Solvency and Financial Condition Report 2023

MS Amlin Insurance S.E.

msamlin.com

Cautionary Statement

This Report includes statements with respect to future events, trends, plans, expectation or objectives relating to MS Amlin Insurance S.E.'s ('MS AISE') future business, financial condition, results of operations, performance and strategy. Forward looking statements are not statements of historical fact and may contain the terms, "may", "will", "should", "continue", "aims", "estimates", "projects", "believes", "intends", "expects", "plans", "seeks" or "anticipates" or words which have a similar meaning. No undue reliance should be placed on such statements because, by their nature, they are subject to unknown risks and uncertainties and can be affected by other factors that could cause actual results and plans of MS AISE to differ materially from those expressed or implied in the forward looking statements (or from past results). Factors such as, but not limited to (i) general economic conditions and competitive factors, particularly in key markets, in each case on a local, regional, national and/or global basis (ii) the risk of a global economic downturn (iii) performance of financial markets (iv) levels of interest rates and currency exchange rates (v) the frequency, severity and development of insured claims events (vi) policy renewal and lapse rates (vii) changes in laws and regulations and in the policies of regulators (viii) increases in loss expenses may all have a direct bearing on the results of operations of MS AISE and on whether any targets may be achieved. Many of these factors may be more likely to occur or be more pronounced as a result of catastrophic events. MS AISE does not undertake or assume any obligation to update or revise any of these forward looking statements, whether to reflect any new information, future events or circumstances or otherwise, except as required by applicable laws and regulations.

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Executive Summary

This annual Solvency and Financial Condition Report (‘SFCR’) for the year ended 31 December 2023 has been prepared for MS Amlin Insurance S.E. (‘MS AISE’ or the ‘Company’).

Business

The Company is a wholly owned subsidiary of Mitsui Sumitomo Insurance Co. Limited (‘MSI’). MSI’s immediate and ultimate parent is MS&AD Insurance Group Holdings, Inc., one of the world’s largest general insurers with an overseas network of 50 countries and regions, and which is also MS AISE’s ultimate parent company. The chart presenting the group structure can be found in section A.1.

MS AISE is a leading independent provider of corporate insurance in Western Europe. MS AISE’s business is organised around two operating segments, Marine and Property & Casualty (‘P&C’). MS AISE underwrites business in both its domestic as well as foreign markets, with the countries of the European Union and the United Kingdom being the most important ones. The Company is domiciled in Belgium and therefore the supervisory authority is the National Bank of Belgium.

The report has as a basis of presentation Solvency II as well as BEGAAP and IFRS4 for comparative purposes. IFRS principles are presented as this is the basis by which the shareholder assesses the Company and by which the Management Committee and Board manage the Company.

On 2 January 2023, MS AISE acquired 90% of the shares of Amlin Netherlands Holding BV for an acquisition price of €17.6 million. The remaining 10% stake is owned by MSI, which is also MS AISE’s sole shareholder. Amlin Netherlands Holding BV in turn owns 100% of the shares of MS Amlin Marine NV (‘MS AM’).

In November 2023, MS AISE’s subsidiary MS AM, who functions a as cover holder for the marine business, received a UK branch licence from the Financial Conduct Authority (‘FCA’). After Brexit became effective, MS AM was operating in the United Kingdom under the Temporary Permissions Regime (‘TPR’). This permitted MS AISE to continue writing marine business in the United Kingdom, through its cover holder MS AM, in the same manner as before, for a temporary period until the application for a third-country-branch licence was approved by the Prudential Regulation Authority (‘PRA’).

Based on its review, the Management Committee recommended to the Board of Directors not to distribute any dividend on the 2023 results. The Board of Directors approved this recommendation as of 21 March 2024 and will propose in the annual General Shareholders Meeting not to pay any dividend.

The Company has not identified any events which would threaten its continuity or going concern. The Company has robust financial and operational grounds to sustain the impacts of adverse events.

Basis of preparation

This SFCR has been prepared in line with the requirements set out in the regulations relating to Solvency II as passed by the European Union, and guidelines issued by the European Insurance and Occupational Pensions Authority (‘EIOPA’) and the NBB. This report is only to meet the Company’s regulatory reporting requirements and should not be relied upon for any other purpose.

Financial information included in this report is based on the generally accepted financial standards IFRS as well as the Company’s annual report and financial statements, prepared for the Company’s shareholder and in accordance with Belgian accounting standards and requirements (‘BEGAAP’). Unless stated otherwise, this report represents the position of the Company as at 31 December 2023 only and will not necessarily reflect all changes in the Company’s operations since that date.

Performance

Underwriting performance

MS AISE's gross written premium has increased in 2023 by €233.7 million, while the overall underwriting result has deteriorated by €14.8 million compared to 2022. The deterioration is mainly explained by prior year claims deterioration in certain lines of business and higher underwriting expenses including higher incentives and investment fees.

BEGAAP underwriting result	2023			2022			Variance	
	Total	Marine	P&C	Total	Marine	P&C	Total	
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	%
Gross written premium	1,217,029	369,752	847,278	983,294	295,586	687,709	233,735	23.8%
Net written premium	1,057,790	352,380	705,410	878,633	297,477	581,156	179,156	20.4%
Net earned premium	1,040,703	337,038	703,665	838,832	284,469	554,363	201,871	24.1%
Net claims	(638,808)	(169,809)	(468,999)	(497,138)	(148,537)	(348,600)	(141,670)	28.5%
Equalisation reserve	(5,465)	-	(5,465)	(4,611)	-	(4,611)	(854)	18.5%
Incurred expenses	(405,003)	(136,606)	(268,397)	(330,810)	(110,172)	(220,638)	(74,193)	22.4%
Underwriting result	**(8,573)**	**30,623**	**(39,197)**	**6,273**	**25,760**	**(19,487)**	**(14,846)**	

The gross written premium for the marine and transport insurance business in MS AISE increased in 2023 over 2022, mainly driven by sustained price increases, prior year written income and new business. Result for the period is a profit of €30.6 million.

The gross written premium of P&C increased mainly due to fire and other damage to property insurance business. The property insurance portfolio has grown across Belgium, France and the Netherlands. The main drivers are an increase in retention rate and more new business compared to 2022. Further growth materialised across other product lines with healthy retention rates, rate increases and new business.

Net claims are €638.8 million which is €141.7 million more than 2022 (€497.1 million). This is largely driven by business growth, worsening prior year claims (€68.0 million deterioration compared to €10.2 million worsening in 2022) and current year claims deterioration in the motor segment.

Furthermore, 2023 allocation of the BEGAAP equalisation reserve for catastrophes deteriorated the underwriting result by €5.5 million.

Investment performance

MS AISE's IFRS investment result in 2023 amounted to a profit of €65.7 million (2022: €28.4 million loss) which is largely driven by higher cash yields due to increased interest rates as well as positive returns from equities and fixed income securities.

Under BEGAAP accounting standards, the investment income is a profit of €64.5 million, primarily driven by (i) the reversal from the reported net unrealised investment profits under IFRS (€37.7 million), almost fully offset by (ii) the impairment testing performed on the financial assets, in accordance with BEGAAP principles, which resulted in a release of €36.4 million to the impairment provision in 2023.

The assets are primarily shares in an Irish domiciled UCITS investments vehicle, which is called the Toro Prism Trust (the 'Trust'). The Trust has solely investors from within the MSI Group. It is primarily structured into 2 sub-funds, i.e. a liquidity fund and an equity securities fund.

Please refer to section A of this report for further details relating to MS AISE's business and performance during the reporting period.

System of governance

MS AISE has a Board of Directors (the ‘Board’) and a Management Committee. The Board is constituted to include an appropriate balance of Executive and Non-Executive Directors. The Board has authority over the conduct of the entire affairs of the Company, while recognising that it is a wholly owned subsidiary of MSI. MS AISE therefore operates within a framework, strategy and structure set by its immediate parent. The parent is represented on the Board, but this does not impair the Board’s obligation to act in the interests of all stakeholders, in particular in the interests of policyholders.

The Board has several committees, to which it delegates oversight and decision making powers in accordance with the Company’s Governance Charter. MS AISE must also report to its parent on aspects of its operations in line with Group reporting requirements from time to time.

No material changes in the system of governance have taken place over the reporting period.

The Board regards the Company’s system of governance overall as adequate. This is subject to continual refinement and review in line with good governance practice.

Please refer to section B of this report for further details relating to MS AISE’s system of governance.

Risk profile

MS AISE’s risk profile is explained using the six categories of the Risk Management Framework in line with the business model and strategic objectives. Overall insurance risk dominates MS AISE’s risk profile.

Strategic risk

The impact of strategic developments and emerging trends are considered as part of the Own Risk and Solvency Assessment (‘ORSA’). This comprehensive process incorporates horizon scanning, scenario analysis, stress testing, and sensitivity analysis to evaluate both qualitative and quantitative impacts.

Key strategic developments, which are being considered, include internal governance or dedicated management attention, internal organization, planning, resource allocation, changes in the competitive landscape (including innovations in technology and products), shifts in external economic, social, and geopolitical conditions. Each of these factors play a crucial role in shaping the risk landscape and the strategic decision-making process.

Emerging trends for trigger concrete actions include extreme weather events, climate change, diversity and inclusion, war on talent, economic inflation and progressive use of alternative intelligence (‘AI’).

Insurance risk

Insurance risk is mainly driven by underwriting activities and reserving from prior underwriting years. Underwriting risk is concentrated around natural perils such as windstorm or fire, events such as terrorism, large risks (like shipyards and construction sites) and unforeseen accumulation of attritional losses. Reserving risk relates to the possible inadequacy of claims provisions. These risks are mainly managed by assuring that for every class:

- a maximum line size, exposure and monitoring programme is available; and
- by assuring adequate pricing models are in place.

No significant changes in MS AISE’s insurance risk profile have been identified over the reporting period, however an increase in gross written business was noted, for which reference is made to the explanation above and section A.2 of this report.

Market and liquidity risk

Market and liquidity risk is being managed in line with the prudent person principle which requires MS AISE to only conduct investment management activities as long as it can be reasonably demonstrated that there is an appropriate level of understanding of the underlying investment, the Company is able to monitor its investments and can justify its investments as prudent to policyholders.

Exposure to market risk is limited to the extent that investments are balanced to:

- optimise investment income whilst focusing on ensuring MS AISE maintains sufficient capital to meet solvency requirements;
- maintain sufficient liquid funds to meet liabilities when they fall due; and
- use derivative instruments to mitigate risks related to financial assets and foreign exchange rates.

Credit risk

Credit risk is mainly driven by exposures to reinsurance counterparties and by exposures to brokers and cover holders. This risk is related to the potential deterioration in the financial condition of counterparties, which may have an impact on MS AISE’s ability to meet its claims obligations and other obligations as they fall due. Credit risk is managed by having an on-boarding process for reinsurers, brokers as well as cover holders and by managing exposures as well as outstanding balances to these counterparties.

Exposure to broker and cover holder credit risk increased over the year as a consequence of growth in top-line premium during 2023. Past experience showed that there is limited default risk relating to these exposures.

Operational risk

MS AISE operates a diverse business across several offices and jurisdictions and is expected to comply with legal, regulatory and best-practice standards. The potential exists for a failure of critical business processes, people or systems resulting in an interruption to normal operations. MS AISE has a risk averse attitude to operational risk. The Company does not wish to have any operational failures which may hinder trading, result in financial loss or any regulatory sanction for inadequate compliance.

The risk profile for operational risk remained largely the same during 2023. Improvements have been realised in relation to managing information security and the IT infrastructure. Further improvements will be realised in 2024 via the IT and cyber remediation programmes.

Please refer to section C of this report for further details relating to MS AISE’s risk profile.

Valuation for solvency purposes

As at 31 December 2023, the Company had excess of assets over liabilities under Solvency II of €814.1 million (2022: €755.5 million) compared to net assets under BEGAAP of €516.5 million (2022: €476.6 million) and net assets under IFRS of €764.3 million (2022: €704.1 million). The adjustments to move from BEGAAP balance sheet to IFRS and Solvency II balance sheet are set out below:

	2023 €'000	2022 €'000
BEGAAP net asset value	**516,502**	**476,567**
Allowed items – deferred taxes and IFRS16 assets & liabilities	6,536	11,648
Reversal amortisation goodwill	26,508	23,293
Financial assets at fair value	68,141	66,937
Adjustment to IFRS technical provisions	146,569	125,678
IFRS net asset value	**764,256**	**704,122**
Disallow items – goodwill, intangible assets, prepayments and deferred acquisition costs	(117,006)	(98,380)
Solvency II technical provisions adjustment	472,183	395,200
Future premiums and claims adjustments	(280,748)	(226,726)
Deferred tax on adjustment items	(24,546)	(18,699)
Excess of assets over liabilities – Solvency II	**814,139**	**755,517**

Please refer to section D of this report for further details relating to MS AISE's valuation for solvency purposes.

Own funds

	2023 €'000	2022 €'000
Excess of assets over liabilities	**814,139**	**755,517**
Subordinated liabilities	2,539	2,486
Total Available own funds	**816,678**	**758,003**
Solvency Capital Requirement ('SCR')	526,195	475,622
Ratio of Eligible own funds to SCR ('Solvency Ratio')	**155.2%**	**159.4%**

MS AISE's policy is to actively manage capital so as to meet regulatory requirements and contribute to the Company's target to deliver a cross-cycle return on equity after tax in excess of 10% (2022: 7%), which will be reviewed should the Company move to an internal model and away from the standard formula. As at 31 December 2023 MS AISE's Solvency Ratio was 155.2% (2022: 159.4%). This decrease is driven by the increase in SCR, primarily as a result of business growth and higher catastrophe exposures in non-life underwriting risk. This is partly offset by the increase of the own funds following a solid investment return incurred during the reporting year.

The subordinated debt has been issued by MS Amlin Corporate Services Limited ('MS ACS') to MS AISE. The agreement is drafted in line with Articles 72 and 73 of the Delegated Regulation (EU) 2015/35 and therefore the subordinated liabilities have been assessed for classification purposes under Solvency II as Tier 2 capital.

The below table analyses the movement in the Solvency II Ratio

	€'000	Solvency II Ratio
Total available own funds over SCR at 1 January 2023	**282,381**	**159.4%**
Change in IFRS net assets	60,133	12.6%
Change in Solvency II valuation adjustments	(1,512)	(0.3%)
Change in subordinated liabilities value	53	(0.1%)
Change in SCR	(50,573)	(16.4%)
Available own funds over SCR at 31 December 2023	**290,483**	**155.2%**

The change in IFRS net assets includes the impact of the IFRS profit after tax of €60.7 million for the Company.

The change in Solvency II valuation adjustments reflects those movements in sections D.1 to D.3 of this report.

The change in Solvency Capital Requirement (‘SCR’) as well as the Minimum Capital Requirement (‘MCR’) is explained in section E.2 of this report.

Capital structure and arrangements

At 31 December 2023, the Company has own funds of €816.7 million. Per the requirements for Solvency II, this is split into tiers as follows:

	2023 €'000	2022 €'000
Tier 1	814,139	755,517
Tier 2	2,539	2,486
Tier 3	0	0
Total Available Own Funds	**816,678**	**758,003**

Tier 1 own funds are made up of the Company’s entire share capital along with its reconciliation reserve. There is no restriction on Tier 1 own funds. See section E.1 of this report for more information on this tier.

Tier 2 own funds relate to the subordinated loan the Company has received, which is classified within this tier as per Solvency II criteria.

Tier 3 relates to the net deferred tax asset position of the Company, as this is required to be classified as Tier 3. As at 31 December 2023, there is no Tier 3 capital due to deferred tax liabilities being valued higher than the deferred tax assets on the Solvency II balance sheet. See section D.1 for more information on the deferred tax valuation.

Use of standard formula

The Company uses the standard formula rules, prescribed in the Solvency II Directive, for calculating its SCR. No simplifications have been used in the calculations. Please see section E.2 for more information on the application of the standard formula calculation. MS AISE does use an Internal Model for internal capital setting processes and in support of various strategic and tactical business initiatives (like sensitivity testing and calculating exposures), as well as supporting MS AISE’s standard formula calculations.

Please refer to section E of this report for further details relating to MS AISE’s own funds.

Section A - Business and Performance

A.1 Business

Legal form

The name of the Company is MS Amlin Insurance S.E. (‘MS AISE’ or ‘the Company’). The legal form of the undertaking is a “Societas Europaea” or “S.E.”.

The Company is domiciled in Belgium. The address of its registered office is:

Koning Albert II Laan 37
1030 Brussels
Belgium

Group structure

In 2023, MS AISE was a wholly owned subsidiary of Mitsui Sumitomo Insurance Company, Limited (‘MSI’), which itself is a wholly owned subsidiary of MS&AD Insurance Group Holdings, Inc. (‘MS&AD’). Both MSI and MS&AD are registered in Japan.

The registered address of MSI is 3-9, Kanda Surugadai, Chiyoda-ku, Tokyo, Japan.

The registered address of MS&AD is Tokyo Sumitomo Twin Building (West Tower), 27-2, Shinkawa 2-chome, Chuo-ku, Tokyo, Japan.

MS&AD is the ultimate parent of MS AISE, and the consolidated accounts of MS&AD represent the largest group in which the results of the Company are consolidated.

For the reporting year 2023, MS AISE is subject to supervision by the National Bank of Belgium (‘NBB’) as well as its branch country regulators.

MS AISE operates in four countries, and is organised and managed through two distinct operating segments as follows:

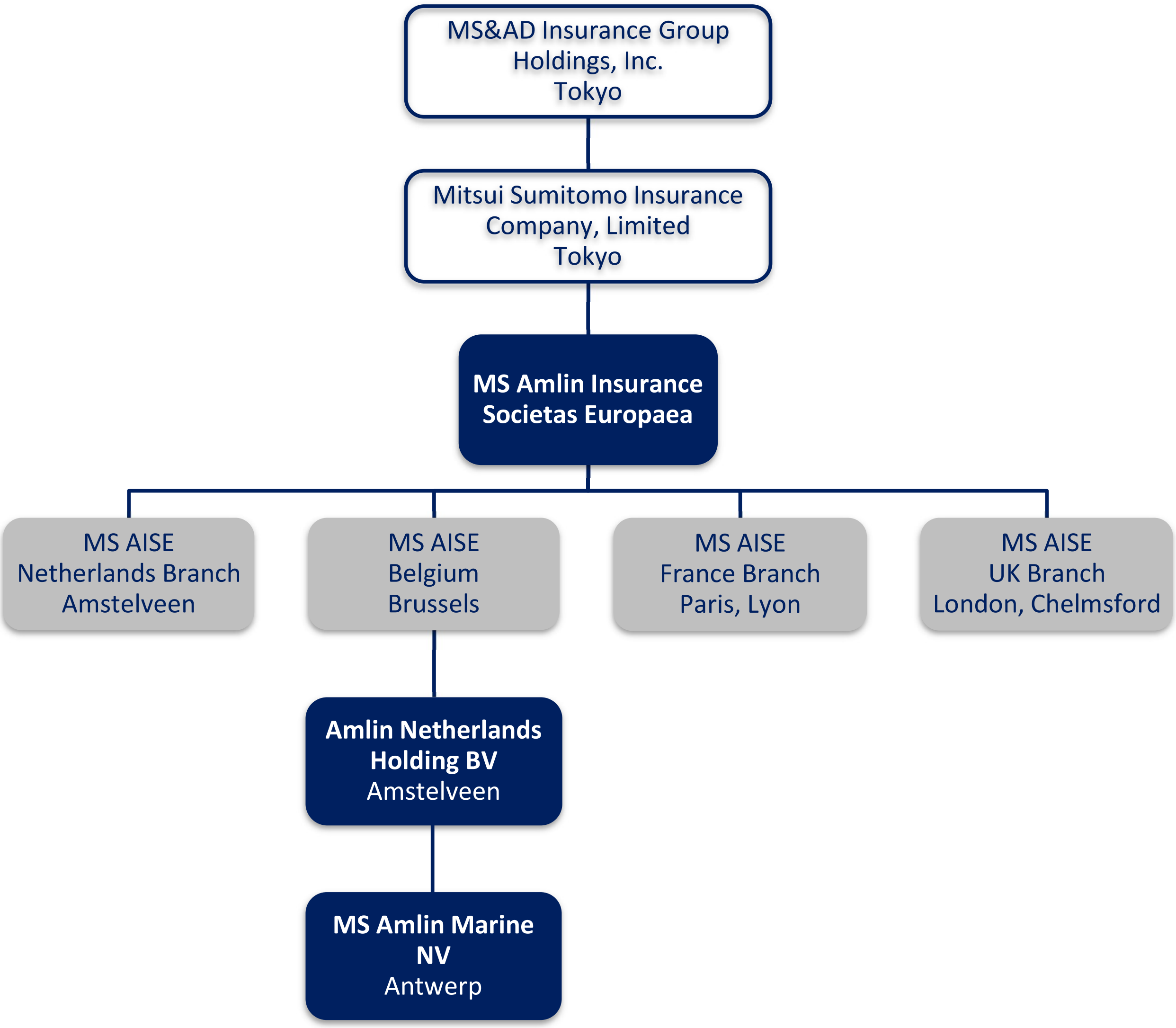
- **Marine**: Primarily focusing on cargo, hull, liability, fixed premium protection & indemnity and yacht portfolios, and other specialist areas such as specie. Operates through the MS Amlin Marine NV (‘MS AM’) cover holder, which is a subsidiary of MS AISE.

