# Allianz Risk Transfer AG

# Solvency and Financial Condition Report 2018

This document is an unofficial English translation of the SFCR. Only the original German version of the SFCR is authoritative.



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# **Executive Summary**

### **Basis of Report**

The first uniform Europe-wide system of financial supervision for primary insurance companies and reinsurance companies entered into force on January 1, 2016 under the name "Solvency II". Under the European legislative framework, in November 2009 the European Parliament and the Council of the European Union approved the proposal by the European Commission and issued a framework directive (Directive 2009/138/EC of the European Parliament and of the Council of November 25, 2009 on the Taking-up and Pursuit of the Business of Insurance and Reinsurance [Solvency II]). The Solvency II Directive governs the taking-up and pursuit of the business of insurance and reinsurance in Europe.

Since January 1, 2016, a fully revised Insurance Supervision Act (VersAG) has also been in force in Liechtenstein, which transposes the European Solvency II Directive into Liechtenstein law.

A European regulation [Commission Delegated Regulation (EU) 2015/35], which was passed by the European Commission as a delegated act on October 10, 2014, is also directly applicable in the member states. It contains detailed rules on implementing the framework directive.

A prominent feature of the supervisory system is the systematically risk-based focus of the company's reporting. In addition to obligations to report quarterly figures to the supervisory authority, including numerous electronic reporting forms, there is an annual report to the public in narrative format, extensive reports to the national supervisory authority and, not least, ad-hoc reporting whose purpose is to notify the regulator in a timely manner of significant events and decisions by management.

While the annual financial statements and the associated reporting requirements are drawn up in accordance with Liechtenstein's Law on Persons and Companies (PGR), the reporting requirements stipulated in the latest update of the VersAG require another report that is presented here. It is called the "Solvency and Financial Condition Report" (also abbreviated as "SFCR") and is intended to provide an informative picture of the company's solvency and financial condition.

In line with the principles of the supervisory system, this report is written from a risk-oriented viewpoint and identifies how the company addresses risks. Using a standardized procedure, the company evaluates and describes its main business processes. In addition, assets and liabilities valued in economic terms (at market value) are compared in the so-called Solvency Overview. The excess of assets over liabilities is shown here as the equity base.

The Allianz Group has an approved, partial Internal Model for determining the Solvency Capital Requirements, which it refines on an ongoing basis. Allianz Risk Transfer AG (ART AG) uses the standard model.

### **Contents**

The remarks in this report take into account the expert knowledge of the intended recipients. The report's structure follows the general recommendations of the European Insurance and Occupational Pensions Authority (EIOPA) and consists of five chapters, all of which are for the reporting period from January 1 to December 31, 2018.

The first section (Business Activities and Performance) contains detailed information about the position of Allianz Risk Transfer AG (ART AG) within the Allianz Group's legal structure and a description of the company's main business segments. It also provides qualitative and quantitative information about underwriting performance during the reporting period, both at the aggregate level and broken down into the main business segments. Finally, the first section provides information on investment results, both overall and broken down into asset classes, as well as on their composition.

The second section provides a description of corporate governance (also referred to as the governance system) at ART AG. This includes information on the organizational structure and workflows, in particular on the design of so-called key functions and how they are integrated into the supervisory system. Additional elements of reporting include requirements for the professional qualifications and personal dependability of management ("Fit and Proper Requirements"), as well as information on the risk management system and the Internal Control System.

The third section deals with the company's risk profile. Information is provided regarding business risks, which are broken down into the following risk categories: underwriting risk, market risk, credit risk, liquidity risk, operational risk and other major risks. Along with a description of these risks, section three contains an assessment of their materiality and a discussion of risk concentrations and risk-mitigation techniques.

Section four of the report focuses on the valuation principles used to prepare the Solvency Overview in accordance with supervisory law, including an analysis of the differences in value to those used for financial reporting in accordance with commercial law. The rules for economic assessment under the new supervisory system were implemented for valuing assets, technical provisions and other obligations.

The fifth and final section (Capital Management) presents a reconciliation of shareholders' equity under commercial law with regulatory capital ("own funds") and the amount of own funds eligible to meet the regulatory Solvency Capital Requirement.

ART AG uses the standard formula to calculate the Solvency Capital Requirement. The use of volatility adjustments was approved in the 2017 fiscal year. As at December 31, 2018, eligible own funds totaled EUR 574.8 million (previous year EUR 582.9 million). With EUR 440.0 million of risk capital (EUR 447.3 million), ART AG's solvency ratio stood at 133.0% (130.3%).

The Solvency and Financial Condition Report published here demonstrates ART AG's sound economic situation and enables the reader to reach his/her own conclusions in that regard.

Due to rounding, totals and percentages may differ slightly from the figures shown.

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# A Business Activities and Performance

### A.1 Business Activities

### Introduction

Allianz Risk Transfer AG (ART AG) is a Liechtensteinbased stock corporation and indirectly a wholly owned subsidiary of Allianz Global Corporate & Specialty SE (AGCS SE), with registered domicile in Munich. 60% of shares in ART AG are held by AGCS International Holding B.V. in Amsterdam, which in turn is wholly owned by AGCS SE. ART AG was founded in Switzerland in 1997 as a globally operating risk entity of Allianz in the field of Alternative Risk Transfer for special insurers and reinsurers. ART AG offers clients with international operations a broad range of insurance and reinsurance policies, predominantly in the fields of general liability, asset insurance, property and technical insurance as well as in the special fields of transport, marine and aviation insurance and energy supply. These services also include efficient claims processing, cross-border solutions within the context of international insurance programs, captive and fronting services, risk consulting and structured risk transfer solutions. Together with Group companies of AGCS SE and a network of Allianz affiliates in more than 70 countries as well as partner companies in other regions, it can provide support for clients in 160 countries. ART AG maintains branch offices in Zurich (Switzerland), Hamilton (Bermuda) and Dubai (United Arab Emirates).

A subsidiary of ART AG, Allianz Risk Transfer Inc. (domiciled in New York), was sold to AGCS International Holding B.V. (Amsterdam) and Allianz Europe B.V. (Amsterdam) in the 2018 fiscal year. The sale included two indirect subsidiaries, Allianz Risk Transfer (Bermuda) Ltd., Hamilton, and EF Solutions LLC, New York.

PricewaterhouseCoopers AG, Zurich, was appointed as the auditor for the 2018 fiscal year.

ART AG is part of the Allianz Group, which is headed by Allianz SE, Munich. The latter is overseen by the German Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht – BaFin), Graurheindorfer Strasse 108, 53117 Bonn.

Allianz SE's Solvency II consolidated financial statements will be published on its website in May. The financial statements may be viewed there or requested from the company. ART AG is included in Allianz SE's Solvency II consolidated financial statements. You can find the annual report of ART AG and other documents at: www.agcs.allianz.com/services/alternative-risk-transfer/art-annual-report.

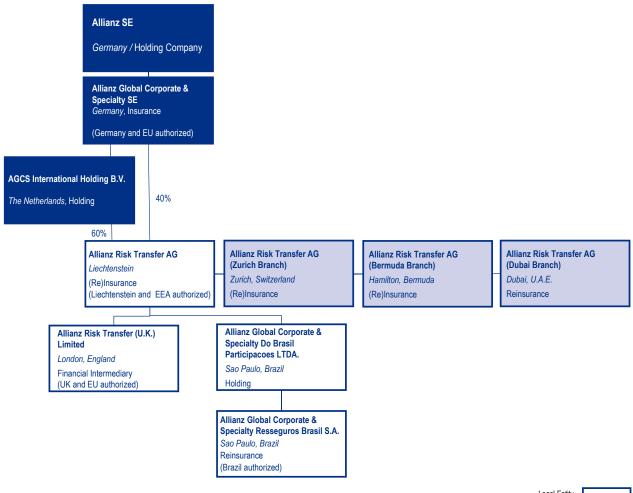
### Affiliated Companies of ART AG

Company	Registered office	Share %
Allianz Risk Transfer (U.K.) Limited	London	100.0
Allianz Global Corporate & Specialty do Brasil Participações Ltda.	Rio de Janeiro	99.9

On December 20, 2018, ART AG sold its 100% stake in its subsidiary Allianz Risk Transfer, Inc. (ART New York) [including the latter's participating interests, together with Allianz Risk Transfer (Bermuda) Limited (ART Bermuda)]. ART New York and ART Bermuda were integrated into the scope of

consolidation of our US affiliate Allianz Global Risk US Insurance Company (AGR US) at the beginning of 2019. This internal restructuring within the Group allowed regional responsibilities for subsidiaries in North America to be brought into line with the organizational model of the AGCS Group.

### Corporate legal structure as of December 31, 2018



<sup>\*</sup> Save where specified otherwise, all participations are 100%, except that: (a) Allianz Risk Transfer AG owns 99.99 % of AGCS Do Brazil Participacoes LTDA; and (b) Allianz Risk Transfer AG is owned by AGCS International Holding B.V. (60%) and Allianz Global Corporate & Specialty SE (40%)

Legal Entity
Branch

### A.2 Underwriting Performance

# Underwriting Performance according to Key Performance Indicators

The market environment was very competitive in the 2018 fiscal year. Despite the previous year's loss burden, which was due to natural catastrophes, premium rates recovered only in isolated cases.

Gross written premiums increased by 3.0% or EUR 34.2 million year on year to EUR 1,170.0 million. This increase was primarily due to the further expansion of the fronting business. Following a decline in the previous year, net premiums earned were up 7.0% or EUR 18.5 million. Premium development was influenced by the market environment, which remained focused on competition, and the associated pressure on premium rates, which affected liability, transport, fire and aviation insurance lines in particular.

Despite major loss events in the liability and property insurance lines, the loss burden was down slightly by 1.5% or EUR 3.3 million compared with the previous year.

Provisions for premium refunds rose significantly by EUR 11.7 million year on year, while other costs fell by EUR 16.3 million. This led to a lower expense ratio overall.

Higher premium income, a lower loss burden and lower costs resulted in a combined ratio of 90.1%, compared with 104.0% in the previous year.

The company achieved a net technical profit of EUR 15.3 million, following a technical loss of EUR 7.4 million in the previous year.

### **Underwriting Result**

EUR thousand	2018	2017
Gross premiums written	1,169,963	1,135,755
Net premiums earned	281,204	262,670
Other net underwriting income		3,766
Net claims incurred	-221,472	-224,790
Change in other net technical provisions		
Net expenses for premium refunds	-12,528	-871
Net operating expenses	-31,939	-48,237
Other net underwriting expenses	-1	13
Net underwriting result before equalization provision	15,264	-7,449
Net loss ratio	78.8%	85.6%
Net expense ratio	11.3%	14.6%
Net combined ratio	90.1%	104.0%
Expenses for administering investments reclassified to the non-technical income statement		
in accordance with the PGR		

In accordance with the guidelines in Annex I of Implementing Regulation 2015/2450, Annex II, S.05.01, the reporting template must show both loss adjustment expenses and expenses for administering investments as part of net operating expenses. In contrast, the PGR states that loss adjustment expenses must be reported as part of net expenditure for insurance claims and that expenses for administering investments must be reported within the non-technical account.

### Underwriting Results for Own Account by Business Segment

	Gross pren	niums written	Net underwriting result before		
			equalization provision		
EUR thousand	2018	2017	2018	2017	
Direct business and proportional reinsurance business assumed					
Fire and other property insurance	621,350	110,319	-28,984	-43,963	
General liability insurance	236,231	244,263	-8,291	30,496	
Marine, aviation and transport insurance	33,369	31,790	4,559	-5,211	
Various financial losses	26,360	23,257	-8,141	-3,697	
Other insurance segments	9,422	45,254	-114	-3,293	
Subtotal 1	926,732	454,884	-40,971	-25,668	
Non-proportional reinsurance business assumed					
Non-proportional property reinsurance	137,707	593,855	-35,586	-22,060	
Non-proportional liability reinsurance	81,329	59,335	65,867	30,561	
Non-proportional marine, aviation and transport reinsurance	23,594	26,890	25,367	9,476	
Non-proportional health insurance	601	791	587	242	
Subtotal 2	243,231	680,871	56,235	18,219	
Total	1,169,963	1,135,755	15,264	-7,449	

#### **Direct & Proportional Reinsurance Business**

In 2018, the direct insurance business and proportional reinsurance business assumed continued to face a very tough competitive environment. Premium rates remained under pressure and recovered only in a very few cases. A shift in ILS (insurance-linked solutions) business led to the transfer of around EUR 500 million in gross written premiums from non-proportional to proportional reinsurance. This effect is not relevant to net premiums earned, as ILS contracts are 100% reinsured. In total, gross premiums in this segment rose by EUR 471.8 million to EUR 926.7 million, while net premiums earned fell by EUR 16.1 million to EUR 98.5 million.

The sum of large and medium-sized loss events increased massively in liability insurance business in particular. This led to a technical loss of EUR 40.9 million in direct business and proportional reinsurance business assumed, following a loss of EUR 25.7 million in the previous year.

In the following sections, key performance indicators, in particular the underwriting result, will be used to explain the results of the individual business segments.

Fire and other property insurance remains the largest business segment and is shaped to a large extent by ILS business. Net premiums earned decreased again slightly by EUR 4.2 million to EUR 33.0 million. Net loss expenses also fell by EUR 3.3 million to EUR 42.8 million. Costs including expenses for profit-sharing declined significantly year on year by EUR 22.1 million to EUR 19.2 million. This reduction was primarily due to higher reinsurance commission from the restructuring of ILS business referred to above. This resulted in a technical loss of EUR 29.0 million, following a loss of EUR 47.7 million in the previous year.

In **general liability insurance**, net premiums earned stood at EUR 32.9 million, down EUR 1.6 million compared with the prior-year period. Net loss expenses rose significantly by EUR 34.4 million to EUR 36.3 million, leading to a technical loss of EUR 8.3 million. A profit of EUR 30.5 million had been recorded in the previous year. The main driver of this deterioration in results was individual major claims.

Net premiums earned in **marine, aviation and transport insurance** remained stable year on year at EUR 13.6 million. Loss expenses declined by EUR 10.7 million to EUR 6.5 million, while costs increased slightly by EUR 1.2 million to EUR 5.2 million. All in all, this led to a technical profit of EUR 4.6 million, following a loss of EUR 5.2 million in the previous year.

In the **various financial losses** business segment, net premiums earned fell by EUR 2.5 million to EUR 10.7 million. Loss expenses grew by EUR 18.7 million owing to a major claim, while costs fell by EUR 10.0 million. The technical loss came to EUR 8.1 million, following a loss of EUR 3.7 million in the previous year.

Net premiums in the **other segments** of direct business and proportional reinsurance business assumed declined by EUR 7.9 million and totaled EUR 8.3 million. At the same time, claims expenditure fell by EUR 8.3 million to EUR 8.0 million. Costs declined by EUR 2.8 million to EUR 0.4 million, resulting in a technical loss of EUR 0.1 million (EUR -3.3 million).

### **Non-Proportional Reinsurance Business**

Gross written premiums were down by EUR 437.6 million at EUR 243.2 million. This fall was driven mainly by the reclassification of ILS business and the expansion of reinsurance within the Group. Net premiums earned grew by EUR 34.6 million to EUR 182.7 million, while the loss burden fell by EUR 44.0 million to EUR 99.9 million. Costs rose by EUR 24.6 million to EUR 4.3 million owing to the reclassification of reinsurance commission in ILS business. The underwriting result improved by EUR 38.0 million to EUR 56.2 million.

### Underwriting Performance by Country 1)

	Gross pre	Gross underwriting result		
EUR thousand	2018	2017	2018	2017
Liechtenstein	14,070	27,735	22,170	22,880
United States	605,981	641,241	213,896	-453,204
Germany	182,007	155,151	28,858	21,742
Switzerland	99,458	88,714	88,490	26,879
Japan <sup>1</sup>	20,437	14,331	16,189	12,503
China <sup>1</sup>	19,266	15,686	21,326	22,660
Country of origin and top 5 countries	941,219	942,858	390,928	-346,540
Remaining countries	228,744	192,897	94,860	5,288
Total	1,169,963	1,135,755	485,789	-341,252

Amounts are allocated to countries here in accordance with the requirements of Implementing Regulation 2015/2450, Annex II, S.05.02. For items that cannot be allocated directly (e.g. internal costs), suitable keys have been used.

<sup>&</sup>lt;sup>1)</sup> Japan and China recorded higher gross premium volume compared with the 2017 fiscal year and thus replaced Luxembourg and the United Kingdom among the top 5 countries.

The following section presents the underwriting result using key performance indicators. The focus is on the gross underwriting result.

ART AG operates insurance and reinsurance business in most countries in the world. One core area of business is global fronting business for institutional investors through hedge funds and for captives of international corporations. The volume was shaped to a large extent by so-called ILS business, which focuses mainly on the core market of the United States. Business concluded and reinsurance business assumed there mostly includes cover for natural catastrophes. In terms of volumes, business in the United States accounted for around 50% of gross premiums, as in previous years. The volume of claims due to hurricanes and other natural catastrophes originating in the United States was down by EUR 770 million year on year. Overall, this led to a gross technical profit of EUR 485.8 million, compared with the previous year's loss of EUR 46.5 million.

ART AG's core market is Switzerland, where the company offers local industrial business for large clients as well as reinsurance business. Despite a competitive market environment and selective underwriting policy, the gross premium volume increased from EUR 88.7 million in the previous year to EUR 99.5 million in the year under review. The absence of major events in Switzerland led to a gross underwriting result of EUR 88.5 million (EUR 26.9 million).

Business originating in Germany was expanded significantly. Gross written premiums increased by EUR 26.9 million to EUR 182.0 million in the reporting period. Most of these sales were achieved with Group companies, particularly in the field of internal reinsurance.

### A.3 Investment Income

### **Investment Result**

Investment income came to EUR 51.1 million in 2018, well above the previous year's figure of EUR 27.3 million. This increase was due in particular to gains on the internal sale of shares in Allianz Risk Transfer Inc. worth EUR 23.3 million. Adjusted for this internal sale within the Group, investment income rose slightly year on year to EUR 27.8 million.

Current income from investments came to EUR 29.7 million in 2018, down slightly on the previous year's figure of EUR 30.6 million. The decline in current income from equities was not entirely offset by higher current income from bonds and the money market.

Portfolio turnover due to maturing bonds and regrouping led to a realized net loss of EUR 0.9 million in 2018, following a loss of EUR 2.9 million in the previous year.

Expenses for administering investments increased to EUR 1.5 million in 2018 (EUR 1.1 million).

Because the euro weakened against the US dollar and the Swiss franc, the company recorded an unrealized profit on currencies amounting to around EUR 4.7 million in 2018. This profit is recognized outside investment income, in the other income and expenses items.

Valuation reserves on investments and loans amounted to EUR 0.8 million (EUR 23.8 million).

Type of Investment	Current Income		Profit		Loss		Write-backs / Write-downs		Investment Result	
EUR thousand	Dec. 31, 2018	Dec. 31, 2017	Dec. 31, 2018	Dec. 31, 2017	Dec. 31, 2018	Dec. 31, 2017	Dec. 31, 2018	Dec. 31, 2017	Dec. 31, 2018	Dec. 31, 2017
Investments in affiliated/associated companies	0	0	23,278	0	0	0	0	0	23,278	0
Equities	5,053	8,812	0	0	0	0	0	0	5,053	8,812
Bonds	11,014	9,305	236	127	-1,130	-3,001	536	630	10,656	7,060
Loans	1,095	1,129	0	0	0	0	0	0	1,095	1,129
Money	12,543	11,396	0	0	0	0	0	0	12,543	11,396
Other investments	0	0	0	0	0	0	0	0	0	0
Expenses	0	0	0	0	0	0	0	0	-1,533	-1,075
Total	29,704	30,641	23,515	127	-1,130	-3,001	536	630	51,091	27,321

### A.4 Performance in Other Activities

There were no noteworthy transactions under other business activities in the year under review.

ART AG did not enter into any significant lease agreements.

### A.5 Other Disclosures

All relevant disclosures about ART AG's business activities and performance are included in previous discussions.

# **B** Governance System

### B.1 General Information about the Governance System

# B.1.1 Board of Directors and Executive Board

# B.1.1.1 Board of Directors – Principle and Function

The Board of Directors of ART AG consists of at least three members. Members of the Board of Directors hold office for a period of three years, unless a shorter term of office is stipulated in the resolution appointing them. The term of office of members of the Board of Directors ends at the end of the next General Shareholders' Meeting. The General Shareholders' Meeting is entitled to appoint members of the Board of Directors and may approve the actions of members of the Board of Directors. Without prejudice to the above, the Board of Directors may itself coopt additional members. Additional members coopted by the Board of Directors must be approved by the next General Shareholders' Meeting.

The Board of Directors currently has four members.

The Board of Directors is responsible for the overall management of ART AG and for supervising corporate governance. It is responsible for establishing the company's organizational structure and an appropriate governance system (including risk management, the actuarial function, compliance, internal control and internal audit). The Board of Directors is also responsible for setting up the accounting function, financial control and financial planning, as well as all duties and responsibilities assigned to the Board of Directors under the applicable regulatory provisions. The Board of Directors represents the company externally and issues the organizational bylaws governing the duties and powers of the Board of Directors and its Chairman, the committees of the Board of Directors and the Executive Board and the Chief Executive Officer. In addition, the Board of Directors is responsible for appointing the members of the Executive Board and for preparing ART AG's annual report.

The Board of Directors shall meet as often as business requires. Any member of the Board of Directors is entitled to request that a meeting be called without delay, specifying the reason for the meeting. The Board of Directors shall have a quorum if at least half of its members are present. Resolutions by the Board of Directors shall be adopted by an absolute majority of those members of the Board of Directors present or represented at the meeting, with the Chairman casting the deciding vote in the event of a tie.

Directors are entitled to reimbursement of any expenses incurred on behalf of the company, as well as compensation commensurate with their services, to be determined by the Board of Directors itself. Compensation shall be paid only to external members of the Board of Directors who have no other full-time position within the Allianz Group.

The structure of the Board of Directors is specified in the Articles of Association and the organizational bylaws of ART AG. The Articles of Association were revised on September 26, 2016 to reflect the relocation of ART AG's headquarters from Zurich, Switzerland to Schaan, Liechtenstein; the organizational bylaws were revised on September 21, 2016. No significant changes had been made to the governance system as at the end of the reporting period in December 2018<sup>1</sup>.

# B.1.1.2 Executive Board – Principle and Function

The Executive Board must have at least two members. It consists of the Chief Executive Officer and other members as determined by the Board of Directors.

The Executive Board currently has five members.

The Executive Board is responsible for the direct management of ART AG's business, under the leadership of the Chief Executive Officer and on behalf of and following the guidance and instructions of the Board of Directors. The Executive Board

shall issue Management Regulations, to be approved by the Board of Directors, concerning the functions, allocation of responsibilities and the powers of management and of the company's committees. The Chief Executive Officer makes periodic reports to the Board of Directors on the course of business, in consultation with the other members of the Executive Board. Extraordinary events with significant consequences and developments that could jeopardize the company's continued existence must be reported to the Board of Directors without delay.

The Executive Board meets as often as business requires and at least once every quarter.

Any member of the Executive Board is entitled to request that a meeting be called without delay. The Executive Board shall have a quorum if at least half of the members are present. Resolutions by the Executive Board shall be adopted by an absolute majority of those members of the Executive Board present or represented at the meeting, with the Chief Executive Officer casting the deciding vote in the event of a tie.

Any member of the Executive Board and any member of ART AG's management team shall be entitled to submit any matter associated with his/her area of responsibility to the Executive Board for a decision and/or to request the approval of the Chairman of the Executive Board. These persons are also entitled to submit matters that are of fundamental importance to the company and that relate to other areas of responsibility to the Executive Board and/or to the Chief Executive Officer for assessment.

# B.1.1.3 Committees of the Board of Directors

The Board of Directors forms three committees from among its members<sup>2</sup>. Subject to certain reservations, as part of the defined responsibilities, the committees have final decision-making authority.

The Business Approval Committee consists of two sub-committees: the Sub-Committee on Transaction Matters<sup>3</sup> and the Sub-Committee on General Management Matters. The Sub-Committee on Transaction Matters shall decide, among other things, whether to enter into transactions that exceed the Executive Board's decision-making authority based on the applicable authorized limit. The Sub-Committee on General Management Matters is – subject to the duties of the Board of Directors that are non-transferable in accordance with the Articles of Association, such as ultimate oversight over the individuals entrusted with corporate governance – responsible for supervising the company's Executive Board and its corporate governance, to the extent that this is not the responsibility of the Audit Committee.

The Remuneration Committee<sup>4</sup> decides, among other things, on the amount of compensation to be paid to members of the Board of Directors and the Executive Board and on adjustments to the compensation system.

