk adjustment).

### Premiums Reserve

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

- a claims related component: the amount of the unearned premium provisions derived from IFRS is multiplied by a specific measure of the current year loss ratio, aiming to remove the effect of the adequacy of the estimated UBEL of the Outstanding Claims Reserve (OCR);
- an administration-expenses related component: the amount of the unearned premium provisions derived from IFRS is multiplied by a specific measure of the administration expense ratio to represent the expected part due to expenses stemming from existing contracts.

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

- cash inflows arising from future premiums;
- cash outflows arising from future claims, net of salvage and subrogation, including allocated and unallocated claims adjustment expenses;
- cash outflows arising from administration expenses in respect of claims occurring after the valuation date as well as costs arising from ongoing administration of in-force policies and acquisition costs, insofar as they are related to the considered portfolio.

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

### Discounting

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

### Risk Margin

The Risk Margin is added to the BEL to derive a market-consistent liabilities value. This captures the economic value of non-hedgeable risks (reserving, pricing, catastrophe, counterparty default and operational) to ensure that the Technical Provisions value is equivalent to the amount that an insurance company would be expected to require to take over and meet the insurance obligations. The Risk Margin is calculated with a Cost of Capital (CoC) approach at the Line of Business level taking the diversification benefits between risk types and Lines of Businesses into account.

### Fair Value of Outstanding Claim Reserve - Total

| | 2018 | 2017 | Change | Change % |
|---|---|---|---|---|
| **Gross IFRS Reserve** | **17,131,497** | **14,909,907** | **2,221,590** | **15%** |
| **Best Estimate of liabilities gross of reinsurance** | **9,859,691** | **7,927,843** | **1,931,847** | **24%** |
| Recoverables from reinsurance after CDA | (4,715,833) | (3,776,836) | (938,997) | 25% |
| Best Estimate of Liabilities Net of Reinsurance | 5,143,858 | 4,151,007 | 992,850 | 24% |
| Risk Margin | 392,916 | 301,565 | 91,351 | 30% |
| **Technical Provisions Net of Reinsurance** | **5,536,773** | **4,452,572** | **1,084,201** | **24%** |

The increase in IFRS claims reserves in major Lines of Business was mainly caused by the following factors:

- outstanding Claims Reserves from accident life riders are newly revaluated as part of Solvency II LoB NL Income Protection
- the increase in business volume in the motor leasing segment and the corresponding increase in IFRS claims reserves
- the increase in the RBNS reserve in already reported claims in accepted reinsurance business

The Best Estimate increased mainly in line with the movement of IFRS reserves. In the case of Other Motor, BEL rose more significantly due to less favorable development in paid claims compared to expectations. Furthermore, there was a decrease in the prudency of IFRS reserves in motor third party liability, due to the longer experience with the new Civil Code and the corresponding decrease in uncertainty as regards the settlement process for bodily injury claims. On the other hand, the year-on-year change in the risk-free rate decreased the Best Estimate of Liabilities, particularly short-term Lines of Business.

The Risk Margin was higher in 2018 compared to 2017, mainly due to the higher Reserving Risk, especially as a result of the inclusion of accident Life riders.

**Fair Value of Outstanding Premium Reserve – Total**

| | 2018 | 2017 | Change | Change % |
|---|---|---|---|---|
| **Gross IFRS Reserve** | **5,164,453** | **5,088,622** | **75,830** | **1%** |
| **Best Estimate of Liabilities Gross of Reinsurance** | **1,675,044** | **1,764,808** | **(89,763)** | **-5%** |
| Recoverables from reinsurance after CDA | (130,122) | (288,371) | 158,249 | -55% |
| Best Estimate of Liabilities Net of Reinsurance | 1,544,922 | 1,476,437 | 68,485 | 5% |
| Risk Margin | 152,660 | 134,352 | 18,308 | 14% |
| **Technical Provisions Net of Reinsurance** | **1,697,582** | **1,610,789** | **86,793** | **5%** |

The IFRS Premium Reserves increased, mainly due to the growing motor business. The decrease in the Best Estimate of Liabilities was mainly caused by the favorable loss ratio in property insurance, where the biggest part of unearned premium reserves and future premium is allocated. On the other hand, the increase in the Best Estimate of Liabilities in motor third party liability was caused by an increase in the expected loss ratio (unfavorable development in 2018) and in the case of Other Motor the higher IFRS value (business volume increase). A different trend is visible in Credit and Suretyship, where business volume as well as IFRS reserve and best estimate decreased.

The Risk Margin is quite stable - the increase is mainly visible due to slightly higher CAT Risks (for more details about movements in Non-life Underwriting Risk, please refer to Section C.1.2).

**Fair Value of Outstanding Claims Provisions**

| Line of business | IFRS reserves Net of Reinsurance | BEL Net of Reinsurance after CDA | Risk Margin | TP Net of Reinsurance |
|---|---|---|---|---|
| **Total** | **9,114,729** | **5,143,858** | **392,916** | **5,536,773** |
| **Direct Insurance** | **8,613,212** | **4,677,430** | **337,340** | **5,014,770** |
| Non-life Motor | 5,113,770 | 2,542,120 | 256,494 | 2,798,614 |
| Non-life Non-motor excl. AHD | 2,125,333 | 1,251,000 | 61,959 | 1,312,959 |
| Accident, Health and Disability | 1,374,110 | 884,311 | 18,887 | 903,198 |
| **Accepted Insurance** | **501,474** | **461,892** | **37,493** | **499,386** |
| Non-life Motor | 16,884 | 16,282 | 569 | 16,851 |
| Non-life Non-motor excl. AHD | 484,178 | 445,214 | 36,908 | 482,122 |
| Accident, Health and Disability | 412 | 397 | 16 | 413 |

The most important segment of Outstanding Claims Provision reserves is the motor business, where a decrease in reserving prudency (described above) was observed.

**Fair Value of Premium Provisions**

| Line of business | IFRS reserves Net of Reinsurance | BEL Net of Reinsurance after CDA | Risk Margin | TP Net of Reinsurance |
|---|---|---|---|---|
| **Total** | **3,159,745** | **1,544,922** | **152,660** | **1,697,582** |
| **Direct Insurance** | **3,117,522** | **1,529,987** | **150,608** | **1,680,595** |
| Non-life Motor | 1,304,163 | 854,204 | 66,077 | 920,281 |
| Non-life Non-motor excl. AHD | 1,778,305 | 656,651 | 84,107 | 740,757 |
| Accident, Health and Disability | 35,054 | 19,133 | 424 | 19,557 |
| **Accepted Insurance** | **42,223** | **14,935** | **2,053** | **16,987** |
| Non- life Motor | 0 | 0 | 0 | 0 |
| Non-life Non-otor excl. AHD | 42,167 | 14,838 | 2,050 | 16,888 |
| Accident, Health and Disability | 56 | 97 | 3 | 100 |

The most important segment of Premium Provision reserves is the property business, followed by the motor third party liability business and other motor.