- **Property & Casualty:** Providing insurance coverage in three main areas – property, casualty and motor – for clients in the Netherlands, Belgium, France and the United Kingdom.

The simplified structure chart below explains the relationships between MS AISE and its parent companies during the reporting period.

MS AISE holds a 90% stake in Amlin Netherlands Holding B.V, which in turn has full ownership of MS AM. Reference is also made to the significant events during the reporting period, highlighted below.

This report has as a basis of presentation Solvency II as well as BEGAAP and IFRS4 for comparative purposes. IFRS principles are presented as this is the basis by which the shareholder assesses the Company and by which the Management Committee and Board manage the Company.



Significant events during the period

On 2 January 2023, MS AISE acquired 90% of the shares of Amlin Netherlands Holding BV for an acquisition price of €17.6 million. The remaining 10% stake is owned by MSI, which is also MS AISE's sole shareholder. Amlin Netherlands Holding BV in turn owns 100% of the shares of MS Amlin Marine NV ('MS AM').

In November 2023, MS AISE's subsidiary MS AM, who functions a as cover holder for the marine business, received a UK branch licence from the Financial Conduct Authority ('FCA'). After Brexit became effective, MS AM was operating in the United Kingdom under the Temporary Permissions Regime ('TPR'). This permitted MS AISE to continue writing marine business in the United Kingdom, through its cover holder MS AM, in the same manner as before, for a temporary period until the application for a third-country-branch licence was approved by the Prudential Regulation Authority ('PRA').

Aside from the items mentioned above no other significant events have been identified during the reporting period.

Significant events after the reporting period

No significant events have been identified between the reporting date and the date on which this Solvency and Financial Condition Report was submitted.

Supervisor information

MS AISE's supervisor is the National Bank of Belgium ('NBB'), de Berlaimontlaan 14, 1000 Brussels, Belgium.

External auditor information

The Company's appointed external auditor is KPMG Bedrijfsrevisoren CVBA, Luchthaven Brussel Nationaal 1K, 1930 Zaventem, Belgium, represented by Frans Simonetti.

A.2 Underwriting performance

The values in this section are consistent with the values reported in the following Quantitative Reporting Templates (‘QRTs’), as included in the annex to this report,

- S.05.01 ‘Premiums, claims and expenses by line of business’; and
- S.04.05 ‘Premiums, claims and expenses by country’.

The classification principles of these QRTs are:

- Underwriting foreign exchange gains or losses are excluded;
- Claims management expenses are presented as part of incurred expenses in the QRTs.

The presentation of underwriting performance, as shown below, is in accordance with BEGAAP accounting standards. The underwriting performance for non-proportional inwards reinsurance has not been presented separately in the tables below. The figures are included in the corresponding, more general, Solvency II classifications for lines of business.

2023 BEGAAP underwriting result	Motor vehicle liability and other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Other non-material lines of business	Total
	€'000	€'000	€'000	€'000	€'000	€'000
Gross written premium	228,444	369,752	295,336	227,441	96,057	1,217,029
Net written premium	219,811	352,380	245,880	205,637	34,082	1,057,790
Net earned premium	224,768	337,038	229,654	211,837	37,406	1,040,703
Net claims	(196,540)	(169,809)	(134,436)	(115,079)	(22,944)	(638,808)
Equalisation reserve	-	-	(2,899)	(2,566)	-	(5,465)
Incurred expenses	(90,743)	(136,606)	(81,993)	(84,497)	(11,164)	(405,003)
Underwriting result	**(62,515)**	**30,623**	**10,326**	**9,695**	**3,297**	**(8,573)**
Claims ratio	87.4%	50.4%	59.8%	55.5%	61.3%	61.9%
Expenses ratio	40.4%	40.5%	35.7%	39.9%	29.8%	38.9%
Combined ratio	127.8%	90.9%	95.5%	95.4%	91.2%	100.8%

2022 BEGAAP underwriting result	Motor vehicle liability and other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Other non-material lines of business	Total
	€'000	€'000	€'000	€'000	€'000	€'000
Gross written premium	193,070	295,586	218,419	207,358	68,862	983,294
Net written premium	185,553	297,477	176,584	189,055	29,965	878,633
Net earned premium	174,635	284,469	169,499	180,617	29,611	838,832
Net claims	(142,855)	(148,537)	(112,598)	(80,576)	(12,571)	(497,138)
Equalisation reserve	-	-	6,286	(10,897)	-	(4,611)
Incurred expenses	(67,981)	(110,172)	(69,616)	(67,130)	(15,911)	(330,810)
Underwriting result	**(36,200)**	**25,760**	**(6,430)**	**22,014**	**1,128**	**6,273**
Claims ratio	81.8%	52.2%	62.7%	50.6%	42.5%	59.8%
Expenses ratio	38.9%	38.7%	41.1%	37.2%	53.7%	39.4%
Combined ratio	120.7%	90.9%	103.8%	87.8%	96.2%	99.3%

Overview

MS AISE gross written premium increased by €233.7 million. The underwriting result deteriorated by €14.8 million leading to a loss of €8.6 million with corresponding combined ratio of 100.8% (2022: 99.3%).

Gross written premium of €1,217.0 million equates to a growth of 23.7% or €233.7 million mainly driven by €188.5 million new business (2022: €136.2 million) combined with higher retention rate of 89.7% (2022: 88.5%). Renewal rate increased to 2.2% (2022: 1.8 %).

Net earned premium of €1,040.7 million increased by €201.9 million or 24.1% with associated cost for reinsurance equating to 12.5% of gross income (2022: 11.0%).

Net claims, without the impact of the equalisation reserve, of €638.8 million are €141.7 million higher than 2022 (€497.1 million), or an increase in the claims ratio of 2.1% from 59.8% in 2022 to 61.9% in 2023. This absolute increase is largely driven by business growth, additional claims in respect of prior years which resulted in a net increase of €68.0 million prior accident year claims (2022: €10.2 million loss). Current year claims ratio deteriorated from 55.0% in 2022 to 55.7% in 2023.

Furthermore, there was an additional allowance in 2023 to the BEGAAP equalisation reserve for catastrophes, resulting into an additional loss of €5.5 million.

Incurred expenses of €405.0 million are €74.2 million higher than 2022 and translates into an expense ratio of 38.9% (2022: 39.4%). Higher acquisition costs and operational expenses in combination with strong income growth has led to a decrease of the overall expense ratio of 0.5%.

Motor vehicle liability and other motor insurance

The MS AISE motor business gross written premium increased in 2023 from €193.1 million to €228.4 million (€35.4 million or 18.3% increase), across the Netherlands, the United Kingdom and Belgium, primarily driven by high retention rate (89.6%) and new business (€35.1 million). Renewal rate increased to 3.5% (2022: 1.0 %).

The underwriting result in 2023 was a €62.5 million loss compared to a €36.2 million loss in 2022. This is mainly explained by an increase in claims ratio of 5.6 % (from 81.8% to 87.4%). Net claims of €196.5 million are €53.7 million higher than 2022 (€142.8 million). This is largely driven by prior year claims worsening (€34.0 million deterioration compared to €14.4 million deterioration in 2022) and current year claims deterioration (underlying claims ratio increased from 66.9% to 71.2%).

Marine and transport insurance

The marine and transport insurance business in MS AISE showed a €74.2 million or 25.1% increase in gross written premium in 2023 from €295.6 million to €369.7 million. Majority of the increase is driven by Hull, Cargo, Fixed premium protection and indemnity classes and Yacht. This is mainly explained by prior year written income, 84.1% retention rate and €52.1 million new business.

Result for the period is an underwriting profit of €30.6 million compared to €25.8 million profit in 2022, benefiting from additional income. Net earned premium increased to €337.0 million which is €52.6 million (or 18.5%) higher than 2022.

Net claims of €169.8 million are €21.3 million higher than 2022 (€148.5 million) or a decrease in the claims ratio of 1.8% from 52.2% in 2022 to 50.4% in 2023. This decrease is largely driven by current year claims improvement (underlying claims ratio decreased from 55.5 % to 51.6 %). Partially offset by prior year claims deterioration (€10.6 million worsening compared to €5.3 million worsening in 2022).

Fire and other damage to property insurance

The property business of MS AISE showed an increase in premium during 2023. Gross written premium grew by €76.9 million or 35.2 % in 2023, mainly driven by new business in France and Belgium. The overall retention rate for the reporting year is 91.1 % (2022: 88.5%).

The underwriting result in 2023 improved compared to 2022 (from €6.4 million loss to €10.3 million profit), mainly explained by a decrease in claims ratio of 2.9 % (from 62.7% to 59.8%) and in expense ratio of 5.4% from 41.1% to 35.7%. Net earned premium in 2023 is €229.7 million, which is €60.2 million (or 35.5%) higher than 2022. Net claims of €134.4 million are €21.8 million higher than 2022. This is driven by both prior year claims worsening (€5.6 million worsening compared to €7.4 million improvement in 2022) and current year claims deterioration (underlying claims ratio increased from 57.0% to 58.0%).

The 2023 allocation of the BEGAAP equalisation reserve resulted into an additional loss of €2.9 million loss (2022: €6.3 million profit).

General liability insurance

In 2023, the casualty portfolio in MS AISE increased by 9.7% (or €20.1 million) with gross written premium of €227.4 million compared to €207.4 million in 2022. This is mainly driven by Belgium and France. The retention ratio increased from 94.2% to 95.8%, coupled with rate increases and new business.

The underwriting result in 2023 is a profit of €9.7 million compared to €22.0 million profit in 2022. Lower profit is mainly explained by an increase in claims ratio of 4.9% (from 50.6% to 55.5%) and increase in expense ratio of 2.7% from 37.2% to 39.9%. Net claims of €115.1 million are €34.5 million higher than 2022. This is driven by prior year claims deterioration (€27.9 million deterioration compared to €1.2 million improvement in 2022) and current year claim worsening (underlying claims ratio increases from 42.6% to 45.0%).

The 2023 allowance to the BEGAAP equalisation reserve deteriorated the underwriting result by €2.6 million loss (2022: €10.9 million loss).

Underwriting performance by material geographical area

2023 BEGAAP underwriting result	Belgium	Netherlands	UK	France	Other	Total
	€'000	€'000	€'000	€'000	€'000	€'000
Gross written premium	257,312	519,832	122,888	250,529	66,468	1,217,029
Net written premium	194,470	507,238	105,091	197,685	53,306	1,057,790
Net earned premium	179,590	511,981	106,422	192,414	50,295	1,040,703
Net claims	(113,136)	(299,983)	(96,003)	(104,767)	(24,919)	(638,808)
Equalisation reserve	(1,140)	(3,034)	(460)	(578)	(253)	(5,465)
Incurred expenses	(66,184)	(199,781)	(47,974)	(73,255)	(17,809)	(405,003)
Underwriting result	**(870)**	**9,182**	**(38,015)**	**13,815**	**7,314**	**(8,573)**
Claims ratio	63.6%	59.2%	90.6%	54.7%	50.0%	61.9%
Expenses ratio	36.9%	39.0%	45.1%	38.1%	35.4%	38.9%
Combined ratio	100.5%	98.2%	135.7%	92.8%	85.5%	100.8%

2022 BEGAAP underwriting result	Belgium €'000	Netherlands €'000	UK €'000	France €'000	Other €'000	Total €'000
Gross written premium	210,923	450,315	81,514	193,431	47,112	983,294
Net written premium	167,579	438,204	72,422	163,454	36,974	878,633
Net earned premium	158,469	413,015	85,057	156,741	25,551	838,832
Net claims	(105,412)	(242,922)	(45,288)	(89,036)	(14,478)	(497,138)
Equalisation reserve	(2,090)	(11,031)	2,847	1,370	4,293	(4,611)
Incurred expenses	(63,591)	(154,710)	(37,683)	(63,651)	(11,175)	(330,810)
Underwriting result	**(12,625)**	**4,351**	**4,932**	**5,423**	**4,192**	**6,273**
Claims ratio	67.8%	61.5%	49.9%	55.9%	39.9%	59.8%
Expenses ratio	40.1%	37.5%	44.3%	40.6%	43.7%	39.4%
Combined ratio	108.0%	98.9%	94.2%	96.5%	83.6%	99.3%

Compared to last year, the underwriting performance of the United Kingdom has worsened by €42.9 million whereas Belgium, France and Netherlands improved by respectively €11.8 million, €8.4 million and €4.8 million.

Belgium

In 2023, the income increased by 22.0% (or €46.4 million) with gross written premium of €257.3 million compared to €210.9 million in 2022. The underwriting result in 2023 was a €0.9 million loss compared to a €12.6 million loss in 2022. This is mainly explained by a lower claims ratio compared to 2022 (4.2 % decrease) and a lower expense ratio (3.2% decrease).

Netherlands

The Netherlands business of MS AISE showed an increase in premium during 2023. Gross written premium increased by €69.5 million or 15.4% in 2023. The underwriting result in 2023 was a €9.2 million profit compared to a €4.4 million profit in 2022. Net claims of €300.0 million are €57.0 million higher than prior year, mainly due to Motor. This is driven by both prior and current year claims deterioration.

United Kingdom

The United Kingdom showed a €41.4 million or 50.8% increase in gross written premium from €81.5 million to €122.9 million, predominantly in the Marine segment and Property. The underwriting result in 2023 was a €38.0 million loss compared to a €4.9 million profit in 2022, in large driven by a higher claims and expense ratio compared to 2022, respectively 40.7% and 0.8% higher.

France

In 2023, France income increased by 29.5% (or €57.1 million) with gross written premium of €250.5 million compared to €193.4 million in 2022. The underwriting result in 2023 was a €13.8 million profit compared to a €5.4 million profit in 2022, in large driven by 1.2% lower claims ratio and 2.5% lower expense ratio. Net claims of €104.7 million are €15.7 million higher than 2022.

Movements from a geographical perspective have also been covered by the line of business commentary above.

A.3 Investment performance

IFRS investment performance by asset class

Below is an analysis of MS AISE's IFRS investment income by relevant asset class.

	2023 €'000	2022 €'000
Equities	20,978	(23,308)
Collective Investment Undertakings	36,036	(7,090)
Corporate bonds	6,952	1,921
Government bonds	529	-
Cash and deposits	1,223	75
Total	**65,718**	**(28,401)**

During the financial year 2023, interest rates continued to stay high as central banks tried to bring inflation back under control. Despite higher rates, the US economy remained more robust than expected, with continued support from both consumers and government spending. In contrast, many other developed economies have struggled to generate growth throughout the year and have flirted with recessionary conditions. General inflation has reduced in varying degrees, with Europe experiencing sharper falls, due to energy prices, compared to the UK. Economic resilience supported positive returns from equities and, in addition, the fixed income securities.

Limited new commitments to private equity funds were made during the third quarter of 2023, with additional capital to be injected over the next few years. Furthermore, the volatile interest rate environment in 2023 demanded careful management of duration exposures in the investments portfolio.

Investments are run on a multi-asset, multi-manager basis. Exposure to the asset classes is achieved using physical holdings of the asset class or derivative instruments. The assets are primarily shares in the UCITS umbrella Toro Prism Trust (the 'Trust'), which provides sub-funds by asset class and unit classes by currency. The Trust has solely investors from within the MSI Group. Assets may also be managed by MS Amlin Investment Management Limited ('MS AIML') directly or by outsourced managers, on a segregated, pooled or commingled basis. Manager selection is based on a range of criteria which leads to the expectation that value will be added to the funds over the medium to long term. The managers have discretion to manage the funds on a day-to-day basis within investment guidelines or prospectuses applicable to their funds, which ensure that compliance with the investment frameworks is guaranteed. The managers' performance, compliance and risk are monitored on an ongoing basis.

BEGAAP investment performance

The investment return according to IFRS principles differs significantly from the BEGAAP result.

Investments are recognised at fair value under IFRS, while for BEGAAP purposes financial assets are valued at historical cost value less impairment and allowance for bad debt. Therefore, the investment return as a result of the fair value adjustments, also known as the unrealised results, is not recognised in the BEGAAP financial statements.

The BEGAAP investment return equals a profit of €64.5 million and is €1.2 million lower compared to €65.7 million profit under IFRS. This is mainly driven by the net unrealised investment profits under IFRS (€37.7 million) during the reporting year, not being recognized under BEGAAP, almost fully offset by the impairment testing performed on the financial assets, in accordance with BEGAAP principles, which resulted in a release of €36.4 million to the impairment provision in 2023. For more information on the valuation rules for impairment, reference is made to the BEGAAP financial statements.

Investments in securitisation

The Company has a small amount of investments in securitised assets which total 2% of the Company's investment assets.

A.4 Performance of other activities

Other material income and expenses

MS AISE has no other material income and expenses in the statement of profit or loss not included in sections A.2 or A.3 of this report.

Leasing arrangements

MS AISE entered into several non-cancellable rental and lease arrangements.

The rent of the office spaces are:

- In 2023, the Amstelveen office is €0.4 million annually and yearly adjusted for inflation. The floor space was reduced as of 1 January 2023 with a first upcoming expiration date 31 December 2028.
- The Brussels contract, €0.4 million annually and yearly adjusted for inflation, ends 31 July 2027. MS AISE has an early termination option per 31 July 2024.
- Paris and Lyon are €0.6 million annually and are yearly adjusted for inflation. The contract for office space in Paris ends 28 February 2031 and amounts to €0.6 million annually. The lease contract of the Lyon office, €0.04 million yearly, ends 2 April 2026.

MS AISE has no purchase options on the above mentioned office buildings.

MS AISE also leases various cars under operating lease agreements.

In total for reporting year 2023, MS AISE incurred €2.9 million for lease and rental expenses (2022: €2.9 million).

A.5 Any other information

All material information relating to the Company’s business and performance has been disclosed in sub-sections A.1 to A.4 above.

Section B - System of Governance

B.1 General information on the system of governance

B.1.1 Structure of the Board and management

MS AISE has a Board of Directors (the ‘Board’) and a Management Committee. The Board is constituted to include an appropriate balance of Executive and Non-Executive directors. The Board has authority over the conduct of the entire affairs of the Company, while recognising that it is a wholly owned subsidiary of MSI. MS AISE therefore operates within a framework, strategy and structure set by its immediate parent. The parent is represented on the Board, but this does not impair the Board’s obligation to act in the interests of all stakeholders, in particular in the interests of policyholders.

MS AISE reports to its parent on aspects of its operations in line with reporting requirements set by its parent from time to time.

The Board sets the strategic direction of the Company and determines the risk appetite and framework of systems and controls. The Board ensures that MS AISE’s Management has the right balance of skills, experience, independence, knowledge and diversity for an evolving business. The Board achieves this by:

- A programme of Board effectiveness evaluation;
- A training and development programme for all directors and senior management;
- Continued analysis by the Remuneration and Nomination Committee of the balance of skills, experience and diversity when appointing new MS AISE directors and key staff;
- Continued focus on the development of potential employees with Board readiness specifically in mind, as well as corresponding succession planning and talent development.

The responsibilities of the individual Executive and Non-Executive directors during the reporting period are described later in this section.