The Audit Committee provides support to the Board of Directors in its supervisory and financial control work. Among other things, the Audit Committee audits the annual financial statements. The Audit Committee is also responsible for assessing the effectiveness of the Internal Control System, including risk management. The Audit Committee receives regular updates on the company's solvency and on compliance with applicable legal requirements and guidelines. Internal Audit reports to the Audit Committee at each meeting on all significant findings.

<sup>&</sup>lt;sup>2)</sup> The organizational bylaws were amended and the number of committees was reduced to two in January 2019.

<sup>&</sup>lt;sup>3)</sup> In view of the structure of the "Alternative Risk Transfer" business segment as a global business segment of the AGCS Group, the Business Approval Committee on Transaction Matters was dissolved in January 2019.

<sup>4)</sup> The Remuneration Committee was also dissolved in January 2019; its functions are now controlled by the Board of Directors and the AGCS Group.

# B.1.1.4 Committees of the Executive Board

The Executive Board establishes committees to carry out certain responsibilities. The committee structure can be modified by the Executive Board at any time upon the recommendation of the Chief Executive Officer. The Chief Executive Officer appoints and dismisses the members and chairpersons of the committees with the approval of the Executive Board. The rights and obligations of the individual committees are laid down in separate committee charters.

In the Alternative Risk Transfer line of business (ART division), the Underwriting Committee is in charge of the underwriting process<sup>5</sup>.

The Local Investment Management Committee provides support to the Executive Board with investments and monitoring of the investment portfolio. The Board of Directors has ultimate responsibility for the investment strategy.

The Risk Management Committee is responsible for establishing and maintaining independent oversight of ART AG's risk management activities. It is the main decision-making body for risk management issues at ART AG.

The Loss Reserve Committee makes decisions regarding the quarterly assessment of underwriting obligations pursuant to IFRS and as part of this process reviews associated activities, developments and information.

The Financial Disclosure & Reporting Committee helps the Chief Executive Officer and the Chief Financial Officer of ART AG to fulfill their responsibility to file IFRS financial statements and related information in full, accurately and on time.

The Procurement & Outsourcing Committee manages and oversees ART AG's outsourcing and procurement activities.

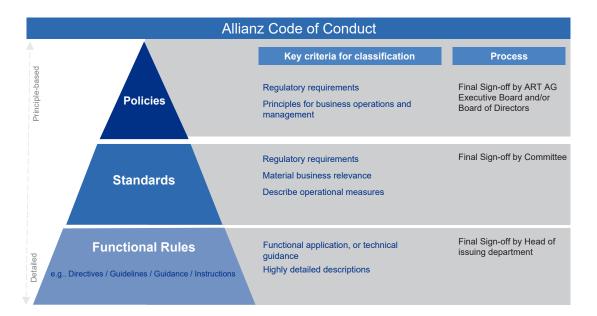
### B.1.2 Set of Rules

### **B.1.2.1 Company Rules**

Company rules include all internal rules established by an authorized party with the intention of creating a company-wide binding standard or a binding guideline. Every company rule must be documented and approved by the relevant panel. There is a defined set of rules within the AGCS Group that describes the relevant criteria for drawing up and updating company rules (including the underlying rule-definition process). ART AG follows the classification and approval concept contained in the set of rules for the AGCS Group. The set of rules encompasses four levels:

- Code of Conduct;
- Policies:
- Standards and
- Functional Rules

<sup>&</sup>lt;sup>5)</sup> The Underwriting Committee was dissolved in January 2019, in view of the structure of the "Alternative Risk Transfer" business segment as a global business segment of the AGCS Group; since then, the AGCS Group's global decision-making processes (Referral Process) have also applied in this business segment.



### B.1.2.2 Three Lines of Defense Model

A basic component of ART AG's control framework is the Three Lines of Defense Model described below.

The separation between various lines of defense is principle-based and defined by the following activities.

The first line of defense is represented by the operating business segments, for example through daily activities, risk management and controls in the respective business segments. Key activities include, in particular:

- Operational management of risks through assumption of or direct influence on the organization and the assessment and acceptance of risks;
- Drafting and implementation of methods, models, management reports or other control standards in order to help optimize risks and expected profits, and
- Participation in business decisions.

The second line of defense provides independent supervision and scrutinizes the daily assumption of risks and controls by the first line of defense. The key activities are:

 Defining an overarching control framework within which the operating business segments can act;

- Carrying out activities such as monitoring compliance with the control framework or scrutinizing business decisions, and
- Evaluating the design and effectiveness of the control environment, including an assessment of the control models and methods. Providing advice regarding risk-mitigation strategies and control activities (including providing professional opinions) for the operating business segments and company management.

The second line of defense has the following main powers:

- Independence from the reporting channels, objectives, goal-setting and compensation of first line of defense responsibilities;
- A direct reporting channel and unlimited access to the Board of Directors;
- If necessary, escalation of relevant issues to the Chairman of the Board of Directors;
- All Key Function Holders (except for the Head of Internal Audit) have the right to veto business decisions that fall within the purview of the control function if they have sound reasons for doing so, and
- The right to be involved in major business decisions and to receive all relevant information.

The third line of defense provides independent monitoring of the first line of defense and the second line of defense. In particular, its activities include:

- An independent assessment of the effectiveness and efficiency of internal controls, including the activities of the first line of defense and the second line of defense, and
- A report to the Audit Committee of the Board of Directors.

The same powers for the functions of the second line of defense also apply to the third line of defense (with the exception of the veto right).

In order to ensure an effective Internal Control System, all control functions are required to cooperate and to share relevant information.

### **B.1.3** Functions

The following sections discuss the actuarial function, the compliance function and the risk management function. These are part of the second line of defense.

Internal Audit, which acts as the third line of defense, is also discussed.

### **B.1.3.1** Actuarial Function

The actuarial function is embedded in the ART Corporate Actuarial Department and is managed by the Head Actuary, who reports to the Chief Financial Officer of ART AG. In order to avoid any conflicts of interest, employees who carry out actuarial work for the underwriting segment (so-called business actuaries) are not part of ART Corporate Actuarial. ART Corporate Actuarial includes the following areas of responsibility: Reserving/Analysis, Actuarial Diagnostics, Actuarial Risk Modeling and Actuarial Pricing Governance.

Within ART Corporate Actuarial, the actuarial function carries out tasks based on regulatory and business requirements. The function heads up the Loss Reserve Committee, which makes decisions about the amount of technical provisions pursuant

to IFRS, makes a recommendation to this body regarding the appropriate amount of such provisions and is itself represented and entitled to vote via the person holding the actuarial function. The actuarial function determines the provisions for the Market Value Balance Sheet (MVBS) and also expresses an opinion regarding the appropriateness of the reinsurance structure, the company's underwriting policy and the effective implementation of the risk management system.

The actuarial function interfaces and works closely with other functions, in particular the risk management function:

- In addition to the appropriate amount, the actuarial function also analyzes the sensitivity and uncertainty of underwriting reserves;
- In addition, the actuarial function is responsible for assessing all underwriting risks in accordance with the standard formula, and
- The actuarial function plays an active role in the entire risk management process to the extent that underwriting risks are involved. The Head Actuary reviews whether the company has sufficient funds that are at least equal to the Solvency Capital Requirement.

### **B.1.3.2 Compliance Function**

The compliance function is headed up by the Head of Compliance, who reports to the General Counsel, a member of the Executive Board of ART AG.

As part of the Internal Control System and as the second line of defense, the compliance function supports and monitors compliance with the applicable legal and administrative regulations and advises the Board of Directors and Executive Board on all matters relating to compliance.

In addition, the compliance function monitors the relevant legal environment and informs the Executive Board and/or the Audit Committee promptly of any significant changes.

In close consultation with risk management, the compliance function assesses the compliance risk for assigned risk areas on an annual basis and monitors the implementation of appropriate measures to minimize risk.

To fulfill its duties, the compliance function has established a global compliance framework in collaboration with the operating units, which the Allianz Group compliance function regularly reviews as part of a maturity analysis to ensure that it is appropriate and effective.

### **B.1.3.3** Risk Management Function

Risk management is headed up by the Head of Risk Management, who reports to the Chief Financial Officer of ART AG and to the Chief Risk Officer of the AGCS Group. The Head of Risk Management chairs ART AG's Risk Management Committee and is a (non-voting) member of other ART AG committees.

ART AG's risk management function, which is embedded in the AGCS Group's risk management, includes the following duties, among others:

- Helping the Executive Board of ART AG and other functions to use the risk management system effectively;
- Monitoring the risk management system;
- Monitoring the overall risk profile of ART AG;
- Providing detailed reporting on ART AG's risk exposures and advising the Executive Board on risk management issues, including on strategic concerns relating to corporate strategy, mergers and acquisitions or larger projects and investments; and
- Identifying and assessing emerging risks.

### B.1.3.4 Internal Audit

Audit forms the third line of defense. Internal Audit is headed up by AGCS's Global Head of Internal Audit, who reports to the Audit Committee of the Board of Directors. Allianz Group Audit and the audit outsourced to AGCS SE for ART AG regularly carry out an independent review of the organizational structure and workflow of the risk management

system. In addition, quality reviews of risk processes are conducted and adherence to business standards and compliance, including compliance with the internal control framework, are tested.

Internal Audit evaluates and provides recommendations on improving the effectiveness of the Internal Control System and the organizational structure and workflows by applying systematic audit approaches. The audit spectrum, which covers all risks, including those arising from outsourcing, is defined and reviewed on an annual basis using risk-based approaches. This audit spectrum is then used to control and prioritize internal audit activities. The entire audit spectrum must be adequately covered within a five-year period.

For every audit conducted, the internal audit function compiles an audit report, including recommendations based on facts and professional judgment, a summary of the most important results and an overall assessment. Follow-up plans for remedying deficiencies identified in the audit report are drawn up by the audited unit and provided to the internal audit unit. The internal audit function holds follow-up meetings to ensure that the deficiencies identified are remedied.

### **B.1.4** Compensation System

Selected key figures from the budgets form the basis for financial and operating targets, which reflect the strategy of the Group and of ART AG. As stipulated, this is intended to:

- Prevent excessive risk-taking;
- Help prevent conflicts of interest;
- Ensure that risk-taking does not exceed the operating unit's risk-tolerance limits; and
- Adequately reflect the main risks, including with respect to their time horizon and their effect on the company's overall success.

ART AG has implemented the Allianz Group's performance management system. The Allianz Group's global compensation system has been adjusted to support Allianz's strategic Renewal Agenda. In addition to Group or company key financial performance indicators (KPIs),

the compensation system considers an employee's individual performance (including the Executive Board), which is measured on the basis of quantitative and, primarily, qualitative criteria. This approach promotes a stronger focus on the behavioral aspects of performance (including compliance) and sets a common standard which is intended to advance cultural change throughout the Group.

For the annual bonus (short-term) of the Executive Board and employees of ART AG, the AGCS Group's quantitative targets account for 50% of the performance evaluation. The operating profit accounts for 40% of these, overall net profit for 20%, the volume of dividend payments made for 20% and the combined ratio for 20%. The other 50% of the performance evaluation is comprised of qualitative targets. An overall assessment of individual priorities (WHAT targets) is drawn up here, along with the HOW target, consisting of four personal attributes that relate to behavioral aspects:

- Excellence in the market and with customers;
- Team-oriented leadership behavior;
- Entrepreneurial conduct; and
- Trust.

For members of the Executive Board and other employees, part of the bonus is paid in cash and the rest is allocated in the form of participating interests in Allianz SE's share ownership plan. Payout of the equity component is delayed for four years after the allocation date and the payout amount is equal to the respective market value of Allianz SE shares on the payout date.

A mid-term bonus may be granted to members of the Executive Board. This mid-term bonus includes sustainability indicators that are in line with the Group's external targets and can be broken down into key performance indicators and health indicators.

The key performance indicators are:

- Sustainable improvement/stabilization of return on equity (excluding unrealized gains/losses from bonds) and
- Compliance with economic capitalization guidelines (degree of capitalization and volatility limit).

The health indicators, which are consistent with the Renewal Agenda, include:

- True customer centricity;
- · Digital by default;
- Technical excellence;
- · Growth engines; and
- Inclusive meritocracy (including the gender-equality initiative/women in leadership positions).

There are no pension commitments for former members of the Board of Directors or the Executive Board.

# B.1.5 Information on Material Transactions

ART AG and AGCS SE are parties to Service Level Agreements for the provision of advisory and support services in various fields, such as risk analysis and risk assessment. Compensation for the services provided is invoiced at cost, plus a profit margin.

ART AG grants non-proportional reinsurance to AGCS SE. In turn, AGCS SE protects ART AG's own funds from losses arising from the overall insurance business through an internal group whole account stop-loss contract. Reinsurance contracts between ART AG and AGCS SE are entered into as arm's-length transactions.

During the 2018 reporting period, there were no material transactions with members of the Board of Directors or the Executive Board.

### **B.2** Fit and Proper Requirements

The key functions include both Key Function Holders and key function members. Key Function Holders are the people who are responsible for carrying out the key functions. They are the heads of the respective segments and report directly to the responsible member of the Executive Board or (in the case of Internal Audit) to the Board of Directors of ART AG. There is one Key Function Holder for each key function.

The key function members are other people working within the key function, including people who report directly to the Key Function Holder and experts with independent decision-making powers.

The key functions and the respective Key Function Holders of ART AG are:

- Actuarial function: Head Actuary;
- Legal function: General Counsel;
- Compliance function: Head of Compliance;
- Risk management function: Head of Risk Management;
- Internal Audit function: AGCS Global Head of Internal Audit;
- Accounting function: Chief Financial Officer.

The evaluation of fit and proper requirements for all these people is relevant for Solvency II purposes and must be ensured. The requirements are listed in AGCS's Fit and Proper Policy. AGCS's Fit and Proper Policy has been implemented by ART AG and approved by the Executive Board. Any changes to AGCS's Fit and Proper Policy are in each case submitted to the relevant ART AG approval panel for ratification.

The AGCS Fit and Proper Policy describes principles, criteria and processes designed to ensure that these people who actually control the company and work in key functions do indeed meet the professional qualifications and demonstrate the personal dependability required. AGCS's Fit and Proper Policy includes a definition of the required professional qualifications and personal dependability for the various positions involved. It also describes the processes that must be followed to ensure that the

relevant people have the necessary professional qualifications and personal dependability.

The professional qualification requirements for internal and external candidates must be defined in the application procedure. Every candidate must submit a résumé and various interviews must be conducted, including an interview with the Human Resources Department. A review must be carried out of the candidate's personal background, which includes sending copies of relevant credentials, criminal record (or similar document) and proof that the candidate is not and has not been involved in insolvency proceedings as a debtor.

Human Resources must review references and carry out a search in public media. This is optional for key function members, but mandatory for Key Function Holders.

Performance reviews (for all people who are the focus of AGCS's Fit and Proper Policy) and career-development conferences (for executives and Key Function Holders) are mandatory and must be held on a regular basis.

Spontaneous reviews of fit and proper requirements shall be carried out in certain exceptional situations if professional qualifications and/or personal dependability have been called into question.

Ongoing professional training programs ensure that the professional qualification requirements are always met. Training courses in ethical business conduct, anti-corruption and combating fraud are offered to provide employees with clear rules regarding appropriate behavior.

AGCS's Fit and Proper Policy sets benchmarks for evaluating professional qualifications and personal dependability regardless of which findings and information have been collected during the application process and regular or spontaneous reviews and as a result of negative evaluations.

# B.3 Risk Management System, including Own Risk and Solvency Assessment

### B.3.1 Risk Management System

The organizational structure and workflows of ART AG's risk management system make it possible to control risks in an integrated manner and ensure that risks assumed are consistent with the company's risk-bearing capacity and, specifically, with the risk appetite defined in the risk strategy. The organizational structure and workflows of the risk management system follow a top-down approach:

#### **Board of Directors of ART AG**

The Board of Directors is responsible for the overall supervision of the company. The Board of Directors defines the organization and an appropriate governance system (including risk management) and supervises and controls the management of ART AG. AGCS's global risk strategy, which also applies to ART AG, is submitted to the Executive Board of ART AG for approval and to the Board of Directors in the event of significant changes.

#### **Executive Board of ART AG**

The Executive Board is responsible for direct management of the business. The Executive Board issues Management Regulations concerning the function, allocation of responsibilities and powers of management. Among other things, the Executive Board is responsible for:

- Appropriately implementing the AGCS Risk Policy within the organizational structure and work processes of ART AG;
- Implementing and approving AGCS's overarching risk strategy, which also includes ART AG, the risk tolerance defined therein and the limits, as well as aligning the risk strategy with ART AG's business strategy and the Allianz Group's risk strategy;
- Setting up a risk management function, which is responsible for independent monitoring of risks;
- Defining and implementing risk management processes, including processes for assessing the company's solvency.

An overarching risk governance system is defined by the implemented guidelines and standards for the organizational structure, the risk strategy, the system of limits and documentation and reporting requirements. These guidelines ensure on one hand that information about developments at the company that are of relevance to risk and about decisions is passed on promptly and in full, and on the other hand that a process is put in place for making and implementing decisions.

# B.3.2 Risk Management Approach and Risk Strategy

### B.3.2.1 Risk Management Approach

One of the core competencies of ART AG – an international insurance company with industrial and corporate clients – is risk management, which is an essential component of its business processes. Assessing, minimizing and assuming risks for policyholders is part of everyday business at ART AG.

The purpose of ART AG's risk management is to increase the company's value sustainably by considering the risk and earnings situation. Risk capital rules are applied with the aim of protecting ART AG's capital base, improving its financial strength and fulfilling the duties arising from insurance business. The risk management system should help to protect ART AG's financial strength in the interests of shareholders while safeguarding policyholders' rights. Risk management includes the necessary strategies, processes and reports for identifying, assessing, observing and controlling existing and potential risks. Another core element of risk management is translating risk drivers, dependencies and capital requirements for risks into decision templates for management. ART AG supports the company's risk culture with a comprehensive, systematically implemented risk governance structure.

# B.3.2.2 Basic Principles of Risk Management

ART AG's risk management assesses the company's risk-bearing capacity. It is based on a uniform understanding of the risks taken and risk management processes as well as the associated control mechanisms. Risk management follows the principles listed below:

# Basic Principle 1: Responsibility of the Board of Directors for the Risk Strategy

ART AG's Board of Directors has ultimate responsibility for compliance with the risk strategy and the associated risk tolerance, which is regularly aligned with the business strategy. The risk strategy describes the general approach to management of all material risks that arise in the course of business activities and in the pursuit of business targets. Risk tolerance for all material quantifiable and nonquantifiable risks takes into account the expectations of shareholders, regulatory requirements and the requirements of rating agencies. Both the risk strategy and risk tolerance are reviewed at least once a year by the Executive Board and submitted to the Board of Directors for approval if there are significant changes. If necessary, they are adjusted and communicated to all affected functions.

### Basic Principle 2: Risk Capital as a Key Control Parameter

Risk capital is the main parameter used to define risk tolerance as part of the solvency assessment. It serves as a key indicator in decision-making and risk management processes relating to capital allocation and limits. Capital is regarded as an available financial resource in this context. The impact on risk capital is taken into account in major business decisions.

Stress scenarios are also examined as part of the solvency assessment, to ensure that adequate capital is available to protect the company against unexpected and extreme economic scenarios.

### Basic Principle 3: Clear Definition of the Organizational Structure and Risk Management Processes

An organizational structure has been established at ART AG that is clearly defined and encompasses all risk categories. The roles and responsibilities of all the functions involved are also defined through this organizational structure. This structure is communicated clearly and in full to all the relevant functions.

### **Basic Principle 4: Consistent Risk Assessment**

Consistent quantitative and qualitative methods are used to assess relevant risks, including both individual and cumulative risks, across all risk categories. In the risk capital calculation, quantitative risks are considered using the standard formula. Risk assessments and calculations are clearly defined in AGCS's risk capital rules and ensure that a consistent procedure is followed within the Allianz Group. Results are analyzed and assessed using statistical methods and qualitative expert assessments.

Individual risks that cannot be quantified with the standard formula, as well as complex risk structures that combine several individual risks or risk categories, are assessed using quantitative criteria, economic portfolio models or, in some cases, simplified quantitative methods (e.g. scenario analyses). If quantification is not possible, the assessment will be performed using qualitative criteria.

# Basic Principle 5: (Further) Development and Integration of the System of Limits

A consistent system of limits has been established that ensures compliance with risk tolerance and governs how concentration risks are dealt with. It includes relevant risk parameters and drivers of risk for risk capital and is supplemented by more extensive operating limits. The system of limits is regularly reviewed by the Executive Board as part of the risk strategy and the associated internal quidelines.

# Basic Principle 6: Mitigation of Risks that Exceed Risk Tolerance

If individual risks exceed their limit or if total risks exceed risk tolerance, the risks must be mitigated appropriately. Measures are defined to ensure that risks remain within the limits and can simultaneously serve the planned risk tolerance, for example by adjusting reinsurance solutions, strengthening the control environment, reducing and/or hedging the risk position or adjusting risk tolerance.

Any risk limitation shall take place only within the context of the framework conditions mandated by economics and the law.

# Basic Principle 7: Consistent and Effective Monitoring

Risk tolerance and handling of risks have been integrated into a standardized process for defining limits, which includes all quantifiable risks of ART AG and takes into account risk diversification and concentration. Clearly defined reporting requirements and escalation processes ensure that if limits are exceeded, risk tolerance compliance will be restored and required measures to limit risks will be instituted immediately, where necessary. More extensive early-warning systems will also be reported and reviewed on a regular basis. These include risk management processes for major risks, estimates of emerging risks and processes for product launches.

## Basic Principle 8: Consistent Risk Reporting and Risk Communication

ART AG's risk management sends regular and, if necessary, ad-hoc reports to the Risk Management Committee and to the Executive Board. The report is supplemented by risk assessments that are especially relevant to outside stakeholders (supervisory bodies, rating agencies, etc.). The results of the company's Own Risk and Solvency Assessment (ORSA) are documented in the annual ORSA Report. The underlying data and assumptions on which the information is based are embedded in a comprehensive control environment that ensures adequate data quality for complete, consistent and timely reporting to management.

Ad-hoc reporting covers events that are unexpected in terms of their size or the amount of the loss or that can have an unexpectedly strong impact on ART AG's risk profile. This impact relates to the income statement, the company's equity resources, its reputation, continuation of business operations or non-compliance with regulatory or legal requirements.

### Basic Principle 9: Integration of Risk Management into Business Processes

Where possible, risk management processes are directly integrated into business processes, including strategic and tactical company decisions and decisions affecting day-to-day business, to the extent that they might affect the risk profile. Above all, such integration is intended to ensure that the risk management system will help to shape future risks while playing only a secondary role in reactively assessing and controlling existing risks.

# Basic Principle 10: Comprehensive and Timely Documentation

The methods, structures and processes relevant to risk management are documented in a comprehensive and timely manner in order to ensure transparency and clarity.

Filling the key functions is pivotal to ensuring optimum implementation of the processes. As a result, when appointing or dismissing the Head of Risk Management, the Chief Financial Officer consults with AGCS's Chief Risk Officer to ensure that the professional and personal qualifications of the Head of Risk Management fully satisfy the requirements specified in AGCS's Fit and Proper Policy.

### **B.3.2.3** Fit and Proper Requirements

The Head of Risk Management must have appropriate qualifications, experience and knowledge to fulfill his responsibilities. He must perform his duties with due regard to the complexity of the business and the nature and size of the company. He must also distinguish himself through his honesty, integrity and excellent reputation and must have appropriate skills and financial strength.

The Head of Risk Management essentially requires the following knowledge:

- Knowledge of the regulatory framework and applicable requirements;
- Knowledge of financial and insurance markets;
- Knowledge of the business strategy and business model of ART AG; and
- Knowledge of the organizational structure and workflows.

### **B.3.2.4 Resources**

The risk management function at ART AG and AGCS has adequate resources to fulfill its responsibilities properly and with a focus on risks. Once a year, the tasks of the risk management function for the coming year are discussed and stipulated. Priorities and tasks that have been set are also matched to the number of employees and their qualifications, to ensure that priorities and tasks are feasible. This process takes into account not only ART AG's available resources, but also those of AGCS's global risk management functions.

Reciprocal oversight also takes place between key functions, in line with regulatory requirements. This reciprocal oversight involves Internal Audit, the compliance function, the Legal Department, the actuarial function, the accounting function and the risk management function.

### B.3.2.5 Risk Strategy

AGCS's global risk strategy, which also includes ART AG, is the core element of the set of rules governing risk management. It is designed to ensure compliance with all obligations to our customers and to create sustainable added value for our shareholders. The risk strategy defines the company's tolerance and appetite for risk, taking into account all of the company's material qualitative and quantitative risks.

ART AG's Board of Directors determines the business strategy and its alignment with the risk strategy and coordinates this with AGCS SE.