No significant changes in the methodology used for the calculation of the fair value of the Outstanding Reserve were undertaken in comparison to the previous year.

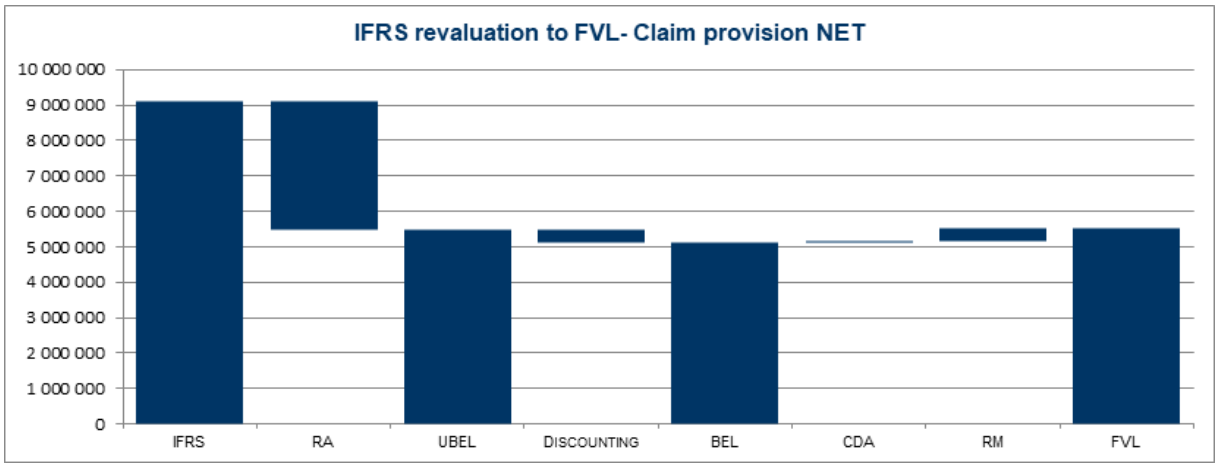
## P&C TP COMPARISON WITH RESERVES

Similar actuarial methods are used for setting both IFRS IBNR and UBEL, but the parameters used for the IFRS IBNR calculation include obvious prudence. Therefore, IFRS outstanding provisions are held at a higher level than UBEL to be able not only to cover the mean expected value of unsettled claims, but also to be able to absorb possible negative deviations in claims run-off. Such deviations can be caused by higher counts of late reported claims, by higher than average severity, or by unfavorable developments in already-reported claims in a given calendar year. The random behavior of claims developments requires the maintenance of an uncertainty margin in IFRS provisions. Consequently, this margin represents the difference between UBEL and IFRS. The size of this margin is monitored and remains within a reasonable range considering the risk appetite of the Company.

Below, you can find a decomposition of the revaluation process for Technical Provisions:

**Revaluation process: from IFRS to Fair Value - Claim Provision**

| (CZK thousand) | IFRS | Reserve Adequacy | UBEL | Discounting effect | BEL | Expected Default | Risk Margin | FV Liabilities |
|---|---|---|---|---|---|---|---|---|
| Total OC NET | 9,114,729 | 3,636,508 | 5,478,221 | 368,406 | 5,109,815 | 34,043 | 392,916 | 5,536,773 |



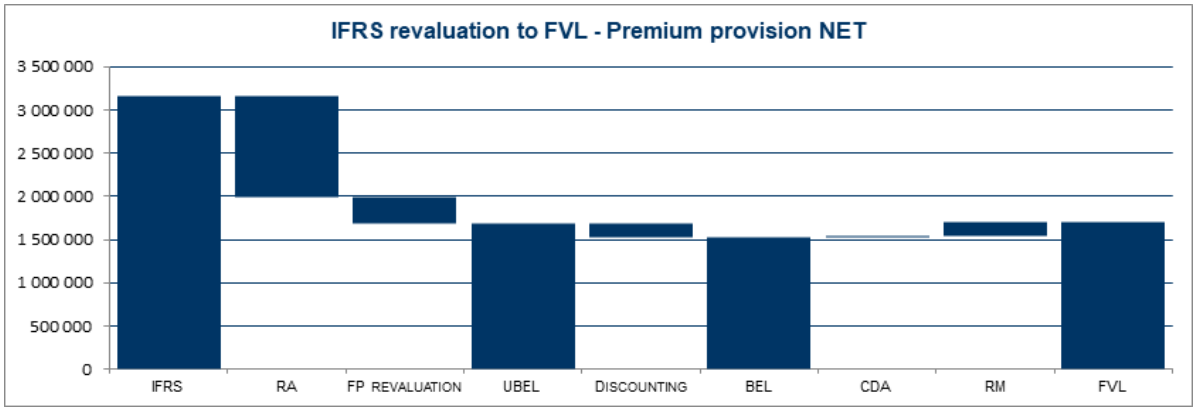

IFRS UP provisions are booked on a pro rata temporis accounting principle reflecting the unearned part of the written premium proportional to the not-yet-due part of the period for which the premium was written. This is done individually for each insurance policy. Contrary to this, Solvency II principles require the evaluation of a premium provision as the difference between future outflows (claims and expenses) and future inflows (premium). This means that the IFRS approach is not strictly dependent on the profitability of the business (only in the case of premium insufficiency), whilst the evaluation according to Solvency II principles is strictly driven by loss and expense assumptions. In addition, only the written part of the premium can serve as the basis for the recognition of unearned premiums in IFRS, but Solvency II

principles require the inclusion of future premiums coming from contracted business that have not yet been written. This includes future instalments of policies in force and premiums from already contracted policies with future inception.