The Board has several committees, to which it delegates oversight and decision-making powers in accordance with the Company’s Governance Charter. These are described in more detail later in this section.

Main roles and responsibilities of the Board and Management Committee

The Board determines the overall business strategy and risk policy; and supervises the Company’s activities. The Management Committee is responsible for the specific management of the Company’s activities, the enforcement of the risk management system and maintaining the organisational and operational structure. Duties and matters reserved to the Board, the Management Committee and other bodies of the Company are described in the Company’s Governance Charter. This Charter is reviewed periodically by the Board to ensure that it remains appropriate.

The Board meets at least four times per year, with regular contact between Management Committee members and Non-Executive Directors throughout the year. All directors have access to the advice of the Company Secretary, and all directors, committees, and the Board itself may procure professional advice at MS AISE’s expense in the furtherance of their duties.

Within the MS AISE Board of Directors the following roles existed during the reporting period:

Executive / Non-Executive Director	Role
Independent Non-Executive	Chair of the Board and Chair of the Remuneration and Nomination Committee
Independent Non-Executive	Chair of the Audit Committee
Independent Non-Executive	Chair of the Risk Committee and Investment Governance Committee

Executive / Non-Executive Director	Role
Independent Non-Executive	Chair of the Underwriting Oversight Committee
Independent Non-Executive	Independent Non-Executive Director
Non-Executives	Shareholder representatives
Executive	Chief Executive Officer
Executive	Chief Financial Officer
Executive	Chief Risk Officer

Segregation of responsibilities within the MS AISE Board

The Governance Charter of the Company sets out how key Board level responsibilities have been allocated to the roles. The Governance and Risk Management Frameworks clearly articulate the procedures for decision making. These are documented within the respective sections of the Governance Charter for the Board and its committees. The frameworks include both corporate and regulatory requirements, such as strategic matters and Solvency II requirements. The Governance Framework also details explicit procedures for key activities such as financial reporting disclosures and contingent future management actions in the event of certain matters arising.

Key MS AISE Board Committees are:

Management Committee

The Management Committee of MS AISE meets at least quarterly but in practice monthly. Its membership is composed as follows:

Director / Management	Role
Executive Director / Chair	Chief Executive Officer
Executive Director	Chief Financial Officer
Executive Director	Chief Risk Officer
Committee member	Chief Underwriting Officer Marine
Committee member	Chief Underwriting Officer Property & Casualty
Committee member	Head of Claims
Committee member	Chief Operating Officer

Its remit is determined in the Governance Charter and includes operationalising the strategy, risk management, administrative and accounting procedures, internal controls and integrity policy. The Management Committee also introduces, monitors and assesses the organisational and operational structure as well as providing financial, management and prudential reporting.

The Audit Committee

The MS AISE Audit Committee meets at least quarterly. Its membership is composed of Non-Executive Directors only. Its remit is determined in the Governance Charter and includes financial reporting and Solvency II reporting matters, as well as internal controls in scope for J-SOX attestation, internal audit, external audit and oversight over 'Speak Up'. The latter policy sets out standards to achieve a culture in which individuals feel comfortable to raise genuine concerns about wrongdoing without fear of personal repercussion.

The Risk Committee

The MS AISE Risk Committee meets at least quarterly. Its membership is composed of Non-Executive Directors only. Its remit is determined in the Governance Charter and includes risk management and solvency capital requirements as well as issues pertaining to regulatory compliance.

The Remuneration and Nomination Committee

The MS AISE Remuneration and Nomination Committee meets at least quarterly. Its membership is composed of the independent Non-Executive Directors and a representative of the shareholder. The Committee is chaired by the Chair of the Board. Its remit is determined in the Governance Charter and it leads the process for appointments to the MS AISE Board, Management Committee, independent control functions and Solvency II identified staff. It advises the Board on the Company's remuneration policy and remuneration for Solvency II identified staff.

The Underwriting Oversight Committee

The Underwriting Oversight Committee ('UOC') meets at least four times a year. The Committee membership is composed of independent Non-Executive Directors. Its remit is determined in the Governance Charter. The remit of this Committee is to oversee the performance, strategy and control framework around underwriting activity of the Company and make recommendations, as appropriate.

The Investment Governance Committee

The Investment Governance Committee ('IGC') meets at least four time a year. Its membership is composed of independent Non-Executive Directors. Its remit is to oversee the adherence to the investment strategy, considering the investment mandate, the investment performance and related investment risks as well as regulatory requirements.

Reporting to the MS AISE Board and its Committees

Monthly and quarterly management information reports are tabled for discussion, reviewed, and challenged at the Board and its committees' meetings, including Management Committee meetings. The reporting covers various business areas including, but not limited to, underwriting, reinsurance, claims, actuarial and reserving, finance, investments, human resources, compliance, legal, internal audit, external audit, risk, internal control and strategy. The reporting facilitates informed decision making.

Roles and responsibilities of key functions

All staff, including key function holders, have clearly defined roles and responsibilities detailed in their job specifications. Performance appraisals take place where staff is assessed against their performance objectives and the requirements of their roles.

The table below comprises the functional areas identified by MS AISE as key functions in accordance with the Solvency II Directive, along with the individuals identified as key function holders, and their management reporting lines.

Key function	Main responsibilities	Key function holder	Reports to	MS AISE Board responsibility
Enterprise Risk Management function	Responsibility for the performance of MS AISE's ORSA. For further information on the ORSA, please refer to section B.3.2.	Chief Risk Officer	Chief Executive Officer	Chief Risk Officer
Assurance and Monitoring function	To assist MS AISE's management in meeting the control framework requirements, through assurance and monitoring reviews.	Chief Risk Officer	Chief Executive Officer	Chief Risk Officer

Key function	Main responsibilities	Key function holder	Reports to	MS AISE Board responsibility
Internal Audit function	To assist the MS AISE Board and the Management Committee to protect the assets, reputation and sustainability of the Company, through the provision of an independent appraisal of the adequacy and effectiveness of the risk management and control processes. For further information on the Internal Audit function, please refer to section B.5.	Head of Internal Audit	Non-Executive Director (Audit Committee Chair); administrative reporting line to the CEO	Chief Executive Officer
Actuarial function	To provide assurance on the actuarial function holder responsibilities. For further information on the Actuarial function, please refer to section B.6.	Chief Actuary	Chief Risk Officer	Chief Risk Officer
Compliance function	To provide an appropriate degree of assurance to the MS AISE Board that the Company is operating in a way which is compliant with relevant rules and regulations.	Chief Compliance Officer	Chief Risk Officer	Chief Risk Officer

The assurance functions are adequately resourced and are staffed by appropriately qualified, skilled and experienced individuals. The assurance functions are authorised and empowered to operate within their agreed terms of reference/charters. The Head of Internal Audit reports functionally to the Audit Committee Chair, an independent Non-Executive Director. The Head of Internal Audit has an administrative reporting line to the CEO, which includes matters such as the determination of necessary human and IT resources as well as the performance with respect to recommendations of the Board or Audit Committee.

The Chief Risk Officer, the Actuarial function and the Chief Compliance Officer report to the MS AISE Risk Committee on a quarterly basis.

Assurance reports are also made available to the Management Committee for their review and consideration but are not subject to Executive approval.

The three lines model

The MS AISE three lines model explicitly defines the roles and responsibilities of all staff across MS AISE based on their remit and authority. The three lines model can be explained as follows:

Three lines model		
First Line	**Second line**	**Third line**
Business functions acting as Control Operators, Control Owners and Risk Owners with the primary responsibility: - Owning, managing and remediating their risks - Designing, operating and reviewing internal controls - Performing on-going monitoring of internal control design and operational effectiveness via control self-certification. - Reporting internal control effectiveness, control exceptions	Actuarial Function, Compliance, Enterprise Risk and Assurance and Monitoring functions: - Setting the risk and control framework in line with board appetite and regulations. - Providing guidance, support, advice and challenge on effective internal controls - Undertaking thematic reviews on internal control effectiveness and regulatory compliance. - Reporting risk and control status to management, board and relevant committees and other key stakeholders including regulators	Internal Audit Function maintain their independence of both the business functions and second line functions. - Testing effectiveness of internal controls performed in the first and second lines. - Providing independent and objective assurance on the internal control environment. - Reporting audit findings to Audit Committee and management.

MS AISE's second line team supports the first line to implement and operate their controls to take responsible business decisions. The second line team combines expertise from the Compliance, Assurance and Monitoring, Actuarial function and Enterprise Risk team.

The third line operates with complete independence from both the first and second lines to enable them to provide objective and independent assurance to the MS AISE Audit Committee and Board.

Segregation of duties

Segregation of duties is a key control within MS AISE that supports transparent governance and culture, and promotes clear accountability for activities. It is built into the Corporate Governance Framework, Organisational Structure, Key Persons Framework Design, Risk Management Framework and Internal Control Framework.

Information systems

Management reporting is performed through the MS AISE Management Committee and ultimately to the MS AISE Board, giving them oversight of the management information containing underwriting, finance, risk, human resources, investments, actuarial and internal control. This reporting forms part of the Company's ORSA process with information contributing to both risk management and capital related decisions.

Risk Management Framework

MS AISE has a Risk Management Framework that seeks to support the fulfilment of its long term strategic objectives, whilst protecting the interests of all third parties, including its policyholders.

The framework complements the systems of governance, ensuring risk management is inherent in the day-to-day activities of the Company and in the key decisions made by the MS AISE Board and its committees.

The framework ensures that information on both qualitative and quantitative aspects of MS AISE's material risks is made available to the Board and its committees, including the Management Committee, and that decisions take account of available own funds to support the mitigation of risks.

Further details on MS AISE's key risk management activities are detailed in section B.3 of this report.

Internal Control Framework

MS AISE operated a system of internal controls for the full year ended 31 December 2023. MS AISE's Internal Control Framework was adopted by MS AISE after formal approval by the MS AISE Audit Committee. The framework was developed in consultation with the Internal Audit, Compliance and Risk functions. It is based on a set of core principles (control environment, risk assessment, control activities, information, communication, monitoring and testing) and references to MS AISE's three lines model. Furthermore, it sets out roles and responsibilities for MS AISE staff of all levels as it relates to matters of internal control.

Further details on MS AISE's internal control framework are provided in section B.4 of this report.

Policies and Standards Framework

MS AISE is supported by a Policies and Standards Framework that articulates the roles, responsibilities and activities that staff must fulfil in relation to these policies and standards. Key policies and standards are translated for non-English speaking staff. Through the respective assurance programmes of the Risk, Compliance and Internal Audit functions, compliance with policies and standards is monitored, reviewed and challenged.

The framework also includes governing mechanisms, such as:

- Explicit ownership by named heads of functions or Executives;
- Monitoring by the Compliance function to ensure policies and standards are kept up to date;
- Escalation of breaches to relevant committees and governance forums.

B.1.2 Remuneration policy and practices

Remuneration strategy

The aim of the MS AISE Remuneration Standard is to ensure that the way MS AISE's people are rewarded is in accordance with and supportive of the Company's and its parent's vision, objectives and strategy – including the Company's risk profile and risk management practices. The MS AISE Remuneration Standard was approved by the MS AISE Board.

By achieving this, the maximum possible alignment between the interest and long term career development of employees is secured, alongside the ambitions of the Company and the creation of long term shareholder value (in accordance, at all times, with agreed levels of ambition and risk appetite).

The MS AISE Renumeration and Nomination Committee (the 'Committee'), subject to Solvency II and relevant remuneration regulatory principles, develops, implements and monitors the remuneration policy and practices designed to attract, retain and motivate employees to add value to MS AISE but prevents having to remunerate at levels which are not merited.

There is a formal and transparent procedure for developing policy on remuneration and for setting the remuneration packages of employees. The Committee also has the discretion to reduce all components of the calculated bonuses to zero if MS AISE were to make a loss over the reporting year.

MS AISE supports and adheres to regulatory and other appropriate remuneration guidelines unless there is a clear rationale to justify departure or alternative arrangements.

Without prejudice to the foregoing, reward arrangements and practices are designed, implemented and maintained by taking into account best-practice where appropriate:

- With an understanding of the external pay environment;
- With the necessary level of transparency to ensure that MS AISE's shareholder may see the link between remuneration paid to Directors and Senior Executives, and corporate performance (considering the cost of capital incurred in delivering such performance where appropriate);
- Ensuring that the financial position and financial soundness of the organisation is taken into account at the time such remuneration is paid;
- Incorporating appropriate safeguards to avoid conflicts of interest;
- Ensuring that an ethical, high-performance culture exists within MS AISE, which is aligned to MS AISE's values; and
- Rewarding staff differentially related to performance (MS AISE does not reward for failure).

MS AISE supports the principles of equal opportunities and the management of diversity in employment. Remuneration structures are fair, equitable and free from bias on grounds of gender, ethnic origin, nationality, religious beliefs, disability or any other legally protected characteristics.

Remuneration structure

The remuneration structure for administrative, management or supervisory body employees (excluding Non-Executive Directors) reflects the potential impact on MS AISE's risk exposure arising from the actions and decisions of these categories of staff. This is achieved by having remuneration arrangements which contain the following characteristics whilst being compliant with local laws and regulations:

- The fixed component of remuneration represents a sufficiently high proportion of the total remuneration;
- The variable component of remuneration is based on a combination of MS AISE's performance and personal performance (using both financial and non-financial measures), as described by the plan rules and/or accompanying guidelines or individual participant communications. It is designed with the intent that top quartile performance is rewarded with top quartile total remuneration and the intent of paying no variable component where a minimum performance threshold is not reached. The non-financial measures referenced in the remuneration setting include the degree of employee alignment with role specific competencies, corporate values and agreed risk appetite;
- A proportion of the variable remuneration for SII identified staff is subject to deferral over a period of not less than three years, in accordance with the deferral target ratio and is also subject to appropriate malus and clawback requirements. Non-financial risk factors which might result in ex-post risk adjustment would include risk failings considered to be material such as adverse audit findings (internal and external), adverse special investigation findings, failure of internal controls, risk appetite breaches, regulatory considerations (including conduct risk) and certain types of misconduct cases;
- The calculation of the aggregate non-discretionary annual variable and non-discretionary individual awards cost is subject to suitable adjustment for factors (both financial and non-financial) of current and future risk;
- Termination and/or redundancy payments are linked to the performance of the individual to ensure failure is not rewarded;
- There is a prohibition from using any personal hedging strategies or remuneration and liability related insurance for remuneration arrangements.

MS AISE has pension plan arrangements but does not have any active supplementary pension plans. Early retirement terms, from MS AISE sponsored pension plans, are pre-determined in the plan rules. MS AISE does not make discretionary enhancements to these terms.

B.1.3 Material changes over the reporting period

There were no material changes to the system of governance during the reporting period.

B.1.4 Material transactions

Reference is made to section A.1, where the acquisition of Amlin Netherlands Holding BV is disclosed as significant event. There were no other material transactions during 2023 to report on.

B.2 Fit and proper requirements

MS AISE seeks to ensure that the Board and Management Committee contain the appropriate balance of skills and experience to ensure that the Company can be adequately managed and controlled. MS AISE's expectations in relation to fitness and propriety are set out in the Fit & Proper Standard. The standard sets out requirements for:

- Fitness – including proper professional qualifications, required knowledge and experience, and the required balance of skills across the management body to ensure sound and prudent management of the Company and the performance of an individual's role; and
- Propriety – individuals should be of good repute and have integrity.

MS AISE operates procedures at the time of recruitment to ensure that individuals demonstrate appropriate levels of fitness and propriety. Precise requirements vary, depending on the role the individual is undertaking, and the location of their work, but for senior roles pre-employment checks will generally include:

- Criminal record checks;
- Credit checks;
- The taking up of employment references; and
- Obtaining proof of professional and other qualifications.

All members of the Board, Management Committee, independent control functions and material risk takers are required to follow a 'fit and proper' procedure as defined in the Belgian Solvency II Law, and the SM&CR procedure as defined by the UK regulator ('PRA') for the UK branch. Individuals employed to undertake roles which are subject to Fit & Proper requirements are not allowed to take those roles up until these are approved by the relevant regulator.

On an ongoing basis the individuals mentioned above are subject to:

- Training and development requirements based on their role and responsibilities;
- Performance management processes, including at least an annual formal performance appraisal;
- Regular reviews of remuneration practices, to ensure that incentives are appropriate;
- A duty to disclose any form of dishonest conduct or change in their fit and proper status; and
- An obligation to disclose conflicts of interest.

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

This section provides an overview of MS AISE’s risk management system including its Own Risk and Solvency Assessment (‘ORSA’).

B.3.1 Risk management system

The risk management system is explained by elaborating on MS AISE’s risk management strategy, framework and underlying processes and reporting procedures. This section concludes with a description of how the system has been integrated in the organisational structure and decision making processes.

Risk management strategy

MS AISE has a top-down approach to risk management whereby the Board has developed a high level risk and capital management statement and mandated its adoption through the Risk Management Policy. To fulfil the needs of MS AISE's Risk Management Policy, a Risk Management Framework has been developed.

MS AISE’s vision and core values provide the strategic focus for the risk management system to deliver “an effective Risk Management Framework which optimises return for the risks we take” with the objective to deliver long term value to its stakeholders (i.e. shareholders, policyholders, staff and other interested parties). This is achieved by actively seeking and accepting risks while managing the risks within acceptable bands.

MS AISE’s risk management strategy has four key elements:

- Clearly defining ownership and responsibilities for identifying, assessing and managing risks across the organisation;
- Ensuring that there is a clear understanding of appetite for key risks, within the overall appetite of the parent, and that there are agreed maximum risk limits or tolerances in place;
- Establishing and maintaining a sustainable enterprise risk management process as an integral part of its business model supporting business planning and capital management; and
- Creating a risk aware culture across the organisation by informing, training and motivating staff to consider risk within their day-to-day decision making.

The implementation of the Risk Management Policy and Framework ensures the analysis of risk on an ongoing basis where assessments consider current risk exposures, as well as forward looking exposures. The analysis considers future business projections as well as emerging trends through potential scenarios and capital management requirements.

Linkage to capital management

MS AISE’s Capital Management Policy seeks to actively manage capital in alignment to the size of the Company’s aggregated risk profile, taking into account of regulatory obligations, requirements to hold contingent capital to support growth and a desire to deliver the return on capital as set by the Board. As a result, the Capital Management Policy plays an integral role within the ORSA process.

Capital is a key consideration in setting business plans and strategies. In order to assess whether returns are sufficient to compensate for the risks taken.

MS AISE calculates capital requirements using both the standard formula as set in Solvency II legislation and a stochastic Internal Model.

The standard formula is used for calculating and reporting Solvency II capital requirements to regulators.

The Internal Model is used within MS AISE for aggregation of the risk profile, including exposures and concentration, and calculation of internal capital requirements.

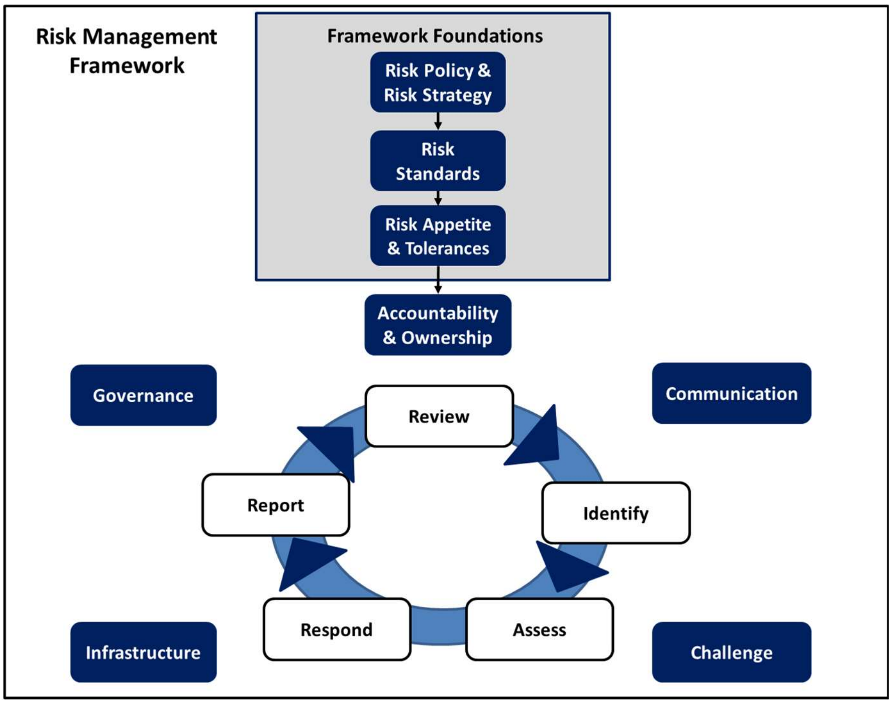
The Actuarial function oversees the process, governance and validation of the Internal Model and is responsible for ensuring the model is appropriately governed and utilised. The capital modelling team is responsible for the day-to-day management of the model including the calculation kernel, model parameterisation, economic simulator generator, catastrophe models and operational risk input.