### **B.3.2.6 Risk Categories**

ART AG categorizes all risks into one of eight risk categories. These risk categories are constantly monitored by risk management as part of risk reporting. Concentration risks may arise for some of these risk categories – in conjunction with other disproportionately large risks – due to an unbalanced risk profile. Concentration risks and emerging risks are not separate risk categories.

For all quantifiable and non-quantifiable risks, there is a comprehensive risk management process that includes risk identification, risk assessment and risk management, as well as risk monitoring and risk reporting. This process is implemented as part of a clearly defined risk strategy and risk appetite and its appropriateness/adequacy is regularly reviewed.

Risk Category	Definition
Market risk	Unexpected losses due to changes in market prices or a change in parameters that affect market prices, as well as risks arising from options and guarantees embedded in contracts, or changes in the value of assets or liabilities of participating interests resulting from changes in the relevant parameters. In particular, this includes changes in equity prices, interest rates, property prices, exchange rates, credit spreads and implied volatilities. As a result, it also includes changes in market prices caused by a deterioration in market liquidity.
Credit risk	Unexpected drops in the market value of the portfolio due to a deterioration in the creditworthiness of counterparties, including failure to meet payment obligations or non-performing instruments (e.g. missed payment deadlines).
Underwriting risk	Losses due to unexpectedly high future claims, including those arising from natural or man-made disasters and run-off losses on existing claim provisions.
Business risk	Losses due to unexpectedly high cancellation rates in the portfolio and the resulting loss of profits, as well as from continuing fixed costs in the case of a drop in new business.
Operational risk	Unexpected losses due to inadequate or faulty internal operating processes or systems, owing to human error or misconduct or to external events.
Reputational risk	Unexpected drop in the Allianz share price or the value of existing or future business caused by damage to the reputation of the Allianz Group or any of the specific business units from the shareholder's perspective.
Liquidity risk	Unexpected financial losses due to non-fulfillment of current short-term or future payment obligations or if fulfillment is based on adverse changes in terms and conditions, as well as the risk of refinancing at higher interest rates or through the sale of assets at a discount during a liquidity crisis.
Strategic risk	Unexpected negative change in the value of a business unit due to wrong management decisions relating to the business strategy and its implementation.

# B.3.2.7 Reporting on Risks and Implementation of Risk Management Processes

ART AG's risk management function generates internal risk reports – both at regular, predefined intervals and on an ad-hoc basis – that contain the relevant risk-related information in a clear, concise format.

The ad-hoc reporting includes events that – in addition to regular reporting – are unexpected in terms of size and impact and involve material changes to known risk issues or completely new or emerging risks that may have significant repercussions. These include material quantitative effects on financial results and capitalization, for example, as well as material qualitative effects on reputation, business continuity or non-compliance with laws and regulations. The comprehensive nature of risk management ensures that all material risks within ART AG are identified and systematically managed and that potential deviations from ART AG's risk appetite are identified at an early stage. Appropriate risk-mitigation techniques are used to deal with cases in which identified risks exceed the specified risk appetite (e.g. violations of limits). If such cases occur, clear measures are instituted to address the problem, such as adjustments to the risk appetite or - following an economic review of the situation conclusion of reinsurance contracts, strengthening of the control environment or reducing/hedging of risks associated with the underlying assets or liabilities.

### B.3.3 Set of Rules Governing the Organization and Workflow of Risk Management

ART AG has established an effective governance system to promote implementation of the business strategy, to ensure adequate monitoring and control of business risks and to guarantee compliance with legal requirements. This system includes guidelines on the methods used to assess risks, on the risk management structures and on risk governance processes.

Additional guidelines deal with capital market risks, credit risks, underwriting risks, business risks and operational risks; they define the risks that are entered into and stipulate risk tolerance in these risk categories. This risk tolerance is the foundation for risk-based control of the business. In addition, the guidelines specify responsibilities and the scope of authority and define measures for minimizing risk and for escalation if limits are exceeded. For each risk category, the guidelines supplement the requirements and provisions in the overarching AGCS Standard on ORSA and the AGCS Guideline on Top Risk Scoping and Assessment.

### B.3.4 Specific Material Risks to ART AG

# B.3.4.1 Framework for the Top Risk Assessment

The Top Risk Assessment (TRA) is a tool used in the company's Own Risk and Solvency Assessment and a key tool used by the Executive Board to control risk. The Top Risk Assessment requirements are documented in AGCS's Guideline on Top Risk Scoping and Assessment.

The Guideline on Top Risk Scoping and Assessment describes a consistent, transparent approach for identifying and managing critical risks at ART AG. All material risks are identified and evaluated in the Top Risk Assessment.

Once ART AG's Executive Board and management have identified the critical risks, these risks are assigned to members of ART AG's Executive Board. The risk owner is responsible for making the risk landscape transparent and for defining actions to mitigate the relevant risk if the risk-tolerance level defined by the Executive Board is exceeded. The results of this risk assessment are reviewed by risk management each quarter or on an ad-hoc basis if necessary and are reported to the Risk Management Committee and to the Board of Directors of ART AG.

### **B.3.4.2 Significant Risks**

For disclosures on significant risks to which ART AG is exposed during the term of its insurance and reinsurance obligations, as well as their inclusion in overall solvency needs, please see Chapter C, Risk Profile.

Disclosures on material risks that are not fully covered when calculating the Solvency Capital Requirement using the standard formula can also be found in Chapter C, Risk Profile.

# B.3.5 Own Risk and Solvency Assessment

Among other things, ART AC's Own Risk and Solvency Assessment (ORSA) includes:

- Overall solvency needs, taking into account ART AG's risk profile, approved risk-tolerance thresholds and ART AG's business strategy;
- Continuous compliance with capital requirements and requirements for technical provisions; and
- The significance of the deviation of the risk profile of the company in question from the assumptions on which the Solvency Capital Requirement is based and which were calculated pursuant to the standard formula.

The guidelines for the company's Own Risk and Solvency Assessment are set out in the AGCS Standard on ORSA. They specify the processes and responsibilities of the company's Own Risk and Solvency Assessment.

The appropriateness of the guidelines is reviewed, and if necessary adjusted and approved, at least once a year by the Risk Management Committee.

### **B.3.5.1** Responsibilities

The Board of Directors of ART AG bears ultimate responsibility for the company's Own Risk and Solvency Assessment.

The Executive Board plays an active role in the company's Own Risk and Solvency Assessment.

It controls the assessment, reviews the results, institutes measures based on the results of the assessment and takes account of these when making strategic decisions. The Executive Board approves ART AG's ORSA Report, which is used for both internal and regulatory reporting.

The Risk Management Committee ensures that the company's Own Risk and Solvency Assessment is designed and carried out in an appropriate manner. The committee approves the guidelines and reviews the ORSA Report.

Risk management coordinates implementation of the company's Own Risk and Solvency Assessment and contributes to the assessment along with the actuarial function and other relevant functions.

### **B.3.5.2 ORSA Processes**

The Own Risk and Solvency Assessment (ORSA) is an umbrella term covering a range of connected activities that take place over the course of the year, with which ART AG ensures on an ongoing basis that it has adequate own funds that are in proportion to the risks it enters into.

The following elements of the ORSA process are particularly important:

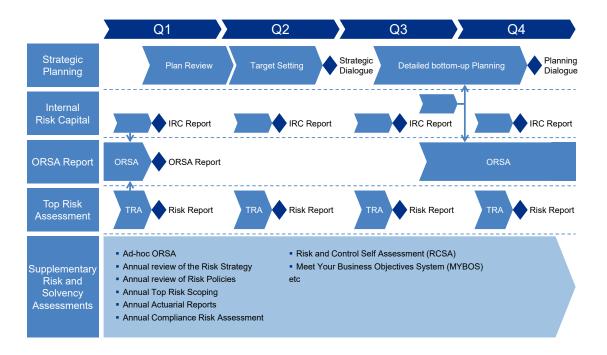
- Ensuring that the business strategy and risk strategy are consistent: The operating profit target derived from the business strategy is reviewed with respect to the company's risk-bearing capacity as part of risk planning. In addition, risk-tolerance limits are specified for the planning period based on profit targets. Future tolerance limits and corresponding concepts are specified in the risk strategy or in documents relating to the risk strategy. This process ensures that the business strategy and the risk strategy are consistent.
- Risk capital calculation: Risk capital is determined with respect to market, credit, underwriting, business and operational risks using the standard formula. Overall risk capital corresponds to the total for the individual categories, less diversification effects and deferred taxes.

- Determination of sensitivities of the solvency situation in stress scenarios.
- Maintaining the system of limits: Results of the
  planning process are analyzed with regard to
  their impact on the capital base, and the limits
  for the next fiscal year are adjusted if necessary.
  Compliance with limits is monitored continuously throughout the year. If necessary, steps are
  taken to ensure that risk exposure remains within
  the prescribed limit. Quantitative limits apply to
  market, credit and underwriting risks.
- Top Risk Assessment: The Top Risk Assessment supplements the overall solvency assessment by evaluating risks that cannot be quantified with the standard formula. If any risks are identified, overall solvency needs are adjusted.
- To assess each individual risk, the amount of the loss and the frequency are estimated. The frequency chosen varies depending on the scenario selected by experts. The Risk Management Committee discusses the risk situation with regard to material risks on a quarterly basis and if necessary decides on measures to mitigate risks.
- Capital management: It is of vital importance to ART AG to ensure adequate capitalization at all times with respect to regulatory requirements, rating capital requirements and market-specific requirements.
- Calculation of economic and regulatory solvency positions and their sensitivity to stress scenarios.
- Determination of the effectiveness of the Internal Control System: The determination of the effectiveness of the Internal Control System takes into account the latest results of control tests, audit reports and reviews, as well as assessments by third-party providers. The ERIC Advisory Group has been set up to manage discussions regarding the assessment of effectiveness of internal controls and thus of the overall system of governance. It consists primarily of representatives of the four key functions (risk management, actuarial, compliance, legal and audit).

 Ad-hoc risk assessments: The regular ORSA processes described above are supplemented by non-regular assessments of the risk profile if required. This is necessary if ART AG's risk profile changes significantly or if such changes are expected.

When and how an ORSA process is carried out depends on the requirements of the business. Some ORSA-related processes are carried out every quarter, e.g. risk reporting, while other processes relating to strategic decisions take place once a year or on an ad-hoc basis if necessary.

Findings from ORSA processes provide support with business decisions. The chart below shows the time sequence for the most important process steps and how they are linked to each other.



The appropriateness of the ORSA processes is reviewed annually.

The findings of all ORSA processes and measures that are decided on are summarized in an ORSA Report. The risk management function coordinates the preparation of the ORSA Report, which contains all information relating to risk that is relevant to the result of the ORSA assessment.

The ORSA Report is normally finalized and adopted by the Executive Board in the second quarter of the fiscal year.

The annual preparation of the report also takes into account feedback from the most recent reviews of previous years' ORSA Reports (e.g. by Group Audit) and any changes in external requirements. The main stakeholders from the areas of Capital Management, Underwriting, Investment Management and Accounting are also included, and any changes from a regulatory viewpoint are taken into account.

The final draft of the ORSA Report is submitted to the Head of Risk Management for review. The Risk Management Committee discusses the findings of the ORSA Report and decides whether to recommend to the Executive Board that the ORSA assessment and corresponding ORSA Report should be approved or whether the risk management function should coordinate further changes before the report is sent to the Risk Management Committee again.

Upon recommendation, the ORSA Report will be submitted to the Executive Board for approval and to the Board of Directors for information. In a final step, the conclusions of the ORSA assessment and the corresponding report are made available to the FMA and to everyone who plays a key role in decision-making processes relating to the corporate strategy, the risk strategy and risk and capital management (e.g. ART AG's Key Function Holders).

The ORSA Report for the 2018 fiscal year does not contain any objections or significant recommendations to the Board of Directors. On the contrary, the overall solvency situation was deemed to be stable and comfortable, both as at the balance sheet date of December 31, 2018 and throughout the planning period.

### B.4 Internal Control System

ART AG has implemented a formal Internal Control System, the so-called ERIC system (Enterprise-wide Risk-based Integrated Control System), to control significant operational risks for the company on an ongoing basis through control activities and to ensure that key controls are effective. This system has been set out in writing in an internal guideline and is based on internationally recognized control frameworks such as the COSO (Committee of Sponsoring Organizations of the Treadway Commission). In line with legal and regulatory requirements and Allianz Group regulations, ERIC pursues the following objectives:

- Achievement of the strategic business targets is effectively supported and ART AG's legal capacity is assured;
- Governance aspects and business processes are effective;
- The applicable laws and regulatory provisions, together with internal guidelines of Allianz, AGCS and ART AG, are complied with; and
- The processes deliver complete, accurate information for internal and external financial reporting and for regulatory reporting. This ensures that internal management decisions are supported effectively and that the expectations of external stakeholders are fulfilled.

As part of the ERIC system, the key controls that are formalized are those that are necessary in order to avoid or reduce significant operational risks to ART AG. The ERIC system provides a comprehensive view of these risks and controls and gives ART AG's Executive Board reasonable assurance that the aforementioned targets will be achieved. The ERIC system uses a uniform approach to carry out assessments of operational risks and controls with various functional areas. That means that it also supports cooperation and the sharing of information between the key functions under Solvency II (compliance, risk management, actuarial and internal audit). The results of activities in connection with the ERIC system are stored in a separate database, to enable consistent reporting, for example.

On the whole, the ERIC system promotes awareness of risks and controls within the organization and creates transparency with respect to responsibilities for risks and controls. The quality of key controls is assessed in a structured and efficient way. With additional support from an effective risk management system for operational risks, potentially significant operational risks are identified at an early stage and the necessary steps are taken to avoid or reduce these risks, making it possible to comply with the risk tolerance limit¹ for operational risks set by ART AG's Executive Board.

The Internal Control System relates to operational risks. However, to facilitate readability, the term "operational" is omitted below. At the same time, the terms "key control" and "control" are used synonymously.

### B.4.1 Key Principles of the ERIC System

The ERIC system is based on the following principles:

- A focus on significant risks;
- A focus on key controls;
- Promotion of positive awareness of risks and controls;
- Effectiveness of key controls;
- Documentation of risks, controls and business processes:
- Integration of service providers used into the Internal Control System; and
- Control strategies such as separation of duties and dual-control principle.

Risk and control assessment programs are the main procedures for determining which operational risks are covered by the Internal Control System; they focus on significant risks relating to the aforementioned targets. All programs deliver their own perspective on the risk and control landscape at ART AG and complement each other. The use of a consistent method allows available results to be used multiple times and prevents overlapping assessments as far as possible. A balanced combination of these programs ensures the completeness of the ERIC system on one hand and its efficiency and feasibility on the other.

Significant risks and key controls are identified and assessed at three levels:

- Management level (e.g. entity-level controls, global Operational Risk Assessment Program);
- IT level (e.g. IT general controls); and
- Process level (important business processes, financial and regulatory reporting).

First, these evaluation programs allow significant risks to be identified and assessed; they are then assigned key controls, which are assessed with regard to their appropriateness/adequacy. In addition, the key controls are subjected to a structured test to determine whether they can be implemented as specified (operating effectiveness).

If a risk level is unacceptable (e.g. because of a lack of key controls or ineffective key controls or due to an inadequate design), countermeasures are defined and implemented in order to bring it back into line with the operational risk tolerance.

The ERIC system's core process consists of four steps and follows an annual cycle:

- Determining the scope of risks;
- Assessing risks and reviewing the control design and documenting/adjusting the controls, and if necessary identifying, remedying and retesting control weak spots;
- Testing controls (i.e. testing them for operating effectiveness) and identifying, remedying and retesting control weak spots, if necessary; and
- Monitoring and reporting.

It is particularly important to test controls, partly in order to be able to show external stakeholders that internal controls are being implemented effectively and also in order to build and maintain the trust of these stakeholders in the reliability of the Internal Control System. Clear and up-to-date documentation of key controls is crucial for the efficient testing of controls.

Missing key controls or key controls that have not been set up properly or are not being effectively implemented are regarded as control weak spots that must be eliminated. The materiality of control weak spots is assessed with the involvement of the risk management function and a realistic and detailed improvement plan is drawn up, setting out responsibilities and deadlines. Once this plan has been executed, the control is retested.

This process is overseen by the ERIC Advisory Group, an advisory body at ART AG. The following functions are represented in this body:

- Risk management function;
- Legal function;
- Compliance function;
- Actuarial function;
- Accounting; and
- Internal Audit (no voting rights).

This composition also supports reciprocal oversight between key functions and thus helps to ensure compliance with the relevant regulatory requirements. The ERIC Advisory Group regularly gives its opinion on:

- The completeness and consistency of the ERIC system;
- The operational implementation of processes under the ERIC system;
- The appropriateness and completeness of the scope for risk and control assessments;
- The effectiveness of the ERIC system and, in particular, the materiality of possible control weak spots; and
- The appropriateness and effectiveness of the governance system.

The risk management function coordinates and monitors all activities necessary for the ERIC system, in particular remedial actions to eliminate control weak spots. It regularly provides updated overviews to the ERIC Advisory Group and to the ART Risk Management Committee. At least once a year, the risk management function, together with the global risk function, produces a so-called ERIC report and an additional accompanying letter that is specific to ART AG. These documents are submitted firstly to the ERIC Advisory Group for review and then to the ART Risk Management Committee for approval, in order to determine on this basis the overall effectiveness of the ERIC system including the governance system. Finally, the report is presented to the Audit Committee of ART AG's Board of Directors and to the Executive Board of ART AG for confirmation.

### **B.4.2** Compliance Function

The compliance function monitors ART AG's compliance with regulatory and legal requirements with a focus on risks, and regards itself as an active adviser to the organization on all matters relating to compliance.

To enable it to fulfill its duties, the compliance function has the right to unrestricted access to information.

### **B.4.2.1 Compliance Organization**

The compliance organization consists of the Compliance Department and other functions and departments with tasks relating to compliance. Responsibilities are stipulated in the AGCS Compliance Policy, which has been implemented by ART AG. The AGCS Compliance Policy sets out the respective organizational structure and method of operation at global, regional and local level within the AGCS Group. Detailed guidelines and work instructions supplement the framework for a functioning compliance organization. The Allianz Code of Conduct is also a central component in ensuring a uniform understanding of compliance within ART AG.

The AGCS Global Integrity Committee also belongs to the compliance organization.

The global approach of compliance follows the structure of AGCS SE.

The governance functions include all other departments that are responsible for monitoring and assessing the applicable legal or regulatory requirements, the implementation of processes and controls and the introduction of any necessary internal quality assurance measures.

The risk areas assigned to the governance functions (Actuarial, Human Resources Department, Accounting, Risk Management, other areas of finance and Market Management) include, for example, accounting standards, actuarial principles, regulations on sales of insurance, outsourcing regulations, employment law and complaints management.

The responsibilities of the compliance and governance functions are specified in the AGCS Compliance Policy and the AGCS Governance Policy. These also contain details of the respective organizational structure and method of operation and of the assigned risk areas. Detailed global guidelines and work instructions supplement the framework for a global organization. The Code of Conduct is also a central component of the Compliance Management System, particularly as it promotes the creation of a uniform understanding of compliance within ART AG.

The Head of Compliance reports regularly to the Board of Directors and the Executive Board of ART AG. Compliance reporting includes the results of the previous compliance risk assessment, possible changes in the compliance risk profile, overviews of current compliance activities, the status of compliance reviews/audits, a summary of any relevant violations and/or deficiencies that have been reported and recommended corrective measures.

The Executive Board and/or Board of Directors of ART AG is responsible for organizational and operational structures and processes for ensuring compliance with the AGCS Compliance Policy and the allocation of the relevant risk areas to the compliance functions and governance function. The Executive Board sets up and maintains a compliance function that is appropriate and effective in relation to risk exposure. The Executive Board also appoints the Head of Compliance.

The Global Head of Compliance is responsible for the implementation of the compliance principles and processes described in the AGCS Compliance Policy. This includes reporting any significant incidents that are of relevance to compliance to the Audit Committee and/or the AGCS Global Integrity Committee.

The heads of the governance functions are responsible for implementing the governance principles and processes within their risk areas. Any significant incidents of relevance to compliance must be reported to the AGCS Global Integrity Committee.

The Audit Committee and/or the AGCS Global Integrity Committee deals with all significant incidents of relevance to compliance that are reported at the AGCS Group and decides on further measures. This also applies to significant incidents at ART AG. The Global Compliance Officer of AGCS SE is the chair. Other members of this body include the global heads of risk management, audit, legal, communications and human resources and, in the case of situations of relevance to ART AG, the holder of the corresponding function at ART AG.

### **B.4.3** Fit and Proper Requirements

The Head of Compliance at ART AG holds the key function for the compliance function. For this function, the Head of Compliance must have adequate qualifications and the necessary practical experience to be able to perform the tasks of the compliance function, taking into account the complexity of the company and its activities and the principle of proportionality. The Head of Compliance must be able to record and assess ART AG's compliance risks and monitor compliance with the relevant internal and external legal requirements and regulations and the associated processes. Furthermore, he must be able to identify any changes in the legal environment at an early stage and be able to manage them, and must have the following knowledge:

- Knowledge of the applicable internal and external legal requirements and regulations;
- Knowledge of the insurance markets;
- Knowledge of the business strategy and business model of ART AG and the AGCS Group; and
- Knowledge of the internal organizational structure and workflows of ART AG and AGCS SE.

# B.4.4 Resources of the Compliance Function

The resources of the compliance function at ART AG (and the AGCS Group) are planned and used in such a way that tasks can be carried out properly and with due regard to risk. Planning takes place within the framework of the annual risk-related Compliance Plan.

In addition, reciprocal oversight takes place between key functions within the context of the ERIC

Advisory Group, in line with regulatory requirements. This also takes into account the resources available for a function in the overall assessment.

# B.4.5 Duties of the Compliance Function

The compliance function and the governance functions have the following tasks, in accordance with the Solvency II Directive:

- Providing advice, in particular advising the Executive Board on compliance-related issues;
- · Risk monitoring;
- · Early warning; and
- Monitoring and reporting.

To implement these tasks, the Global Compliance Officer at AGCS SE has introduced a Compliance and Governance Management System within the AGCS Group, which has been coordinated with Allianz Group Compliance. The main elements and processes are described in the AGCS Compliance Policy. ART AG implements a corresponding Compliance and Governance Management System in accordance with the AGCS Compliance Policy.

The Compliance and Governance Management System covers the following tasks:

- Promoting a culture of integrity and compliance;
- Providing and implementing training courses and communication;
- Advising the Executive Board and the operating units:
- Establishing and complying with compliance principles and processes;
- Processing information provided by employees and resolving compliance incidents;
- Cooperating with regulatory authorities; and
- Monitoring compliance rules and reporting.

The Compliance Management System currently involves the following main processes:

#### · Performing Risk Assessments

The compliance function regularly identifies and assesses the compliance risk associated with business activities in the assigned areas of risk. The results are documented and form the basis for the Compliance Plan. The methods, timing

and procedures for these assessments are coordinated with the risk management function.

#### Compiling, Coordinating and Updating the Compliance Plan

The Compliance Department develops and implements an annual risk-related Compliance Plan. This plan sets out the compliance control activities for the relevant individual risk areas for a specific time frame, and considers the activities from the Compliance Plan of the AGCS Group and the Allianz Group. The annual Compliance Plan is submitted to the member of the Executive Board in charge of compliance and is reviewed with regard to any necessary changes and adjusted at least once every six months. The Compliance Plan is approved by the Executive Board and is brought to the attention of the Audit Committee of the Board of Directors.

#### Resolving Compliance Incidents

The Compliance Department deals in an appropriate manner with incidents involving compliance violations, if necessary by escalating such issues to the Audit Committee and/or the AGCS Global Integrity Committee. In the event of an investigation, the compliance function can request support from experts in other functions or from external specialists if necessary.

Monitoring Risks Relating to Legal Changes
 The compliance function continuously monitors

the relevant legal environment for ART AG. Any relevant legal changes are analyzed and documented at local and global level in connection with specific issues, and any necessary risk-based measures are recorded. The process, which is supported by a database, has been rolled out globally within the AGCS Group. Reporting to management takes place in relation to risks, using established local and global reporting structures.

#### Quality Assurance Procedure

The compliance function carries out regular risk-related monitoring of the appropriateness and adequacy of implementation and of the effectiveness of the compliance programs, processes and controls. This may involve taking random samples, performing surveys or other analyses.

#### **B.4.6** Significant Changes

Other than the developments in certain processes, methods and documentation systems referred to above, there were no relevant changes in the year under review.

The revised Compliance Policy of AGCS SE was approved by the Executive Board of ART AG at the beginning of the current year and is being implemented during the first quarter of 2019.

#### **B.5** Internal Audit

Internal Audit is a key function within ART AG's Internal Control System.

Internal Audit is an independent and objective audit and advisory function that aims to create added value and improve an organization's business processes. It supports the organization in achieving its goals by assessing the effectiveness of risk management and controls and of management and monitoring processes using a systematic and targeted approach and by helping to improve them.