Below, you can find a decomposition of the revaluation process for premium reserves:

**Revaluation process: from IFRS to Fair Value - Premium Provision**

| (CZK thousand) | IFRS | Reserve Adequacy | FP revaluation | UBEL | Discounting effect | BEL | Expected Default | Risk Margin | FV Liabilities |
|---|---|---|---|---|---|---|---|---|---|
| Total UP NET | 3,159,745 | 1,169,869 | (297,664) | 1,692,212 | 160,365 | 1,531,846 | 13,076 | 152,660 | 1,697,582 |




## SOURCES OF UNCERTAINTY AND SENSITIVITY ANALYSES

Two kinds of sources of uncertainty are embedded in the Technical Provisions. The first arises from the essence of the insurance business and is represented by the randomness of the process of claims occurrence and reporting. This is monitored by actuaries through the construction of stochastic scenarios resulting in the distribution of possible claims run-off results. The highest uncertainty is experienced in Lines of Business that include large risks (mainly corporate property). IFRS reserves are currently set at a level so that the Company is able to cover deviation from Undiscounted BEL with a return period higher than 20 years.

The second type of uncertainty is represented by external factors such as claims inflation, interest rates and changes in legislation. These factors are not driven by the Company, but their impact can be reduced by ongoing monitoring of the market and legal environment, and early identification or even anticipation of possible changes. Sensitivity analyses of external factors are performed by the Company. A decrease in the risk-free rate of 20 basis points would result in a BEL increase of 0.63%.

The biggest uncertainty is still expected in regard to the ultimate effect of the New Civil Code (NCC). This change in legislation affects compensation in liability insurance, especially in the case of bodily injuries. The NCC came into force on 1 January 2014. Although developments in this area seem to be favorable, the settlement processes and court practice have still not been stabilized. Insufficient experience with such a big change presents a significant source of uncertainty in UBEL evaluation. The reserving process is closely monitored throughout the Company.

The Company reduces the risk of volatility risk through diversification and reinsurance. Providing a wide portfolio of insurance products mitigates the relative impact of unfavorable developments from run-off in individual Lines of Business. A properly chosen reinsurance structure, including quota share and XL treaties, helps limit the absolute impact of potential negative run-off. The current reinsurance setup mitigates Reserving Risk by almost 40%.

## LONG-TERM GUARANTEE MEASURES (VOLATILITY ADJUSTMENT AND TRANSITIONAL MEASURES)

Neither transitional measures nor matching adjustments were applied during the calculation of the best estimates of Technical Provisions. A volatility adjustment was applied by the Company. Swap risk-free rates were used in line with EIOPA guidance. The spot curve is presented in following table.

The usage of a volatility adjustment decreased the net BEL by 0.5%, or CZK 61.3 million. The total revaluation reached by discounting the TP was CZK 902 million.

**Risk Free Rate used at 2018YE**

| Run-Off Period | Interest Rate wo VA | Volatility Adjustment | Interest Rate with VA |
|---|---|---|---|
| 1 | 2.0% | 0.2% | 2.1% |
| 2 | 1.9% | 0.2% | 2.1% |
| 3 | 1.8% | 0.2% | 2.0% |
| 4 | 1.8% | 0.2% | 1.9% |
| 5 | 1.7% | 0.2% | 1.9% |
| 6 | 1.7% | 0.2% | 1.8% |
| 7 | 1.6% | 0.2% | 1.8% |
| 8 | 1.6% | 0.2% | 1.8% |
| 9 | 1.6% | 0.2% | 1.8% |
| 10 | 1.7% | 0.2% | 1.8% |

| Run-Off Period | Interest Rate wo VA | Volatility Adjustment | Interest Rate with VA |
|---|---|---|---|
| 11 | 1.7% | 0.2% | 1.8% |
| 12 | 1.7% | 0.2% | 1.9% |
| 13 | 1.7% | 0.2% | 1.9% |
| 14 | 1.7% | 0.2% | 1.9% |
| 15 | 1.8% | 0.2% | 1.9% |
| 16 | 1.8% | 0.2% | 2.0% |
| 17 | 1.9% | 0.2% | 2.0% |
| 18 | 1.9% | 0.2% | 2.1% |
| 19 | 2.0% | 0.2% | 2.1% |
| 20 | 2.0% | 0.2% | 2.2% |

| Run-Off Period | Interest Rate wo VA | Volatility Adjustment | Interest Rate with VA |
|---|---|---|---|
| 21 | 2.1% | 0.2% | 2.2% |
| 22 | 2.1% | 0.1% | 2.3% |
| 23 | 2.2% | 0.1% | 2.3% |
| 24 | 2.2% | 0.1% | 2.4% |
| 25 | 2.3% | 0.1% | 2.4% |
| 26 | 2.3% | 0.1% | 2.5% |
| 27 | 2.4% | 0.1% | 2.5% |
| 28 | 2.4% | 0.1% | 2.5% |
| 29 | 2.5% | 0.1% | 2.6% |
| 30 | 2.5% | 0.1% | 2.6% |

| Run-Off Period | Interest Rate wo VA | Volatility Adjustment | Interest Rate with VA |
|---|---|---|---|
| 31 | 2.5% | 0.1% | 2.7% |
| 32 | 2.6% | 0.1% | 2.7% |
| 33 | 2.6% | 0.1% | 2.7% |
| 34 | 2.7% | 0.1% | 2.8% |
| 35 | 2.7% | 0.1% | 2.8% |
| 36 | 2.7% | 0.1% | 2.8% |
| 37 | 2.8% | 0.1% | 2.9% |
| 38 | 2.8% | 0.1% | 2.9% |
| 39 | 2.8% | 0.1% | 2.9% |
| 40 | 2.8% | 0.1% | 2.9% |

## D.3. OTHER LIABILITIES

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

There were no material changes to the general valuation framework in comparison with the previous reporting period.

#### EXCLUSION OF IFRS VALUATION METHODS

In this chapter, an overall description of the SII valuation methods for liabilities other than Technical Provisions is given, complementary to the general valuation for solvency purposes (Section D - Introduction).

Solvency II, in accepting the valuation methods defined in IFRS, anticipates that there are cases where IFRS valuation methods are not consistent with Solvency II requirements.

#### SII SPECIFICITIES

Solvency II specifies the treatment of the liabilities listed below for which a valuation different from IAS/IFRS measurement is required:

- technical liabilities;
- contingent liabilities;
- financial liabilities;
- deferred taxes.

Except for technical liabilities and deferred taxes (that have already been disclosed in D.2. Technical Provisions, and D.1. Assets), all remaining points are analyzed in the following dedicated sections.

#### CONTINGENT LIABILITIES

Valuation

The recognition criteria for contingent liabilities on the Solvency II balance sheet are determined by the definition in IAS 37 for contingent liabilities.

While under IAS 37 an entity should not recognize a contingent liability but only disclose it under Solvency II if these contingent liabilities are material and the possibility of an outflow of resources embodying economic benefits is not remote, they have to be recognized on the Solvency II balance sheet.