The next table presents the use of the standard formula and Internal Model within the Company during 2023. MS AISE's capital management strategy is further explained in section E.1 of this report.

Process	MS AISE
Communicate SCR to regulator	standard formula
Internal capital requirement	standard formula, Internal Model
Decision making	standard formula, Internal Model
Risk assessment	standard formula, Internal Model

Risk Management Framework

MS AISE's Risk Management Framework, as presented below, consists of a suite of standards, governance processes and procedures that put risk management into practice. It is built into the core operating model of the Company and forms part of the overall approach to internal control. It provides the infrastructure within risk governance and sets out the processes required to sustain risk management within MS AISE.



The framework and underlying processes (see paragraph on risk management process) are being managed by the Risk function. This is an independent second line function which reports directly to the Risk Committee. The function is managed by MS AISE's CRO which sits as an Executive Director in the Board of the Company. The CRO also oversees the MS AISE Compliance and Actuarial function. Within MS AISE there are dedicated resources which oversee the total framework. Additional resources in risk analytics have been added throughout the reporting year in order to strengthen areas like investment risk oversight and management.

The scope of the Risk Management Framework is entity wide and applies to all business activities, countries, functions, systems and employees. It covers day-to-day activities, acquisitions, disposals, outsourcing arrangements, joint ventures, new products and strategic projects.

The Risk Management Framework is documented in the Risk Management Policy, Risk Management Framework Overview, three lines framework and underlying standards per risk category. These documents are evaluated on an annual basis and re-submitted to the Risk Committee for approval.

Risk categorisation

MS AISE groups the relevant risks into six key categories as specified in the table below. Accordingly, the Risk Management Framework has been designed to take account of these risk categories and seeks to ensure ownership, accountability and consistency in processes and approach where possible.

Each of these risk categories is owned by a Management Committee member with appropriate expertise and authority to manage the risk on a day-to-day basis.

Risk category / Risk owner	Definition	Scope	Paragraph in section C
Insurance risk / CEO, CUOs, CFO, Head of Claims	Risk of loss arising from the inherent uncertainties in the occurrence, amount and timing of insurance liabilities and premiums. This includes reserving risk or claims arising on business written prior to the year in question.	Underwriting, catastrophe, pricing, delegated authority, product and conduct, reserving, claims, reinsurance (excluding reinsurance credit risk)	C.1
Market risk / CFO	Risk arising from fluctuations in values of, or income from, assets, interest & currency rates and investment returns.	Investment market volatility, investment counterparty risk, currency fluctuation	C.2
Credit risk / CFO	Risk of loss if counterparty fails to perform its obligations or fails to perform in a timely fashion.	Reinsurers, brokers, cover holders, (re-)insureds, banks	C.3
Liquidity Risk / CFO	Risk arising from insufficient financial resources being available to meet liabilities as they fall due.	All assets and potential liabilities	C.4
Operational risk / CEO, COO, CFO, Head of Claims	Risk from inadequate or failed internal processes, people and systems, or from external events.	Systems, cyber, information security and technology, business interruption, outsourcing, data, people, legal and regulatory financial reporting	C.5
Strategic risk / CEO	Risk of the current and prospective impact on earnings or capital arising from adverse business decisions, improper implementation of decisions or lack of responsiveness to industry changes.	Group, political & economic, conduct, capital management, merger & acquisition	C.6

The above material risks (except for strategic risk) are all included in the calculation of MS AISE's Solvency Capital Requirement as set out in Article 101(4) of SII Directive 2009/138/EC.

The risks in scope of each of the above categories are captured in an entity specific risk register that supports assessment, monitoring and reporting of the risks. The key processes of the Risk Management Framework are discussed in more detail below. The associated exposures, concentrations, mitigating strategies and reporting procedures for each category of risk are described in more detail in section C (see reference in last column of table above).

Risk management process

MS AISE's risk management process, as described in the Risk Framework, measures, manages and monitors risks on a continuous basis, both on an individual as well as at an aggregated level. It is an iterative process with high involvement of MS AISE's Board and functions, including underwriting management (the first line).

This risk management process can be summarised via the below activities. These are performed in cooperation with the other control functions, like the Compliance and Actuarial function, where needed.

- The Board is responsible for aligning MS AISE's strategy with its risk appetite. A Risk Appetite Statement per risk is approved by the MS AISE Board.
- Risk Appetite Statements are translated into measurable tolerances and limits. Management is accountable for managing levels of risk within the allocated limits. Exposure versus limits is reported quarterly to the MS AISE Risk Committee and Board.
- Via the Internal Model and standard formula a wide range of parameters are stressed and potential impact of future developments is assessed using sensitivity and scenario analysis (see also next section on ORSA).
- Risks are assessed periodically by the first line risk owners and challenged by the second line functions. The purpose of these activities is to identify, assess and analyse areas of risk exposure and associated mitigation.
- Effectiveness of mitigating risks is measured via the Internal Control Framework ('ICF'). The relationship between the risk management process and the ICF is explained in section B.4.
- Reporting on the Risk Management Framework, including Risk's opinion on first line's effectiveness in managing risk exposure is done by the Risk function to MS AISE's Management Committee and Risk Committee on a regular basis.

Lessons learned from the risk management process are used as input in the strategy setting process for the following year, but also for improving risk culture and awareness entity wide.

Decision making processes

MS AISE's Board is responsible for making key decisions across the organisation, but delegates some of its decision making responsibilities to its committees, e.g. the Management Committee, Risk Committee and Audit Committee. The Risk function presents its opinion on risk exposure to the MS AISE Management Committee in order to provide opportunity for concluding on mitigation actions, after which the output is reviewed by the Risk Committee, with a summary of key items taken to the Board.

An important instrument which explains how the risk management function is integrated into the organisational decision making processes is the ORSA reporting process. This process is detailed in the next section.

B.3.2 Own Risk & Solvency Assessment ('ORSA')

The ORSA is fully embedded into the overall Risk Management Framework and aligned to capital strategy and business planning related processes and decision making. The Company operates an annual cycle with numerous inputs and outputs to the process throughout the year, summarised into an annual ORSA report which is presented to MS AISE's Management Committee, Risk Committee and Board.

The Board is accountable for sustaining a robust ORSA process that informs management on business strategy in relation to risk exposure and solvency. MS AISE defines its ORSA process as:

- The entirety of its risk management processes and procedures that seek to identify, assess, monitor, manage, and report the short and long term risks of the Company and its strategy;
- The processes and activities used to determine the adequacy of own funds necessary to ensure that the overall solvency needs of the Company are met at all times;
- A process that links and articulates the development and management of the Company's risk profile and associated capital requirements.

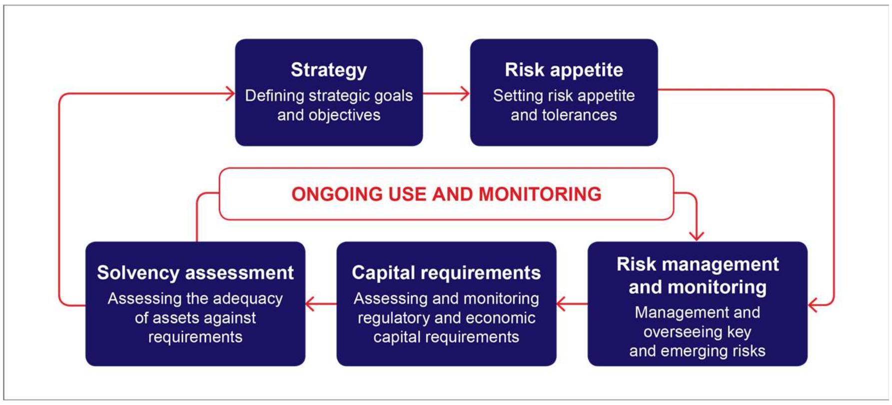
The last full iteration of the ORSA process concluded with the presentation of the annual ORSA report to the MS AISE Management Committee, Risk Committee and Board in June 2023. A copy of the report was shared with the NBB.

The Risk Committee oversees the execution of the ORSA process ensuring it is appropriate and follows the governance process. The Risk Committee ensures that:

- The ORSA is reviewed by all members of Management Committee;
- The ORSA is presented to the Risk Committee for review and comment; and
- The Board approves the ORSA, subject to the actions raised.

ORSA Processes

The ORSA leverages key business processes, the Risk Appetite Framework, Risk Management, capital modelling and finance processes. The process runs in conjunction to the business planning process, allowing it to inform the development of the business plan during the annual cycle. The process covers current year business plan monitoring on a quarterly basis as well as forward looking forecasting of future years.



Current year monitoring

The current year monitoring ORSA process is designed to provide MS AISE's Management Committee and Board with a clear understanding of the solvency position at a particular point in time, given the risk exposures. Current year monitoring runs from the start of the financial year to 31 December with quarterly reporting in place.

As part of current year monitoring MS AISE's business plan is assessed and challenged by the Risk function which takes into consideration risk, capital and solvency implications. The development of the business plan against these considerations is monitored during the year to ensure that the business plan and levels of risk remain within predefined risk appetites and tolerances.

The iterative current year monitoring takes account of all (net) current risk exposure that determine solvency requirements via the Internal Model and standard formula. Capital requirements are assessed versus actual own funds and consider the capital management ranges and intervention points detailed in the Capital Management Policy. The quarterly outcomes of current year monitoring are used to support decision making and are standing agenda items for the Risk Committee and Board.

Forward looking forecasting

Forward looking forecasting seeks to identify, assess, monitor, manage and report the longer term strategic risks and forecast returns faced by the organisation. It also considers how MS AISE's solvency needs are impacted by changes in these risks. Forward looking forecasting is conducted using a selection of stress and sensitivity tests which are challenged in the Management Committee, Risk Committee and/or Board meetings. It is an annual process and summarised into the annual ORSA report. Capital requirements are calculated using both the standard formula and the Internal Model.

The process is based on a number of sub-processes operated through the year to identify, assess and manage the possible risks MS AISE may face in the next financial year and beyond. It is designed to ascertain that sufficient own funds, necessary to meet the solvency requirements, are held at all times in these future periods.

Ad hoc ORSA reruns

There is a framework to determine if the ORSA process needs to be executed outside of the typical schedule. Both the quarterly current year monitoring process, forward looking process and resultant reports can be run outside of these timeframes (in full or partially) if there is a significant (risk) event, or series of (risk) events that may necessitate the immediate review and re-evaluation of MS AISE's solvency position or risk profile based on changed circumstances and assumptions.

Examples of such ad hoc triggers include, but are not limited to, business plan reforecasts, material underwriting catastrophes, material financial market movements/volatility or material reserve adjustments.

Stress, scenario and sensitivity testing framework

MS AISE has an established stress, scenario and sensitivity testing framework to assess its risk profile. Testing is based on the business plans and capital projections of the Company. The process seeks to challenge assumptions made and calibrations used in determining the expected business plan, as well as to evaluate the financial robustness of MS AISE in extreme circumstances. The process also challenges or improves management's preparedness for extreme events. On an ad hoc basis stress and scenario analyses are performed via the risk assessment process or via deep-dives into a specific risk. The stress and scenario analyses combine multiple risks and risk categories.

For the design of the analyses information is taken from the following sources:

- Subject matter experts view of the business model;
- Risk and control assessments and risk ranking;
- Risk event and near miss information;
- Emerging risks;
- Market knowledge; and
- Historic data and experience.

The analyses can be grouped in five categories as presented in the below table. For each type of test the impact is assessed in line with risk appetite. The impacted parameters can all be traced back to the profit or loss account, balance sheet or capital requirements.

Type	Explanation	Process	Frequency
Realistic Disaster Scenarios ('RDS')	Monitors in force exposures to specific event scenarios at a single point in time.	Business planning, ORSA	100% annually with a quarterly update of the most material scenarios.
Sensitivity analysis	Assessment of standardised and severe change in single or multiple parameter(s) at a single point in time.	Business planning, ORSA, Internal Model validation	Multiple times on different occasions.
Stress testing	Assessment of standardised and severe change in single or multiple parameter(s) during one year.	Business planning, ORSA, Internal Model validation	Multiple times on different occasions.
Scenario analysis	Assessment of standardised and severe change in single or multiple parameter(s) during multiple years.	Business planning, ORSA, Internal Model validation	Multiple times on different occasions.
Reverse stress testing	Single or multiple parameters to stress risk of discontinuity of business activities.	ORSA, recovery plan	Annually.

B.4 Internal Control System

B.4.1 Internal controls system

MS AISE operated a system of internal controls for the full year ended 31 December 2023.

MS AISE's Internal Control Framework is organised around the three lines model and based on a set of core principles (control environment, risk assessment, control activities, information, communication, monitoring and testing), references to MS AISE's three lines model (as explained in section B.1.1) and sets out roles and responsibilities for MS AISE staff of all levels as it relates to matters of internal control.

MS AISE's key internal control procedures comprise company level controls, IT general controls and process level controls. These include, but are not limited to, access controls, oversight controls, segregation of duties, initiation and approval controls, monitoring and oversight controls, reporting controls, reconciliation controls, as well as other controls. The effectiveness of internal controls is assured through the operation of the MS AISE three lines model.

For the year ended 31 December 2023, MS AISE's internal controls contributed to meeting various objectives, including operational effectiveness and efficiency, reliable financial reporting, compliance with laws and regulations, and management of reputational and strategic risks. MS AISE managed its internal controls on a dedicated internal controls software solution that required control operators to perform a quarterly self-assessment of the effectiveness of their controls on the system, to upload supporting evidence to the system and to submit their self-assessment to an assigned control owner for review and approval. This process was managed by a dedicated Assurance and Monitoring team within the Risk function, which was also tasked with reporting on the results of the quarterly control self-assessment cycles to the MS AISE Risk Committee. This process was further strengthened by quality assurance reviews that were carried out by the Risk Assurance team over the control self-assessments, which was done on a sample basis.

The Assurance and Monitoring team supports and challenges the first line on their management, maintenance, enhancement and remediation of key internal controls, provides internal control training to control owners and operators, and manages the quarterly internal control self-assessment process.

Other assurance providers, such as the Internal Audit, Risk and Compliance functions, contributed to the enhancement of MS AISE's Internal Control Framework through their respective assurance activities and reporting. Feedback loops between these assurance providers and the Assurance and Monitoring team are present and were operating effectively for the year ended 31 December 2023.

J-SOX

MS&AD, the ultimate parent company, is required to comply with the requirements in the Financial Instruments and Exchange Act (known as 'J-SOX'). As MS AISE is part of the MS&AD group, it is in scope for J-SOX attestation as well.

J-SOX requires MS AISE's management to evaluate and report annually on the effectiveness of Internal Controls over Financial Reporting ('ICOFR') and to report the evaluation results in an Internal Controls report (known as management's internal J-SOX attestation) to MSI by May 2024. Management has appointed the Internal Audit function to perform an evaluation of the ICOFR and will rely on their work for the attestation.

B.4.2 Compliance function

The Compliance function operates on the basis of a Charter with a dedicated Chief Compliance Officer having responsibility for the Compliance function within MS AISE as a legal entity. The independent status of the Compliance function in MS AISE's framework is set out in the Governance Charter and the function's Charter. Compliance representatives are present at MS AISE's head office and all larger branches of the Company. If a Compliance representative is not based at an office location, this will be covered by an off-site Compliance employee. The Compliance function annually reviews the Compliance Management System.

The function's Charter sets out the Compliance function's responsibilities, reporting lines and rights to perform its duties unimpeded by management. The Charter is approved by the Risk Committee and reviewed annually. The Risk Committee approves the Compliance plan on an annual basis and enables the Compliance function to discharge their responsibilities set out in the Charter.

The Charter is supported by the Compliance strategy and describes the role of the Compliance function as being to provide assurance to the Management Committee and Board of compliance with regulatory requirements, associated laws and relevant policies. These policies are adjusted to local regulations in the countries where MS AISE operates if necessary. The Compliance function has six key responsibilities to support its objective:

- Establish – identifying stakeholders, integrity risks, determining the scope and establishing the Compliance Management System and Compliance Policy;
- Develop – identifying compliance obligations and evaluating integrity risks;
- Implement – planning to address integrity risks, achieve objectives and design and implement controls to protect MS AISE from identified risks, including awareness and training;
- Evaluate – evaluate, monitor and report on the effectiveness of these controls;
- Improve – managing compliance issues if and when they occur as well as continuous improvement;
- Maintain – advise the business on compliance, rules and controls in specific cases.

The Compliance function reports quarterly to the Risk Committee on integrity risks, regulatory breaches (if any) and compliance monitoring findings. The Compliance function reports to the MS AISE Management Committee on a monthly basis. The Chief Compliance Officer has a standing invitation to the meetings of the MS AISE Board and its committees.

Three lines model

The Compliance function forms part of a coherent set of transversal control functions, which is set out in MS AISE's three lines model. The model is explained in section B.1.1. The model explicitly defines the roles and responsibilities of all staff across MS AISE on the basis of their remit and authority. Segregation of duties is a key control within MS AISE that supports transparent governance and culture, and promotes clear accountability for activities. It is built into the Corporate Governance Framework, Organisational Structure, Key Persons Framework Design, Risk Management Framework and Internal Control Framework. In addition, all (potential) conflicts of interest are logged and monitored in the Company's Conflict of Interest Register.

Integrity risk identification and management

As part of the key responsibilities, the Compliance function periodically assesses integrity risks within the Integrity Risk Framework. The Integrity Risk Framework is part of the overall enterprise Risk Management Framework and builds on the same processes, tools and governance structure. The framework aims to provide assurance to the MS AISE statutory governing body in managing integrity risks. The framework is built on the principle that integrity risks and controls are predominately owned within/by the first line. Senior management of the first line is interviewed and involved in the assessment of integrity risks through the periodic risk reviews. The findings feed into the Compliance plan. The outcome of the periodic risk reviews and the Compliance plan are reviewed and recommended for approval to the Board by the Risk Committee.

Compliance monitoring

Compliance monitoring is carried out in accordance with a plan approved annually by the MS AISE Risk Committee. The compliance monitoring process includes both thematic reviews and periodic data analysis, with the intention of ascertaining that:

- Processes operated by first line functions servicing MS AISE, designed to achieve compliance with Group standards and underlying regulations, would be adequate to ensure compliance if followed; and
- These processes are being followed in practice by MS AISE.

The universe of issues covered by compliance monitoring is set in the Integrity Risk Framework designed to measure MS AISE's compliance with regulatory obligations. Areas covered include:

- Business integrity;
- Financial crime controls;
- Customer treatment; and
- Prudential control requirements.

Compliance Policy

The Compliance function is also responsible for the Corporate Integrity Policy and related compliance policies and standards. The Corporate Integrity policy is reviewed by the MS AISE Management Committee and recommended for approval to the Board by the MS AISE Risk Committee. The Policy articulates the roles, responsibilities and activities that staff must fulfil in relation to these policies and standards. Key policies and standards are translated for non-English speaking staff.

Corporate Values

MS AISE adopted the corporate values of its global parent MS&AD. These values are implemented by the senior leadership team of MS AISE:

- Customer Focus – striving to provide security and satisfaction to our customers;
- Integrity – being sincere, kind, and fair in our dealings with people;
- Teamwork – growing together as a team by respecting one another's individuality and opinions and sharing knowledge and ideas;
- Innovation – always improving the way we work while responding to stakeholders' interests;
- Professionalism – providing high-quality services by constantly enhancing our skills and proficiency.