Internal Audit submits analyses, assessments, recommendations and information as part of its audit activities.

Internal Audit has primary responsibility for audits within ART AG and at all other insurance companies in the ART Group. At the same time, it is part of the worldwide audit function within AGCS SE and the Allianz Group, the functional management of which is overseen by Group Audit at Allianz SE. As the superordinate audit unit within the Group, Group Audit performs a specialist monitoring and supervisory function.

Internal Audit works on behalf of the Audit Committee of ART AG and reports directly to it. The Head of Internal Audit may also attend meetings of the Board of Directors.

The Audit Committee of ART AG is kept informed of audit activities, the results of audits and significant developments from the point of view of Internal Audit through periodic reports. Furthermore, members of the Audit Committee and the Chief Executive Officer receive final audit reports specific to ART. The Head of Audit also confirms that Internal Audit is independent from an organizational viewpoint in his annual report to the Audit Committee of the Board of Directors and the Chief Executive Officer.

Internal Audit's activities are based on a comprehensive audit plan that is updated annually, which covers all material activities and business segments (audit subjects) in the ART Group and the AGCS Group. A risk-oriented assessment of audit subjects is carried out as part of the annual planning process in Internal Audit. An operational plan is drawn up on the basis of the annual plan. Each audit passes through the phases of audit preparation and implementation, reporting and follow-up action based on this.

Audit preparation includes an analysis of the theme of the audit, appropriate assessment of risks, induction into the subject matter of the audit, detailed planning of the procedure for the audit and the obtaining of information.

The audit implementation phase includes the following activities: opening discussion, audit activities (field work), documentation of audit activities, determining the results of the audit and follow-up discussion/concluding discussion.

The activities that are necessary in connection with this are stipulated and documented in an internal audit document, the audit program.

Internal Audit draws up an audit report immediately for each audit as part of its reporting activities. The aim of this is to provide brief, concise and targeted information to the Board of Directors, the senior level of management that is responsible and the units being audited about the object of the audit and the audit results.

After the audit report has been distributed, Internal Audit oversees the timely implementation of the agreed measures relating to the audit findings by

the responsible units specified in the audit report (follow-up). In monitoring the progress of implementation, Internal Audit follows all findings irrespective of the risk content.

ART AG has a duty to issue internal company guidelines as part of its organization of the business. Mandatory guidelines have been adopted by ART AG as part of this (adaptation of the AGCS Audit Policy).

The AGCS Audit Policy for Internal Audit (which has also been implemented by ART AG), as part of the internal guidelines of AGCS SE, is reviewed annually and where there are special reasons for doing so. A central process has been set up for this, which is coordinated by the independent risk controlling function and the Legal Department. The unit that is responsible for the subject area firstly reviews the quideline to determine whether it needs to be adapted. If any changes are immaterial, the revised version is submitted to the member of the Executive Board who is responsible and to the Chief Executive Officer for approval. Any material changes are also submitted to the Executive Board and – in the case of fundamental changes – to the Board of Directors for approval, and are then made known within the company.

The structure and correct organization of Internal Audit as a key function is specified in the AGCS Audit Policy adopted by the Executive Board, taking into account the regulatory guidelines of the Insurance Supervision Act (Versicherungsaufsichtsgesetz) and the requirements of Group Audit. This guideline describes the organizational structure and position of Internal Audit within the company and the principles of audit activities, tasks, responsibilities and main processes, as well as reporting lines and rights to information. The AGCS Audit Policy builds on the guidelines in the Group Audit Policy.

The AGCS Audit Manual supplements and clarifies the AGCS Audit Policy and is reviewed and published by the Head of Internal Audit each year and where there are special reasons for doing so.

Internal Audit has a duty to report any material findings from its area of responsibility to Group Audit immediately.

Internal Audit carries out its tasks autonomously and independently. The Executive Board and Board of Directors ensure that Internal Audit is functionally independent, within the framework of the AGCS Audit Policy approved by them, to maintain the functionality of the company's business organization (including information and audit rights). This independence is further protected by the position of Internal Audit within the organizational structure; it is independent of the "first and second line of defense" functions.

Internal Audit is not bound by any instructions or subject to other influences when conducting audits, reporting or evaluating the results of audits. The Audit Committee of the Board of Directors can order additional audits within the scope of its decision-making authority without this affecting the autonomy and independence of Internal Audit.

Internal auditors assess all the relevant facts in a balanced way and do not allow their opinion to be influenced by their own interests or those of others. In principle, employees working in Internal Audit may not perform any tasks that are not or do not appear to be in line with audit activities.

Internal Audit shall conduct audits with the necessary expertise and an appropriate level of professional care. Employees in Internal Audit shall apply

the maximum degree of expert objectivity when collating, assessing and forwarding information on audited activities or business processes. The findings of audits must be based on facts and must be backed up by adequate evidence.

Internal Audit at ART AG has been outsourced to AGCS SE. It is under the control of the Chief Executive Officer of AGCS SE and also reports to the Supervisory Board of AGCS SE. The Head of Internal Audit or his deputy has direct and unrestricted access to the Audit Committee of ART AG. As the superordinate audit unit within the Group, Group Audit also performs a specialist monitoring and supervisory function.

Internal Audit may be asked for its opinion on issues affecting the Internal Control System. Where this is the case, Internal Audit must maintain the necessary independence and must not be involved to any significant extent in the development, implementation or performance of processes and work instructions. Moreover, these advisory activities must not be organized in such a way that they compromise the performance of Internal Audit's core tasks and the audit plan.

The Head of Internal Audit must confirm the independence of the audit function to the Audit Committee of ART AG each year.

#### **B.6** Actuarial Function

Section B.1.3.1 provides detailed information about how the actuarial function is implemented at ART AG.

# **B.7** Outsourcing

ART AG applies the Global Procurement & Outsourcing Policy of the AGCS Group (AGCS P&O Policy), reflecting the significance of outsourcing. All of the requirements specified in the Allianz Group Outsourcing Policy (GOP) are included in the AGCS P&O Policy. Any changes to the GOP are reflected in

adjustments to the AGCS P&O Policy, which are submitted to ART AG's internal approval bodies for approval in accordance with the internal ratification process. Legally independent companies must incorporate the AGCS P&O Policy into their internal system of governance through ratification.

The AGCS P&O Policy applies to:

- · ART AG, including all branch offices; and
- All legally independent companies that are subject to ART AG's management control.

In particular, the AGCS P&O Policy governs the following aspects:

- Definition of outsourcing;
- Criteria for selecting, commissioning and managing suppliers;
- Definition of roles, responsibilities and approvals; and
- Rights of control during outsourcing (including termination).

A special role is played by the outsourcing function, which ensures that the necessary processes for monitoring and supervising the outsourced functions and services are defined and implemented.

The outsourcing function assumes responsibility for ensuring that the necessary processes for monitoring and supervising the outsourced functions and services are defined and implemented. This is done in consultation with the local key functions involved (e.g. Legal Department, Compliance, Risk Management, Business Continuity Management, Information Security Officer,

Allianz Group functions) and the persons in charge of the outsourcing agreement.

The outsourcing function has special responsibility for the following main activities:

- Instructing the organization on how requirements are to be satisfied from an outsourcing standpoint;
- Supporting all business owners in their activities in order to ensure compliance with the AGCS P&O Policy;
- Centralized filing/archiving of all outsourcing agreements (inventory), along with related documents and evidence (e.g. risk assessment, business plan, due diligence); and
- Reporting the AGCS outsourcing agreements to the Allianz Group, on request.

Terms and conditions for implementation and operating documents continue to be defined and reviewed annually in the Governance Toolkit with the contract holder, in consultation and agreement with global and regional key functions. The Toolkit thereby takes into account the various phases of outsourcing, from decision-making through implementation and the operational phase to termination of the agreement. If the terms and conditions are not met, escalations to procedures are defined.

# Critical and Important Outsourcing Agreements of ART AG

Service provider for ART AG	Country	Description
Allianz Investment Management SE	Germany	Investment Services *
Allianz Global Investors (Schweiz) AG	Switzerland	Investment Services *
PIMCO Deutschland GmbH	Germany	Investment Services *
Allianz Global Corporate & Specialty SE	Germany	Internal Audit **

<sup>\*</sup> Responsibility for function – Chief Financial Officer

#### **B.8** Other Disclosures

ART AG's governance system ensures that the company can properly identify, measure, control and report risks to which the company is, or may be, exposed. This is supported by the Internal Control System.

<sup>\*\*</sup> Responsibility for function - Chief Executive Officer

# C Risk Profile

ART AG categorizes all risks into one of eight risk categories (see Section B.3.2.6). ART AG's risk profile is described below based on these eight categories.

# C.1 Underwriting Risks

Underwriting risks are risks arising from obligations of the direct insurance business (non-life insurance business) and the reinsurance business (all risks) relating to the risks covered and the processes used in pursuing the business. The uncertainty of the results with respect to insurance and reinsurance obligations under existing policies and the new business expected over the next twelve months is taken into account.

The most important underwriting risk relates primarily to the trend in claims. A distinction is made between premium risk, i.e. the risk that, due to unexpected future claims, there will not be sufficient premium income to finance them, and reserve risk, i.e. the risk that provisions will be inadequate to cover existing claims due to unexpected run-off losses.

Premium and reserve risks only take into account loss events that occur with regular frequency. Extreme events that occur very rarely are not included in the premium and reserve risks, but instead in the catastrophe risk. Under catastrophe risk, a distinction is made between natural disasters, man-made events and other catastrophic events.

Underwriting risks also include lapse risk. This refers to the possibility of unexpectedly high cancellations in the existing business and the resulting loss of future profits.

ART AG calculates all underwriting risks using the standard formula.

No material insurance risk is transferred to special-purpose vehicles, and there is no material exposure from off-balance-sheet items.

ART AG actively controls premium and catastrophe risks; risk assessments and underwriting limits are integrated into the underwriting process and ART AG's risk appetite encourages the purchase of reinsurance coverage. Assessing risks as part of the underwriting process is a key element of risk management at ART AG. As part of strategic planning, future business volumes and associated risks, as well as their impact on solvency, are forecast.

With regard to reserve risk, ART AG regularly monitors the trend in provisions for insured events at individual policy level. In addition, ART AG performs annual reserve uncertainty analyses in order to evaluate the sensitivity of reserves to the assumptions on which the calculations are based.

With regard to risk concentration, ART AG's catastrophe risk before reinsurance is driven primarily by man-made catastrophes. The remaining portion of the gross catastrophe risk is based on natural disasters. Other catastrophic events play a minor role. One of the main drivers of premium risk is non-proportional internal group active reinsurance.

There is currently no sign of concentration risks in the underwriting risk after reinsurance that could significantly influence the solvency ratio.

Excessive risks are mitigated through internal and external reinsurance contracts. In addition to traditional forms of reinsurance, ART AG also uses modern forms such as industry loss warranties.

The risk arising from active internal non-proportional reinsurance is limited with aggregate excess of loss reinsurance. Own funds are protected from losses arising from the overall insurance business through an internal group whole account stop-loss contract with the parent company, AGCS SE.

The sensitivity of the underwriting risk is analyzed through sensitivity analyses and stress tests. Here, sensitivity to higher business volumes is analyzed, along with the impact of major losses and sensitivity to claims reported at a later date and losses that develop at a later date.

#### C.2 Market Risk

ART AG defines market risk as the risk of loss due to changes in market prices or in parameters that result in changes in the market prices of financial assets and liabilities. This also includes changes in market prices due to a deterioration in market liquidity.

Market risk consists of the following subrisks:

- Interest rate risk is the possible change in value of the portfolio due to changes in interest rates;
- Share price risk is the possible change in value of the portfolio due to price changes in the equity markets;
- Property risk is the possible change in value of the portfolio due to changes in market values of properties;
- Spread risk is the possible change in value of the portfolio due to changes in the credit spread;
   and
- Exchange rate risk is the possible change in value of the portfolio due to fluctuations in exchange rates.

In addition, market risk concentrations are assessed using the standard formula.

The main market risks for ART AG are exchange rate risk and market risk concentrations.

#### **Interest Rate Risk**

ART AG's interest rate risk is controlled as part of a comprehensive asset/liability management (ALM) system. In the non-life insurance business, payment obligations are typically shorter-term than the investments hedging them. ART AG's target duration is based on the assumption that it will continue to operate as a going concern. This results

in a longer duration on the asset side than on the liability side. This duration overhang implies interest rate risk. On the asset side, the duration is controlled by limits.

The sensitivity of the interest rate risk is analyzed using stress tests (among other things, a 100-basis-point increase/decrease in the interest rate).

#### **Share Price Risk**

ART AG's share price risk is primarily due to its participating interest in the ART AG subsidiary in Brazil.

In addition, ART AG holds two smaller positions totaling EUR 1.5 million that come from an Alternative Asset Portfolio that has been in run-off since 2009.

As at December 31, 2018, ART AG holds no further equity positions, as the participating interests in the subsidiaries in the USA and Bermuda were sold internally within the Group in December 2018. This led to a significant reduction in the share price risk in the fourth quarter of 2018.

The sensitivity of the share price risk is analyzed using stress tests (30% decrease in the values of participating interests and the rest of the Alternative Asset Portfolio).

#### **Property Risk**

ART AG has no properties in its investment portfolio.

#### **Spread Risk**

ART AG's spread risk is driven by bonds, loans and balances at South African banks.

ART AG normally holds fixed-income securities to maturity. As a result, short-term changes in market values have no negative financial effects on us. As a long-term investor, ART AG therefore has the option to invest in securities whose spreads are above the risk-free rate, and also to realize these spreads.

#### **Exchange Rate Risk**

Aside from the euro, ART AG has assets and liabilities in various currencies, in particular in Swiss francs (CHF), US dollars (USD) and Brazilian real (BRL). An appreciating euro causes assets denominated in currencies other than the euro to fall in value. At the same time, however, the corresponding capital requirements from a euro standpoint decrease, which reduces the impact on capitalization.

The local own funds of ART AG's subsidiary in Brazil are invested in the local functional currency, BRL. ART AG's BRL risk exposure comes exclusively from the participating interest in the Brazilian subsidiary.

The exchange rate risk is dominated by CHF, followed by USD and BRL.

Stress tests are used to analyze the sensitivity of the exchange rate risk (depreciation of foreign currencies against the euro by 10%).

#### **Market Risk Concentrations**

Market risk concentrations within the meaning of the standard formula relate to the participating interest in the Brazilian subsidiary and to balances at South African banks.

The market concentration risk increased significantly in the second quarter of 2018 owing to an adjustment to capital requirements for subsidiaries. The participating interest in the subsidiaries in the USA and Bermuda was sold internally within the Group in December 2018. This led to a significant reduction in the market concentration risk in the fourth quarter of 2018. However, the figures were still higher as at December 31, 2018 compared with a year previously.

#### **Business Prudence Principle**

ART AG's assets are invested in accordance with the business prudence principle (Article 80 VersAG):

- ART AG invests only in assets and instruments whose risks it can adequately identify, measure, monitor, manage, control and report and which it can adequately consider in determining the total Solvency Capital Requirement, and
- All assets, in particular those covering the Solvency Capital Requirement and the Minimum Capital Requirement, shall be invested in such a way as to ensure the security, quality, liquidity and profitability of the portfolio as a whole. Assets held to cover the technical provisions shall be invested in a manner appropriate to the nature and maturity of the insurance and reinsurance liabilities.

The Strategic Asset Allocation (SAA) defines the investment strategy for ART AG's investment portfolio.

The SAA is based on an analysis of assets and liabilities and a medium-term performance perspective. In structuring the SAA, great care is taken to ensure suitable target levels for quality and security, e.g. ratings, additional collateral and sustainable profits, as well as adequate liquidity and availability of the investment portfolio as a whole.

This ex-ante assessment is underpinned by constant compliance with the SAA (including leeways and limits) in the investment process and ex-post monitoring in order to facilitate corrective actions in the event of divergence from the targets.

ART AG's SAA stipulates that 100% of assets should be invested in fixed-income investments (the remainder of the Alternative Asset Portfolio of EUR 1.5 million is exempted from the SAA).

In order to ensure that individual investment decisions satisfy the business prudence principle, the Allianz Group and ART AG have:

- Drawn up a list of standard investments and
- Set up a process for investments that are not (yet) viewed as standard investments [New Financial Instrument (NFI) Process].

Only investments that are made regularly and over a sufficiently long period of time and in which ART AG and/or the Allianz Group's outsourced investment functions have relevant expertise are regarded as standard investments. Moreover, the internal processes and IT systems must be able to depict such investments adequately. Standard investments form the basis of ART AG's investment portfolio.

Before investments not included in the list of standard investments can be made, the NFI process must be completed successfully. This process checks the following aspects in particular: ART AG's ability to control all investment-specific risks, compatibility of the investment with the interests of the insured parties and effect of the investment on the quality, security, liquidity, availability and profitability of the investment portfolio as a whole.

ART AG's risk management system defines the framework conditions for managing market risk. In particular, these include the standards and the uniform methods and models for market risks, comprehensive limit systems for the investment portfolio and the system for reporting market risks. Furthermore, the responsibilities for managing market risk are defined in detail in Allianz's Standard for Market Risk Management. These include:

- Analyzing the market risk capital, identifying concentration risks and monitoring measures to reduce risk;
- · Identifying and controlling market risks;
- · Monitoring compliance with limits;
- Internal reporting to management and external reporting (including reporting to the supervisory authority) regarding market risk; and
- Optimizing the portfolio in terms of profitability and market risk.

Derivatives are used only to hedge and fine-tune foreign currency exposure (through FX forwards).

The Corporate Finance & Treasury Department of AGCS SE supports ART AG in monitoring and regularly reporting on ART AG's identified market risks. Reporting is handled through regular reports and, if necessary, ad-hoc reports. The purpose of risk reporting is to provide an up-to-date overview of risks to decision-makers (including the Board of Directors and the Executive Board) and to show the utilization of limits. In addition, it is intended to improve risk transparency at all levels of the company and to help management make decisions.

#### C.3 Credit Risk

ART AG defines credit risk as the possible loss in value of the portfolio within a defined time horizon caused by changes in the credit quality (creditworthiness) of debtors in the portfolio, including default or non-fulfillment of financial obligations. Default on a loan receivable may be caused either by a deterioration in creditworthiness (migration risk) or by the inability or unwillingness of the debtor to fulfill contractual obligations.

The framework for controlling credit risk pursues two major goals:

- Auditing and monitoring outstanding debts from individual parties with the goal of reducing the risk of default by individual counterparties, but also to ensure adequate diversification across the portfolio as a whole (e.g. with respect to various industries or regions), or to avoid a strong concentration on individual counterparties; and
- Ensuring that ART AG has sufficient capital at all times to reliably bear the credit risk it has assumed.

Along with both of the goals mentioned above, the following aspects are taken into account:

- · Reporting and managing the risks assumed;
- Defining and managing limits per counterparty and country; this also includes maintaining lists of counterparties subject to particular scrutiny (Watch List) or with which no business should be concluded (Black List);
- Business planning and capital management;
- Controlling the investment portfolio;
- Complying with investment accounting (including auditing required write-downs); and
- Including credit risks when estimating the price of insurance policies.

ART AG monitors and controls credit risk exposures and concentrations in order to ensure that it is in a position to satisfy its insurance obligations at all times. ART AG is supported in this by the Allianz Credit Risk Platform (CRisP), an Allianz application for monitoring and controlling credit risks. Among other things, the CRisP application makes it possible to:

- Set limits for individual debtors or groups of debtors; and
- Monitor and control limits based on reporting, including notification of updates for data and

limits on names of counterparties who either are subject to a special audit (Watch List) or with whom no business should be concluded (Black List).

The Allianz Group assigns credit limits to Allianz companies in a centralized process via CRisP. CRisP calculates the maximum limit for individual counterparties based on a large number of factors (such as the debtor's rating, total assets, the associated business segment and region) and monitors the respective limit utilization.

ART AG has the option to revise downward the assigned limits for maximum risk with respect to a debtor or group of debtors by stipulating its own limit. The limit assigned by the Allianz Group or the internal limit set by ART AG – whichever is lower – shall determine the discretionary limit for investments, credit risk insurance and/or reinsurance.

The Allianz Public Rating Plus (PR+) is used as an early-warning system to test the quality of counterparties and to provide information for preparation of the Watch List of individual counterparties for which the limits in CRisP may have to be adjusted.

The two different components of ART AG's credit risk exposure are the investment portfolio and the reinsurance portfolio.

Premium income and own funds required to cover written risks are invested almost exclusively in fixed-income securities. Because of the type of business activity in the non-life insurance business, typical investments by ART AG are short- to medium-term fixed-income securities, which leads to a lower credit risk. The limit systems for the investment portfolio described in the section on market risk also include, in particular, limits to mitigate the credit risk from investments.

The credit risk for external reinsurers arises from insurance risks that ART AG transfers to external reinsurance companies in order to reduce its own insurance risk. Potential losses may arise either from payment defaults on existing settlement claims arising from the reinsurance business or from default on reinsurance contracts. Reinsurance partners are checked by the Allianz Security Vetting Team (SVT). The SVT ensures that to the greatest extent possible, companies with strong credit profiles are selected. In addition, it may demand letters of credit, cash deposits or other financial collateral to further reduce the credit risk.

The sensitivity of the credit risk (investment and reinsurance portfolio) is analyzed using stress tests (e.g. downgraded two rating grades, whereby the rating grade refers to the rating subcategories, e.g. AA+, AA and AA- at Standard & Poor's).

ART AG's main risk exposures, which, among other things, are used to calculate counterparty default risk in the standard formula, include:

- Internal reinsurance with Allianz Group companies;
- Reinsurance with captives (as part of ART AG's fronting business); and
- Deposits with South African banks as part of a structured reinsurance transaction in South Africa.

ART AG mainly uses the following risk-mitigation techniques to reduce credit risk from the instruments below.

Instrument	Minimizing Risk
Reinsurance	All reinsurance partners are checked by SVT. Depending on this assessment, collateral in the form of e.g. guarantees, cash or other suitable financial measures is required in order to reduce credit risk.
Fixed-income securities	Requirement to invest primarily in high-quality securities and to limit concentrations with respect to counterparties in the portfolio.  Secured investments will be selected where necessary. Good portfolio diversification is required.

### C.4 Liquidity Risk

Liquidity risk is defined as the risk that utilizations under current or future payment obligations cannot be satisfied or can be satisfied only under terms and conditions that have undergone adverse changes. Above all, liquidity risk may arise if, over time, there are mismatches between cash flows on the asset side and the liability side.

The main objective in planning and controlling ART AG's liquidity position is to ensure that the company is always in a position to satisfy its payment obligations. To accomplish this goal, ART AG monitors and forecasts its liquidity position on a daily basis.

Liquidity planning for each of the next three years is carried out as part of strategic planning. It takes into account conditional liquidity requirements and liquidity sources in order to ensure that ART AG can satisfy future payment obligations.

In addition to liquidity planning, ART AG's liquidity risk is controlled by monitoring liquidity requirements against sources of liquidity under various stress scenarios, which are summarized in the Liquidity Risk Report (see below).

ART AG controls liquidity risk in order to ensure that available liquidity and liquidity needs are adequately balanced. The investment strategy ensures adequate quality and liquidity of the investment portfolio, e.g. through investment in liquid instruments such as high-grade government bonds. This means that even if unlikely events do occur, higher liquidity requirements can be met without substantial financial losses. ART AG applies actuarial methods to estimate the liabilities under insurance policies. During the course of liquidity planning, it ensures that all cash flows on the asset and liability sides match.

Coverage of short-term liquidity needs (less than two weeks) is supported by ART AG's access to the Allianz Group's cash pool.

ART AG compiles a Liquidity Risk Report each quarter. It contains a forecast of cash inflows and outflows over various time horizons (ranging from one week to a year), an assessment of available

countermeasures, including the realization of liquid investments, the application of various stress scenarios and an aggregation with KPIs such as the liquidity coverage ratio. Thresholds for warning levels and limit violations ensure that management is able to assess the liquidity situation under current and hypothetically tougher market conditions.

The stress scenarios examined in the quarterly liquidity report include scenarios that are run by every Allianz Group company. These include claims stress scenarios that examine claims leading to losses that at most occur once in 200 years. The premium stress scenario examines an interruption in premium income (from existing and new business) within the next two months, only 50% of which is recovered in the following month. As well as the stress scenarios applied throughout the Allianz Group, there are stress scenarios that are specific to ART AG. In particular, a rating downgrade for ART AG is analyzed.

In all the stress scenarios examined, the liquidity coverage ratio for every time horizon considered is under 50%. The liquidity coverage ratio is the ratio of cash outflows to cash inflows, taking into account available countermeasures.