Contingent liabilities are material if information about the current or potential size or nature of that liability could influence the decision-making or judgment of the intended user of that information. An exception to the requirement to recognize material contingent liabilities in the Solvency II balance sheet exists when a contingent liability arises if no reliable estimate is possible for the valuation of a liability. In such instances, since the value of the contingent liability cannot be reliably measured, only disclosure is required.

According to Solvency II principles, a contingent liability should be valued at the expected present value of future cash flows required to settle the contingent liability over the lifetime of that contingent liability, using the relevant risk-free interest rate term structure. Moreover, when valuing liabilities, no adjustment to take account of the own credit standing of the insurance or reinsurance undertaking shall be made.

The estimate of future cash flows is thus based on an expected present value approach (i.e. a probability-weighted average of the present values of the outflows for the possible outcomes).

The amount and range of possible cash flows considered in the calculation of the probability-weighted cash flows shall reflect all expectations about possible cash flows and not the single most likely or the expected maximum or minimum cash flow.

Finally, an entity shall consider the risk that the actual outflows of resources might ultimately differ from those expected. Risk adjustment measures the amount, if any, that the entity would rationally pay in excess of the expected present value of the outflows for bearing this risk.

Contingent Liabilities Shown in the Financial Statements

As at 31 December 2018 and 2017, the Company recognized the following provisions for contingent liabilities:

| | 2018 | 2017 |
|---|---|---|
| Restructuring provision | 37,400 | 36,700 |
| Provisions for commitments | 331,162 | 373,195 |
| **Total** | **368,562** | **409,895** |

Provisions for commitments consist mainly of provisions for the MTPL deficit connected with the Company´s membership in the Czech Insurers' Bureau (CZK 317 million, 2017: CZK 350 million).

*Membership in the Czech Insurers' Bureau*

On 31 December 1999, statutory MTPL insurance was replaced with contractual MTPL insurance in the Czech Republic. All rights and obligations arising from statutory MTPL insurance prior to 31 December 1999, including the deficit of received premiums to cover the liabilities and costs, were transferred to the Czech Insurers' Bureau (CIB/the Bureau).

On 12 October 1999, the Company obtained a license to write contractual MTPL insurance in the Czech Republic and, as a result, the Company became a member of the Bureau.

CIB members share the risks of the CIB in proportion to their market shares in compulsory contractual MTPL insurance. In accordance with this, a single CIB member is exposed to risks arising from:

1. incurred claims to be covered by the CIB, consisting of claims from:
    a. old statutory MTPL insurance sold until 31 December 1999;
    b. new compulsory contractual MTPL insurance sold since 1 January 2000 (caused by uninsured or unknown drivers);
2. claims to be covered by the CIB from the new compulsory contractual MTPL insurance caused by uninsured or unknown drivers;
3. The potential bankruptcy of another CIB member, i.e. counterparty default risk;
4. other financial and credit Risks of the CIB.

Items under points 1b. and 2 are covered through the CIB's Guarantee Fund 1, while item No 3 is covered from the CIB's Guarantee Fund 2.

*Risks associated with incurred claims*

The overall liability of CIB for incurred claims is covered by the CIB members in proportion to their market shares. Part of this overall liability is not covered by investments of the CIB but by a receivables to members allocated to individual members in proportion to their market shares.

To match these receivables, CIB members recognize a liability to the CIB in their balance sheets. This liability is calculated by the CIB, and its amount is periodically updated in light of new claim information and changing market shares.

*Risks of the the CIB'S guarantee fund*

Members of the CIB contribute to the CIB's guarantee fund established for claims against the CIB from the new compulsory contractual MTPL insurance intended to cover:

i) claims caused by uninsured or unknown drivers (GF1); and
ii) liabilities of a potentially bankrupt member (GF2).

CIB members charge their contributions to the Guarantee Fund as expenses when they become due.

On the CIB side, the guarantee fund is built up from members' contributions and run off profit from incurred claims, and is used to cover claim payments and run off losses on unsettled claims. It is also intended to cover any claims against a bankrupt member.

## COMMITMENTS DISCLOSED UNDER IFRS

There are no commitments as at 31 December 2018 and 31 December 2017 that are disclosed in IFRS that should be - because of its substantial scope and the possibility of a decrease in resources representing economic benefits - reported in the Solvency II balance sheet according to Solvency II.

Legal

As at 31 December 2018, a legal suit was brought consolidating several cases concerning the decision of the General Meeting of the Company in 2005 approving a squeeze-out of minority shareholders and consideration paid on the pending squeeze-out. Based on legal analyses carried out by external legal counsel, the Company management believes that none of these cases will give rise to any contingent future liabilities for the Company.

Nuclear pool participation

Česká pojišťovna a.s. is a member of the Czech Nuclear Pool (CNP). The subscribed net retention is as follows:

| | 2018 | 2017 |
|---|---|---|
| Liability (w/o D&O liability) | 172,121 | 172,121 |
| D&O liability only | 21,275 | 21,275 |
| FLEXA extended coverage of nuclear risks plus BI | 578,000 | 578,000 |
| **Total** | **771,396** | **771,396** |

As a member of the CNP, the Company has signed pool documents like statutes, cooperation agreements, claims handling cooperation agreements and a solidarity agreement. Hence, the Company is jointly and severally liable for the obligations resulting from these pool documents. In the event that one or more of the other members are unable to meet their obligations to the CNP, the Company will be obliged to take over the uncovered part of this liability, pro-rata to its own net retention used for the contracts in question. The management does not consider the risk of another member being unable to meet its obligations to the CNP to be material to the financial position of the Company. The CNP has implemented adequacy rules for its members' net retentions related to their capital positions, assessed per quarter. In addition, the potential liability of the Company for any given insured/assumed risk is contractually capped at quadruple the Company's net retention for direct risks (insurance contracts) and double the Company's net retention for indirect risks (inwards reinsurance contracts).

## FINANCIAL LIABILITIES

Valuation

To ensure compliance with Solvency II principles, the liabilities - including financial liabilities - should be valued at fair value without any adjustment for changes to the own credit standing of the insurance/reinsurance undertaking.

The valuation methodology for the fair value of an asset or liability shall be based on the following approaches:

- mark-to-market approach (default approach): this approach is based on readily available prices in orderly transactions that are sourced independently (quoted market prices on active markets);
- mark-to-model approach: any valuation technique that has to be benchmarked, extrapolated or otherwise calculated as far as possible from a market input (maximize market inputs, minimize unobservable inputs).