Compliance with Solvency II

In accordance with the Charter, the Compliance function has advised the MS AISE Board on several recommendations relating to Solvency II in 2023. These included fitness, propriety requirements for individuals, outsourcing and submissions required by the Belgian Solvency II Law and other regulatory approvals.

B.5 Internal Audit function

The Solvency II key function holder for Internal Audit is the MS AISE Head of Internal Audit, overseeing and managing the Internal Audit function. The Head of Internal Audit attends the MS AISE Audit Committee (‘MS AISE AC’) and reports inter-alia, on planned audit work, recent audits completed and any other matters as directed by the MS AISE Board and/or the MS AISE AC. An annual audit plan is prepared each year during the fourth quarter, which is approved by the MS AISE AC. The audit plan includes MS AISE’s marine activities being managed via the cover holder MS AM. Audits might focus on MS AISE as a legal entity, on a specific location, or on MS ACS or MS AIML shared services where these impact MS AISE.

The Internal Audit plan is developed using a risk-based methodology, including input from senior management and the MS AISE Board and/or the MS AISE AC. Internal Audit reviews and adjusts the plan, as necessary, in response to changes in the organisation’s business, strategies, risks, operations, programmes, systems, and controls. The MS AISE Head of internal Audit communicates the impact of resource limitations and significant interim changes to the MS AISE Board and/or the MS AISE AC and other stakeholders as deemed applicable.

Internal Audit has sufficient and timely access to key management information and a right of access to all of the organisation’s records, personnel, property and operations of the Company, necessary to discharge its responsibilities, with strict responsibility for safekeeping and confidentiality.

The scope of internal auditing is based on an approved audit plan and encompasses, but is not limited to, the examination and evaluation of the adequacy and effectiveness of the organisation’s governance, risk management, and the internal control framework established by management, to ensure achievement of MS AISE’s strategic and operational objectives. Internal Audit also examines the quality of performance in carrying out assigned responsibilities. This is achieved by:

- Effective identification, assessment and management of risk;
- Compliance with those policies, standards, procedures, laws and regulations which could have a significant impact on MS AISE’s operations or reputation;
- Display of and adherence to MS AISE’s values and culture;
- Safe custody of assets; and
- Effective and efficient use of resources.

There is specific emphasis on:

- The design and operational effectiveness of governance structures and control processes, including strategic and operational decision making information presented to the MS AISE Board.
- The setting of an adherence to risk appetite.
- The effectiveness of the second line with regards to its monitoring and oversight responsibilities.
- The Company’s culture and management of conduct risk, including:
  - Key indicators of a sound risk culture, “tone at the top”, accountability, effective communication and challenge;
  - The risk of poor customer outcomes, giving rise to reputational or conduct risk;
  - High-risk key corporate events, for example significant business process changes, the introduction of new products and services, outsourcing decisions and acquisitions/divestments.

The key responsibilities of Internal Audit are to:

- Develop and maintain a risk-based audit plan that takes account of emerging risks, significant corporate events, strategic changes, regulatory themes and areas of control concerns;

- Review the plan on a continuous basis and propose additions, cancellations and deferrals to the Audit Committee for approval on a quarterly basis;
- Provide reasonable assurance as to the adequacy and effectiveness of the Internal Control Framework in operation throughout the Company by ensuring there is appropriate audit coverage across all areas;
- Report the results of internal audit activity, significant control issues identified, progress in delivering the audit plan and status of management remediation activities;
- Establish and deliver a programme of quality assurance activities to confirm that expected internal audit standards are being met and to report the results to the Audit Committee annually;
- Manage the function to ensure that audit staff have appropriate knowledge, skills, qualifications and experience to deliver the proposed plan of work;
- Provide active support to the MS AISE Board and line management in the promotion of high standards of internal control;
- Assist and advise management on the prevention of fraud and embezzlement;
- Work with the MS AISE Legal team to play a leading role in the investigation of internal fraud; and
- Support the Speak Up Committee in discharging its responsibility.

In the provision of assurance, Internal Audit will ordinarily provide an opinion on the strength of the control framework in operation within the subject area covered by an audit. Internal Audit may also be asked by management to perform advisory work, i.e. to assist with the design of control processes or to complete other work, including work of an investigatory nature. Such work will not be accepted if doing so significantly impairs Internal Audit's ability to deliver on its primary objectives.

The MS AISE Audit Committee:

- Approves the Internal Audit Charter;
- Approves the risk-based Internal Audit plan;
- Approves the Internal Audit budget;
- Approves decisions regarding the appointment and removal of the Head of Internal Audit, in consultation with MSI Internal Audit ('MSI IA');
- Evaluates the performance of the Internal Audit function on a regular basis;
- Makes appropriate inquiries of management and the Internal Audit function to determine whether there is an inappropriate scope or resource limitations.

Approvals above are required annually except for the approval of the Internal Audit Charter as such approvals are only required when it is revised. Internal Audit has the right to attend and observe all or part of the MS AISE Board meetings, MS AISE Management Committee meetings and any other key management decision making fora. The Head of Internal Audit operates at a sufficiently senior level within the organisation to provide the appropriate standing, access and authority.

B.6 Actuarial function

The Actuarial function provides an independent opinion to the MS AISE Management Committee and Board on the Solvency II technical provisions, the reinsurance policy and the underwriting policy. Additionally, review of the Solvency Capital Requirement (both standard formula and Internal Model) and credit risk are included in its remit. To ensure the independent position, the Actuarial function directly reports to the MS AISE Chief Risk Officer and is not involved in first line activities.

The first line actuarial activities are picked up by the following teams:

- **Reserving team:** the calculation of and reporting on the IFRS/BEGAAP reserves and the Solvency II technical provisions are performed on a quarterly basis, including additional analysis like back testing. The team reports directly to the Chief Financial Officer of MS AISE. For the P&C operating segment, the reserving classes are treated and discussed per branch, while for the marine segment the focus is on reserving classes across all branches. All results and reports are discussed with the key stakeholders, such as the Management Committee of the legal entity, claim handlers, underwriters and finance departments.

  The Actuarial function holder reviews the activities of the reserving team and shares his view directly with the team in the reserving meetings and to the Audit Committee. Any conclusions will be summarised in the relevant Actuarial function report.

- **Central reserving team:** the central reserving team, employed by sister entity MS ACS, provides oversight and peer review of the reserving process for Group reporting purposes.

  The Actuarial function holder uses the findings of the central team when forming an opinion on the output of the reserving team.

- **Capital modelling team:** the capital modelling team calculates the Solvency II standard formula SCR, handles all processes involving the Internal Model and interprets the results. The team uses the Internal Model to provide insight in specifics items like the margin setting, the business planning and determination of strategic targets for the loss ratios. This Internal Model has not yet been approved by the regulators. The capital modelling team reports to the MS AISE CFO.

  The Actuarial function holder verifies the capital calculations, and provides insight in the potential developments, risks and opportunities thereof.

- **Technical pricing team:** the technical pricing team is responsible for designing and maintaining the technical pricing models which are used by the underwriters to set the policy premiums. The technical pricing team reports to the MS AISE CUO P&C.

  The Actuarial function holder reviews the sufficiency of the pricing and the use of the models by the underwriters.

The second line activities entail the following, next to the responsibilities described above:

- Review the planning and coordination of the calculation of the IFRS and BEGAAP reserves and the Solvency II technical provisions. This is done in close cooperation with the Finance reporting team, which is responsible for the delivery of all regulatory reports.

- Review the calculations, methodologies and assumptions of the IFRS and BEGAAP reserves (including the equalisation reserve) and technical provisions, for gross and reinsurance. The risks and uncertainties of those results are determined, and an opinion on the quality of the data is formed. Special attention is also given to the overall efficiency of the process, since this could limit the available time for quality control and the implementation of improvements. The Actuarial function will make sure this review is shared before the numbers are finalised, so any conclusion can be incorporated in the submitted regulatory reports. The conclusions will also be shared in the Actuarial function report on the technical provisions, including suggested actions for further improvement of the process.

- Providing advice on the various options and the potential impact thereof in the reinsurance programme, especially when the programme is being negotiated for the next year. The base for these discussions will be incorporated in the Actuarial function report on reinsurance.
- Monitoring and reporting on the credit risk, whether it is coming from reinsurers, fronting business, captives or brokers. This includes approval of individual counterparties and providing guidance on this topic for the relevant first line teams.
- Determine the sufficiency of the premium setting, considering effects like market trends and anti-selection in the portfolio. This is primarily done by reviewing the business plan, including the underwriting actions contained therein (prospective), and the reserving results and class performance (retrospective). Expert Risk Reviews are set up to provide in-depth feedback on the underwriting processes. New products are evaluated to make sure these will contribute to long term profitability, whether any specific issues are present in the risk selection, and whether the impact on capital is within limits. Options and guarantees in the (re)insurance are not written by MS AISE, and therefore not a concern. Any conclusions will be shared directly with the relevant stakeholders and included in the Actuarial function report on underwriting.
- Validate the capital models, being the regulatory standard formula or the Internal Model, and provide advice to management which improvements should be made. This includes reviewing the completeness and consistency of the model, the statistical soundness, the data quality of the inputs, the available documentation and the quality of the expert judgments.
- Any other activities, including contributing to the ORSA report.

The second line Actuarial function has a charter/terms of reference, which includes the following:

- The place of the Actuarial function within the organisation, including the authority, the reporting lines and an organogram;
- How the independence of the Actuarial function is guaranteed, by direct access to the Board, a remuneration independent of the direct responsibilities, appropriate resources and information, and limiting the options to remove the function from its responsibilities;
- The scope/activities of the function, including a detailed description of the responsibilities for the reserving process, the Solvency II technical provisions, the reinsurance and technical pricing/underwriting;
- The responsibilities of the Management Committee;
- The reporting obligations (regulatory or otherwise).

The Actuarial function consists of the function holder, who is knowledgeable on the relevant actuarial techniques and the wider organisation. The function holder is assisted by two team members, who will focus on underwriting, reinsurance/credit risk and review/validation of the capital calculations. There is close cooperation with the other control functions.

The charter/terms of reference will be evaluated once per year, or when the circumstances dictate more often. The Actuarial function proposes changes hereto (if any), which must be approved by the Risk Committee.

B.7 Outsourcing

B.7.1 Description of the outsourcing policy

External outsourcing

Outsourcing of critical or important functions and activities

The MS AISE Outsourcing Policy outlines the approach and regulatory requirements to be considered to both the third party service provider selection and the management of outsourcing agreements. The Policy applies to all new and existing outsourcing agreements.

MS AISE has outsourced the provision of certain critical or important operational functions and activities which are listed in subsection B.7.2 of this report. Material outsourcing refers to outsourcing of a 'critical or important' operational function of, or for, MS AISE. The test as to what is 'critical or important' is if any defect or failure in the outsourcing performance would materially impair the Company's:

- Continued compliance in accordance with the terms of its authorisation;
- Other obligations under its regulatory system;
- Financial performance; and
- Soundness or continuity of its services and operations.

The following functions will not be considered as critical or important for the purposes of outsourcing:

- Provision of advisory services, and other services which do not form part of the core services and activities of MS AISE, including the provision of legal advice, the training of personnel, billing services and the security of premises and personnel;
- Purchase of standardised services, including market information services and the provision of price feeds.

Policy requirements

The policy requirements are set to undertake the outsourcing of critical or important operational functions and activities in such a way as to:

- Assure the quality of MS AISE's internal controls;
- Assure the quality, confidentiality and control of services provided to the clients;
- Enable the appropriate regulator to monitor MS AISE's compliance with all obligations under the regulatory system;
- Conduct an appropriate level of due diligence on the supplier of the services outsourced to assure the provision of the services on an ongoing basis;
- Conduct the minimum standards of due diligence for material outsourcing as defined in the Policy applicable to MS AISE;
- Record material outsourcing on a register maintained by the Procurement function;
- Ensure robust due diligence is undertaken and that there is an appropriate level of internal challenge and approval prior to the ultimate decision for the outsourcing to proceed;
- Inform the Chief Compliance Officer for guidance on regulatory communications prior to entering into a material outsourcing arrangement;
- Notify the relevant regulators of any new material outsourcing or any material changes to existing material outsourcing agreements;
- Utilise the Procurement function to support the commercial and contracting discussions prior to entering into or materially amending an outsourcing agreement;

- Ensure an acceptable level of rigour and governance is maintained for the oversight, relationship management and risk management of the outsourced service and its suppliers to ensure that the interests and assets of MS AISE and its policyholders remain protected.

Implementation, monitoring and management of the outsourcing

MS AISE is responsible for implementing, monitoring and managing the outsourcing arrangements on an ongoing basis to ensure the quality and efficiency of the outsourced services or functions. This is assured by:

- The reporting on an agreed basis and in an agreed manner sufficient to meet the Company's responsibilities;
- A register kept of all MS AISE's material outsourcing arrangements and the supported entities for each agreement, which is provided to the Procurement function at least annually;
- The right from the compliance or internal audit teams to audit the monitoring and management processes of critical or important outsourcing providers;
- The appointment of a functional head or similar grade for each material outsourcing agreement, who retains responsibility for ensuring all regulatory responsibilities are met by the supplier;
- Agreeing the Terms of Reference for the implementation, monitoring and management of the relationship and performance of the service provider.

Expected or unexpected termination and other service interruptions

MS AISE has contingencies in place for dealing with expected or unexpected service interruptions from its outsourcing arrangements and requires service providers to have adequate contingency plans to deal with emergency situations or business disruptions. MS AISE has a Business Continuity Management Policy and Business Continuity Management Standard which is also applicable for all material outsourcing agreements.

Renewing outsourcing agreements

Outsourcing agreements may run for a fixed term and be renewable or may be operated on a continuous basis. MS AISE has processes in place to:

- Review the financial health, business continuity plans and exit plans of MS AISE's critical and important outsource providers;
- Review the appropriateness of written agreements (both term-based and continuous) at the point of renewal or, at least, not less frequently than every two years; and
- Report any issues identified or encountered appropriately to the Board.

Outsourcing of underwriting and claims activities

Material outsourcing parties for underwriting and claims activities are monitored and managed through the Binder Control Framework, with data exchange, audits, market scans and delegated authorities.

Intra-group outsourcing

Investments activities

As from 1 January 2023, the Company has a new service agreement in place with an MSI sister entity – MS Amlin Investment Management Limited ('MS AIML') – for the provision of investment services including cash management activities. These investment management services were previously outsourced to MS ACS. All services have been successfully transferred to and will be provided by MS AIML as of 1 January 2023. However, the staff providing investment management services remain employed by MC ACS.

Pursuant to its Investment Governance Framework, the Company has invested the majority of its investment assets (€1,434.3 million out of €1,872.7 million) with the Toro Prism Trust (the ‘Trust’). The Trust has solely investors from within the MSI Group. The Trust has been authorised by the Central Bank of Ireland as an undertaking for collective investment in transferable securities pursuant to the European Communities - Undertakings for Collective Investment in Transferable Securities - Regulations 2011. The Trust is managed by a third-party fund management company, Carne Global Fund Managers (Ireland) Limited (‘Carne’). Carne has reappointed MS AIML as the headline portfolio manager of the Trust. MS AIML has been authorised and is regulated by the Financial Conduct Authority and as an investment firm subject to the Markets in Financial Instruments Directive 2014/65/EU (‘MiFID’).

MS AISE also invests into a hedge fund through administrator JP Morgan Hedge Fund Services Ireland and managed by BlueBay Asset Management LLP. The market value of this fund amounts to €34.7 million. In addition to these investment activities, the Company has engaged Veritas Asset Management LLP and CBRE Global Collective Investors UK Limited to manage €44.0 million and €101.6 million of its assets respectively.

Furthermore, part of MS AISE’s investment portfolio consists of a segregated bond mandate that is being managed by Aegon Asset Management UK plc and covers €221.9 million of the Company’s assets. Aegon Asset Management has been authorised and is regulated by the Financial Conduct Authority and as an investment firm subject to the Markets in Financial Instruments Directive 2014/65/EU (‘MiFID’).

During 2023, MS AISE has also invested in a private equity fund which is being managed by LGT Capital Partners, through administrator LGT Fund Managers (Ireland) Limited. The market value of the investment amounts to €5.0 million.

The residual balance of the investment assets, presented on the Solvency II balance sheet, consists of derivative assets as well as the participation in Amlin Netherlands Holding BV (reference is made to section A.1).

Centralised support functions

MS Amlin Corporate Services (‘MS ACS’) is an MSI sister entity that provides services from its personnel to MS AISE and other MSI Group companies with appropriate skills and qualifications. MS ACS as a legal entity does not provide any professional or regulated services itself.

The individuals employed by MS ACS provide services to MS AISE under the direction and supervision of the MS AISE Management Committee and Board either directly or through the centralised service functions by MS ACS, and these individuals are accountable to the entities. MS ACS has contracted with MS AISE to deliver suitably qualified personnel, and the service levels to be delivered by the personnel supplied are agreed on a case-by-case basis as appropriate. During 2023, the quality of the services delivered was monitored both at MS ACS level as well as at MS AISE level through the MS AISE Operations Committee and performance information provided to the MS AISE Board and Management Committee. The SLAs are accompanied by a Master Services Agreement (intra-group), that provides the overall contractual framework for the outsourcing relationship.

As from 1 January 2023, a new service agreement has been in place between MS AISE and the shared service centre MS ACS. This is underpinned by the service catalogues that have been reviewed and agreed between MS AISE and MS ACS for 2023. These catalogues include KPIs and reporting requirements. The cost allocation for 2023 from MS ACS to MS AISE was agreed as part of the business planning process.

B.7.2 Outsourced key functions or activities and their local jurisdiction

MS AISE is currently utilising several service providers for the outsourcing of certain critical or important operational functions or activities on its behalf. Details of the outsourced key functions, activities and the jurisdiction are provided below:

Description of outsourced key functions or activities	Jurisdiction
External outsourcing	
Delegated underwriting activity for certain products in all business lines	Belgium, the Netherlands, France, United Kingdom
Global real estate investment manager	United Kingdom
Hedge fund investment manager	United Kingdom
Corporate bond investment manager	United Kingdom
Private equity fund manager	Ireland
End-to-end claims outsource for motor and fire insurance	Belgium, United Kingdom
IT infrastructure provider for hosting managed network, workplace and service desk services	United Kingdom
Loan market association transaction services	United Kingdom
Catastrophe modelling analytical services	United Kingdom
Internal outsourcing	
MS Amlin Marine service provider acting as delegated underwriting authority for marine products	The Netherlands
MS AIML as headline investment portfolio manager	United Kingdom
MS ACS providing personnel, IT and infrastructure services	United Kingdom
MS ACS providing information security and risk management operations services	United Kingdom

The table does not include external investment managers to which MS AIML delegates the day-to-day management of financial assets.

B.8 Any other information

All material information relating to the Company’s systems of governance has been disclosed in sub-sections B.1 to B.7 above.

Section C - Risk Profile

Section C presents MS AISE's risk profile in accordance with MS AISE's Risk Management Framework which identifies the following risk categories: insurance, market, credit, liquidity, operational and strategic. For each risk category there is an individual section which explains:

- Risk definition and appetite statements;
- Material risk concentrations;
- Risk exposure (including off-balance sheet positions);
- Measures used to assess these risks;
- Outcomes of stress, scenario and sensitivity testing; and
- Risk mitigation techniques used (including a description of monitoring activities).

The description includes exposures at year-end as well as developments in exposure during the year. The tables and diagrams contain MS AISE specific data unless otherwise stated. Besides the risk categories in MS AISE's Risk Management Framework, no other risk categories have been identified. Strategic risk is explained in the other risk section.

Risk appetite statements

Risk appetite statements in the document follow a standard categorisation as set out below:

- Risk seeking (grow) – These are risks where the Company will seek to increase exposure in the pursuit of fulfilling strategic objectives, knowing there are rewards associated with taking on the risk;
- Risk seeking (maintain) – These are risks the Company will continue to seek as part of the business strategy, maintaining a level of risk relatively consistent with current exposures;
- Risk neutral – These are risks the Company will accept with caution, as by-products of pursuing risk, knowing there may be some negative impact necessary in the pursuit of strategic objectives. There is no desire for unnecessary additional exposure and strong control is expected to manage exposure within acceptable limits;
- Risk averse – These are risks the Company has no desire to accept on the basis they should be wholly manageable and have no material contribution to the fulfilment of strategic objectives.