Risk-mitigation measures must be prepared and sent to Group Risk Management as soon as any limit is exceeded under at least one scenario examined in the Liquidity Risk Report. Depending on the size of the liquidity gap, there are various escalation levels that require the involvement of the Risk Management Committee. An example of such a mitigation measure is the cancellation of a planned activity that would negatively affect the company's liquidity profile.

Concentration risks play a subordinate role in liquidity risk.

The expected profit taken into account in connection with liquidity risk, which is contained in future premiums, totals EUR 32.6 million at year-end 2018. This expected profit that is factored in to future premiums comes mainly from the Alternative Risk Transfer business segment (ART division). The total expected profit factored in to future premiums is

higher than in the previous year (EUR 1.9 million), as the new refined method of recording premium maturities within ART business has led to a reduction in future premiums. The total contribution of the expected profit factored in to future premiums per segment is calculated as the cash value of the difference between future premiums and the

associated expected future payments for claims and expenses. The assumptions used in these calculations are the same as those used to calculate technical provisions. Offsetting against potential losses is possible only within homogeneous risk groups.

### C.5 Operational Risk

#### C.5.1 Risk Exposure

The Allianz Group, including ART AG, defines operational risk as unexpected losses resulting from inadequate or faulty internal operating processes or systems or caused by human error or misconduct or by external events. This definition encompasses legal risks, compliance risks and risks relating to financial reporting. However, strategic risks, reputational risks and project risks are not included.

Operational risks are inherent in all kinds of products, activities, processes and systems and cannot be avoided entirely. Unlike most other kinds of risks, they occur suddenly and unexpectedly and can significantly affect the balance sheet, profits, corporate targets, business activities or reputation of ART AG.

Operational risks can be subdivided into the following categories:

- · Willful misconduct;
- Improper actions by third parties;
- Employment practices and workplace safety;
- Business practices and product features;
- Damage to operating and office equipment;
- Business interruption and failure of technical systems; and
- Business process risks.

### C.5.2 Management of Operational Risks

The risk management system for operational risks is based on the Allianz Group's three lines of defense concept. ART AG's employees are generally aware of potential operational risks and help to control and manage them by taking them into account in day-to-day business. In view of the company's positive risk and control culture, ART AG assumes that decision-makers in particular will make all identified weak spots and risks transparent so that the necessary countermeasures can be carried out in a timely manner.

Operational risks are controlled first and foremost on a cost-benefit basis, whereby the expected reduction in losses should exceed the costs involved in improving controls. However, there may be exceptions to this cost-benefit approach, for example in order to comply with laws and regulations, to protect the reputation of the company and the AGCS Group or to fulfill other strategic goals.

The operational risk capital is used as a cushion to protect the company from extreme operating losses caused by unexpected failures of key controls.

In a broader context, operational risks are controlled by ART AG's Top Risk Assessment program, which is supplemented by risk and control assessment programs. ART AG's risk management system for operational risks has been developed specifically in order to learn from risk events that have occurred in the past and avoid surprises due to operational risks in the future, i.e. to prevent the occurrence of operational risks outside ART AG's risk tolerance limit.

First, an understanding must be gained of what could potentially happen. This is done in two ways:

- Operational risk events that have occurred are examined retrospectively on an ongoing basis and their causes are identified. External operational losses that are disclosed by Allianz SE are also taken into account; and
- Specific forward-looking (stress) scenarios with potentially negative effects are analyzed on an annual basis.

ART AG identifies, assesses and controls operational risks with this structured approach. Both perspectives help to set priorities and to deploy resources to effectively manage operational risks in a targeted manner in order to make processes, systems, governance structures and methods more robust and to respond proactively to expected internal or external changes with the aim of avoiding operational risk events or reducing their negative effects on ART AG. As all the relevant functions of ART AG are involved in these analyses, they also help in particular to identify potential structural weaknesses that could in some circumstances point to a concentration of operational risks.

Even if operational risk events by definition often occur due to errors, our risk management system for operational risks does not focus on errors. Instead, it promotes a culture of risk transparency and treats errors as an opportunity for improvement. The company wants to learn from negative experiences and to identify potential weak spots at an early stage in order to avoid the possibility of similar losses in future. Such a mentality is a prerequisite for effectively managing operational risks.

ART AG's risk management system for operational risks is supplemented and supported by important activities. These are controlled by functions outside the risk management function and include:

- Compliance initiatives on combating fraud, combating corruption, antitrust law, economic sanctions, (unauthorized) cross-border business, capital market compliance, money laundering and financing of terrorism, sales compliance and data protection;
- Emergency management;
- Procurement processes at ART AG, including outsourcing; and
- Initiatives on information security.

#### C.5.3 Risk Mitigation

Operational risks are reduced through a series of appropriate and effective countermeasures (i.e. controls for the respective risks). These are defined as key controls if the actual risk would be significantly higher without the key control.

Because of their importance, the quality of key controls is assessed in a structured manner, i.e. the company reviews firstly whether their design is adequate to reduce the anticipated risks, and secondly whether they are being implemented effectively. This takes place within the framework of ART AG's internal control system.

#### C.6 Other Material Risks

In addition to underwriting risk, market risk, credit risk, liquidity risk and operational risk, ART AG also monitors business risk, reputational risk and strategic risk (see Section B.3).

#### Strategic Risk

Strategic risk is the risk of an unexpected negative change in company value due to management decisions with a negative effect on the business strategy and its implementation.

This risk is estimated and analyzed every year as part of the Top Risk Assessment process and is therefore within ART AG's risk tolerance.

Strategic controls are used to ensure that the strategic targets in the current business plan are correctly implemented. The company monitors market and competitive conditions, capital market requirements, regulatory conditions, etc. continuously in order to decide whether strategic adjustments need to be made. Strategic decisions are also discussed by various committees at the level of the Executive Board (e.g. by the Risk Management Committee). The Head of Risk Management is represented on all strategically relevant committees. Assessing the relevant risks is a core element of such discussions.

#### **Reputational Risk**

Various criteria influence the perception of ART AG as a respected provider of insurance services that acts responsibly: product quality, company management, financial strength, customer service, innovative capacity, leadership of employees, intellectual property and corporate responsibility.

Reputational risk relates to a possible loss of reputation for ART AG that could lead to an unexpected decline in Allianz SE's share price or a drop in future business volumes.

This risk is likewise estimated and analyzed every year as part of the Top Risk Assessment process and is within ART AG's risk appetite.

In the analysis, the maximum loss of premiums that can be expected from possible scenarios in the event of an incident affecting reputation is quantified. The Allianz ESG criteria are used to identify potential triggers: they define the guidelines on environmentally conscious/socially responsible business conduct. The risk is actively managed through existing processes in which various departments are involved. The maximum anticipated financial extent of a possible reputational crisis is within AGCS's risk appetite.

Individual management decisions on reputational risk are integrated into the risk management system. Reputational risk is also dealt with at AGCS SE and in the Allianz Group; a clearly defined reporting process is applied on a case-by-case basis.

#### **Business Risk**

Business risk, which results from losses due to unexpectedly high rates of cancellation in the portfolio and the resulting loss of profits, as well as losses caused by ongoing fixed costs in the case of a decline in new business, is evaluated both using the standard formula and in the Top Risk Assessment process.

#### C.7 Other Disclosures

All relevant disclosures regarding ART AG's risk profile are contained in the preceding notes.

# D Valuation for Solvency Purposes Comparison of Balance Sheet Figures

Dec. 31, 2018 in EUR thousand	Solvency II	PGR	Difference
Dec. 31, 2010 III LOK tilousaliu	30ivency ii	1 UK	Difference
Intangible assets	0	0	0
Deferred tax assets	3,247	0	-3,247
Surplus in retirement benefits	0	0	0
Real estate, property, plant & equipment and inventories for own use	32	32	0
Investments (excluding assets for index-linked and fund-linked contracts)	1,156,613	1,107,034	-49,579
Real estate (other than for own use)	0	0	0
Shares in affiliated companies, including participating interests	69,753	67,102	-2,651
Equities	1,469	1,469	0
Equities – unlisted	1,469	1,469	0
Bonds	976,168	939,358	-36,810
Government bonds	313,872	313,028	-844
Corporate bonds	662,209	626,240	-35,969
Collateralized securities	87	90	3
Collective investment undertakings	0	0	0
Derivatives	10,769	10,769	0
Funds held by others, not equivalent to cash	98,454	88,335	-10,119
Loans and mortgages	84,415	123,080	38,665
Other loans and mortgages	84,415	123,080	38,665
Amounts recoverable from reinsurance contracts:	792,419	914,682	122,263
Non-life and health similar to non-life	792,419	914,682	122,263
Non-life excluding health	791,170	913,024	121,854
Health similar to non-life	1,248	1,657	409
Funds held by others (deposits to cedants)	45,976	45,976	0
Receivables from insurance companies and intermediaries	77,030	195,408	118,378
Receivables from reinsurers	5,421	5,421	0
Receivables (trade, not insurance)	149,830	159,949	10,119
Cash and cash equivalents	60,599	60,599	0
Other assets not shown elsewhere	1,280	1,280	0
Total assets	2,376,862	2,613,461	236,599

Dec. 31, 2018 in EUR thousand	Solvency II	PGR	Difference
Technical provisions – non-life	1,412,706	1,626,134	213,428
Technical provisions – non-life (excluding health)	1,400,961	1,612,613	211,652
Best estimate	1,338,284	0	-1,338,284
Risk margin	62,677	0	-62,677
Technical provisions – health (similar to non-life)	11,745	13,521	1,776
Best estimate	11,611	0	-11,611
Risk margin	134	0	-134
Other technical provisions	0	0	0
Provisions other than technical provisions	12,166	12,984	818
Pension benefit obligations	13,713	0	-13,713
Deposits from reinsurers	-1,445	-1,445	0
Deferred tax liabilities	0	0	0
Derivatives	818	0	-818
Financial liabilities other than liabilities to banks	170,270	170,270	0
Liabilities to insurance companies and intermediaries	1,950	1,950	0
Liabilities to reinsurers	14,079	21,817	7,738
Payables (trade, not insurance)	9,160	9,160	0
Other liabilities not shown elsewhere	240,591	240,586	-5
Total liabilities	1,874,007	2,081,456	207,449
Excess of assets over liabilities	502,855	532,005	29,150

#### D.1 Valuation of Assets

The valuation methods used in accordance with Solvency II and the PGR are compared below. International Financial Reporting Standards (IFRS) provide the framework for recording and measuring assets and liabilities. IFRS rules essentially serve as an adequate approximation for valuation under Solvency II; however, the specific Solvency II regulations in the Omnibus II Directive (Directive 2014/51/EU) and the Delegated Regulation (Directive 2015/35/EU) take precedence. For assets that are valued at amortized cost under IFRS and for which the difference between market value and amortized cost is immaterial, the amount stated under IFRS was used. There were no changes in the recognition and valuation methods or estimates used during the period under review.

Where there are significant differences in valuation between Solvency II and PGR, these are explained in more detail.

#### **Intangible assets**

Intangible assets are identifiable, non-monetary assets that are not physical in nature. If intangible assets can be sold separately and the insurance company can prove that there is a market value for these or comparable assets, they can be stated at market value in the Solvency II balance sheet. Otherwise, intangible assets must be valued at zero under Solvency II valuation principles, as stipulated in Article 10 (2) of Regulation (EU) 2015/35.

PGR: Intangible assets are stated at production or acquisition cost and are amortized over their useful lives (generally five years).

#### **Deferred tax assets**

Deferred taxes are calculated for temporary differences in the values of individual assets and liabilities under Solvency II and in the balance sheet prepared for tax purposes (Article 15 of Delegated Regulation 2015/35). Deferred tax assets are assets that can be used to reduce income tax expense in future periods. Deferred taxes are not discounted.

PGR: No accruals are recorded for deferred tax assets.

# Real estate, property, plant & equipment and inventories for own use

Amortized cost figures are deemed to be a reasonable estimate of the fair value pursuant to Article 9 (4) of the Delegated Regulation.

PGR: The item property, plant & equipment is stated at acquisition or production cost, less scheduled or unscheduled depreciation.

# Shares in affiliated companies, including participating interests

Pursuant to Article 13 of Delegated Regulation 2015/35, participating interests are valued using the adjusted equity method or are valued at zero.

PGR: Participating interests are stated at cost. In the event of impairment that is expected to be permanent, the corresponding value adjustments are made.

#### **Equities**

Listed shares are stated at the share price on the most recent day of trading.

PGR: They are stated at the lower of cost or market.

#### **Bonds**

Listed bonds are stated at the market price on the most recent day of trading. If there is no active market, the fair value of unlisted securities will be provided by brokers or market-makers or calculated using the discounted cash flow method.

The relevant discount rates are based on observable market parameters and take into account the financial instruments' remaining term to maturity and probability of default.

PGR: They are carried at amortized cost.

#### **Collateralized securities**

Market values are provided by independent commercial banks. They are generally calculated using valuation models that in turn are based on available market data.

PGR: They are carried at amortized cost.

#### **Derivatives**

Derivatives are measured at market value pursuant to IAS 39.

PGR: The carrying amount is stated at market value.

#### Other loans

These are stated at fair value based on valuations by independent data providers or calculated using the discounted cash flow method. The effective interest rate on similar debt securities is used.

PGR: They are stated at face value and adjusted for any impairments.

# Amounts recoverable from reinsurance contracts

See Chapter D.2 for both Solvency II and PGR.

#### **Reinsurance deposits**

These are stated at face value, because for the deposits in question, the future interest payments essentially reflect the market interest rate.

PGR: They are stated at face value and adjusted for any impairments.

# Receivables from insurance companies and intermediaries

These are reported at face value less repayments. For accounts receivable from the direct insurance business, general loss allowances are made to account for the general credit risk. Receivables for premiums that are not yet due are not shown here, but rather as negative technical provisions.

PGR: These are reported at face value less repayments. For accounts receivable from the direct insurance business, general loss allowances are made to account for the general credit risk.

#### **Receivables from reinsurers**

These are reported at face value less repayments. Receivables for premiums that are not yet due are not shown here, but rather as negative technical provisions.

PGR: They are reported at face value less repayments, taking into account any necessary value adjustments.

#### Receivables (trade, not insurance)

These are measured at face value less repayments, adjusted for the probability that the counterparty will default.

PGR: They are reported at face value less repayments, taking into account any necessary value adjustments.

#### Cash and cash equivalents

These are reported at face value for Solvency II and the PGR.

#### Other assets not shown elsewhere

These are stated at amortized cost, by analogy with Article 9 (4) of the Delegated Regulation.

PGR: They are valued at amortized cost. Assets of low value are immediately written off.

# D.2 Measurement of Technical Provisions and Amounts Recoverable from Reinsurance Contracts

Under Solvency II, technical provisions have three components: premium provision, provision for claims and risk margin.

Premium provision is defined as the discounted best estimate of future cash flows (claim payments, expenses, premiums) relating to obligations under future events covered by policies in existence on the valuation date. Claim provision is defined as the discounted best estimate of future cash flows (claim payments, expenses, premiums) relating to loss events occurring before the valuation date. The risk margin is defined as the amount in excess of the best estimated value that a third party assuming the liabilities on the valuation date would require in order to close the transaction.

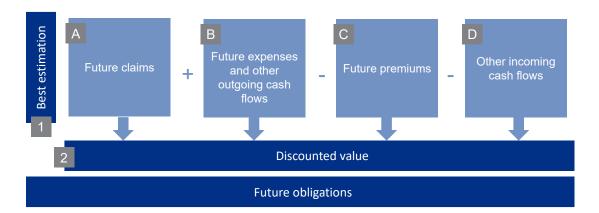
ART AG's valuation of the premiums and claim provisions is initially undiscounted. In a second step, the future cash flows – separate, in each case, for premium provision and claim provision, as well

as for the gross provision and reinsurance – are used to calculate an adjustment for the current monetary value of the cash flow (discounting). The risk margin is calculated using a blanket cost-of-capital approach, including discounting.

The following sections describe the calculation of the individual components, and in each case the undiscounted best estimate for the premium provision and claim provision on a gross basis and after reinsurance, the associated discounting and the risk margin. Next, the resulting technical provisions pursuant to Solvency II as at December 31, 2018 are presented and the approaches used to calculate reserve uncertainty are discussed. Finally, a comparison is made between the technical provisions pursuant to Solvency II and the corresponding provisions calculated in accordance with PGR. The main differences in measurement are described and the figures as at December 31, 2018 are presented.

#### **Premium Provisions**

The following chart depicts the calculation of the gross premium provisions:



Premium provisions include all expected premiums, commissions and claim payments under all existing policies as at the balance sheet date that will not become due and payable until after the balance sheet date.

As the first step in calculating gross premium provisions, the degree of exposure – the not-yet

earned premium components for all policies active as at the balance sheet date – is identified, regardless of whether the premiums were already due and payable before the balance sheet date or whether the premiums will become due and payable only after the balance sheet date. The accrued premium components are referred to below as Solvency II unearned premiums.

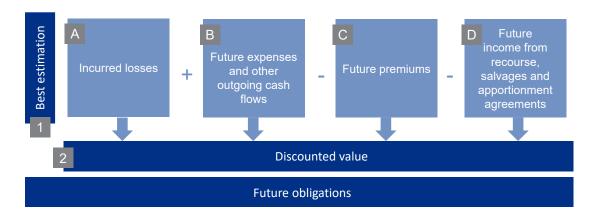
Based on the above, the best estimate for each of the individual components shown in the chart is calculated separately:

- Future claims: the expected loss ratio (excluding internal and external loss adjustment expenses) is applied to the Solvency II unearned premiums;
- The following components are used to calculate future expenses:
  - Not-yet-due portions of agent, broker and lead insurer commissions for existing policies;
  - Not-yet-due premium refunds and profit commissions;
  - Internal and external loss adjustment expenses: the expected loss adjustment expense ratio is applied to Solvency II unearned premiums;

- Administrative costs: the expected administrative expense ratio is applied to Solvency II unearned premiums;
- Future premiums: premiums under existing policies that will not become due and payable until after the balance sheet date are always included; and
- Other incoming cash flows, if applicable.

#### **Claim Provisions**

The following chart depicts the calculation of the gross claim provisions:



The undiscounted best estimates for the individual components shown in the chart above are calculated separately. IFRS approaches are used to calculate undiscounted specific case provisions and IBNR provisions:

- Incurred losses: these correspond to the total of specific case provisions + IBNR provisions (in both cases excluding loss adjustment expenses);
- Future expenses and other outgoing cash flows: these correspond to the total of specific case provisions + IBNR provisions for external loss adjustment expenses + provisions for internal loss adjustment expenses;
- Future premiums: reinstatement premiums for reserved damages; and
- Future income from recourse, salvages and apportionment agreements for damages already incurred as of the balance sheet date.

Below is a description of the calculation of IBNR provisions under IFRS and PGR for the various business segments as of December 31, 2018.

#### **AGCS Switzerland and Dubai Division**

Provisions are analyzed in detail once a year in the third quarter based on data for the first half of the year. In the fourth quarter, an update is calculated for all segments based on data for the third quarter. The results of the update – in particular for previous years – are rolled forward for the annual financial statements.

Business is divided into homogeneous reserving segments that are based primarily on the respective insurance division and allow a detailed analysis. The underlying currency is the euro. All other currencies are converted into euros using the exchange rates at the end of the quarter. Due to technical limitations, historical exchange rates are also used for some run-off triangles.

For reserving purposes, the external loss adjustment expenses and refunds from recourse, salvages and apportionment agreements are contained in the claims data (payments, specific case provisions, IBNR provisions). For accounting purposes, the external loss adjustment expenses are extracted from the IBNR provisions via percentage rates. The percentage rates are based on historical data.

The reserving approaches for claims during the fiscal year and for prior-year claims differ:

To forecast claims for the fiscal year, the claims data are divided into minor claims, medium-sized claims, major claims and catastrophic claims. Minor, medium-sized and major claims are based on the loss expense after facultative reinsurance across the various AGCS units. Minor and medium-sized claims are packaged into one joint run-off triangle per insurance division. For major claims, separate major claim run-off triangles are created. For catastrophic claims, all the relevant claims are combined, regardless of the claim amount. The threshold for medium-sized claims is EUR 1.0 million; for major claims, it is EUR 5.0 million. For all claims from the aviation and energy insurance divisions, as well as all claims in which our units in the USA or Canada were the lead underwriters of the underlying insurance policy, US dollar thresholds are used. In all other cases, claims classifications are euro-based.

The approaches for calculating IBNR provisions for the fiscal year distinguish between long-tail and short-tail insurance divisions. Long-tail insurance divisions include general liability, property damage liability insurance, aviation insurance subdivisions for manufacturer's risk, for airport liability and for reinsurance treaty business and insurance for medium-sized companies and major events. The short-tail divisions include fire and other property insurance, technical insurance, aviation insurance subdivisions for airlines, general aviation, marine and transport insurance and energy risk insurance.

For long-tail divisions, IBNR provisions are calculated on the basis of the expected loss ratio. It is possible to offset the minor claims and medium-sized claims categories against each other. The expected loss ratios are reviewed by the actuarial function in a separate analysis using actuarial methods. The relevant parameters are part of the risk capital model and as such are approved by Allianz Group Actuarial.

For short-tail divisions, the approach is more nuanced: for minor and medium-sized claims, the Bornhuetter-Ferguson method is used both for a gross and a "gross-net" figure from which facultative reinsurance has been eliminated – based on the expected loss ratios (see explanations above) and specific run-off patterns for the loss expense according to the current annual reserve analysis. Except for quota share reinsurance, for which the corresponding quota share is deducted when calculating the net IBNR provisions, no refunds are accepted under obligatory reinsurance contracts. It is assumed that, for the short-tail divisions, the claims exceeding the retention are already known. The net IBNR provisions are therefore equal to those after facultative reinsurance.

The reserving approach for major claims is based on an analysis of the major claims run-off triangles. For technical insurance, the aviation insurance subdivisions for airlines, general aviation, marine and transport insurance and energy risk insurance, a Bornhuetter-Ferguson approach is used to calculate IBNR provisions for major claims. For fire insurance, the analysis of run-off triangles has demonstrated that no IBNR provisions are needed for major claims.

For catastrophic claims, no IBNR provisions had been set up for unknown claims at the end of 2018, because it can be assumed that all losses incurred are already known. However, specific IBNR provisions were set up separately for events that were already known.

The methods described above are applied at the division level. A weighted completion factor is calculated for this purpose that is based on the factors for the individual underlying reserving segments (e.g. branch offices). The projected loss expenses serve as the weights. Reserving segments for which no completion factors were chosen during the annual analysis are not included when calculating the weighted completion factor for the division. In a second step, the IBNR provisions calculated at division level for the three relevant claims categories are allocated to the underlying reserving segments. Various weights can be chosen for the allocation, e.g. premiums earned, the projected loss expense or IBNR provisions according to the Bornhuetter-Ferguson method. However, the allocation method is usually coordinated with the method selected to calculate the IBNR provision. Finally, it is still necessary to review whether the gross IBNR provision for each reserving segment and each claims category is at least as high as the gross figure after facultative reinsurance and whether this, in turn, is at least as high as the net figure. If not, the IBNR provisions for the gross amount and/or the gross figure after facultative reinsurance will be raised accordingly.

The annual reserve analysis is based on run-off triangles and the following projection methods:

- Chain ladder for claim payments;
- Chain ladder for loss expense;
- Loss ratio method;
- Bornhuetter-Ferguson method for claim payments; and
- Bornhuetter-Ferguson method for loss expense.

The final selection is based both on an individual assessment of the results from the specific methods and on qualitative information from the Underwriting and Claims departments. The method chosen depends, among other things, on the insurance division, the available claims history and the paid claims status for the respective claim year.

For the annual financial statements, the results of the reserve analysis (updated based on third-quarter data) are rolled forward. The basic approach is to hold paid claims stable in the fourth quarter compared with the results of the reserve analysis for the third quarter. However, based on the comparison of actual and expected claims development in the fourth quarter alone, the run-off of prior-year claims will be adjusted if necessary, especially for short-tail divisions. The expected claims development is based on the run-off patterns chosen as part of the reserve analysis.

For segments that were not the subject of the reserve analysis, suitable alternative approaches are applied.

Amounts that can be recovered from reinsurers are calculated as best estimates based on the underlying contracts.

The following incoming and outgoing cash flows from contractually agreed reinsurance contracts are shown under amounts recoverable from reinsurance contracts.

#### Incoming cash flows:

- Amounts recoverable from reinsurance contracts for claim payments and corresponding expenses; and
- Reinsurance commissions and profit-sharing pursuant to the individual reinsurance contracts.

#### Outgoing cash flows:

• Future reinsurance premiums under existing contracts, including reinstatement premiums.

# Internal Group Reinsurance and ART Division Business:

Specific (stochastic) actuarial models for reserving and risk-modeling are produced for the material transactions in this segment. The most suitable risk distributions and parameters are used for each transaction and the contractual arrangements, some of which are complex, are explicitly considered in the model. Smaller transactions are examined on a portfolio basis.