According to IFRS 9 (not yet adopted by the Company), the amount of change in the fair value of the financial liability attributable to changes in the Credit Risk of that liability[2] should be determined either:

(a) as the change in its fair value not attributable to changes in market conditions that give rise to market risk;
(b) using an alternative method the entity believes more faithfully represents the change in the liability's fair value attributable to changes in its Credit Risk.

As with all estimates of fair value, an entity's measurement method for determining the portion of the change in the liability's fair value that is attributable to changes in its Credit Risk must make maximum use of market inputs.

Consistency with IFRS

According to IAS 39.47, all liabilities, except for the following, are required to be measured at amortized cost using the effective interest method:

(a) financial liabilities at fair value through profit or loss;
(b) financial liabilities that arise when a transfer of a financial asset does not qualify for derecognition or when the continuing involvement approach applies;
(c) financial guarantee contracts;
(d) commitments to provide a loan at a below-market interest rate.

Financial liabilities valued at amortized cost according to IAS 39 shall be valued at fair value for the Solvency II balance sheet.

[2] In accordance with IFRS 9 paragraph B5.7.16 and subsequent

For purposes of financial liabilities valuation, the IAS 39 fair value definition is consistent with the Solvency II principle taking into account that:

- The fair value measurement approach in IAS 39 at recognition is a good representation of the economic value at recognition in the Solvency II balance sheet.
- The fair value measurement approach in IAS 39 for subsequent measurements is a good representation of the economic value for Solvency II purposes if, and only if, changes in the undertaking's own credit standing have not been taken into account. When changes in the undertaking's own credit standing influence the value under IAS 39, they shall be eliminated in the Solvency II valuation.

## D.3.2. RECONCILIATION OF SII VALUES AND FINANCIAL STATEMENTS

**Year-on-year comparison of the Solvency II value**

| Liabilities | 2018 | 2017 |
|---|---|---|
| Technical provisions | 45,861,118 | 48,505,544 |
| Provisions other than technical provisions | 260,983 | 167,514 |
| Deposits from reinsurers | 1,400,000 | 1,401,599 |
| Deferred tax liabilities | 1,064,928 | 1,535,072 |
| Derivatives | 427,708 | 512,273 |
| Financial liabilities other than debts owed to credit institutions | 21,048,292 | 24,157,355 |
| Insurance and intermediaries payables | 0 | 0 |
| Reinsurance payables | 0 | 0 |
| Payables (trade, not insurance) | 2,067,304 | 1,688,826 |
| Any other liabilities, not elsewhere shown | 8,467,695 | 8,520,116 |
| **Total liabilities** | **80,598,028** | **86,488,299** |
| **Excess of assets over liabilities** | **29,676,783** | **31,357,909** |

Movements on financial liabilities other than debts owed to credit institutions are driven by market conditions and investment policies.

The year-on-year decrease in deferred tax liabilities was caused by a new deferred tax receivable from unrealized gains and losses from securities. For details please see D.1.2

The year-on-year increase in trade payables was mainly caused by an increase in the liability to the Ministry of Finance of the Czech Republic for employer liability insurance to the amount CZK 858 million (2017: CZK 754 million), which the Company administers for the state, and by an increase in tax liabilities. In 2017, income tax prepayments were significantly higher than tax due for the period, and this decreased tax liability.

**Reconciliation of Solvency II value to statutory financial statements**

| Liabilities | Solvency II value | Statutory accounts value | Note | Amount per financial statements | Mapping |
|---|---|---|---|---|---|
| Technical provisions | 45,861,118 | 60,920,141 | Different valuation methodology | 60,920,141 | |
| Provisions other than technical provisions | 260,983 | 368,562 | The provision for the Czech Insurers' Bureau is revalued to best estimate for SII | 368,562 | |
| Deposits from reinsurers | 1,400,000 | 1,400,000 | | 1,400,000 | |
| Deferred tax liabilities | 1,064,928 | 0 | Regarding the impact of different valuation methodology | 0 | |
| Derivatives | 427,708 | 427,708 | | 427,708 | |
| Financial liabilities other than debts owed to credit institutions | 21,048,292 | 21,048,292 | | 21,048,292 | |
| Insurance and intermediaries payables | 0 | 0 | | 2,246,603 | The balance sum represents payables in the statutory financial statements. |
| Reinsurance payables | 0 | 0 | | 4,951,029 | The difference in insurance and intermediaries and reinsurance payables represents payables not past due, which are mapped to Any other liabilities not elsewhere shown in Solvency II. |
| Payables (trade, not insurance) | 2,067,304 | 2,067,304 | | 1,852,622 | |
| Any other liabilities, not elsewhere shown | 8,467,695 | 8,467,695 | | 1,484,745 | The difference in insurance and intermediaries and reinsurance payables represents payables not past due, which are mapped to Any other liabilities not elsewhere shown in Solvency II. |
| **Total liabilities** | **80,598,028** | **94,699,702** | | **94,699,702** | |
| **Excess of assets over liabilities** | **29,676,783** | | | | |

## D.4. ALTERNATIVE METHODS FOR VALUATION

In respect of the official SII data valuation, no significant alternative methods except the valuation of instruments at Level 3 (see D.1) were used.

The following table provides a description of the valuation techniques and the inputs used in the fair value measurement:

| | |
|---|---|
| Equities | The fair value is mainly determined using an independent evaluation provided by a third party or is based on the amount of shareholders' equity. |
| Investment Funds | The fair value is mainly based on information about the value of the underlying assets. The valuation of underlying assets requires significant expert judgment or estimation. |
| Bonds, loans | An indicative price is provided by a third party or the discounted cash flow technique uses objectively unobservable inputs (extrapolated interest rates and volatilities, historical volatilities and correlations, significant adjustments to the quoted CDS spreads, the prices of similar assets requiring significant adjustments etc.) |
| Investment properties | The fair value is determined using independent valuation provided by a third party and is based on the market value of the property determined by comparing recent sales of similar properties in the surrounding or competing area to the subject property. |

The table below describes unobservable inputs at Level 3:

| Description | FV as at 31.12.2018 | FV as at 31.12.2017 | Valuation technique(s) | Non-market observable input(s) |
|---|---|---|---|---|
| Equities | 412,767 | 118,350 | Net asset value | n/a |
| Investment funds | 20,049 | 19,074 | Expert judgment | Value of underlying instruments |
| Bonds Government | 1,723,985 | 1,717,461 | Discounted cash flow technique | Level of credit spread |
| Bonds Corporate | 993,452 | 1,264,080 | Discounted cash flow technique | Level of credit spread |
| Investment property | 0 | 6,369 | External valuation expert | Similar transactions |

## D.5. ANY OTHER INFORMATION

All significant information on valuation has been mentioned in the above sections.