Methods and assumptions used for measuring exposures and concentrations, and sensitivity analyses are applicable to multiple risk categories. Therefore, this introduction presents the methods and assumptions used. The actual exposures and concentrations, and outcomes of sensitivity analyses are presented in subsections per risk category.

Exposures and concentrations

As referred to in section B.3, in addition to the standard formula, MS AISE measures the Company's exposures and concentrations through the use of a stochastic Internal Model. The outcome of the Internal Model is an internal capital measure per risk category and an overall capital measure. The Internal Model aggregates exposures considering the reduction impact of the associated mitigation strategies. Modelled exposures are monitored quarterly and reported to MS AISE's Risk Committee where management actions are concluded if necessary. The presented exposures and concentrations in this section are based on the Internal Model. Furthermore, deterministic in force exposure figures are used in addition to modelled recoveries output from the Internal Model and presented in this document where applicable.

Risk mitigation

For each category of risk there are mitigation techniques in place as presented in the subsections. These techniques are unique for every category but do follow a standardised pattern. For each category at least the following measures are in place:

- Policies, procedures and standards;
- Tolerance, limit setting and performance monitoring;

- Stochastic modelling;
- Scenario analysis; and an
- Internal Control Framework.

C.1 Insurance risk

MS AISE defines insurance risk as the risk of loss arising from the inherent uncertainties in the occurrence, amount and timing of insurance liabilities and premiums. This includes reserving risk or claims arising on business written prior to the year in question. The scope of insurance risk includes underwriting, catastrophe, reserving, claims and the mitigation effect of reinsurance (excluding reinsurance credit risk).

C.1.1 Risk definition and appetite

Insurance risk consists of two core components, namely underwriting risk and reserving risk.

Underwriting risk

Underwriting risk relates to risk from both expected and unexpected attritional and large losses, which can be caused by inadequate pricing, terms and conditions and/or unexpected claims frequency, and catastrophe losses from large natural or non-elemental events such as earthquake, hurricane or terrorism threats.

MS AISE has a positive, risk seeking appetite towards underwriting risk and actively seeks to balance the Company’s underwriting exposures by writing a diverse risk portfolio which is made up of several business classes. There is an inherent risk of insurance losses associated with these exposures. The appetite for underwriting risk is governed by the amount of business that meets the pricing requirements and fits the Company’s overall strategy for profitable growth but also by the risk bearing capacity determined by the capital base and outwards reinsurance arrangements.

Reserving risk

Reserving risk relates to the possible inadequacy of claims provisions. Specifically, it relates to the uncertainty that reserves (technical provisions under Solvency II) are adequately accounted for, taking account of fluctuations in claim settlements.

MS AISE has adopted a risk neutral approach to reserving risk, which is a consequence of underwriting a business portfolio where claims may develop after the policy period has elapsed. MS AISE’s appetite is governed by a policy which ensures that reserves are carried above the actuarial best estimate of future outcomes by adding a risk management margin under IFRS and BEGAAP principles. Classes of business which have a higher level of uncertainty of potential development will naturally carry a higher level of reserve provision. MS AISE does not discount reserves to take account of the investment return generated by premium or reserves held for future claims payments. Furthermore, the Company takes consideration of likely cash flow requirements when investing carried reserves to reduce asset-liability miss matching.

C.1.2 Underwriting risk

Concentration and exposure

MS AISE has a portfolio of property, casualty, motor and marine insurance that has exposure to non-elemental perils such as industrial accidents as well as weather and earthquake exposures. Primary underwriting risk concentration is derived from:

- Natural perils such as windstorm, flood, fire and earthquake;
- Large loss man-made events such as terrorism, industrial accidents (e.g. oil spills), etc.;
- Large risks such as shipyards and construction; and
- Correlated liability coverage such as professional liability for medical practice.

The liability class shows the highest underwriting risk, driven by the uncertain nature of the occurrence and severity of the underlying claims over a large class of commercial use-cases. Also the property classes exhibit a significant risk, driven by substantial risk exposure due to its larger line sizes and susceptibility to catastrophic events. Both liability and property classes are also subject to inflationary risks.

Scenario, stress and sensitivity testing

Specific sensitivity analyses performed for underwriting risk are, on the one hand, Realistic Disaster Scenarios ('RDS') and, on the other hand, stress and sensitivity testing.

The results of the RDS and stress tests are compared with MS AISE's risk appetite and operating capital target as outlined in MS AISE's Capital Management Policy. On a continuous basis MS AISE's capital position is monitored and compared to predefined thresholds triggering required management responses.

Realistic Disaster Scenarios ('RDS')

The table below presents the results from the RDS analysis with the largest exposures as of 1 January 2023 and 2024. Data is presented including reinsurance recoveries and reinstatement premiums (net losses). Exposures as per 1 January are used to reflect positions against the reinsurance programme for the coming year.

Event	Jan 2024 €'000	Event	Jan 2023 €'000
EU Windstorm – UK Europe	40,443	EU Cyber Blackout	35,402
EU Windstorm – France, Belgium, Netherlands	39,960	EU Windstorm – UK Europe	34,606
EU Windstorm – Bordeaux Munich	34,690	EU Windstorm – France, Belgium, Netherlands	33,537
US Windstorm - North East Two Events	10,951	EU Windstorm – Bordeaux Munich	28,662
		US Windstorm - North East - Two Events	10,997

The table above shows an approximate standalone impact from various events on profitability. Increases to the net exposures are mainly explained by changes to the reinsurance structure and overall business growth resulting in higher gross exposures.

It should be noted that the RDS analysis does not consider the potential for any additional reserve releases or other management actions that may be applied in the ordinary course of business leading up to or following an event.

Stress testing and sensitivity analysis

The below scenarios were designed to test the financial resilience of the 2024 business plan under stressed underwriting assumptions.

Nr.	Sensitivity test	Impact on available capital €'000	Impact on SCR €'000	Impact on Solvency Ratio %
Base	solvency position per 31 December 2023	816,678	526,195	155.2%
1	5% less gross premium received during 2024 compared to plan	(34,980)	(2,479)	(5.9%)
2	5% more ceded reinsurance premium during 2024, across all classes, compared to plan	(5,916)	(782)	(0.9%)
3	Increase catastrophe events by 20% in 2024 compared to plan	(2,250)	(159)	(0.4%)
4	2.5% less reinsurance recoveries received during 2024, across all classes, compared to plan	(2,958)	4,281	(1.8%)
5	Two European windstorms in 2024 with an expected occurrence of one-in-hundred years	(29,970)	(2,124)	(5.1%)

Several tests have been selected to evaluate the underwriting assumptions underlying the 2024 business plan, focusing on premium income and the impact of the European windstorm scenario, which is the natural catastrophe with highest impact on the underwriting portfolio. The tests aim to assess the resilience of the Company's capital coverage.

The catastrophe scenario related to two European windstorms, with an expected occurrence of every hundred years, results in a Solvency ratio of 150.1%, above the 140% risk appetite limit. The impact is quantified assuming that all claims are paid out in the accident year, affecting mainly own funds and minor compensating impact in required capital as result of lower assets under management.

All stress test scenarios generate a solvency ratio exceeding 140%, providing assurance that the underwriting strategy aligns with the company's risk appetite regarding Solvency II solvency ratio.

Management, mitigation and monitoring techniques

In addition to the risk management process outlined in section B.3.1, this section discloses management and mitigation techniques in relation to underwriting risk. Monitoring results are reported to MS AISE's Risk Committee on a quarterly basis.

- *Strategy and business planning* – As part of business planning, the underwriting strategy is elaborated into plans for the coming year. In these annual plans resources are directed to those businesses which create the most desirable expected loss costs and ultimate loss ratios during the underwriting year. The goal is to realise profitable growth;
- *Policies, procedures and standards* – The Underwriting Policy and Philosophy, as owned by the first line, assure consistency across underwriting and related control activities;
- *Tolerance, limit setting and performance monitoring* – The underwriting strategy is aligned to a risk appetite and tolerances. For every insured class there is a maximum line size, exposure, and monitoring process (using stochastic modelling). Furthermore, there are underwriting authority limits and guidelines for individual underwriters in place;
- *Reinsurance* – A key instrument for risk mitigation of insurance risk is the use of reinsurance facilities;
- *Technical pricing and modelling* – Technical pricing takes account of hazards so premiums are adequate. Furthermore, stochastic modelling is used to estimate exposures to assure sufficiency of the best estimate and for price setting;
- *Underwriting control framework* – A technical underwriting review process complements the standard underwriting controls in place to ensure adherence and discipline to the procedures and standards across all branches.

C.1.3 Reserving risk

Concentration and exposure

Reserving risk concentrations are the accumulation of assumed claims and the uncertainty associated with the ultimate size of the claims, given the extended duration it can take for some claims to mature. As a result of its long tail nature, MS AISE's portfolio of casualty classes dominates the reserving risk profile.

MS AISE operates an actuarial led reserving process to estimate the reserves on a best estimate basis. Reserving risk exposures and concentrations are identified through the use of the Internal Model. Exposures are modelled using volatility around the amount of reported best estimates. The following table presents MS AISE's five largest reserving exposures as per year-end 2022 and 2023.

Jan 2024	Class	Jan 2023	Class
1	NL Liability – General Third Party Liability	1	NL Liability – General Third Party Liability
2	NL Fleet – Liability Binder	2	NL Fleet – Liability Binder
3	Marine – Cargo	3	Marine – Builders Risk
4	FR Property - Non-Binder	4	BE Liability – Non-Medical
5	Marine – FPPI Shipowners	5	BE Liability – Medical

Primary classes driving exposure is casualty due to the longer term in which claims are settled compared to other business lines. Inflation was an important driver for reserve adjustments in the liability classes. It is worth noting that the 2023 risk ranking is based on allocated SCR which aligns with the metrics considered.

Scenario, stress and sensitivity testing

For reserving risk, following selection of tests has been made from the tests completed:

Nr.	Sensitivity test	Impact on available capital €'000	Impact on SCR €'000	Impact on Solvency Ratio %
Base	solvency position per 31 December 2023	816,678	526,195	155.2%
1	5% deterioration in net claims ratio during 2024, across all classes, compared to plan	(36,965)	11,596	(10.2%)
2	15% deterioration in net claims ratio during 2024, for fleet class, compared to plan	(14,864)	6,550	(4.7%)

All stress test scenarios generate a solvency ratio exceeding 140%, providing assurance that the reserving risk aligns with the Company's risk appetite regarding Solvency Ratio. Increased levels of provisions have an adverse impact on both own funds and required capital.

Management, mitigation and monitoring techniques

In addition to the risk management process outlined in section B.3.1, this section presents management and mitigation techniques in relation to reserving risk. Monitoring results of reserving risk are reported to MS AISE's Risk Committee and Audit Committee on a quarterly basis.

- *Process and governance* – MS AISE operates a consistent, actuarially driven process quarterly to assess that appropriate level of reserves are carried, taking account of the characteristics and risks of each business class, to arrive at a best estimate. The best estimates are reviewed by members of the Management Committee and the MS AISE Audit Committee on behalf of the MS AISE Board;
- *Policies and procedures* – Consistent claims processes and accurate case reserve setting aims to ensure that an adequate provision is established for advised claims;
- *Tolerance setting and monitoring* – A tolerance is set for reserving as the minimum probability of carried reserves being in excess of liabilities for at least 65%. This sufficiency of reserves is monitored on a quarterly basis via the Internal Model;
- *Risk margin* – An additional margin is proposed by management which aims to reflect the level of underlying risk and to achieve the required tolerance level to determine the carried reserves;
- *Reinsurance* – The reinsurance programme responds to large loss developments from prior years.

C.2 Market risk

Market risk is defined as risk arising from fluctuations in values of, or income from, investment assets, interest rates, currency exchange rates and market prices. MS AISE seeks to optimise its risk adjusted investment return whilst focusing on ensuring it maintains sufficient capital to meet solvency requirements and maintain sufficient liquid funds to meet liabilities when they fall due. Exposure to market risk is therefore limited to the extent that investment strategies are balanced by these primary objectives.

In addition to the description of market risk, this section explains how MS AISE adheres to the prudent person principle.

C.2.1 Risk definition and appetite

Market risk is divided into three subcategories, namely investment market volatility, foreign exchange and investment counterparty risk.

Investment market volatility risk

This is the risk of loss resulting from fluctuations or volatility of investment assets and in the value of financial securities, either directly or indirectly. MS AISE has a cautious risk seeking (maintain) attitude to investment market volatility risk. The Company has multi-asset risk exposures and manages the risk according to an annual Value-at-Risk ('VaR') tolerance[1]. Investments are limited by the liquidity requirements of meeting claims as these become payable.

Foreign exchange risk

Foreign exchange risk is the impact on the value of balance sheet items or earnings arising from movements in the exchange rate of the euro against other currencies. MS AISE has a risk neutral appetite to currency risk. The Company is exposed to currency risk by virtue of holding balance sheet assets, investment funds, premiums and liabilities in foreign currencies.

Investment counterparty risk

There is a risk of loss to MS AISE due to a change in the value of assets resulting from investment counterparties default, credit rating downgrade or a change in spread over the risk-free rate accounted for the counterparties. MS AISE has a risk seeking (maintain) appetite for investment counterparty credit risk as part of market risk. The Company manages the counterparty exposures by monitoring the concentration of assets against grade/quality exposure limits, which are designed to maintain a level of diversification in the asset portfolio.

C.2.2 Prudent person principle

The prudent person principle provides guidelines for undertakings about how to manage investment strategy. Undertakings should only conduct investment management activities as long as it can be reasonably demonstrated that there is an appropriate level of understanding of the underlying investment (i.e. the ability to look through into individual positions), are able to monitor their investments (counterparty monitoring) and can justify their investments as prudent to policyholders.

MS AIML is responsible for the day-to-day management of MS AISE's investments and operates within the MS AISE Investment Governance Framework and Investment Guidelines. MS AIML only invests in assets and instruments whose risks can be identified, measured, monitored, managed, controlled and reported.

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[1] MS AIML uses VaR below expected return as standard VaR measure.

MS AISE’s policyholder assets (backing technical provisions) are managed against a low appetite for risk, with assets held in funds which invest in money market funds and a mix of bonds, derivatives and currencies. The management of policyholder funds is aligned with the prudent person principle.

C.2.3 Investment market volatility risk

Concentration and exposure

Market concentration risk can result from having too much exposure in a single asset class, currency, political domicile or counterparty. Concentration risk is managed by ensuring MS AISE’s portfolio is well-diversified across multiple asset classes and multiple regions. It is managed to tolerances that prohibit excessive market and credit risk concentrations.

MS AISE’s asset allocation as at 31 December 2023 and 2022 is presented below as a percentage of asset under management (‘AUM’). Allocations are largely held through the Company’s investment in the Toro Prism Trust. This is an open-ended investment unit trust authorised by the Central Bank of Ireland as a UCITS (Undertakings for Collective Investment in Transferable Securities) regulated by the European Union.

	2023		2022	
	€'000	%	€'000	%
Collective investment undertakings (excl. property)*	1,474,016	76%	1,253,901	71%
Property*	101,644	5%	116,951	7%
Equities*	61,567	3%	122,029	7%
Corporate bonds*	206,201	11%	195,053	11%
Government bonds*	15,701	1%	-	0%
Derivatives*	13,583	1%	8,390	0%
Cash and deposits	77,753	4%	66,366	4%
Total assets invested	1,950,465	100%	1,762,690	100%

* These items are presented together under the line Investments (incl. participations) in the Solvency II assets table under section D.1 of this report.

Stress, scenario and sensitivity testing

Scenario analysis is performed for investment market volatility risk. The following selection of tests has been made:

Nr.	Sensitivity test	Impact on available capital €'000	Impact on SCR €'000	Impact on Solvency Ratio %
Base	solvency position per 31 December 2023	816,678	526,195	155.2%
1	1% increase in risk-free interest rates during 2024	30,290	(2,340)	6.5%
2	1% decrease in risk-free interest rates during 2024	(31,906)	1,738	(6.6%)
3	20% decrease in market value of financial assets, except fixed income securities and cash	(59,460)	(4,573)	(10.0%)
4	No investment return in 2024	(39,599)	(2,806)	(6.7%)

The third scenario presents the most negative impact on the Solvency Ratio and follows a severe financial market stress. The adverse impact on own funds is only partially mitigated through a decrease in market risk following the lower assets under management. This results in a SII solvency ratio of 146%, still above the 140% risk appetite limit. Based on these stress tests and analyses current capital position is considered adequate.

Management, mitigation and monitoring techniques

In addition to the risk management process outlined in section B.3, this section presents management and mitigation techniques in relation to investment market volatility risk. Monitoring results are reported to MS AISE's Risk Committee on a quarterly basis.

- *Strategic asset allocation* – Investment opportunities are evaluated taking into consideration risk and reward, liquidity and effects on capital in relation to solvency requirements;
- *Asset – Liability matching* – The interest rate risk exposure resulting from the term structure of policyholder liabilities is mitigated through duration matching of a fixed income investment portfolio;
- *Hedging* – The use of derivatives such as futures, swaps and swaptions is used in case the fixed income portfolio cannot fully match the target duration exposure in cash, as a result of market imperfections;
- *Policies, procedures and standards* – The investment policy aims to maximise risk-adjusted investment return in relation to an agreed risk budget;
- *Tolerance, limit setting and performance monitoring* – Investment strategy is aligned to risk appetite, tolerances and indicators. For every asset class there is a maximum exposure and monitoring programme;
- *Stochastic VaR monitoring* – Exposure is assessed using a stochastic model at confidence levels of 99% (one month) and 99.5% (one year);
- *Scenario and stress tests* – Stress and scenario tests are performed outside of the Stochastic VaR monitoring to provide alternate portfolio losses in a variety of stressed circumstances;
- *Sub-advisor monitoring* – A spread of sub-advisors is appointed to carry out asset selection within specialized asset classes. Each sub-advisor has discretion to manage the funds on a day-to-day basis within the Investment Guidelines or Mandates. These are designed to ensure that investments comply with the Investment Frameworks.

C.2.4 Foreign exchange risk

Concentration and exposure

MS AISE is exposed to the fluctuations in the exchange rates of currencies. Besides euro (EUR) denominated exposures, MS AISE holds material exposures in US dollars (USD) and British pound sterling (GBP). As part of the investment guidelines, there are clear restrictions in place with regard to the currency gap between investment assets and policyholder liabilities.

The next table presents the 31 December 2022 and 2023 exposures in USD and GBP (presented in EUR amounts). The total balance sheet is based on Solvency II valuation methods. The reduction in USD denominated assets is driven by less financial investments, while the higher USD liability position is due to additional technical provisions. This is in line with the strong business growth in the Marine book, which primarily writes USD denominated insurance policies. The decrease in GBP assets is driven by less financial assets compared to prior year following lower GBP denominated securities in the Toro Prism Trust. The increase in GBP liabilities follows the variation of the technical provisions.

Value by currency ('000)	2023			2022		
	Total (EUR)	USD	GBP	Total (EUR)	USD	GBP
Total assets	2,284,118	65,110	66,116	2,055,235	102,549	88,259
Total liabilities	1,469,979	133,606	105,345	1,299,718	84,581	63,978

In addition to the exposures on the balance sheet, on a look-through basis, MS AISE holds the Lilac (money market fund) and Blue (bond fund) Toro Prism Trust share classes in multiple currencies, with the aggregated exposures contributing significantly to the required capital for market risk.

Stress, scenario and sensitivity testing

For foreign exchange risk no stand-alone sensitivity analyses are being performed, motivated by the proportionality principle, focusing on other more material market risk exposures. Furthermore, foreign exchange risks are stochastically modelled within the context of the Internal Model.

Management, mitigation and monitoring techniques

In addition to the risk management process outlined in section B.3.1, this section presents management and mitigation techniques in relation to foreign exchange risk. Monitoring results are reported to MS AISE's Risk Committee on a quarterly basis.

- *Asset-liability matching* — The currency risk resulting from the currency gap between asset and liabilities is managed by investment guidelines that match the policyholder exposures;
- *Hedging* – The use of derivatives such as currency forwards is used in case the cash exposures cannot fully match the matching currency exposure of the policyholder liabilities as a result of market imperfections or temporary treasury exposures.