To calculate the IBNR provisions, the models are updated every quarter, every six months or at least every year, depending on the transaction and the availability of new data, and loss scenarios are simulated. The original assumptions from pricing and the actual claims experience are weighted using suitable credibility approaches in order to calculate the expected final loss burden as of the balance sheet date, which is then used to calculate and post the required IBNR provisions.

#### Discounting

Premium provisions and claim provisions are discounted for each claim year, insurance division, region and currency and for the following cash flows:

#### Gross:

- Future claim payments;
- Future expenses and other outgoing cash flows;
- Future premiums;
- Future incoming cash flows from recourse, salvages and apportionment agreements; and
- Other incoming cash flows.

Amounts recoverable from reinsurance contracts. The following parameters are used in the calculation:

- Undiscounted premium provision and claim provision by claim year, division, region and currency;
- Expected payment pattern per type of provision, division and region; and
- Risk-free yield curve per currency, plus volatility adjustment per currency and maturity.

The following principles apply:

- The yield curve is specified by the Allianz Group;
- Premium provision and claim provision are calculated separately. In addition, they are separated by claim year, reserving segment and primary currency (EUR, CHF, USD, GBP, AUD, CAD and others);
- The cash flow forecast is based on payment patterns that were selected as part of the annual reserve analysis for each reserving segment;
- To simplify, it is assumed that payouts from claim provisions are made at mid-year, on average;
- It is assumed that payouts (mainly for future claims) that are reserved in the premium provisions as of the balance sheet date will be made from the premium provisions at the end of the respective year on average;
- The same duration is used for technical provisions and the adjustment for potential bad-debt losses; and
- Gross and reinsurance cession (facultative and obligatory) are discounted separately.
   No adjustments were made to the risk-free yield curve used within the meaning of Article 77 (2) VersAG.

#### **Risk Margin**

There is no observable market value for technical provisions. Instead, an estimate is made of the amount that would have to be paid to sell the liabilities to an independent reference undertaking. The discounted best estimate plus a risk or market value margin (MVM) is used. The MVM represents the cost of the capital the acquiring company would have to provide during run-off.

The starting point for the cost of capital used is the Solvency Capital Requirement under Solvency II (SCR); however, this amount in each case only covers the capital requirement for a period of one year. A time series of future SCRs must therefore be estimated for the MVM. The cost of capital rate to be used is set at 6% (Delegated Regulation, Article 39), estimated as the cost of capital rate of the reference undertaking.

Initially, the MVM is calculated for ART AG as a whole. It is then allocated to the insurance lines of business specified under Solvency II, whereby the respective sums of the discounted risk time series for the insurance risks are used as weights. Within the insurance lines of business, there is an allocation to claim provision and premium provision, with the respective undiscounted provisions used as weights. In the final step, both portions are further allocated to reporting segments and regions, whereby the relevant provisions under IFRS serve as weights.

#### **Overview of Technical Provisions**

Because the internal calculations are carried out at the level of the reserving segments, which are different from the Solvency II segments, the latter are based on a suitable allocation. The table below shows technical provisions for non-life insurance under Solvency II as of December 31, 2018 in accordance with segmenting pursuant to Solvency II. Technical provisions fell year on year from EUR 735 million to EUR 620 million, for the following reasons:

- Decline in premium provisions from EUR 136
  million as at the end of 2017 to EUR 35 million
  as at the end of 2018: This decline was mainly
  due to the revised method of reporting future
  premiums, which had no impact on income.
  With regard to actuarial assumptions, there were
  no material changes compared with the previous
  year when it came to calculating premium
  provisions.
- Claim provisions came to EUR 522 million as at the end of 2018 and thus remained stable compared with the end of 2017 (EUR 530 million).

Transfers at the level of the Solvency II segments were driven on one hand by major claims, while at the same time further investments were made in improving data quality in 2018, which also led to changes in the allocation of the reserves.

# Best estimate

EUR thousand		Premium provisions		(	Claim provisions					
	Gross	Amounts recoverable	Net	Gross	Amounts	Net	Total gross	Total net	Risk margin	Technica
		from reinsurance			recoverable from					provision
		contracts		re	insurance contracts					
Direct insurance business										
Health insurance	406	100	306	410	364	46	816	352	24	376
Income replacement insurance	-13	3	-16	446	111	334	433	319	42	361
Motor vehicle liability insurance	0	0	0	0	0	0	0	0	0	(
Other motor vehicle insurance	0	0	0	0	0	0	0	0	0	(
Marine, aviation and transport insurance	-335	-128	-207	57,947	33,299	24,648	57,611	24,441	3,007	27,448
Fire and other property insurance	2,579	1,220	1,359	16,061	6,983	9,078	18,639	10,436	746	11,183
General liability insurance	9,636	1,749	7,887	109,698	68,134	41,564	119,335	49,452	3,900	53,352
Legal protection insurance	0	0	0	0	0	0	0	0	0	
Various financial losses	976	751	225	1,991	1,210	780	2,967	1,005	177	1,182
Subtotal	13,249	3,695	9,554	186,552	110,100	76,452	199,800	86,005	7,897	93,902
Proportional reinsurance assumed										
Health insurance	1,458	342	1,116	942	307	636	2,401	1,752	58	1,810
Income replacement insurance	5	2	2	79	20	59	84	62		1,810
Motor vehicle liability insurance	332		332	11,245	170	11,075	11,577	11,408	1,396	12,804
Other motor vehicle insurance	0		0	3,008	0	3,008	3,008	3,008	379	3,387
Marine, aviation and transport insurance	205	398	-194	14,017	3,850	10,167	14,222	9,973	1,201	11,174
Fire and other property insurance	18,850	107,706	-88,856	152,497	95,192	57,305	171,347	-31,552	7,144	-24,407
General liability insurance	29,058	35,064	-6,006	149,523	111,157	38,366	178,581	32,360	5,655	38,015
Credit and surety	14,430	10,294	4,136	937	0	937	15,367	5,073	115	5,189
Various financial losses	7,870	3,136	4,734	34,902	9,051	25,851	42,772	30,585	3,030	33,615
Subtotal	72,208	156,943	-84,735	367,150	219,747	147,404	439,358	62,669	18,983	81,652
Non-proportional reinsurance business assumed	7 020	0	7,020	Ε0.	0	FO	7 070	7 070	6	7.004
Non-proportional health reinsurance	7,828 56,457	10,888	7,828 45,570	50 108,634	2,486	50 106,149	7,878 165,092	7,878 151,718	12,719	7,884 164,437
Non-proportional accident reinsurance		10,888								
Non-proportional marine, aviation and transport reinsurance	4,497		4,497	11,492	1,382	10,109	15,989	14,606	1,233	15,839
Non-proportional property reinsurance	53,463	643	52,819	468,316	286,535	181,781	521,778	234,600	21,974	256,573
Subtotal	122,245	11,531	110,714	588,491	290,403	298,088	710,736	408,802	35,931	444,733
Total non-life insurance obligations	207,701	172,168	35,532	1,142,194	620,250	521,944	1,349,895	557,476	62,811	620,287
Annuities from non-life insurance policies linked to obligations										
outside health insurance	0	0	0	0	0	0	0	0	0	0
Total	207,701	172,168	35,532	1,142,194	620,250	521,944	1,349,895	557,476	62,811	620,287

### Risk of Change in Technical Provisions

ART AG, working jointly with AGCS SE, carries out an annual review of the risk of change to which the technical claim provision is exposed. The following approaches were applied in the various segments in 2018:

#### **AGCS Switzerland and Dubai Division**

In order to ensure consistency with the reserve analysis, third-quarter data are used.

The run-off triangles used correspond to the triangles that were also used in the reserve analysis. The run-off patterns selected also use the same basis – the gross figure or the gross figure after facultative reinsurance – as in the reserve analysis.

Two types of methods are generally used to determine the reserve risk: the bootstrapping technique (based on incurred Mack, paid Mack and paid over-dispersed Poisson) and a stochastic Bornhuetter-Ferguson method. The bootstrap procedures are used for short-tail divisions and the Bornhuetter-Ferguson method is used for long-tail divisions. Both the suitability of the model and consistency with the reserve analysis play a role when selecting the method for the individual claims triangles analyzed. For every claims triangle analyzed, the standard error is first calculated using the bootstrapping method and/or using the Bornhuetter-Ferguson method. The suitability of the model is assessed based on the residuals and the comparison of simulated ultimate claim amounts with the results of the reserve analysis.

# Internal Group Reinsurance and ART Division Business

The underwriting risk, which consists of a premium risk and a reserve risk, is calculated using transaction-based or portfolio-based stochastic models.

When determining the reserve risk, the models for all policies are resimulated from the beginning of the contract term in order to determine the reserve risk for past contract periods. At the same time, the degree of progress in settling claims is taken into account: exposures from old claim years that have already been almost completely settled have only minor residual reserve risk, whereas relatively new exposures from recent claim years that are not yet settled have elevated reserve risk.

#### Results of the Analysis as at December 31, 2018

The table below shows the results of the most up-to-date analysis of the risk of a change in reserves. Naturally, uncertainty is greatest in the estimate of reserves for internal group reinsurance, as this involves non-proportional reinsurance for major claims. This uncertainty is driven in particular by reinsured long-term business: there is potential for IBNR claims, but the amount is highly uncertain, which makes it difficult to calculate reserves at "best estimate" level and means that the capital required for any deviations must be monitored on an ongoing basis.

	Reserve risk at the	Undiscounted	
EUR million	99.5% percentile	claim provisions	%
AGCS Switzerland and Dubai	-94.9	171.8	55.2
Internal group reinsurance	-97.4	116.6	83.5
ART division	-25.8	247.0	10.4

### Discussion of Material Differences between Solvency II and PGR in Terms of the Valuation of Technical Provisions and Amounts Recoverable from Reinsurance Contracts

Both Solvency II and PGR are based on the Best-Estimate Principle. Nevertheless, there are some differences, which are described below.

#### **Premium Provisions (undiscounted)**

Under Solvency II, premium provisions are set up for expected future claims and expenses under existing insurance policies. The provisions are calculated by multiplying the expected loss ratio, the expected loss adjustment expense ratio and the expected administrative expense ratio from the internal actuarial model by the PGR unearned premiums. In addition, not-yet-due premium income under contracts in existence as of the balance sheet date is deducted from the premium provision and the related, not-yet-due closing expenses are added to the premium provision. There are no plans to capitalize commissions that are due and payable on or before the balance sheet date. Under Solvency II, the entire profit margin from existing insurance policies is reported in own funds.

#### Claim Provisions (undiscounted)

There are essentially no differences between specific case provisions and IBNR provisions under Solvency II and PGR. For relevant segments, IBNR provisions are calculated using reporting year data in order to separate a claim year's newly reported claims from the development of already known claims.

#### Discounting

While no discounting is stipulated for the non-life insurance business under PGR, the Present-Value Principle applies under Solvency II. That means that future cash flows are discounted using a discount curve specified by the Allianz Group.

#### Counterparty Default Risk (Credit Risk)

Under Solvency II, the adjustment for counterparty default risk is calculated using the simplified approach in accordance with Article 61 of Delegated Regulation (EU) 2015/35. This adjustment is not made under PGR.

#### Risk Margin

Under Solvency II, the risk margin reflects the cost of capital derived as part of the fair value in a theoretical transfer of obligations to a third party due to the uncertainty in the run-off of the technical provisions. Solvency II assumes a cost of capital rate of 6% in this case. Under PGR, there is no provision for a risk margin.

# Volatility Adjustment

ART AG uses a volatility adjustment (VA). A change in the volatility adjustment to zero would have only a minor impact on the company's financial situation. The table below quantifies these effects as at December 31, 2018:

In EUR million	Without VA	With VA	Difference
Basic own funds	439.3	443.3	4.0 (0.9%)
Own funds eligible to meet the			
Solvency Capital Requirement	570.8	574.8	4.0 (0.7%)
Solvency Capital Requirement	433.3	432.1	-1.2 (-0.3%)
Solvency ratio	131.7%	133.0%	1.3%
Own funds eligible to meet the			
Minimum Capital Requirement	439.3	440.0	0.7 (0.2%)
Minimum Capital Requirement	136.6	135.8	-0.8 (-0.6%)
Minimum Capital Requirement ratio	321.6%	324.1%	2.5%

# **Technical Provisions**

EUR thousand	Technical provisions under PGR	Reclassifications (e.g. reinstatements, premium refunds)	Revaluation of premium provisions (undiscounted)	Revaluation of claim provisions (undiscounted)	Discounting of future cash flows	Adjustment for counterparty default risk (credit risk)	Risk margin under Solvency II	Technical provisions under Solvency II	Lower provisions under Solvency II vs. PGR
Direct insurance business									
Health insurance	554	0	-194	0	-7	0	24	376	177
Industrial accident insurance	0	0	0	0	0		0	0	0
Income replacement insurance	349	0	-26	0	-4	0	42	361	-12
Motor vehicle liability insurance	0	0	0	0	0		0	0	0
Other motor vehicle insurance	0	0	0		0		0	0	0
Marine, aviation and transport insurance	26,747		-953	0	-1,367	14	3,007	27,448	-702
Fire and other property insurance	10,150	0	521	0	-1,307	20	746	11,183	-1,033
General liability insurance	52,722	0	-2,160	415	-1,762	237	3,900	53,352	-630
Legal protection insurance	0	0	-2,100	0	-1,702	0		0	-030
Travel assistance insurance	0		0	0	0	0	0	0	0
Various financial losses	1,194		-245	0	57	0	177	1,182	12
Subtotal	91,715	0	-3,058	415	-3,338	271	7,897	93,902	-2,188
Subtotal	51,713		-5,036	413	-5,556	271	1,651	33,302	-2,100
Proportional reinsurance assumed									
Health insurance	2,526	0	-719	0	-55	0	58	1,810	716
Industrial accident insurance	2,320	0	0	0	-55	0		0	0
Income replacement insurance	71	0	<del>-</del> 9	0	-1		4	66	6
Motor vehicle liability insurance	12,946	0	-553	0	-985		1,396	12,804	142
Other motor vehicle insurance	2,714	0	553	0	-259		379	3,387	-673
Marine, aviation and transport insurance	11,959	0	-1,583	0	-402		1,201	11,174	784
Fire and other property insurance	59,061	6,299	-97,480	28	484	56	7,144	-24,407	83,468
General liability insurance	30,585	0,233	2,736	0	-1,394	434	5,655	38,015	-7,430
Credit and surety	6,204	0	-831	0	-312	12	115	5,189	1,016
Travel assistance insurance	0,204	0	0	0	0	0	0	0	0
Various financial losses	34,151	0	-267	-2,000	-1,305	7	3,030	33,615	535
Subtotal	160,215	6,299	-98,153	-1,972	-4,230	509	18,983	81,652	78,563
Non-proportional reinsurance business assumed	100,213	0,233	36,133	1,512	1,230	303	10,303	01,032	10,303
Non-proportional health reinsurance	8,364	0	0	0	-487	0	6	7,884	480
Non-proportional liability reinsurance	165,775	0	-8,228	320	-6,173		12,719	164,437	1,338
Non-proportional marine, aviation and transport reinsurance	17,556	0	-2,148	0	-0,173	0	1,233	15,839	1,717
Non-proportional property reinsurance	267,829	0	-25,508	1,245	-9,001	36	21,974	256,573	11,255
Subtotal	459,523	0	-35,883	1,564	-16,464	61	35,931	444,733	14,790
Subtotal	455,525		-55,005	1,504	-10,404	01	33,331	777,733	14,730
Total non-life insurance obligations	711,453	6,299	-137,094	7	-24,031	841	62,811	620,287	91,165
Annuities from non-life insurance policies linked to obligations outside health insurance		0	0	0	0	0	0	0	0
Total	711,453	6,299	-137,094	7	-24,031	841	62,811	620,287	91,165

#### D.3 Valuation of Other Liabilities

Below are separate descriptions of the bases, methods and main assumptions used to value each major group of other liabilities for solvency purposes, as well as comparisons with PGR principles.

#### **Pension commitments**

The pension provision contains net obligations arising from company pensions, whereby all existing pension commitments are classed as so-called defined benefit plans within the meaning of IAS 19. Pension commitments are offset against cover funds. If cover funds exceed pension commitments, there will be no pension provision; instead, there will be an excess of pension benefits.

Assumptions must be made about future developments in interest rates and wages in order to measure pension commitments and cover funds. These are reviewed each year and adjusted if necessary. The Solvency Overview in principle contains the amounts in accordance with IFRS.

PGR: There is no pension provision, as company pensions have been outsourced to an external institution.

#### Provisions other than technical provisions

Under IAS 37, they are measured at the amount that an entity would rationally pay to settle the obligation at the balance sheet date (best estimate). For provisions with a maturity of greater than one year, a present-value approach is advisable if discounting will significantly affect the amount stated. Under Solvency II, these provisions are discounted using a market interest rate, pursuant to IAS 37.

PGR: Non-technical provisions are generally stated at the expected settlement amount. The expected settlement amount is derived from the best estimate.

#### **Deposits by reinsurers**

They are recorded at face value less repayments, unless the market value is different.

PGR: They are recorded at the repayment amount less repayments.

#### **Deferred tax liabilities**

Deferred taxes are calculated for temporary differences in the values of individual assets and liabilities on the Solvency II balance sheet and the balance sheet prepared for tax purposes. Deferred tax liabilities are liabilities that will lead to income tax expenses in future periods.

PGR: No deferred tax liabilities are included.

# Financial liabilities other than liabilities to banks

They are measured at fair value pursuant to IAS 39 and Article 14 of Delegated Regulation 2015/35, without taking into account changes in own default risk. Receivables and liabilities are netted where permitted by contract.

PGR: They are recorded at the repayment amount.

# Liabilities to insurance companies and intermediaries

They are measured at fair value pursuant to IAS 39 and Article 14 of Delegated Regulation 2015/35, without taking into account changes in own default risk. Receivables and liabilities are netted where permitted by contract.

PGR: They are recorded at the repayment amount.

#### Liabilities to reinsurers

They are measured at fair value pursuant to IAS 39 and Article 14 of Delegated Regulation 2015/35, without taking into account changes in own default risk. Receivables and liabilities are netted where permitted by contract.

Not-yet-due liabilities (e.g. for reinstatement premiums) are shown under technical provisions.

PGR: They are recorded at the repayment amount. Receivables and liabilities are netted where permitted by contract.

This item also includes provisions for reinstatement premiums for outstanding reinsurance reserves.

#### Payables (trade, not insurance)

They are measured at fair value pursuant to IAS 39 and Article 14 of Delegated Regulation 2015/35, without taking into account changes in own default risk. Receivables and liabilities are netted where permitted by contract.

PGR: They are recorded at the repayment amount.

#### Other liabilities not shown elsewhere

They are measured at fair value pursuant to IAS 39 and Article 14 of Delegated Regulation 2015/35, without taking into account changes in own default risk. Receivables and liabilities are netted where permitted by contract.

PGR: They are recorded at the repayment amount.

### D.4 Alternative Valuation Methods

As there are no listed market prices for ART AG's participating interests, they are valued using the adjusted equity method.

### D.5 Other Disclosures

All relevant disclosures regarding ART AG's valuation for solvency purposes are contained in the preceding notes.

# **E** Capital Management

### E.1 Own Funds

### **Targets, Guidelines and Processes**

ART AG's capital base is a central resource for sustainable business activity and corporate management. Capital management encompasses all ART AG activities aimed at ensuring that the company and its branches have an adequate capital base in terms of legal requirements, the capital requirements set by rating agencies, market specifications and the risk-tolerance level specified in the risk strategy.

Capital management principles and processes are defined in AGCS's Global Capital Management Policy, which is implemented by ART AG. In addition to specifications for controlling and planning the capital base and dividends, the policy also includes definitions of relevant duties and processes. It is closely linked with the company's risk strategy, which defines risk-bearing capacity and risk tolerance in the form of a target capitalization and a minimum capitalization.

ART AG's capital base is reviewed at least once a quarter for compliance with all relevant requirements. The review includes current consistency with the target and/or minimum capitalization and consideration of developments and measures that might affect future capitalization, as well as an assessment of their impact. All results, valuations and capital control measures are reported to the Executive Board on a regular basis in order to ensure prompt countermeasures can be taken in the event of noncompliance with the target capital requirement.

The effects of projected business performance on compliance with the target capital requirement are also examined as part of the three-year business plan. At the same time, the target and minimum capital requirements themselves are reviewed. The results of capital and dividend planning are approved by ART AG's Chief Financial Officer and reported to the Executive Board.

### Reconciliation of the Excess of Assets over Liabilities in the PGR and Market Value Balance Sheets

The excess of assets over liabilities in the Market Value Balance Sheet totals EUR 502.9 million, while the excess of assets over liabilities in the PGR balance sheet (shareholders' equity) amounts to EUR 532.0 million. The differences between the excess of assets over liabilities under Solvency II (basic own funds) compared with PGR shareholders' equity are due to the differing recognition and valuation requirements under the two approaches. Detailed explanations of the main differences in valuations of individual balance sheet items can be found in Chapter D of this report. The following overview shows the main items for which the valuation and recognition requirements differ under PGR accounting and Solvency II.

EUR thousand	Dec. 31, 2018	Dec. 31, 2017	Change
PGR shareholders' equity	532,005	473,786	+58,219
Revaluation of investments	35,992	40,513	-3,703
Revaluation of participating interests	2,651	20,073	-17,424
Adjustments to technical provisions (net)	153,976	32,768	121,209
Inclusion of risk margin in market value balance sheet	-62,811	-68,895	6,084
Revaluation of deferred tax receivables (net)	3,247	5,177	-1,930
Revaluation of other asset/liability items	-162,205	-50,529	-112,493
Solvency II excess of assets over liabilities	502,855	452,893	+49,962

### **Amount and Composition of Own Funds**

EUR thousand	Dec. 31, 2018	Dec. 31, 2017	Change
Excess of assets over liabilities	502,855	452,893	+49,962
Less expected dividend payments	-59,573	-1,541	-58,032
Total basic own funds	443,282	451,352	-8,070
Plus ancillary own funds	131,529	131,529	_
Total own funds	574,811	582,881	-8,070

Total own funds amount to EUR 574.8 million and are composed of EUR 443.3 million of basic own funds and EUR 131.5 million of ancillary own funds. Basic own funds are equal to the excess of assets over liabilities from the Market Value Balance Sheet after deducting the expected dividend payment

of EUR 59.6 million. They consist of the company's paid-in share capital, the statutory reserve, the reconciling entry and net deferred tax assets, which break down as shown in the table below. The company has no subordinated liabilities.

EUR thousand	Dec. 31, 2018	Dec. 31, 2017	Change
Paid-in share capital	131'529	131'529	0
Statutory reserve	131'529	131'529	0
Reconciling entry	176'977	183'117	-6'140
Net deferred tax assets	3'247	5'177	-1'930
Total basic own funds	443'282	451'352	-8'070

Ancillary own funds come to EUR 131.5 million and consist exclusively of the unpaid 50% portion of subscribed share capital. The debtors of the capital that has not yet been called in are AGCS Holding International B.V., which accounts for 60%, and Allianz Global Corporate & Specialty SE, which accounts for 40% (see also the overview of the corporate legal structure in Chapter A.1). AGCS Holding International B.V. acquired the 60% stake in 2016 from Allianz Global Corporate & Specialty SE and issued a declaration of liability in connection with the acquisition for the unpaid equity attributable to the acquired stake. This obligation is also backed by a directly enforceable guarantee from Allianz Global Corporate & Specialty SE. Equity capital that has not been called in may be called in to absorb losses and through regulatory approval is eligible to be used as ancillary own funds.

# Classification of Own Funds into Quality Tiers

The items are classified into tiers in accordance with the criteria described in Articles 93 to 96 of Solvency II Directive 2009/138/EC and Articles 69 to 78 of Delegated Regulation (EU) 2015/35. The rough aim of this classification is to categorize own funds as to whether they (i) are available in the long term to absorb potential losses, (ii) are subordinate to claims of the company's creditors, (iii) are free from any claims of third parties, (iv) do not give rise to any ongoing expenses and (v) do not offer any incentive to repay the funds to the investor.

Tier 1 refers to own funds that are subject to stricter requirements than Tier 2; Tier 2, in turn, is subject to stricter requirements than Tier 3. This classification is carried out separately for basic own funds and ancillary own funds.

Basic own funds consist of EUR 440.0 million of Tier 1 own funds and EUR 3.2 million of Tier 3 own funds. These funds are uncommitted and can be used without restrictions to cover losses.

The paid-in share capital, the statutory reserve and the reconciling entry are classified as Tier 1, unrestricted own funds.

The amount equal to the value of net deferred tax assets is classified as Tier 3 own funds.