# E. Capital management

The Company has a comfortable and sound solvency position from the Solvency II perspective with a solvency ratio significantly above 100%.

The solvency ratio has decreased by 47 percentage points compared to the previous year mainly due to planned payout of part of the retained earnings to the shareholder. Still the amount of available own funds stays at a very comfortable level and ensures the Company's ability to meet its obligations even in critical scenarios of incurred losses.

**Solvency Position**

| | 2018 | 2017 | Change |
|---|---|---|---|
| Own Funds | 23,508,783 | 27,790,909 | (4,282,126) |
| Solvency Capital Requirement | 8,537,918 | 8,634,618 | (96,700) |
| Solvency Ratio | 275% | 322% | |

The following chapters provide more details on the Company's own funds and the Solvency Capital Requirement.

## E.1. OWN FUNDS

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

The capital management activities are defined by the Group and local Capital Management Policy, which is subject to approval by the respective Board of Directors.

Capital management activities refer to own funds management and control, and in particular procedures that are intended to:

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

The Capital Management Plan represents a part of the overall three-year Strategic Plan. The Strategic Plan is primarily based on the following assumptions:

- financial scenarios;
- strategic asset allocation;
- the business mix.

The Capital Management Plan includes a detailed description of the development of own funds and the Regulatory Capital Requirement during the Strategic Planning period.

The CRO of the Company is responsible for producing the Capital Management Plan and the CEO is responsible for submitting it to the Board of Directors.

If extraordinary operations (e.g. mergers and acquisitions, issuance of own funds) are expected in the plan period, their impact is explicitly included in the own funds and regulatory capital requirement development and further details are included in the relevant documentation. Issuances of own funds are explicitly included in the Capital Management Plan with a detailed description of the rationale.

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

The Capital Management Plan is defined taking into account limits and tolerances set out in the Risk Appetite Framework.

## E.1.2. AMOUNT AND QUALITY OF ELIGIBLE OWN FUNDS

The Company regularly evaluates its own funds and analyses their value and composition. The own funds of the Company consist of its share capital, the reconciliation reserve and the foreseeable dividend. All mentioned components are part of Tier 1, which represents the highest quality capital.

The difference between the Company's IFRS equity and Solvency II own funds is based on the revaluation of technical provisions, intangible assets, participations and other items.

**Reconciliation between IFRS Equity and Own Funds for Solvency Purposes**

| | 2018 |
|---|---|
| IFRS Equity | 22,389,628 |
| Revaluation of intangible assets | (2,244,398) |
| Revaluation of investments | 995,451 |
| Revaluation of net technical provisions | 9,883,860 |
| Revaluation of other Items | 134,178 |
| Revaluation of deferred taxes | (1,481,936) |
| Excess of assets over liabilities in Solvency II | 29,676,783 |
| Foreseeable dividend | (6,168,000) |
| Eligible own funds | 23,508,783 |

Revaluations in the table above represent differences between the valuation according to IFRS accounting standards and a valuation in accordance with the Solvency II Directive.

Intangible assets are revalued to zero for Solvency II purposes. The valuation of investments (including participations) is based on the market value of the instrument/undertaking.

Technical Provisions valued for solvency purposes are equal to the sum of the best estimate, risk margin and counterparty default adjustment. The best estimate corresponds to the probability-weighted average of future cash flows, taking into account the time value of money and using the relevant risk-free interest rate term structure. The risk margin is based mainly on the assumption that the whole portfolio of insurance and reinsurance obligations is taken over by another insurance or reinsurance undertaking. The counterparty default adjustment takes into account the expected losses due to the default of a reinsurance counterparty.

The remaining part of the difference consists of deferred taxes related to the revaluations mentioned above and other minor differences between the valuation for accounting and solvency purposes.

More details about valuation methods under Solvency II are provided in Section D.

The Company has no restrictions in terms of the transferability of own funds.

Eligible own funds to meet SCR equal the total amount of available own funds after deduction of foreseeable dividend. The development of eligible own funds to meet the SCR, split according to tiers, is shown in the following table.

**Eligible Own Funds by Tiering**

| | 2018 | 2017 | Change |
|---|---|---|---|
| **Total eligible own funds to meet the SCR** | **23,508,783** | **27,790,909** | **(4,282,126)** |
| Tier 1 – unrestricted | 23,508,783 | 27,790,909 | (4,282,126) |
| Tier 1 - restricted | 0 | 0 | 0 |
| Tier 2 | 0 | 0 | 0 |
| Tier 3 | 0 | 0 | 0 |

Eligible own funds decreased year-to-year. The change is mainly caused by higher foreseeable dividend which reflects the intention to pay out part of the retained earnings to the shareholder. Further effects are a drop in the value of investment assets and growth of nonlife technical provisions arising from newly underwritten business. This movement is partially offset by a drop in life technical provisions. These diminish overall as a consequence of maturities in the current portfolio, despite the growth of new profitable protection business.

The tables below contain a comparison of the basic own funds in the current and previous year, together with a split of basic own funds by tiers.

### Basic Own Funds – Comparison with Previous Year

| | 2018 | 2017 | Change |
|---|---|---|---|
| Ordinary share capital (gross of own shares) | 4,000,000 | 4,000,000 | 0 |
| Share premium account related to ordinary share capital | 0 | 0 | 0 |
| Surplus funds | 0 | 0 | 0 |
| Preference shares | 0 | 0 | 0 |
| Share premium account related to preference shares | 0 | 0 | 0 |
| Reconciliation reserve | 19,508,783 | 23,790,909 | (4,282,126) |
| Subordinated liabilities | 0 | 0 | 0 |
| An amount equal to the value of net deferred tax assets | 0 | 0 | 0 |
| Other own-fund items approved by the supervisory authority as basic own funds not specified above | 0 | 0 | 0 |
| Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds | 0 | 0 | 0 |
| Deductions for participations in financial and credit institutions | 0 | 0 | 0 |
| **Total basic own funds after deductions** | **23,508,783** | **27,790,909** | **(4,282,126)** |

### Basic Own Funds by Tiers

| | Total | Tier 1 - unrestricted | Tier 1 - restricted | Tier 2 | Tier 3 |
|---|---|---|---|---|---|
| Ordinary share capital (gross of own shares) | 4,000,000 | 4,000,000 | 0 | 0 | 0 |
| Share premium account related to ordinary share capital | 0 | 0 | 0 | 0 | 0 |
| Surplus funds | 0 | 0 | 0 | 0 | 0 |
| Preference shares | 0 | 0 | 0 | 0 | 0 |
| Share premium account related to preference shares | 0 | 0 | 0 | 0 | 0 |
| Reconciliation reserve | 19,508,783 | 19,508,783 | 0 | 0 | 0 |
| Subordinated liabilities | 0 | 0 | 0 | 0 | 0 |
| Amount equal to the value of net deferred tax assets | 0 | 0 | 0 | 0 | 0 |
| Other own -fund items approved by the supervisory authority as basic own funds not specified above | 0 | 0 | 0 | 0 | 0 |
| Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds | 0 | 0 | 0 | 0 | 0 |
| Deductions for participations in financial and credit institutions | 0 | 0 | 0 | 0 | 0 |
| **Total basic own funds after deductions** | **23,508,783** | **23,508,783** | **0** | **0** | **0** |

The reconciliation reserve is equal to the total excess of assets over liabilities reduced by the amount of own shares, foreseeable dividends and distributions and other items listed in the following table.