C.2.5 Investment counterparty risk

Concentration and exposure

Risk concentration can occur due to an accumulation of MS AISE owned assets with a limited number of counterparties. The investment guidelines are designed to mitigate credit risk by ensuring diversification of the holdings. For each portfolio there are limits to the exposure to single issuers and to the total amount that can be held in each credit quality rating category, as determined by reference to credit rating agencies. MS AISE is exposed to counterparty risk primarily through the investment in the Toro Prism Trust.

Limits for government bonds and non-government bond exposures are defined in the investment guidelines by rating, both at aggerate and single issuer level, as illustrated below.

Holding restrictions	Aggregate limit
Credit rating	Percentage of total
AAA/AA and below (government bonds)	No limit.
AAA/AA/A and below (all other assets)	50%
BBB and below	30%
Below BBB	7.5%

Single issuer limits		
Rating	Government	All other assets
AAA/AA	No limit	5%
A	10%	4%
BBB	5%	2%
Below BBB	1%	1%

There are also concentration limits in place by industry type (max 10%), by geographical area (max exceeding 10%) and by issuer (max 1%).

Stress, scenario and sensitivity testing

Scenario analysis is performed for investment counterparty risk. The following selection of tests has been made:

Nr.	Sensitivity test	Impact on available capital €'000	Impact on SCR €'000	Impact on Solvency Ratio %
Base	solvency position per 31 December 2023	816,678	526,195	155.2%
1	1% increase in spread of fixed income assets compared to risk-free rate during 2024	(6,470)	(1,576)	(0.8%)
2	Downgrade to default for financial assets, excluding cash, with credit quality step 4 or less	(14,759)	23,789	(9.4%)

The scenarios are benchmarked against a severe credit crisis, including spread widening, rating downgrades and default of investments instruments classified per credit quality step 4 or less, excluding cash. The impact is relatively low, explained by the low duration of credit exposures, and the overall high quality of the portfolio. The increase in the capital charge, as a result of the second scenario, results from higher spread risk associated with lower rated bonds.

Management, mitigation and monitoring techniques

In addition to the risk management process outlined in section B.3, this section presents management and mitigation techniques in relation to investment counterparty risk. Monitoring results are reported to MS AISE's Risk Committee on a quarterly basis.

- *Counterparty on-boarding* – Due diligence processes exist to pre-vet any counterparties before being on-boarded;
- *External credit ratings* – MS AISE uses ratings from multiple credit rating agencies, such as Standard & Poor and AM Best;
- *Credit rating limits* – Investment counterparty exposure is managed through limits over exposure based upon credit ratings;
- *Creditworthiness monitoring* – Is conducted by MS AIML for all institutions MS AISE transacts with, both current and potential. A summary is sent to the Investment Management and Compliance functions;
- *Investment Counterparty Management* – The custodians of MS AISE's investment assets are contractually bound to hold all assets specifically on behalf of MS AISE and not in their own right.

C.3 Credit risk

MS AISE defines credit risk as the risk of loss, resulting from deterioration in the financial condition of insurance and reinsurance counterparties (reinsurers and retrocessionaires, insured and reinsured clients, cover holders, brokers). Credit risk could therefore have an impact upon MS AISE's ability to meet claims and other obligations as they fall due and upon the investment return.

C.3.1 Risk definition and appetite

Credit risk is divided into three subcategories, i.e. reinsurance credit risk, broker credit risk and investment counterparty risk. Investment counterparties (e.g. treasury intermediaries) have a high proximity to market risk. Therefore, exposure to investment counterparties is described within the market risk section.

Reinsurance credit risk

Reinsurance credit risk is the risk of loss resulting from deterioration in the financial condition of reinsurers and retrocessionaires. MS AISE has a risk neutral attitude to reinsurance credit risk. The Company recognises the need to accept some reinsurance counterparty credit risk as a result of using risk capacity and providing protection for large losses and severe catastrophe events. The Company aims to limit credit risk in relation to reinsurer balances and potential recoveries by establishing limits for the extent to which such assets could become uncollectible in the event of insolvency or impairment.

Broker and cover holder credit risk

MS AISE defines broker and cover holder credit risk as the risk of loss resulting from deterioration in the financial condition of insured and reinsured clients, cover holders and brokers. MS AISE has a risk neutral attitude to intermediary credit risk. MS AISE recognises that brokers need to collect both premiums and claims as part of their services. The Company aims to limit credit risk in relation to debtor balances by establishing limits for the extent to which such assets could become uncollectible in the event of insolvency or impairment.

C.3.2 Reinsurance credit risk

Concentration and exposure

Reinsurance credit risk includes both reinsurers' share of outstanding claims, as well as amounts expected to be recovered on unpaid outstanding claims (including incurred but not reported claims) in respect of earned risks. Reinsurance recoverables by external credit rating according to Standards & Poor's, based on Solvency II valuation principles, due at 31 December 2022 and 2023 are shown in the table below.

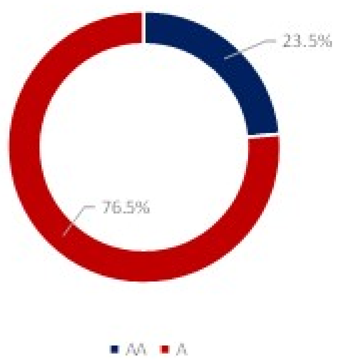
	2023		2022	
Reinsurance recoverables	€'000	%	€'000	%
AA	57,306	44.0%	84,543	47.2%
A	61,583	47.3%	55,473	30.9%
BBB	0	0.0%	30,801	17.2%
Other	11,320	8.7%	8,420	4.7%
Total	**130,208**	**100.0%**	**179,237**	**100.0%**

There are tolerances applicable for each reinsurer reflecting an approximation capital charge based on a single loss and the financial strength credit ratings, assigned by external credit rating agencies such as Standard & Poor and AM Best. The internal MS AISE credit rating is used in case of non-rated counterparties, where such rating is derived from the latest available solvency ratio.

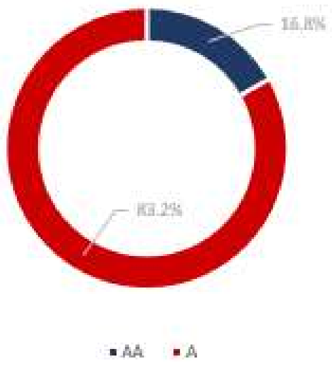
The applied limit per reinsurer is the aggregate exposure across all programmes written. The exposure of the reinsurer, who participates in a current reinsurance programme, is frequently monitored by the MS AISE Actuarial Function team.

The chart below shows in force reinsurance aggregate exposure (assuming one total loss for each contract written) across the excess of loss treaty programmes protecting MS AISE with effect from 1 January 2023 and 2024, broken down by financial strength rating. Exposures as per 1 January are used to reflect positions against the reinsurance programme for the coming year.

1 January 2023



1 January 2024



Collateralised reinsurance

This has not been applicable to MS AISE to date and is not expected to be a feature over the business planning period.

Use of external credit ratings

Information from external credit rating agencies is used on a quarterly basis to determine the credit risk of MS AISE, for reporting to the Counterparty Security Committee. The Actuarial Function also monitors the internal MS AISE credit ratings provided to reinsurance counterparties which participate in the reinsurance programme.

Stress, scenario and sensitivity testing

Scenario analysis is performed for reinsurance credit risk. The following selection of tests has been made:

Nr.	Sensitivity test	Impact on available capital €'000	Impact on SCR €'000	Impact on Solvency Ratio %
	Base solvency position per 31 December 2023	816,678	526,195	155.2%
1	Downgrade to default for reinsurance and cash exposures with credit quality step 4 or less	(14,759)	23,789	(9.4%)

The scenario considers the event with a default of reinsurance and cash counterparties classified per credit quality step 4 or less, which leads to a Solvency Ratio of 146%, comfortably above the 140% risk appetite limit. The increase in SCR results from higher counterparty risk charges associated to the cash holdings.

Management, mitigation and monitoring techniques

In addition to the risk management process outlined in section B.3, this section presents management and mitigation techniques in relation to reinsurance credit risk. Monitoring results are reported to MS AISE's Risk Committee on a quarterly basis.

- *Accreditation* – A Counterparty Approval tool is used for reinsurer accreditation, approval for the engagement of new reinsurers and review of existing reinsurers;
- *Fronting* – Approval of fronting local policies for members of the INI, Globex or other networks is also handled by the Counterparty Approval tool;
- *Policies, procedures and standards* – Procedures for the approval of new reinsurers, review of existing reinsurers and use of unapproved reinsurers on an exception basis are set out in the Counterparty Security Standard;
- *Tolerance, limit setting and performance monitoring* – Within the framework of the Counterparty Security Committee, the Company seeks to manage and monitor exposures to reinsurance companies by setting risk tolerances and indicators across the risk category;
- *Stochastic modelling* – Is utilised to report on modelled reinsurance recoveries;
- *Reinsurer review process* – Considers the aggregate capital of each reinsurer across all programmes written, which is incorporated in the Counterparty Approval database. Monitoring results are reported to the Counterparty Security Committee on a quarterly basis;
- *Debt control* – Reinsurance debt credit control is carried out to limit outstanding balances owed by counterparties. Credit risk is controlled by applying maximum in force exposure limits applicable to each reinsurer, linked to their ability and willingness to pay claims;
- *Cross entity cost sharing and loss usage* – There is a protocol for cross entity (including MS AISE) cost sharing and loss usage considering the allocation of reinsurance credit cost and losses;
- *Claims management* – MS AISE‘s claims end-to-end process is designed to pursue and secure claims recoveries in an efficient manner.

C.3.3 Broker and cover holder credit risk

Exposure and concentrations

The table below presents the breakdown at 31 December 2022 and 2023 of insurance receivables by rating according to external credit agencies. The table includes credit risk exposures to brokers, cover holders and policyholders.

	2023		2022	
Insurance receivables	**€'000**	**%**	**€'000**	**%**
A	214,310	46.6%	152,178	44.5%
Other	245,461	53.4%	190,177	55.5%
Total	**459,771**	**100.0%**	**342,355**	**100.0%**

Broker credit risk is managed through several controls and internal reporting, including broker approval, annual financial review, assessment of the internal rating of brokers and regular monitoring of premium settlement performance.

Cover holder credit risk is also managed through several controls and internal reporting, including cover holder approval, assessment of the internal rating of cover holders and regular monitoring of open positions and payment behaviour. Furthermore, there are annual financial monitoring controls in place which measure the cover holder’s solvency ratio and current account balances.

Stress, scenario and sensitivity testing

No sensitivity analyses are performed for broker and cover holder credit risk. After managing the Company’s exposures to brokers and cover holders via the debt control process, the residual risk is not considered significant.

Management, mitigation and monitoring techniques

In addition to the risk management process outlined in section B.3.1, this section presents management and mitigation techniques in relation to broker and cover holder credit risk.

In case of irregularities or issues noted for specific counterparties, a mitigation process is in place to handle and minimize the risk. This process includes all the corresponding parties such as the Finance team, the Sales team (for brokers) and the Delegated Authority team (for cover holders).

The process of risk mitigation is similar for brokers and cover holders. Monitoring results are reported to MS AISE's Risk Committee on a quarterly basis.

- *On-boarding*
    - The Sales team is responsible for broker accreditation and on-boarding (approval of new brokers);
    - The Delegated Authority team is responsible for the cover holder accreditation and on-boarding (approval of new cover holders);
- *Policies, procedures and standards* – For both brokers and cover holders, policies and standards are in place to explain the process of on-boarding, credit review, debt control and claims management;
- *Tolerance, limit setting and performance monitoring* – For both brokers and cover holders, the Company seeks to manage and monitor exposures by a number of risk tolerances and limits across the risk category;
- *Debt control* – For both brokers and cover holders, the timely and correct settlement is monitored on a daily basis by the Credit Control team within Finance. Monitoring results (aging debt and unmatched cash) are reported on a quarterly basis during a Business Review meeting;
- *Claims management* – MS AISE's claims management process is designed to pursue and secure claims recoveries in an efficient manner for both brokers and cover holders.

C.4 Liquidity risk

Liquidity risk refers to the risk that sufficient financial resources are not available to meet liabilities as they fall due. That is, the risk that cash is not available to pay claims or other key financial commitments. In addition to the description of liquidity risk, this section presents the impact of expected profits in future premiums.

C.4.1 Risk definition and appetite

The scope of liquidity risk includes managing unexpected changes in funding sources, market conditions and cash flow planning incorporating asset-liability management. MS AISE has a risk averse attitude to liquidity risk. It seeks to avoid any situation where funds are not available to meet claim payments and operating expenses as required because this would have significant reputational and regulatory impact. The Company recognises that it has the obligation to pay claims promptly and that this could result in heavy cash flow demands in the event of catastrophe claims. MS AISE ensures the availability of sufficient funds to cover any claims from such events and the combination of other adverse circumstances which may give rise to short term cash requirements in excess of MS AISE's available liquid funds.

C.4.2 Concentration and exposure

Liquidity risk can result from having concentrations in financial assets which cannot be monetised quickly. It can materialize as a result of exposure to simultaneous occurring perils such as windstorms and floods, in combination with stress on the capital markets.

Responsibility for cash management and the allocation of assets to ensure appropriate liquidity is delegated to MS AIML. MS AISE therefore provide investment guidelines to ensure that the investment portfolios are sufficiently liquid to allow liabilities to be settled at any time, in particular under stressed circumstances. The prudent person principle, as described in paragraph C.2.2, is applicable to managing liquidity risk.

MS AISE periodically monitors the liquidity ratio as part of the risk appetite monitoring process. The ratio as at year-end 2023 is well above the tolerance of 100% at 324%. The indicator is based on the level of High Quality Liquid Assets ('HQLA'), which are calculated by applying Basel II regulatory haircuts, against Solvency Capital Requirements. The indicate provides comfort that MS AISE is extremely well funded and positioned to handle multiple loss events before liquidity could become an issue.

It is important that MS AISE can pay obligations as they fall due. Levels of cash are therefore managed on a daily basis and buffers of liquid assets are held in excess of the immediate requirements. This is to reduce the risk of being a forced seller of any of MS AISE's assets, which may result in realising prices below fair value, especially in periods of abnormal asset liquidity.

C.4.3 Sensitivity analysis

Given the excess level of liquidity, no additional stress tests are performed related to liquidity, motivated by the proportionality principle. The uncertainty related to stressed circumstances are embedded within the liquidity ratio. As part of the review of the liquidity framework, stress testing is performed to assess the conservativeness of the liquidity ratio in place.

C.4.4 Management, mitigation and monitoring techniques

Management and mitigation of liquidity risk is done via cash management and liquidity ratio monitoring:

- The rapid collection of reinsurance recoveries following settlement of major claims is a key priority within cash management;
- Liquidity ratio monitoring is done to assess if MS AISE can meet its liabilities in a stressed liquidity environment.

C.4.5 Impact of expected profit in future premiums ('EPIFP')

Any profits expected from premiums that have not yet been invoiced but are expected in future periods are utilised in business planning and amounted to €260.0 million as at 31 December 2023 (2022: €152.3 million) on future expected premiums of €808.8 million (2022: €643.1 million).

Management is aware of the risk of falling short of either the expected profits or the level of future expected premiums, both of which can contribute to liquidity risk if large enough. MS AISE's capital position is strong and liquid enough to absorb shocks of this magnitude. No material liquidity issues are expected to arise if the level of profits from expected future premiums is not met.

C.5 Operational risk

MS AISE operates a diverse business across several offices and jurisdictions and is expected to comply with legal, regulatory and best-practice standards. The risk of execution arises from a failure of critical business processes, people or systems resulting in financial losses or reputational damage.

C.5.1 Risk definition and appetite

The table below shows an overview of all the operational risks considered in the Internal Model.

Operational risks	
Related to conduct or people	**Related to systems and processes**
Treating customers fairly	System availability risk
Sanctions risk	Information Security (IT)
Money laundering and terrorism financing risk	Data privacy risk (non-IT)
Bribery and corruption	Data management risk
External fraud	Project management risk
Conflicts of interest	Business interruption, safety and security risk
People conduct risk	Outsourcing and procurement risk
Internal fraud risk	Delegated authority risk
	Human resource and social risks
	Financial and regulatory reporting risk
	Model quality risks
	Capital management risks
	Financial operations risks

Risk Control self-assessment

The listed operational risks are assessed and quantified as part of the Risk Control Self-Assessment (‘RCSA’), which is the process in place to identify potential risks and to assess the effectiveness of internal controls. It provides a structured approach for evaluating risks and ensuring that adequate controls are in place to mitigate them.

Given the critical role of the RCSA, a tight governance is in force which combines shared responsibility and oversight of both first and second line teams. The processes are facilitated by the second line Assurance & Monitoring team to ensure that risk assessments are performed timely and that output is challenged by relevant second line representatives.

MS AISE has an aversion to operational risk, targeting an exposure that is “as-low-as-reasonably - practical”, avoiding any operational failures which may hinder trading, result in financial loss or any regulatory sanction for inadequate compliance. It is recognised, however, that achieving complete certainty of such failures not occurring would entail an unacceptable cost.

Process for preparing contingency plans

A Business Continuity Management policy is in place. Each department is required to develop and maintain a Business Impact Analysis and Risk Assessment, the tools used for the identification and assessment of the departmental criticality and the impact of its loss.

Where the Business Impact Analysis indicated that critical business activities take place, the department shall be required to develop and maintain a Business Continuity Plan which contains the documentation used to manage the continuation of critical business area processes at the time of an incident. The department will also have to test and exercise the plan.

C.5.2 Stress and sensitivity analysis

The above listed operational risks are modelled stochastically within the context of the Internal Model. Review of the model parameters is fully integrated within the RCSA process and signed off by the Model Governance Committee.

In addition, a stress scenario is presented below to assess the vulnerability of the business plan to adverse expense developments.

Nr.	Sensitivity test	Impact on available capital	Impact on SCR	Impact on Solvency Ratio
		€'000	€'000	%
	Base solvency position per 31 December 2023	816,678	526,195	155.2%
1	10% increase in underwriting expenses, across all classses, during 2024	(12,446)	-	(2.4%)

The above scenario, with an increase of 10% of the total underwriting expenses, is considered a very significant deviation from expectations with limited impact on Solvency Ratio (152.8%).

C.5.3 Management, mitigation and monitoring techniques

In addition to the risk management process outlined in section B.3, this section presents management and mitigation techniques in relation to operational risks. Monitoring results are reported to MS AISE's Risk Committee on a quarterly basis.

- *Policies, procedures and standards* – The Operational Risk Standard ensures all significant operational risks are identified, assessed, evaluated, managed, monitored and reported in a consistent manner across the organisation. The JSOX and Internal Control Framework explain the standards required for the ownership, operation and performance of internal controls. Besides these standards there are policies in place for managing business continuity, data quality, information security, outsourcing, and procurement;
- *Tolerance setting* – Results of the risk assessment are monitored against tolerances and limits according to target risk appetite levels. The framework considers the adequacy of the mitigation strategies via the Internal Control Framework;
- *Risk Management Framework* – The implementation of a framework for the identification, assessment and control of operational risks ensures that operational risks are understood and managed by relevant functions/operating segments;
- *Internal Control* – Effectiveness of managing operational risk is measured via the Internal Control Framework. This framework measures operation of key controls in day-to-day operations;
- *Risk assessments* – The identified risks are assessed via periodic risk discussions with relevant stakeholders and via thematic deep-dive assessments. For identified risks remediation actions are identified and monitored, such as the IT strategy aimed at simplifying and modernising the IT landscape and Cyber Security strategy targeted at improving cyber resilience;
- *Risk events and near misses* – Are reported to raise awareness and identify areas for improvement. MS AISE's risk appetite is used as the basis for evaluating risk events;
- *Scenario analyses* – Are used to determine the level of economic capital required to support the level of operational risk within the Company;
- *Insurance coverage* – MS AISE purchases insurance protection to cover property damage, liability, cyber risk, errors and omissions and fraud. These insurances are purchased directly or centrally within the MSI group for MS AISE.

C.6 Other risks

MS AISE identifies strategic risks as input for the other risks section. Besides the risk categories in MS AISE's Risk Management Framework no other material risk categories have been identified.