The full amount of ancillary own funds, which comes to EUR 131.5 million, is classified as Tier 2. Classification, amount and composition are unchanged compared with the prior year.

The table below shows the classification of basic own funds by tier:

EUR thousand	Total	Tier 1	Tier 3
		unrestricted	
Paid-in share capital	131,529	131,529	0
Statutory reserve	131,529	131,529	0
Reconciling entry	183,117	183,117	0
Value of net deferred tax assets	5,177	0	5,177
Basic own funds as at December 31, 2017	451,352	446,175	5,177
Paid-in share capital	131,529	131,529	0
Statutory reserve	131,529	131,529	0
Reconciling entry	176,977	176,977	0
Value of net deferred tax assets	3,247	0	3,247
Basic own funds as at December 31, 2018	443,282	440,035	3,247
Change vs. previous year	-8,070	-6,140	-1,930

### **Eligible Own Funds**

Eligible own funds are those own funds that are available to fulfill the Solvency Capital Requirement (SCR) and/or the Minimum Capital Requirement (MCR) if quantitative maximum limits for tiers are applied to the available own funds.

After these maximum limits for tiers are applied, the total amount of own funds of EUR 574.8 million is available to meet the Solvency Capital Requirement (SCR) as at December 31, 2018. This results in

a solvency ratio of 133.0% if we compare eligible own funds with the Solvency Capital Requirement as at December 31, 2018.

The own funds available to meet the Minimum Capital Requirement consist of Tier 1 basic own funds of EUR 440.0 million.

# Classification of Eligible Own Funds into Quality Tiers

EUR thousand	Total	Tier 1	Tier 2	Tier 3
		unrestricted		
Eligible to meet the SCR	574,811	440,035	131,529	3,247
Eligible to meet the MCR	440,035	440,035	0	0

### **Changes in Own Funds**

Total own funds fell by EUR 8.1 million year on year. This change related solely to basic own funds, while ancillary own funds remained unchanged. Tier 1 unrestricted basic own funds fell by EUR 6.1 million, while Tier 3 basic own funds declined by EUR 1.9 million. The decline in total own funds is reflected in a drop in the same amount in own funds eligible for meeting both the Solvency Capital Requirement and the Minimum Capital Requirement.

Of basic own funds, the paid-in share capital and the statutory reserve remained unchanged year on year. The reconciling entry fell very slightly by EUR 6.1 million, while net deferred tax assets decreased by EUR 1.9 million.

EUR thousand	d	2018	2017	Change
Tier 1	Paid-in share capital	131,529	131,529	_
	Statutory reserve	131,529	131,259	_
	Reconciling entry	176,977	183,117	-6,140
Tier 3	Value of net deferred tax assets	3,247	5,177	-1,930
Total	Own funds	443,282	451,352	-8,070

# E.2 Solvency Capital Requirement and Minimum Capital Requirement

ART AG uses the standard formula to calculate the Solvency Capital Requirement. To determine exposure to counterparty default risk, the amounts recoverable from reinsurance contracts were calculated using the simplified calculation stipulated in Article 107 of Delegated Regulation 2015/35. The company-specific parameters referred to in Article 59 VersAG were not used.

The table summarizes the Solvency Capital Requirements at year-end 2018.

The diversified Solvency Capital Requirement after tax came to EUR 432.1 million at the end of 2018. Non-life underwriting risks and market and credit risks accounted for the largest share of risk, as the breakdown in the table below shows. The Solvency Capital Requirement declined marginally by 3% year on year, primarily owing to lower market risks and lower underwriting and operational risks.

EUR thousand	Dec. 31, 2018	Dec. 31, 2017	Change
Market risk	107,836	119,257	-11,421
Counterparty default risk (credit risk)	108,962	101,143	+7,819
Non-life underwriting risk	279,745	286,675	-6,930
Health underwriting risk	703	830	-127
Undiversified Basic Solvency Capital Requirement	497,246	507,905	-10,659
Diversification	-105,742	-109,349	+3,607
Diversified Basic Solvency Capital Requirement	391,504	398,556	-7,052
Operational risk	40,608	48,706	-8,098
Diversified capital requirement before taxes	432,112	447,262	-15,150
Tax effect	0	0	0
Diversified capital requirement incl. taxes	432,112	447,262	-15,150

At year-end 2018, the Minimum Capital Requirement was EUR 135.8 million.

In addition to the Solvency Capital Requirement, the calculation of the Minimum Capital Requirement is based on technical provisions excluding the risk margin, after deducting the amounts recoverable from reinsurance contracts and premiums written for insurance and reinsurance obligations in the last twelve months after deducting premiums for reinsurance contracts.

The Solvency Capital Requirement at the end of 2018 was calculated using the Solvency II standard formula, as in the previous year.

# E.3 Use of the Duration-Based Equity Risk Submodule to Calculate the Solvency Capital Requirement

No duration-based equity risk submodule pursuant to Article 18 VersAV is used to calculate the Solvency Capital Requirement.

### E.4 Differences between the Standard Formula and any Internal Models Used

ART AG does not use an internal model.

# E.5 Noncompliance with the Minimum Capital Requirement and Noncompliance with the Solvency Capital Requirement

ART AG was in compliance with the Minimum Capital Requirement and the Solvency Capital Requirement at all times in 2018

#### **E.6** Other Disclosures

All relevant disclosures regarding ART AG's capital management are contained in the preceding notes.

#### **Annex I**

#### Selected Reporting Templates (QRT)

In accordance with Article 4 of Implementing Regulation (EU) 2015/2452 of December 2, 2015, insurance and reinsurance companies must publish the following reporting templates as a minimum, as part of their Solvency and Financial Condition Report:

- a) Reporting template S.02.01.b
- b) Reporting template S.05.01.b
- c) Reporting template S.05.02.b
- d) Reporting template S.12.01.b no disclosures
- e) Reporting template S.17.01.b
- f) Reporting template S.19.01.b
- g) Reporting template S.22.01.b
- h) Reporting template S.23.01.b
- i) Reporting template S.25.01.b
- j) Reporting template S.25.02.b no disclosures
- k) Reporting template S.25.03.b no disclosures
- l) Reporting template S.28.01.b
- m) Reporting template S.28.02.b no disclosures

You can find these reporting templates (QRT) in this order on the following pages. Tables in which it is not possible to provide any information are not attached.

Appendix I: S.02.01.b

2019-04-11 / 14:13:25 RC780 2018-12-31 Reporting unit: Qualifying date: Export date:

Balance sheet

Assets

Investments (other than assets held for index-linked and unit-linked contracts) Property, plant & equipment held for own use Property (other than for own use) Deferred acquisition costs Pension benefit surplus Deferred tax assets Intangible assets Goodwill

31,648.00

0.00

3,246,820.00

R0040 R0060 R0080 R0090

31,630.00 1,156,613,400.00

Statutory accounts value C0020

Solvency II value C0010 1,107,033,667.00

1,468,921.00

1,468,920.00

R0100 R0110 1,468,920.00

69,752,940.00

67,102,315.00

313,028,330.00

313,872,430.00

R0140

R0120 R0130 R0150 R0160

R0180

R0190 R0200 R0210 R0220 R0230 R0240

R0170

976,168,480.00

662,209,110.00

10,768,928.00 88,335,318.00

10,768,930.00

98,454,130.00

86,940.00

89,713.00

123,079,633.00

84,414,540.00

1,468,921.00 939,358,185.00 626,240,142.00

Holdings in related undertakings, including participations

Equities - listed

Equities - unlisted Bonds Government Bonds

Corporate Bonds

Collateralised securities

Structured notes

Collective Investments Undertakings

Derivatives

Deposits other than cash equivalents Other investments Assets held for index-linked and unit-linked contracts Loans and mortgages

Loans and mortgages to individuals Loans on policies

Other loans and mortgages

Reinsurance recoverables from:

Non-life and health similar to non-life

913,024,176.00

1,657,350.00

914,681,526.00

123,079,633.00 914,681,526.00

> 792,418,600.00 791,170,300.00

792,418,600.00 1,248,300.00

R0310

R0330

R0340 R0350 R0360

R0320

84,414,540.00

R0250

R0260 R0270 R0280 R0290 R0300 195,408,463.00 5,420,890.00 159,949,251.00

77,029,890.00

45,976,460.00 5,420,900.00 149,830,420.00

R0380

45,976,463.00

Non-life excluding health Health similar to non-life

Life and health similar to life, excluding health and index-linked and unit-linked

Health similar to life

Life excluding health and index-linked and unit-linked

Life index-linked and unit-linked

Deposits to cedants

Insurance and intermediaries receivables

Reinsurance receivables

Receivables (trade, not insurance)

Own shares (held directly)

Appendbt I: S.02.01.b

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60,598,793.00 1,280,366.00

60,598,790.00

2,376,861,820.00

1,280,370.00

2,613,460,700.00

1,626,134,227.00 1,612,613,073.00

1,412,705,820.00

1,400,961,010.00

Statutory accounts value

Solvency II value C0010 13,521,154.00

62,676,920.00

11,744,810.00

1,338,284,090.00

11,610,630.00

134,180.00

Amounts due in respect of own fund items or initial fund called up but not yet paid in		
Cash and cash equivalents	R041	R0410
Any other assats not eleawhere shown	R042	R0420
Total assession	R050	R0500
Liabilities		
Technical provisions – non-life	R051	R0510
Technical provisions – non-life (excluding health)	R052	R0520
Technical provisions calculated as a whole	R053	R0530
Best Estimate	R054	R0540
Risk margin	R055	R0550
Technical provisions - health (similar to nor-life)	R056	R0560
Technical provisions calculated as a whole	R057	R0570
Best Estimale	R058	R0580
Risk margin	R059	R0590
Technical provisions - life (excluding index-linked and unit-linked)	R060	R0600
	7000	00040

Technical provisions – Iffe (excluding health and index-linked and unit-linked)

R0670

R0660 R0680 R0690 R0700 R0710 R0730

R0640

R0720 R0740

Technical provisions calculated as a whole

Technical provisions - index-linked and unit-linked

Technical provisions calculated as a whole

Best Estimate

Risk margin

Technical provisions - health (similar to life)

Technical provisions calculated as a whole

Best Estimate

Risk margin

Best Estimate

Risk margin

Other technical provisions

Contingent liabilities

Provisions other than technical provisions

Pension benefit obligations

Deposits from reinsurers Deferred tax liabilities

Derivatives

Debts owed to credit institutions

Financial liabilities other than debts owed to credit institutions

170,270,074.00 1,949,563.00 21,816,759.00 9,159,551.00

0.00

170,270,080.00 1,949,570.00

818,420.00

14,078,770.00

R0830 R0840 R0850 R0860

9,159,520.00

12,983,945.00

13,712,840.00 -1,444,740.00 0.00

R0760 R0780 R0800 R0810 R0820

R0770

R0790

R0750

12,165,520.00

-1,444,728.00

240,586,161.00

240,590,700.00

R0870

Insurance & intermediaries payables Reinsurance payables

Payables (trade, not insurance) Subordinated liabilities

Subordinated liabilities not in Basic Own Funds

Subordinated liabilities in Basic Own Funds

Any other liabilities, not elsewhere shown

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Reporting unit:
Qualifying date:
Export date:

Total liabilities

Excess of assets over liabilities

R0900	1,874,006,500.00	2,081,455,55
R1000	502,855,320.00	532,005,14

 Appendix I:

 5.05.01b

 Reporting unit:
 RC780

 Qualifying date:
 2019-04-11 14:14:55

 Export date:
 2019-04-11 14:14:55

 Prenntume, claims and expenses by line of business

				Line of Bu	Line of Business for: non-life insurance and reinsurance	insurance and re	sinsurance obligati	obligations (direct business and accepted proportional reinsurance)	ss and accepted	proportional reins	urance)			ac	Line of bus septed non-propo	Line of business for: accepted non-proportional reinsurance		Total
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property	General liability insurance	Credit and Suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Health	Casualty	Marine, aviation, transport	Property	
		01000	C0020	00000	C0040	C0050	09000	C0070	C0080	06000	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0200
Premiums written																		
Gross - Direct Business		584,557.27	448,872.65		00:00	00:00	19,028,300.87		59,587,749.72	0.00			8,443,142.83					112,316,074.7
Gross - Proportional reinsurance accepted	R0120	7,890,056.03	66,133.10		-1,779,938.67	-444,990.50	14,340,414.63	597,126,577.2	176,643,562.0	2,657,123.63			17,917,297.60					814,416,235.1
Gross - Non-proportional	R0130													600,676.87	81,329,293.43	23,593,582.03	137,707,074.3	243,230,626.7
Reinsurers' share	R0140	6,644,836.96	174,014.80		00.00	00:00	19,663,407.63	598,283,774.1	209,728,118.5	2,471,594.07			13,013,097.22	88.36	27,927,713.20	2,300,915.85	15,377,875.27	895,585,436.0
Net	R0200	1,829,776.34	340,990.95		-1,779,938.67	-444,990.50	13,705,307.87	23,066,254.48	26,503,193.22	185,529.56			13,347,343.21	600,588.51	53,401,580.23	21,292,666.18	122,329,199.1	274,377,500.4
Premiums eamed					-											-		
Gross - Direct Business	R0210	470,192.60	456,145.37		00:00	00:00	18,897,410.12	25,365,164.73	59,919,719.21	00:00			7,762,391.93					112,871,023.9
Gross - Proportional reinsurance	R0220	7,610,466.51	63,717.42		3,096,203.21	774,044.97	14,030,816.00	478,595,923.1	184,819,419.8	6,568,781.22			15,268,115.80					710,827,488.0
Gross - Non-proportional	R0230							1						661,724.33	65,838,406.54	23,035,231.83	203,103,827.3	292,639,190.0
Reinsurers' share	R0240	6,677,190.50	166,677.05		0.00	0.00	19,300,618.86	470,928,221.0	211,840,094.3	3,935,891.59			12,344,231.41	88.36	18,951,059.49	2,300,915.85	88,688,968.63	835,133,957.1
Net	R0300	1,403,468.61	353,185.74		3,096,203.21	774,044.97	13,627,607.26	33,032,866.79	32,899,044.70	2,632,889.63			10,686,276.32	661,635.97	46,887,347.05	20,734,315.98	114,414,858.7	281,203,744.9
Claims incurred																		
Gross - Direct Business	R0310	439,942.29	107,587.84		00:00	00:00	12,758,342.56	12,896,772.56	-3,507,928.47	00:00			-1,098,590.11					20,716,242.09
Gross - Proportional reinsurance	R0320	4,396,386.89	30,320.49		5,531,980.91	1,160,792.18	1,927,160.35	510,880,747.8	26,874,971.31	939,114.81			32,988,940.02					584,730,414.7
Gross - Non-proportional	R0330													-399,463.60	-24,325,449.42	-3,164,767.85	-95,116,383.48	1 0
Reinsurers' share	R0340	3,589,368.68	38,120.96		480,060.18	00:00	8,517,442.69	487,830,116.6	-8,929,774.32	00:00			3,909,821.83	1,809.51	2,711,593.14	1,205,978.23		271,832,586.0
Net	R0400	367,075.92	99,787.37		5,051,920.73	1,160,792.18	6,168,060.22	35,947,403.71	32,296,817.16	939,114.81			27,980,528.08	-401,273.11	-27,037,042.56	4,370,746.08	132,405,568.0	210,608,006.4
Changes in other technical provisions																		
Gross - Direct Business		0.00	0.00		0.00	00:00	0.00	0.00	0.00	00:00			00:00					00.00
Gross - Proportional reinsurance accepted		0.00	00:00		0.00	0.00	00:00	0.00	0.00	0.00			00:00					00:00
Gross - Non-proportional reinsurance accepted														00:00	00.00	0.00	00:00	0.00
Reinsurers' share		0.00	0.00		00:00	0.00	0.00	0.00	0.00	0.00			0.00	00:00	00'0	00:00	00:00	00:00
Net	R0500	00:00	0.00		0.00	0.00	-	0.00	00:00	00:00			00:00	00:00	0.00	00.00	00:00	00:00
Expenses incurred	R0550	493,011.82	4,947.76		195,577.87	83,510.52	3,009,305.47	26,221,766.79	9,092,992.39	43,755.21			630,627.62	36,534.74	-324,022.42	-265,295.08	5,114,261.33	44,336,974.02
Administrative expenses	0,500		000			000	000	07000	000	0			0					or our our F
Gross - Proportional reinsurance	R0620	00:0	000		000	8000	408 422 27	5 777 366 12	1 029 737 28	00:0			118 275 89			İ		7 333 801 56
accepted Gross - Non-proportional	R0630													0.00	0.00	00:00	0.00	00:00
reinsurance accepted Reinsurers' share	R0640	0.00	0.00		00:0	0.00	0.00	0.00	0.00	0.00			0.00	0.00	0.00	0.00	00:00	00:00
Net	R0700	0.00	0.00		0.00	0.00	914,520.86	6,205,979.54	1,847,825.06	00.00			118,275.89	0.00	0.00	00:00	00:00	9,086,601.35
Investment management expenses																		
Gross - Direct Business	R0710	0.00	0.00		36,825.37	9,943.57	108,460.37	153,278.74	199,942.06	19,264.83			13,238.06					540,953.00
Gross - Proportional reinsurance accepted	R0720	0.00	0.00		0.00	00:00	00:00	0.00	0.00	00:00			00:00					00:00
Gross - Non-proportional reinsurance accepted	R0730													00:00	383,587.07	51,586.04	557,755.70	992,928.81
Reinsurers' share	R0740	0.00	0.00		00:00	0.00	0.00	0.00	0.00	00:00			00:00	00:00	00.00	00:00	00:00	0.00
Net	R0800	00:00	0.00		36,825.37	9,943.57	108,460.37	153,278.74	199,942.06	19,264.83			13,238.06	0.00	383,587.07	51,586.04	557,755.70	1,533,881.81

Appendix I: S.05.01.b Reporting unit: Qualifying date: Export date:

Claims management expenses															
Gross - Direct Business	R0810	-11,184.94	3,765.23	0.00	00:00	-542,994.74	5,864,861.96	3,175,966.82	00:00	17,552.99					8,507,967.32
Gross - Proportional reinsurance	R0820	14,088.82	-0.47	250,313.45	113,259.95	171,412.88	2,578,748.61	1,453,720.67	346.60	69,548.74					4,651,439.25
Gross - Non-proportional	R0830										955.71	499,844.40	-403,401.57	-866,272.45	-1,768,562.71
Reinsurers' share	R0840	-11,021.41	143.21	0.00	00.00	-734,070.63	1,554,450.09	671,504.98	00:00	66,653.95	00:00	172,667.84	00:00	-1,193,670.56	526,657.47
Net	R0900	13,925.29	3,621.55	250,313.45	113,259.95	362,488.77	6,889,160.48	3,958,182.51	346.60	20,447.78	955.71	-672,512.24	403,401.57	327,398.11	10,864,186.39
Acquisition expenses									-				-	-	
Gross - Direct Business	R0910	189,061.46	37,922.89	0.00	00:00	2,169,026.75	2,249,544.94	4,591,700.33	00:00	231,735.28					9,468,991.65
Gross - Proportional reinsurance	R0920	544,131.35	14,856.67	-91,560.95	-39,693.00	1,605,553.86	87,256,536.12	8,767,744.77	32,081.51	2,382,804.84					100,472,455.1
Gross - Non-proportional	R0930										35,616.58	552,088.35	88,262.39	4,484,970.28	5,160,937.60
Reinsurers' share	R0940	254,106.28	51,453.35	0.00	00:00	2,150,745.14	76,532,733.03	10,272,402.34	7,937.73	2,135,874.23	37.55	587,185.60	1,741.94	255,862.76	92,250,079.95
Net	R1000	479,086.53	1,326.21	-91,560.95	-39,693.00	1,623,835.47	12,973,348.03	3,087,042.76	24,143.78	478,665.89	35,579.03	-35,097.25	86,520.45	4,229,107.52	22,852,304.47
Overhead expenses															
Gross - Direct Business	R1010														
Gross - Proportional reinsurance	R1020														
Gross - Non-proportional	R1030														
Reinsurers' share	R1040														
Net	R1100														
Other expenses	R1200														
Total expenses	R1300													7	44,336,974.02

Appendix I: S.05.01.b

 Reporting unit.
 RC780

 Qualifying date:
 2018-12-31

 Export date:
 2019-04-11 / 14-14-55

 Premiums, datims and expenses by line of business

Total Life reinsurance obligations Health reinsurance C0270 Annuties sterming from Annuties sterming from nortifie rise area contracts nortifie returance contracts and relating to issuance insurance coligations objections of the than health insurance objections. C0260 C0250 Other life insurance C0240 Line of Business for: life obligations
Index-linked and unit-linked Other life insurance C0230 Insurance with profit participation C0220 Health insurance C0210 R1410 R1420 R1500 R1510 R1520 R1600 R1610 R1620 R1700 R1710 R1720 R1800 R1900 R1910 R1920 R2000 R2010 R2020 R2100 R2110 R2120 R2200 R2210 R2220 R2300 R2310 R2320 R2400 R2500 Changes in other technical provisions Investment management expenses Claims management expenses Administrative expenses Acquisition expenses Overhead expenses Reinsurers' share
Net
Premiums earned
Gross Expenses incurred Reinsurers' share Premiums written Gross Claims Incurred Gross Gross Gross Gross Gross Gross

Appendix I:

S.05.01b

Reporting unit:

Export date:

Export date:

Total expenses

Total amount of surrenders

RC780 2018-12-31 2019-04-11 / 14:14:55

R2600

RC780 2018-12-31 2019-04-11 / 14:15:33 Appendix I: S.05.02 b.non-life Reporting unit: Qualifying date: Export date: Premiums, daims

Premiums, claims and expenses by country								
		Home Country	Total Top 5 and home country		Top 5 countries (by	Top 5 countries (by amount of gross premiums written) - non-life obligations	- non-life obligations	
	R0010			(US) United States	(DE) Germany	(CH) Switzerland	(JP) Japan	(CN) China
		08000	C0140	06000	C0000	06000	06000	00000
Premiums written	,							
Gross - Direct Business	R0110	14,070,441.28	95,200,648.06	1,506,762.50	1,783,486.57	77,778,283.57	52,572.25	9,101.89
Gross - Proportional reinsurance accepted	R0120	00:00	684,920,999.85	561,947,375.01	62,071,042.95	21,337,507.80	20,384,033.05	19,181,041.04
Gross - Non-proportional reinsurance accepted	R0130	00.00	161,096,965.42	42,527,102.89	118,152,358.31	342,116.61	00:00	75,387.61
Reinsurers' share	R0140	14,308,335.80	750,028,861.55	553,106,685.77	60,675,599.39	83,515,742.22	19,482,590.37	18,939,908.00
Net	R0200	-237,894.52	191,189,751.78	52,874,554.63	121,331,288.44	15,942,165.76	954,014.93	325,622.54
Premiums earned	•							
Gross - Direct Business	R0210	17,540,162.24	96,168,736.49	1,516,104.34	1,885,632.16	75,163,152.64	19.792,61	8,917.50
Gross - Proportional reinsurance accepted	R0220	00:00	598,501,654.30	471,254,136.27	64,036,391.29	23,519,150.18	17,259,374.32	22,432,602.24
Gross - Non-proportional reinsurance accepted	R0230	00:00	227,556,888.92	113,961,199.88	113,182,515.90	337,785.53	00:0	75,387.61
Reinsurers' share	R0240	23,701,327.50	702,607,357.91	497,682,469.35	60,335,676.40	82,494,277.04	19,426,539.87	18,967,067.75
Net	R0300	-6,161,165.26	219,619,921.80	89,048,971.14	118,768,862.95	16,525,811.31	-2,112,397.94	3,549,839.60
Claims incurred								
Gross - Direct Business	R0310	316,784.28	20,506,181.44	84,386.92	5,913.26	20,099,096.98	00:0	00'0
Gross - Proportional reinsurance accepted	R0320	-1,714,001.46	521,060,582.64	457,327,539.12	17,202,978.60	48,060,679.58	2,902.88	180,483.92
Gross - Non-proportional reinsurance accepted	R0330	-3,629,754.46	-139,397,626.78	-171,243,168.01	102,834,500.73	-67,317,219.77	00:0	-41,985.27
Reinsurers' share	R0340	-2,098,276.53	247,256,641.19	231,878,906.15	12,252,677.35	5,220,005.06	00.0	3,329.16
Net	R0400	-2,928,695.11	154,912,496.11	54,289,851.88	107,790,715.24	4,377,448.27	2,902.88	135,169.49
Changes in other technical provisions	•							
Gross - Direct Business	R0410	00:00	00'0	0.00	0.00	0.00	00:0	0.00
Gross - Proportional reinsurance accepted	R0420	00:00	00'0	0.00	0.00	00'0	00:0	00:00
Gross - Non-proportional reinsurance accepted	R0430	00:00	0.00	0.00	0.00	0.00	00.0	0.00
Reinsurers' share	R0440	00:00	0.00	0.00	0.00	0.00	00:0	0.00
Net	R0500	00:00	0.00	0.00	00'0	00:00	00:00	0.00
Expenses incurred	R0550	609,216.02	31,401,214.96	9,028,241.27	15,496,885.84	4,151,125.09	1,070,464.77	1,045,281.98
Other expenses	R1200							
Total expenses	R1300		31,401,214.96					