The year-to-year change in the reconciliation reserve is mainly driven by a drop of AFS reserve and the growing nonlife portfolio concurrently with lowering the prudency on nonlife IFRS reserves, these effects are compensated by a decrease in life reserves as a consequence of maturities in the portfolio and underwriting of new profitable business.

### Reconciliation Reserve

| | 2018 | 2017 | Change |
|---|---|---|---|
| Assets – Liabilities | 29,676,783 | 31,357,909 | (1,681,126) |
| Own shares | 0 | 0 | 0 |
| Foreseeable dividends and distributions | 6,168,000 | 3,567,000 | 2,601,000 |
| Other basic own fund items | 4,000,000 | 4,000,000 | 0 |
| Restricted own fund items due to ring fencing | 0 | 0 | 0 |
| **Reconciliation reserve** | **19,508,783** | **23,790,909** | **(4,282,126)** |

None of the basic own fund item is subject to transitional measures.

The Company does not have any ancillary own funds.

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

The Company's own funds eligible to meet the MCR equal the total amount of own funds eligible to cover the MCR. In the case of the Company, they equal the eligible own funds to meet the SCR because the whole capital amount is classified as Tier 1.

**Eligible Own Funds by Tiers**

| | 2018 | 2017 | Change |
|---|---|---|---|
| **Total eligible own funds to meet the MCR** | **23,508,783** | **27,790,909** | **(4,282,126)** |
| Tier 1 – unrestricted | 23,508,783 | 27,790,909 | (4,282,126) |
| Tier 1 - restricted | 0 | 0 | 0 |
| Tier 2 | 0 | 0 | 0 |
| Tier 3 | 0 | 0 | 0 |

The year-on-year difference in eligible own funds is consistent with that provided in the section dedicated to eligible own funds to meet the SCR.

## E.2. SOLVENCY CAPITAL REQUIREMENT AND MINIMUM CAPITAL REQUIREMENT

### E.2.1. SCR AND MCR VALUES

The Solvency Capital Requirement is calculated based on the Partial Internal Model approved in March 2016 by the College of Supervisors (including the Czech National Bank).

The Minimum Capital Requirement is calculated according to the relevant legislation, and its value is significantly lower than the Solvency Capital Requirement. The detailed inputs for the MCR calculation are part of the annex to this report (QRT S.28.01).

**SCR and MCR**

| | 2018 | 2017 | Change |
|---|---|---|---|
| Solvency Capital Requirement | 8,537,918 | 8,634,618 | (96,700) |
| Minimum Capital Requirement | 2,703,285 | 2,640,537 | 62,749 |

The Solvency Capital Requirement is lower predominantly as a consequence of a drop in credit risks. These decrease mainly due to lower exposure and better rating structure (the upgrade of the Czech Republic rating from A to AA had a significant impact too). This decrease is however considerably offset by lower tax absorption caused by lower deferred tax liability, which serves as its cap. The Minimum Capital Requirement, being a volume based indicator, increases due to the growth of nonlife portfolio.

### E.2.2. SCR BREAKDOWN

The YE18 SCR amounts to CZK 8.5 billion. The Partial Internal Model splits the total SCR into the following modules: Financial Risks, Credit Risks, Life Underwriting Risks, Non-life Underwriting Risks and Operational Risk. In addition to these risk modules, the total SCR is increased by the amount of Model Adjustment which reflects risks that are not taken into account properly in the Partial Internal Model. The Tax Cap item reflects the amount of tax relief within the SCR scenario which cannot be used to absorb losses, as there is a cap of initial net deferred tax liability.

**SCR breakdown**

| | 2018 | weight | 2017 | weight |
|---|---|---|---|---|
| SCR before diversification | 10,567,362 | 100% | 10,393,315 | 100% |
| Financial Risk | 3,598,594 | 34% | 3,479,587 | 33% |
| Credit Risk | 2,837,326 | 27% | 3,423,215 | 33% |
| Life Underwriting Risk | 627,342 | 6% | 584,568 | 6% |
| Non-life Underwriting Risk | 2,299,630 | 22% | 2,046,738 | 20% |
| Operational Risk | 740,450 | 7% | 724,277 | 7% |
| Tax Cap | 428,020 | 4% | 109,392 | 1% |
| Model Adjustment | 36,000 | 0% | 25,538 | 0% |
| Diversification benefit | (2,029,444) | | (1,758,697) | |
| **Total SCR** | **8,537,918** | | **8,634,618** | |

The SCR breakdown shows that the risk profile of the Company is stable as for the structure, with significantly higher risks related to the assets' portfolio than to the liabilities arising from underwritten policies. The Nonlife underwriting risks are also significant, while Life underwriting risks are relatively minor. This is partially due to application of contract boundaries which results in cutting off most of the cash flows related to the life riders, which carry significant morbidity and lapse risk.

The figures presented in the table above are consistent with the Quantitative Reporting Template (QRT) reported to the Czech National Bank and hence present the risk capitals net of tax.

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

The Company does not use the duration-based equity risk sub-module in the calculation of the SCR.

## E.4. DIFFERENCES BETWEEN THE STANDARD FORMULA AND THE INTERNAL MODEL USED

This section provides an overview of the Internal Model used to calculate the SCR, reported in Section E.2. Before focusing on the main differences between the Standard Formula and the Internal Model for the main risk categories, a brief introduction is provided to highlight the main purpose and scope of the Internal Model and to illustrate the methods used.

### E.4.1. PURPOSE OF THE INTERNAL MODEL

The Company deems that the Internal Model is the most appropriate way of assessing the SCR as it represents the best way of capturing the risk profile in terms of granularity, calibration and correlation of various risk factors.

The Group's Internal Model is structured around a specific risk map, which contains all the risks that Generali Group and the Company have identified as relevant to their business, allowing for the calculation of the Solvency Capital Requirement at single risk level for each node of the hierarchy.

In implementing the Model, the Group has employed a Monte Carlo approach with 'proxy functions' to determine the full probability distribution of the change in the basic own funds over a one-year horizon and to calculate the SCR at any percentile for in-scope companies and risks (Monte Carlo methods are used in the industry to obtain precise numerical results using the embedded characteristics of repeated random sampling to simulate more complex real world events. Proxy functions are mathematical functions that mimic the interaction between risk drivers and insurance portfolios to obtain the most reliable results). The aggregation process consists of the use of advanced aggregation techniques (market best-practice techniques), and the calibration procedure involves quantitative and qualitative aspects.

### E.4.2. SCOPE OF THE INTERNAL MODEL

From a Company point of view, the Internal Model covers all the risk categories reported in the Group Risk Map in Section B.3.1. The Internal Model covers all Life Underwriting Risks, Non-life Underwriting Risks, Financial Risks and Credit Risks. Only Operational Risk is modelled using the Standard Formula approach. The Internal Model's purpose is to capture the behavior of individual risks and their impact on the balance sheet, taking into account the diversification between portfolios, risks and locations.

To calculate the Company's capital requirement, the Operational Risk capital charge is added.

## E.4.3. METHODS USED IN THE INTERNAL MODEL

The Group Partial Internal Model allows for the determination of a full Probability Distribution Forecast (PDF) of the change in basic own funds (BOF) over a one-year time horizon. From the resulting PDF, the SCR can be calculated at a given confidence level (such a level where the outcome is deemed to correctly represent events with a low probability of occurrence) by reading the corresponding percentile. Generali uses a Monte Carlo approach with proxy functions that allows for the simulation of each balance sheet item through the calculation of the full distribution of gains/losses. Other capital metrics that are required for internal purposes, such as single risk capital charges (e.g. a change in BOF after a 1-in-10 drop in the level of equity prices) can also be derived from the single risk PDF.

The risk measure used is the Value at Risk (VaR) at a 99.5% quantile of the probability distribution function (corresponding to a 1-in-200 years event), the underlying variable is represented by the change in the basic own funds, and the time horizon is one year according to the calibration principles of the Solvency II Directive.

The main risks of the Company are described in the following paragraphs.

### Life Underwriting Risk

- The Internal Model stress calibration for Life Underwriting Risk is based on Company-specific historical portfolio data, unlike the standard stress levels provided by the Standard Formula approach. In particular, the Company calculates the potential deviations from the best estimate due to adverse events through:
  - a combination of market data with local exposures for Catastrophe Risk calibration (Mortality);
  - and single company historical portfolio data for all other risks.
- The methodology underlying the Life Underwriting Risk calibration is given by the Group and its adequacy assessed at local level and also applied at local level.

### Non-life Underwriting Risk

The main differences between the Standard Formula and the Internal Model for the Solvency Capital Requirement calculation concerning Non-life Underwriting Risks are:

- As regards the Pricing and Reserving Risks, the difference refers to the calibration approach, where the Standard Formula uses a standard deviation defined by EIOPA, whilst for the Internal Model a bottom-up calculation of the business underwritten is performed and own data are used;
- For CAT Risk, the difference lies in the calibration approach, where the Standard Formula is based on exposures to CAT risks in which geographic risk coefficients are determined by EIOPA. The Internal Model uses advanced models based on market best practice instead;
- As regards reinsurance, the Standard Formula uses a series of simplified approaches, whilst the Internal Model performs precise modelling of the reinsurance programs (proportional and non-proportional, including facultative).

### Financial and Credit Risk

- The Standard Formula approach for Market Risks is based either on the application of standardized stress factors directly to assets' exposures or, in case of Interest Rate Risk, in the application of a standardized and simplified stress level to the curves used to discount future cash flows;
- The Internal Model adopts much more sophisticated state-of-the-art modelling techniques, based on a more granular risk map. Interest rate volatility and equity volatility risk are, for example, modelled within the Internal Model while they are not modelled within the Standard Formula;
- Furthermore, also within the same risk module, the Internal Model is capable of producing a much more accurate representation of the risk profile. This is because the higher granularity of the Internal Model risk map allows better reflection of the true diversification benefit of individual portfolios as well as peculiarities of individual financial instruments.

For a description of the nature and appropriateness of the data used in the Internal Model, please refer to Section B.3.2.

## E.5. NON-COMPLIANCE WITH THE MINIMUM CAPITAL REQUIREMENT AND NON-COMPLIANCE WITH THE SOLVENCY CAPITAL REQUIREMENT

The Company has a sound solvency position and no issues have arisen in relation to compliance with either the Minimum Capital Requirements or the Solvency Capital Requirement.

## E.6. OTHER INFORMATION

### SENSITIVITIES

As anticipated in Section C.7, sensitivity testing analyses the impact of simple changes in specific risk drivers (e.g. interest rates, equity shock, credit spreads and interest rate volatility) on the level of own funds, the Solvency Capital Requirement as well as solvency ratio.

The level of eligible own funds and the SCR were recalculated for each sensitivity. Their joint impact on the solvency ratio is presented in the following table.

**Sensitivities**

| | Solvency ratio |
|---|---|
| Base scenario | 275% |
| Yield curve +50 bps | 277% |
| Yield curve -50 bps | 276% |
| Equity +25% | 273% |
| Equity -25% | 274% |
| Corporate spread +50 bps | 274% |
| No volatility adjustment | 257% |
| Ultimate forward rate -15 bps | 275% |

It is obvious that none of the sensitivities represents a significant threat to the solvency position of the Company. The most impactful one among the above presented sensitivities is the scenario without volatility adjustment, however even in this case the solvency ratio does not fall under 250%.

## SCENARIOS

Apart from the testing of sensitivities to shifts in single risk factors we tested two scenarios combining the effect of changes in several risk factors.

The first represents a scenario of global economic slowdown and comprises drop in interest rates, widening of the corporate spreads, changes in spreads of government bonds and drop in value of equities and real estates.

The second combined scenario tests primarily the impact of drop in value of equity and bond portfolio on the position of the company.

**Scenarios**

| | Solvency ratio |
|---|---|
| Base scenario | 275% |
| Combined scenario 1 | 257% |
| Combined scenario 2 | 255% |

The results presented in the table above show that the Company stays highly solvent also in the combined scenarios, the solvency ratio stays above 250% and ensures stability and reliability of the Company even after realization of such negative scenarios.