		RC780	2018-12-31	2019-04-11 / 14:17:05	al Provisions
ii vanundah ,	S.17.01.b	Reporting unit:	Qualifying date:	Export date:	Non-life Technical Provisions

Total Recoverables from reinsurance/SPV and Finite Re after the adjustme expected losses due to counterparty default associated to TP as a whole Total recoverable from reinsurance/SPV and Finite Re before the adjustm expected losses due to counterparty default Recoverables from reinsurance (except SPV and Finite Reinsurance) befor for expected losses Total recoverable from reinsurance/SPV and Finite Re before the adjustmexpected losses due to counterparty default Recoverables from reinsurance (except SPV and Finite Reinsurance) befr for expected losses Recoverable from reinsurance contract/SPV and Finite Re after the adjust expected losses due to counterparty default - total Recoverables from SPV before adjustment for expected losses Recoverables from Finite Reinsurance before adjustment for expected los Total recoverable from reinsurance/SPV and Finite Re after the adjustmer losses due to counterparty default Recoverables from Finite Reinsurance before adjustment for expected los Total recoverable from reinsurance/SPV and Finite Re after the adjustmer losses due to counterparty default Technical provisions minus recoverables from reinsurance/SPV and Finite Line of Business: further segmentation (Homogeneous Risk Groups - HRV Premium provisions - Total number of homogeneous risk groups (HRGs) Other cash-in flows (incl. Recoverable from salvages and subrogations)

Cash-flows of the Best estimate of Claims Provisions (Gross) Claims provisions - Total number of homogeneous risk groups (HRGs) Cash-flows of the Best estimate of Premium Provisions (Gross) Recoverables from SPV before adjustment for expected losses Gross - accepted non-proportional reinsurance business Technical provisions calculated as a sum of BE and RM Gross - accepted non-proportional reinsurance business Gross - accepted proportional reinsurance business Gross - accepted proportional reinsurance business Amount of the transitional on Technical Provisions Accepted proportional reinsurance business Future expenses and other cash-out flows Future benefits and claims Future expenses and other cash-out flows Technical provisions calculated as a whole Net Best Estimate of Premium Provisions Claims provisions Net Best Estimate of Claims Provisions Total Best estimate - gross Accepted non-proportional reinsurance Technical provisions - total Future benefits and claims Technical provisions - total Total Best estimate - net Gross - direct business Gross - direct business Best estimate Premium provisions Future premiums Cash out-flows TP as a whole Best estimate Cash out-flows Cash in-flows Gross - Total Gross - Total Risk margin

Cash in-flows

						Direct by	a peluess and accepted a	Direct business and accepted proportional reinsurance							Accepted non-proportional reinsurance	ional rainsurance		Total Non-Life
	Medical	Medical expense Inc	Income protection insurance	Workers' N compensation insurance	Motor vehicle liability Oth insurance	Other motor insurance Marine, aviation and Fire and other damage transport insurance to property insurance	urine, aviation and Fire nsport insurance to		Seneral liability insurance	Credit and suretyship insurance	Legal expenses Insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional Non-proportional casualty reinsurance transport reinsurance		Non-proportional property reinsurance	obligation
		C0020	00030	C0040	C0050	09000	C0070	C0080	06000	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
2 6	R0010	0.00	00:00		0.00	0.00	00:00	0.00	00:00	0.00			00:0	00:00	00:00	0.00	0.00	0.00
ž 6	ROUZO	00:00	00:00	+		o o	00:00	0.00	00:00	C			00:00					0.00
2 22	R0040	00.00	0.00		00:00	0.00	0.00	00:00	0.00	00:00			00:00	0.00	00.0	00.00	0.00	0.00
ustment for R0 note	R0050																	
					_													
RG	R0060	1,863,890.00	-8,050.00		332,290.00		-130,430.00	21,529,120.00	38,989,060.00	14,430,350.00			8,845,680.00	7,827,930.00	56,162,220.00	4,496,950.00	53,361,940.00	207,700,950.00
22 (		405,640.00	-12,650.00				-335,360.00	2,679,110.00	9,931,460.00				975,950.00					13,644,150.00
. B	R0090	1,458,250.00	4,600.00		332,290.00		204,930.00	18,850,010.00	29,057,600.00	14,430,350.00			7,869,730.00	7827930.00	56162220.00	4496950.00	53361940.00	72,207,760.00
ustment for R0	R0100	442,190.00	5,150.00				272,570.00	109,487,400.00	37,403,450.00	10,306,370.00			3,893,710.00		10,399,740.00		102,210.00	172,312,790.00
before adjustment R0	R0110	442,190.00	5,150.00				272,570.00	109,487,400.00	37,403,450.00	10,306,370.00			3,893,710.00		10,193,070.00		102,210.00	172,106,120.00
RO	R0120	0.00	00:00				0.00	00:00	0.00	0.00			0.00		206,670.00		0.00	206,670.00
		00:00	00:00				0.00	0.00	00:00	00:00			00:00		00.00		0.00	0.00
tment for expected R0	R0140	442,000.00	5,150.00				270,180.00	109,467,890.00	37,325,140.00	10,293,990.00			3,887,100.00		10,375,430.00		101,640.00	172,168,520.00
SR.	R0150	1,421,890.00	-13,200.00		332,290.00		400,610.00	-87,938,770.00	1,663,920.00	4,136,360.00			4,958,580.00	7,827,930.00	45,786,790.00	4,496,950.00	53,260,300.00	35,532,430.00
0 <del>2</del>	R0160	1,352,400.00	524,820.00		11,245,010.00	3,007,780.00	71,960,310.00	168,505,610.00	258,405,630.00	936,910.00			36,892,570.00	49,640.00	109,449,980.00	11,495,240.00	468,367,880.00	1,142,193,780.00
R		410,060.00	445,620.00				57,943,020.00	16,008,630.00	108,882,680.00				1,990,650.00					185,680,660.00
3. g		942,340.00	79,200.00		11,245,010.00	3,007,780.00	14,017,290.00	152,496,980.00	149,522,950.00	936,910.00			34,901,920.00	000000	400 440 000 00	400000000000000000000000000000000000000	00 000 252 004	367,150,380.00
ustment for R0	R0200	670,240.00	131,010.00		169,730.00		37,161,040.00	102,231,570.00	179,882,950.00				10,261,110.00	00.00	2,486,350.00	1,382,900.00	286,570,260.00	620,947,160.00
before adjustment R0	R0210	670,240.00	131,010.00		169,730.00		37,161,040.00	102,231,570.00	179,882,950.00				10,261,110.00		2,486,350.00	1,382,900.00	286,570,260.00	620,947,160.00
98	R0220	0.00	00:00		0.00		0.00	00:00	0.00				00:00		00:00	0.00	0.00	0.00
	R0230	00:00	00.0		0.00		0.00	0.00	0.00				00:00		00:0	0.00	0.00	0.00
tment for expected R0	R0240	670,150.00	131,010.00		169,700.00		37,148,980.00	102,175,010.00	179,290,990.00				10,261,110.00		2,485,510.00	1,382,400.00	286,535,220.00	620,250,080.00
22 1		682,250.00	393,810.00		11,075,310.00	3,007,780.00	34,811,330.00	66,330,600.00	79,114,640.00	936,910.00			26,631,460.00	49,640.00	106,964,470.00	10,112,840.00	181,832,660.00	521,943,700.00
¥ 8	R0270 2,	3,216,290.00	380,610.00		11,577,300.00	3,007,780.00	34,410,720.00	190,034,730.00	297,394,690.00	15,367,260.00			31,590,040.00	7,877,570.00	165,612,200.00	15,992,190.00	521,729,820.00	1,349,894,730.00
R		81,960.00	46,110.00		1,396,220.00	378,810.00	4,207,990.00	7,888,410.00	9,463,070.00	115,280.00			3,207,060.00	6,110.00	12,811,100.00	1,233,260.00	21,975,710.00	62,811,090.00
82	R0290	0.00	0.00		0.00	00:00	0.00	0.00	0.00	0.00			0.00	0.00	00:00	0.00	0.00	0.00
RG	R0300	0.00	00:00		00:00	0.00	0.00	0.00	0.00	00:00			00:00	0.00	00:00	0.00	0.00	0.00
Z.	R0310	0.00	0.00		0.00	0.00	0.00	00.00	0.00	0.00			00.00	0.00	0.00	0.00	0.00	0.00
		3,298,250.00	562,880.00		12,973,520.00	3,386,590.00	76,037,870.00	197,923,140.00	306,857,760.00	15,482,540.00			48,945,310.00	7,883,680.00	178,423,300.00	17,225,450.00	543,705,530.00	1,412,705,820.00
djustment for <b>R0</b> :		1,112,150.00	136,160.00		169,700.00		37,419,160.00	211,642,900.00	216,616,130.00	10,293,990.00			14,148,210.00		12,860,940.00	1,382,400.00	286,636,860.00	792,418,600.00
e- total	R0340 2;	2,186,100.00	426,720.00		12,803,820.00	3,386,590.00	38,618,710.00	-13,719,760.00	90,241,630.00	5,188,550.00			34,797,100.00	7,883,680.00	165,562,360.00	15,843,050.00	257,068,670.00	620,287,220.00
· HRG) Gs) R0	1350	е	22		-	-	17	24	27	2		-	23	2	12	8		
	R0360	4	ю		5	2	13	18	22	5			17	+	-	9	10	
X 8	R0370 1,0	1,675,600.00	99,950.00		332,290.00	00:00	11,221,440.00	112,908,860.00 7,959,370.00	36,464,310.00	13,662,160.00			6,213,330.00	7,827,950.00	23,950,060.00	4,355,870.00	20,416,350.00	230,967,910.00
RC RG	R0390	-3,640.00	121,400.00		0.00	0.00	12,534,800.00	99,339,130.00	157,910.00	00.00			2,410,650.00	0.00	4,366,330.00	00.00	17,286,960.00	136,213,540.00
<u>&amp;</u>		,277,740.00	511,000.00		11,238,590.00	2,959,130.00	68,684,080.00	164,923,950.00	245,679,910.00	936,570.00			36,437,550.00	48,760.00	109,896,680.00	11,889,710.00	469,111,140.00	1,123,594,810.00
RG	R0420	74,660.00	13,820.00		6,420.00	48,650.00	3,276,230.00	3,581,660.00	12,725,720.00	340.00			455,030.00	880.00	-446,700.00	-394,470.00	-743,220.00	18,599,020.00

Appendix I:	S 17 01 h
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S.17.01.b														
Reporting unit: RC780														
Qualifying date: 2018-12-31														
Export date: 2019-04-11 / 14:17:05														
Future premiums	R0430	00:00	0.00	00:00	00:00	00:00	00:00	00:00	0.00	00:0	0.00	00:00	00:00	
Other cash-in flows (ind. Recoverable from salvages and subrogations)	R0440	0.00	0.00	0.00	00.00	00:00	10.00	00:00	0.00	-10.00	0.00	0.00	0.00	
Percentage of gross Best Estimate calculated using approximations	R0450													
Best estimate subject to transitional of the interest rate	R0460	0.00	0.00	00:00	00:00	00:00	00:00	00:00	00:00	00:0	0.00	00.00	0.00	
Technical provisions without transitional on interest rate	R0470	3,298,250.00	562,880.00	12,973,520.00	3,386,590.00	76,037,870.00	197,923,140.00	306,857,760.00	15,482,540.00	48,945,310.00	7,883,680.00	178,423,300.00	17,225,450.00	543
Best estimate subject to volatility adjustment	R0480	3,216,300.00	516,760.00	11,577,300.00	3,007,790.00	71,829,880.00	190,034,700.00	297,394,660.00	15,367,270.00	45,738,250.00	7,877,570.00	165,612,200.00	15,992,190.00	52
Technical provisions without volatility adjustment and without others transitional	R0490	3,326,540.00	566,660.00	13,116,860.00	3,423,980.00	76,793,740.00	199,395,110.00	310,480,600.00	15,673,540.00	48,100,700.00	7,981,630.00	179,952,440.00	17,350,180.00	548

Annex I S.19.01.21

RC780 2018-12-31 2019-04-11 / 17:44:00 Reporting unit: RC780
Qualifying date: 2018-1
Export date: 2019-0
Non-life Insurance Claims Information

1 - Accident Year	
Z0010	
Accident year / Underwriting year	

Gross Claims Paid (non-cumulative) (absolute amount)

P	Year R0100 R0100 R0160 R0170 R0180 R0200 R0210 R0210 R0230	0 0 0 0 0 0 0 0 0 0 0 77.9679 77.9679 77.9683 1207863	C0020 0 0 0 69730 148651 76230 77230 77230 90660	2 C0030 0 0 2187 69'645 -8'568 59'134 92'935 37'094	20040 -21629 -7753 6977 11520 8408	233461 233461 23330 2229 25506 7347 6'062	00080 33396 872 11707 588 1269	14745 5445 5445 612	7 C0080 31896 11885 1192	C0090 11750 11461
N-7	R0240	370'305	460'479							
z	DOSEO	766,676								

		_			<u> </u>	<u> </u>	_	_	<u> </u>	_		
10 & +	20110	21										
10	00			1								
6	C0100	V	427									
œ	06000	$\backslash$	1,750	1,461		_						
7	C0080	$\backslash$	3,896	1.595	192		_					
9	C0070	$\langle \rangle$	14.745	5,445	372	612		_				
2	C0000	$\backslash$	33,396	872	1,707	288	1,269					
4	C0020	V	-33'461	23,330	2,229	25'506	7:347	6,062				
ဗ	C0040	V	0	-21'629	37'753	2.26,9	11,520	8,408	44'185			
7	C0030	V	0	0	2'187	69,645	-8,268	59'134	92,932	37,094		
-	C0020	V	0	0	0	69'730	148'651	76'230	77'928	099,06	460,426	
0	C0010	V	0	0	0	0	42'137	19'679	77'932	120'563	370'305	242'227
Year		R0100	R0160	R0170	R0180	R0190	R0200	R0210	R0220	R0230	R0240	R0250

In Current year (cumulative)

(absolute amount)	Gross undiscounted best Estimate Claims (absolute amount)	e ciaims Provisions	2		_	Development year					
Year	0	-	2	ო	4	ю	9	7	œ	ნ	10 & +
	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300
R0100	1	$\backslash$	$\setminus$		\ \	\ \	$\backslash$	<b>/</b>	$\setminus$	\ \	10'361
R0160	0	0	0	69'722	84'385	80,335	20,449	19'813	14'167	11'927	1
R0170	0	0	98,120	84'633	56'404	43'570	52'572	49,007	44'641		
R0180	0	137'942	110'589	62'013	44'727	18'762	13'406	1,594		_	
R0190	196'334	325'217	103'384	89'874	31'921	20'346	9,675				
R0200	982,299	120'844	115'339	54,066	36'977	28'607					
R0210	273'316	244'135	117'376	87'956	84'345						
R0220	262,292	244'694	154'474	87.759							
R0230	210'189	185'361	136'430								
R0240	883'097	482'093									
01000	171.000										

(discounted	data)	09800	6,844	11'228	44'511	1,558	9326	27'403	87'624	96,049	130'771	456'941	266'910	1.142.194
			R0100	R0110	R0170	R0180	R0190	R0200	R0210	R0220	R0230	R0240	R0250	R0260
														Total

Year end

		C0200	C0210	C0220
Prior	R0100	$\backslash$	$\langle$	$\backslash$
6-N	R0160	0	0	0
8º N	R0170	0	0	98'120
V-N	R0180	0	137'942	110'589
9-N	R0190	196'334	325'217	103'384
9-N	R0200	985,99	120'844	115'339
A X	R0210	273'316	244'135	117'376
e-N	R0220	262,295	244,694	154'474
N-2	R0230	210'189	185'361	136'430
N-1	R0240	883'097	482'093	
z	R0250	280'715		

Appendix I: S.22.01.b

Reporting unit: Qualifying date

Impact of long term guarantees measures and transitional Export date:

Technical provisions Basic own funds

Tier II Tier

2019-04-11 / 14:24:46 RC780 2018-12-31

650,031.90 -3,993,053.12 -3,993,053.12 820,263.47 11,866,180.00 -3,993,053.13 -746,233.12 4,643,085.03 Impact of all LTG measures and transitionals C0100 00.00 0.00 00.00 00.00 00.00 00.00 00.00 0.00 Without transitional on impact of transitional on interest rate interest rate adjustment and without adjustment set to zero adjustment and without adjustment set to zero adjustment and without adjustment set to zero offen small and adjustment set to zero adjustment and without all adjustment set to zero offen small and adjustment set to zero adjustment set to zero offen small adjustment set to zero adjustment set to zero adjustment set to zero adjustment set to zero offen small adjustment set to zero 06000 435,392,414.97 1,424,572,000.00 498,862,266.88 136,572,674.58 433,303,730.32 570,818,266.87 3,896,851.90 439,289,266.88 C0080 Impact of the Long Term Guarantee measures and transitionals (Step-by-step approach) 1,192,154.91 820,263.47 -3,993,053.12 650,031.90 11,866,180.00 -3,993,053.12 3,993,053.13 -746,233.12 -4,643,085.03 131,529,000.00 136,572,674.58 433,303,730.32 1,424,572,000.00 439,289,266.88 498,862,266.88 570,818,266.87 435,392,414.97 3,896,851.90 439,289,266.88 C0060 00.00 0.00 0.00 0.00 0.00 0.00 0.00 C00050 443,282,320.00 502,855,320.00 0.00 131,529,000.00 432,111,575.41 135,752,411.11 1,412,705,820.00 574,811,320.00 440,035,500.00 3,246,820.00 440,035,500.00 C0040 Impact of transitional on technical provisions 0.00 0.00 00.00 0.00 C0030 502,855,320.00 131,529,000.00 1,412,705,820.00 443,282,320.00 574,811,320.00 440,035,500.00 3,246,820.00 432,111,575.41 440,035,500.00 135,752,411.11 Without transitional on technical provisions Amount with Long Term Guarantee measures and transitionals 443,282,320.00 502,855,320.00 131,529,000.00 135,752,411.11 1,412,705,820.00 440,035,500.00 432,111,575.41 440,035,500.00 574,811,320.00 3,246,820.00 R0010 R0070 R0080 R0090 R0110 R0020 R0030 R0060 R0050 Restricted own funds due to ring-fencing and matching portfolio Eligible own funds to meet Solvency Capital Requirement Eligible own funds to meet Minimum Capital Requirement Excess of assets over liabilities Solvency Capital Requirement Minimum Capital Requirement

Appendix I:						
523.01b						
Reporting unit: RC780						
Qualifying date: 2018/12-31 Errord date: non nut of traces						
		Total	Tier 1 - unrestricted	Ter 1 - restricted	Tier 2	Tler3
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35		C0010	C0020	C0030	C0040	09000
Ordinary share capital (gross of own shares)	R0010	131,529,270.00	131,529,270.00		0.00	
Share premium account related to ordinary share capital	R0030	131,529,270.00	131,529,270.00		00:00	
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	176,976,960.00	176,976,960.00			
Subordinated liabilities	R0140					
An amount equal to the value of net deferred tax assets	R0160	3,246,820.00				3,246,820.00
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180					
Own funds from the financial statements that shall not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds			-	-	-	
Own funds from the financial statements that shall not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220					
Dadustins						
Oddistans for controllarist allows in financial and credit incitions.	00000					
Debuggioris for participations in mentant and debuggioris. Taket basic num finde efter debuggioris.	00000	00 000 000	00 000 000			00 000 000 0
Andillary own funds		00.026,262,644	00.000,000,044		00:0	0.020,042,0
Unpaid and uncalled ordinary share capital callable on demand	R0300	131,529,000.00			131,529,000.00	
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mulual and mulual - type undertakings, callable on demand	R0310					
I lead is confirmed a subcommenda de serve a confirmed to the serve de serv	00000					
Ulpain and uncated preference states callable for unfination.  A largety thinding commitment to subscribe and navigor, exploritional liabilities on demand	Rosso					
Letters of credit and guarantees under Article 96/2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390					
Total andliary own funds	R0400	131,529,000.00			131,529,000.00	
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	574,811,320.00	440,035,500.00		131,529,000.00	3,246,820.00
Total available own funds to meet the MCR	R0510	440,035,500.00	440,035,500.00		00:00	
Total eligible own funds to meet the SCR	R0540	574,811,320.00	440,035,500.00		131,529,000.00	3,246,820.00
Total eligible own funds to meet the MCR	R0550	440,035,500.00	440,035,500.00		00.00	
SCR	R0580	432,111,575.41				
MCR	R0600	135,752,411.11				
Ratio of Eligible own funds to SCR	R0620	1.330238				
Ratio of Eligible own funds to MCR	R0640	3.241456				

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S.23.01.b

RC780 2018-12-31 2019-04-11 / 14:25:17 Reporting unit:
Qualifying date:
Export date:

Reconciliation reserve

Own shares (held directly and indirectly) Excess of assets over liabilities

Foreseeable dividends, distributions and charges

Other basic own fund items

Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds

59,573,000.00

R0700 R0710 R0730 R0740 R0760

176,976,960.00

502,855,320.00

C0060

34,621,880.00

R0770 R0780 R0790

Expected profits

# Reconciliation reserve

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

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

Total EPIFP

1	2	
	ī	

Appendix I: S.25.01.b

Reporting unit:
RC780
Qualifying date:
2019-10-31
Export date:
2019-04-11 / 14.25x8
Solvency Capital Requirement - for undertakings on Standard Formula

Article 112? (Y/N)

Z0010

# Basic Solvency Capital Requirement

R0010
R0020
R0030
R0040
R0050
R0060
R0070
R0100
R0120
R0130
R0140
R0150
R0160
R0200
R0210
R0220
R0400
R0410
R0420
R0430
R0440
R0450
R0460

Appendix I: S.28.01.b

Reporting unit: Qualifying date:

Export date: 2019-04-11 / #28.54 Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

Linear formula component for non-life insurance and reinsurance obligations

MCRNL Result

R0010

135,752,411.11

C0010

Income protection insurance and proportional reinsurance Medical expense insurance and proportional reinsurance

Workers' compensation insurance and proportional reinsurance

Motor vehicle liability insurance and proportional reinsurance Other motor insurance and proportional reinsurance

Marine, aviation and transport insurance and proportional reinsurance

Fire and other damage to property insurance and proportional reinsurance

General liability insurance and proportional reinsurance

Credit and suretyship insurance and proportional reinsurance

Legal expenses insurance and proportional reinsurance

Assistance and proportional reinsurance

Miscellaneous financial loss insurance and proportional reinsurance

Non-proportional health reinsurance

Non-proportional casualty reinsurance

Non-proportional marine, aviation and transport reinsurance

Non-proportional property reinsurance

Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
C0020	C0030
2,122,798.78	1,824,309.48
387,147.81	353,775.63
0.00	0.00
11,407,600.03	00:0
3,007,779.99	0.00
34,611,651.54	14,146,049.96
0.00	23,754,968.36
81,208,405.51	26,994,216.57
5,073,269.99	193,478.88
0.00	00.00
0.00	0.00
31,590,040.05	23,440,860.93
7,877,569.99	191,387.13
152,759,301.40	46,217,779.16
14,609,790.01	22,152,736.84
236,139,836.89	113,135,262.27

R0020 R0030 R0040 R0060 R0070 R0080 R0100 R0110 R0130

R0140 R0150 R0160

Appendix I: S.28.01.b

Reporting unit: RC780
Qualifying date: 2018-10-31
Export date: 2019-04-11 M-2654
Linear formula component for life insurance and reinsurance obligations

MCRL Result

Obligations with profit participation - guaranteed benefits
Obligations with profit participation - future discretionary benefits

Index-linked and unit-linked insurance obligations

Other life (re)insurance and health (re)insurance obligations

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

0.00 C0040

R0200

Net (of reinsurance/SPV) best estimate Net (of reinsurance/SPV) total capital at and TP calculated as a whole

C0060

C0050

0.00 0.00 00.00

R0210 R0220 R0230 R0240

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RC780 2018-12-31 2019-04-11 / 14:26:54 Reporting unit: Qualifying date: Export date:

Overall MCR calculation
Linear MCR
SCR
MCR cap
MCR floor

Combined MCR

Absolute floor of the MCR

Minimum Capital Requirement

C0070

135,752,411.11 432,111,575.41 194,450,208.93 108,027,893.85 135,752,411.11 3,700,000.00

R0300 R0310 R0320 R0340 R0350

R0400

135,752,411.11

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