Strategic risk

MS AISE has processes in place to respond effectively to changes in the internal and external environment that closely involve the Board. The aim of the process is to identify impending changes that could compromise the business model in the long term and to identify threats or opportunities requiring strategic repositioning of the portfolio, organic expansion and/or acquisition where market conditions allow. Once changes and/or targets are secured, change resources are assigned to deliver the necessary objectives.

C.6.1 Risk definition and appetite

Strategic risks are defined as risks to current and prospective earnings or capital arising from adverse business decisions, improper implementation of decisions or lack of responsiveness to industry changes and the business environment in general. These include risks associated with the appropriateness of business strategy in the face of the current and future commercial, geopolitical, legislative and economic environment.

MS AISE has a risk seeking (maintain) attitude to those risks as it actively pursues ways of developing the business model. MS AISE also faces a number of external factors which may impact demand for or supply of our products. These risks are analysed and actions are agreed to adapt the strategic approach to cater for them.

C.6.2 Concentration and exposure

MS AISE sees strategic risk concentration from several factors explained below.

Developments in relation to strategic objectives

The development of strategic objectives is carried out by MS AISE senior executives and through the decisions of the MS AISE Board. The strategy is fundamental to the development of MS AISE's market share, brand, reputation, underwriting aims and the fulfilment of the expectations of its parent and other interested parties such as policyholders, rating agencies and regulators.

Geopolitical and economic factors

MS AISE is exposed to geopolitical uncertainty and resulting instability that could affect the delivery of MS AISE's strategy and/or the provision of its products and services. This could crystallise as a result of political decisions, events or conditions.

Drivers for political and economic risk are political and economic protectionist movements, Chinese cyber-attacks and industrial espionage.

Strategic Group risk

MS AISE is a subsidiary of the MS&AD Group and there is a risk that losses in other Group companies may impact the ability of MS AISE to execute its strategy, especially if the impact is upon the Group's capital management strategy and limits options to recapitalise in the event of a material capital reduction. Other examples include Group's influence over entities' strategy, potentially clashing with the fulfilment of local strategy.

Whilst MS AISE accepts that these risks are pertinent to the sector and local jurisdiction, it is necessary to understand the risk and manage the potential impact where possible.

C.6.3 Scenario analysis and reverse stress testing

The ORSA includes a specific section on climate risks, currently focusing on following aspects:

- Impact of changing climate patterns in terms of frequency, severity and correlations between perils of different kinds such as hail, flood and windstorms.
- Impact on assets considering, considering transition to carbon free economy.

Analysis is typically performed by means of scenario-analysis. Further effort are also explored with regard to the sophistication of the exposure management framework in this context.

C.6.4 Management, mitigation and monitoring techniques

In addition to the risk management process outlined in section B.3, this section presents management and mitigation techniques in relation to strategic risk. Monitoring results are reported to MS AISE's Risk Committee on a quarterly basis.

- *Group Strategy Alignment* – MS AISE's strategic objectives and decisions also include consider the strategy requirements of the MS&AD Group, including capital needs, regulatory requirements and risks;
- *Culture* – MS AISE's culture and strategic objectives take account of customer needs and expectations;
- *Strategy commitment* – There is resource commitment to support the duration of the executed strategy and strategies have flexible re-directive decision points in their plan;
- *Market monitoring* – Horizon scanning of external factors often takes place, decisions take account of current and longer term market movements;
- *Governed decision making* – Strategic risks are assessed taking account of all requirements while risk acceptance is undertaken within a controlled manner considering capital constraints and the cost of capital;
- *Capital management* – Aggregate risk exposure is continuously monitored against available capital, and action is taken where solvency ratios are deemed unacceptable. Contingency and resilience plans are developed to manage adverse capital events;
- *Stress testing* – Business plans are thoroughly considered and reviewed against the potential impact of external factors and developments;

C.7 Any other information

All material information relating to the Company's risk profile has been disclosed in sub-sections C.1 to C.6 above.

Section D - Valuation for Solvency Purposes

D.1 Assets

D.1.1 Solvency II valuation method and differences compared to BEGAAP and IFRS per material asset class

	Note	Reported under BEGAAP €'000	IFRS adjustment €'000	Reported under IFRS €'000	SII reclass €'000	SII valuation adjustment €'000	SII balance sheet 2023 €'000	SII balance sheet 2022 €'000
Cash and cash equivalents	1	77,540	185	77,725	28	-	77,753	66,366
Investments (incl. participations)	2	1,801,785	68,289	1,870,073	2,638	-	1,872,712	1,696,324
Reinsurers' recoverables	3	324,074	7,385	331,459	-	(201,250)	130,208	179,237
Insurance, reinsurance and intermediaries receivables	4	541,222	(54,314)	486,908	-	(383,413)	103,496	30,498
Receivables (trade, not insurance)	5	92,863	(4,898)	87,964	(1,751)	(16,529)	69,685	51,845
Deferred acquisition costs	6	-	64,080	64,080	-	(64,080)	(0)	-
Deferred tax asset	7	-	13,057	13,057	-	3,063	16,120	16,021
Property, plant & equipment held for own use	8	2,772	11,373	14,144	-	-	14,144	14,944
Goodwill and intangible assets	9	17,338	26,508	43,847	-	(43,847)	0	-
Total Assets		**2,857,594**	**131,665**	**2,989,258**	**916**	**(706,056)**	**2,284,118**	**2,055,235**
Total Liabilities		**2,341,092**	**(116,089)**	**2,225,002**	**916**	**(755,939)**	**1,469,979**	**1,299,718**
Excess of Assets over Liabilities		**516,502**	**247,754**	**764,256**	**(0)**	**49,883**	**814,139**	**755,517**

The above table shows the reclassification of assets from BEGAAP to IFRS and from IFRS to Solvency II presentation. For the SII adjustments, a distinction is made between IFRS to SII reclassifications as well as SII valuation adjustments as at 31 December 2023. The 2022 Solvency II balance sheet has been included for comparative purposes.

The breakdown into asset classes in the above table is less granular than the S.02.01 balance sheet QRT, as presented in the annex. This has been done to allow a clearer understanding of the valuation differences.

BEGAAP to IFRS adjustments

The BEGAAP to IFRS adjustments per asset class are highlighted below, while the IFRS to SII adjustments are discussed in the remainder of this section.

1. Cash and cash equivalents

There is no valuation difference on the cash and cash equivalents between IFRS and BEGAAP. However, there is a slight presentation difference related to the transit account for processing and matching of executed payments. The transit account is presented as insurance and reinsurance receivables under BEGAAP while it has been included as part of the cash position for IFRS reporting purposes.

2. Investments (incl. participations)

Investments are recognised at fair value under IFRS, while for BEGAAP purposes financial assets are valued at historical cost value less impairment and allowance for bad debt. Therefore, the fair value adjustments are added to the balance sheet. Any currency exchange differences recognised on the fair value adjustments are to be included on the balance sheet as well.

3. Reinsurance recoverables

On the BEGAAP balance sheet reinsurance recoverables represent the reinsurers' share of the provision for outstanding claims and unearned premiums. The reinsurers' share of the provision for unearned premiums, according to BEGAAP, is calculated on the reinsurance premiums less commission expenses for acquisition. Under IFRS, however, this is not the case and the reinsurance commission expenses for acquisition are not subtracted from the reinsurance premiums. Therefore, the netting with reinsurer's share of acquisition expenses has to be reversed in the provision for unearned premiums when adjusting from BEGAAP to IFRS.

The remainder of the IFRS-BEGAAP restatement is driven by a valuation difference on the reinsurance margin held within the technical provisions.

4. Insurance, reinsurance and intermediaries receivables

There is no difference on the valuation of insurance, reinsurance and intermediaries receivables between IFRS and BEGAAP. The BEGAAP-IFRS restatement, presented above, relates to the reclassification of certain recourse items from the assets side of the balance sheet to technical provisions presented as liabilities.

5. Receivables (trade, not insurance)

Receivables (trade, not insurance) include prepayments, sundry debtors and other receivables. The BEGAAP-IFRS restatement, primarily relates to the presentation of claims recoveries from the Belgian regional governments. Belgian insurance entities can recuperate claims settlements for natural catastrophes from the government once the total indemnity payment passes a certain threshold. These recoveries are presented as other receivables on the BEGAAP balance sheet and increasing the technical provisions presented as liabilities.

6. Deferred acquisition costs

Acquisition costs comprise commission expenses for acquisition incurred on insurance contracts written during the financial year.

Under BEGAAP, as mentioned above, these commission expenses are netted with the provision for unearned premiums. Therefore, deferred acquisition costs are presented at zero in the BEGAAP balance sheet.

7. Deferred tax assets

According to BEGAAP principles, deferred tax is not recognised except for government investment grants and disposal of fixed assets. As MS AISE does not have any qualifying deferred tax items, the positions are valued at zero on the balance sheet.

8. Property, plant and equipment held for own use

Property and equipment are the physical assets utilised by the Company to carry out business activities and generate revenues and profits. For MS AISE, it consists of the following:

- Fixtures and fittings;
- Computer equipment; and
- Lease properties.

The IFRS 16 standard determines the valuation and handling of lease contracts. The lease property recognised on the IFRS balance sheet is in accordance with this standard. Under BEGAAP, however, IFRS 16 is not being recognised, which explains the restatement from BEGAAP to IFRS of €11.4 million for lease assets.

9. Goodwill and intangible assets

According to BEGAAP, goodwill is to be amortised over its useful life where under IFRS amortisation is not allowed. Therefore, the amortisations on goodwill have to be reversed from BEGAAP to IFRS standards.

Solvency II reclassification of IFRS balances

For Solvency II reporting purposes there are several reclassifications with the IFRS balance sheet. These reclassifications are presentational in nature, thus do not impact the excess of assets over liabilities balance. These have been summarised in the below table and major reclassifications are further explained after.

	Reported under IFRS	SII re-class	IFRS represented
	€'000	€'000	€'000
Cash and cash equivalents	77,550	28	77,578
Investments (incl. participations)	1,870,073	2,638	1,872,712
Receivables (trade, not insurance)	87,962	(1,751)	86,212
Payables (trade, not insurance)	(188,985)	(250)	(189,234)
Derivative liabilities	(1,952)	(916)	(2,868)
Subordinated liabilities	(2,789)	250	(2,539)
Total	**1,841,860**	**(0)**	**1,841,860**

Major reclassifications are on investments. There is a receivable of €1.8 million related to accrued interest on corporate and governments bonds which is considered as part of receivables (trade, not insurance) valuation under IFRS, while it is classified as Investments (incl. participations) on the Solvency II balance sheet in line with Solvency II guidance.

A minor reclassification item is highlighted on the payables (trade, not insurance) and subordinated liabilities due to presentation of accrued interest for the subordinated debt. According to the Solvency II Directive, accrued interest is not to be included in subordinated liabilities as these are classified as Tier 2 own funds. For more details on the subordinated liabilities, reference is made to section D.3 Other liabilities.

Solvency II valuation adjustments

In order to arrive at the Solvency II balance sheet, the following valuation adjustments to the IFRS balances are required:

- Derecognition of deferred acquisition costs, goodwill and intangible assets;
- Conversion of IFRS best estimate net insurance liabilities and net future receivables to Solvency II technical provisions standards;
- Recalculation of net deferred tax assets to consider impact of above valuation changes.

Set out in the remainder of this section are the Solvency II valuation principles for material asset classes with a comparison to the corresponding IFRS valuation principles, if different.

1. Cash and cash equivalents

Cash and cash equivalents are defined differently under IFRS than Solvency II. Under IFRS, cash equivalents include short term, highly liquid investments which are believed to be subject to an insignificant risk of changes in value. For Solvency II reporting, cash equivalents are defined as deposits exchangeable for currency on demand at par and which are directly usable for making payments by cheque, draft, giro order, direct debit/credit, or other direct payment facility, without penalty or restriction.

The different definitions have resulted in re-classifications of IFRS cash equivalents to different asset categories for Solvency II reporting. Cash and cash equivalents are valued at fair value under both Solvency II and IFRS.

2. Investments (incl. participations)

Investments are recognised at fair value both under Solvency II and IFRS. Therefore, no valuation differences exist for investments. There were no significant changes to the valuation techniques during the year.

MS AISE currently classifies all its investment securities as fair value through profit or loss. Management determines the classification of its investment securities at initial recognition. MS AISE's investment assets designated at fair value through profit or loss amounted to €1,872.7 million (2022: €1,696.3 million). Hence, the IFRS value is considered a suitable approximation of the Solvency II fair value requirement.

Note that MS AISE's investment in the Trust is primarily structured into 2 sub-funds, i.e. the Blue and Lilac fund. The Company has assessed for each of these whether MS AISE should recognise its investment as a participation in line with the requirements of the Solvency II Directive. The Company has a share of 10.7% and 40.5% respectively in the funds under management, and so the Lilac funds must be considered as a participation. The net investment value must be presented as 'Holdings in related undertakings, including participations' in the S.02.01 QRT. The other Trust funds are disclosed as 'Collective Investments Undertakings'. The investment in the Trust is described further in the Collective investment undertakings paragraph below.

Fair Value Hierarchy

For Solvency II reporting purposes, MS AISE classified its investments (incl. participations) into the three Solvency II levels of fair value hierarchy as follows:

Quoted market prices – Quoted prices (unadjusted) in active markets for identical assets or liabilities. An active market is a market where transactions for the asset occur with sufficient frequency and volume to provide readily and regularly available quoted prices.

Adjusted quoted market prices – Where the use of quoted market prices in active markets for the same assets or liabilities is not possible, the Company will value assets and liabilities using quoted market prices in active markets for similar assets and liabilities with adjustments to reflect differences. Those adjustments reflect specific and relevant factors such as:

(a) the condition or location of the asset or liability;

(b) the extent to which inputs relate to items that are comparable to the asset or liability; and

(c) the volume or level of activity in the markets where the inputs are observed.

Alternative valuation methods – Inputs to a valuation model for the assets or liabilities that are not based on observable market data (unobservable inputs) and are significant to the overall fair value measurement. Unobservable inputs may have been used to measure fair value to the extent that observable inputs are not available, thereby allowing for situations in which there is little, if any, market activity for the assets or liabilities at the measurement date (or market information for the inputs to any valuation model). As such, unobservable inputs reflect the assumptions that market participants would use in pricing the assets.

At the reporting date, MS AISE's Investments (including participations) classified by hierarchy is as follows:

Investments classification under Solvency II	Quoted market prices €'000	Adjusted quoted market prices €'000	Alternative valuation methods €'000	Total €'000
Holdings in related undertakings, including participations	955,803	-	17,600	973,403
Collective investment undertakings	478,466	-	141,392	619,858
Equities	43,967	-	-	43,967
Derivative assets	10,996	2,587	-	13,583
Corporate bonds	-	206,201	-	206,201
Government bonds	-	15,701	-	15,701
Total investments	**1,489,232**	**224,488**	**158,992**	**1,872,712**

Furthermore, MS AISE has derivative financial instruments with a fair value of €2.9 million included in other liabilities. Of this amount €0.9 million categorised within quoted market prices and €2.0 million as adjusted quoted market prices under Solvency II and disclosed in section D.3 of this report.

Collective investment undertakings and holdings in related undertakings (participations)

Collective investment undertakings and participations include MS AISE's investment in the Trust of €1,434.3 million, a managed fund co-invested into with other MSI companies. This fund represents an Irish domiciled UCITS-vehicle, which is primarily structured into 2 sub-funds, a fixed income securities fund (Blue) and a liquidity fund (Lilac).The investment shares in the funds are valued using quoted market prices for the same assets. Furthermore, as explained in section A.1, the Company holds a €17.6 million participation in Amlin Netherlands Holding BV, presented as a holding in related undertakings in the above table.

The collective investment undertakings balance also includes investments in property fund portfolios of €101.6 million, a hedge fund of €34.7 million, which is managed by BlueBay Asset Management LLP, and a €5.0 million investment in a private equity fund managed by LGT Capital Partners. These fund portfolios are valued by using an alternative valuation method. Alternative valuation methods are explained in section D.4 of this report.

Equities

As stated above, MS AISE holds only listed equities per 31 December 2023. The listed equities are classified as quoted market prices under Solvency II.

Derivatives

Listed derivative contracts are valued using quoted prices and are classified as quoted market prices. Over the counter ('OTC') currency options are valued by the counterparty using quantitative models with multiple market inputs such as foreign exchange rate volatility. The market inputs are observable and the valuation can be validated through external sources. Therefore, OTC derivative contracts are classified as adjusted quoted market prices.

The value of derivative liabilities has been included in other liabilities as shown in the table per section D.3 of this report.

Corporate and government bonds

Corporate and government bonds consist fully of MS AISE's investment into a segregated bond mandate that is being managed by Aegon Asset Management UK plc, covering €221.9 million of the Company's assets. Because the mandate allows for investment in different bond types, the portfolio consisted of both corporate bonds and government bonds as at 31 December 2023.

3. Reinsurance recoverables

On the Solvency II balance sheet reinsurance recoverables represent amounts due from reinsurers on unsettled claims arising from the related reinsurance contracts. Under IFRS this is presented as the reinsurers' share of the provision for outstanding claims as well as the unearned premiums.

Please refer to subsection D.2.5 for a bridge table from IFRS to Solvency II net technical provisions.

4. Insurance, reinsurance and intermediaries receivables

Under Solvency II the insurance, reinsurance and intermediaries receivables represent amounts due as at the balance sheet date and valued at fair value. Under IFRS the above receivables are initially recognised at fair value and subsequently measured at amortised cost using the effective interest rate method.

Receivables not overdue more than 90 days are considered within the calculation of the technical provisions as future premiums, resulting in an adjustment of €383.4 million to receivables. The receivables overdue more than 90 days are presented as an asset on the Solvency II balance sheet.

Due to the short term nature of the remaining overdue receivables, the IFRS carrying value (amortised cost net of bad debt provision) is considered not materially different from the fair value under Solvency II. Therefore, no other adjustment is made.

5. Receivables (trade, not insurance)

The IFRS receivables are initially recognised at fair value and subsequently measured at amortised cost using the effective interest rate method. Under Solvency II receivables are measured at fair value. Furthermore, the investments related receivables (€1.7 million) are re-classified to be part of the Investments (incl. participations) line under Solvency II. The IFRS to Solvency II valuation adjustment relates to €16.5 million prepayments which are consider to have a market value of zero as these relate to future liability obligations.

Due to the short term nature of the other receivables, the IFRS carrying value is considered not materially different from the fair value under Solvency II. Therefore, no other adjustment is made.

6. Deferred acquisition costs

Under Solvency II, deferred acquisition costs are included in the best estimate of future cash outflows for the technical provisions. Therefore, deferred acquisition costs are valued at zero on the balance sheet.

Under IFRS, the deferred acquisition costs are amortised over the period in which the related premiums are earned.

7. Deferred tax assets

For the Solvency II balance sheet MS AISE recognises deferred taxes on the basis of the difference between values of the assets, liabilities and technical provisions assessed in accordance with Solvency II principles and the values ascribed to assets and liabilities as recognised for tax purposes.

Under IFRS the valuation of deferred tax assets and liabilities is based on IAS 12, whereby for deferred tax assets, an assessment is made of the probability of future taxable profits and the realisation of the deferred tax asset within a reasonable time frame. For Solvency II, the Company considers the requirements of the Circular 2022_27, issued by the NBB on 2 November 2022, which may result in temporary methodology differences between Solvency II and IFRS for the valuation of deferred tax assets and liabilities.

A deferred tax asset is recognised to the extent that MS AISE is capable and allowed to utilise it within the applicable tax legislation. MS AISE does not discount its deferred tax assets and liabilities. MS AISE offsets deferred tax assets and liabilities only if it has a legally enforceable right to set off and if it relates to taxes levied by the same tax authority on the same taxable undertaking.

Therefore, the Solvency II deferred tax assets are increased by €3.1 million to reflect the tax impact of valuation differences of assets, liabilities and technical provisions under IFRS and Solvency II.

Next to the impact of the above valuation differences, MS AISE has material deferred tax assets outstanding for the Belgian, French and UK branches which are predominantly related to fiscal losses. These losses can be offset against future profits for an indefinite period. The unused Belgian tax losses have not been fully accounted for as deferred tax asset and the recognised deferred tax asset has been limited to the amount which MS AISE expects to be able to realise over the next five years.

8. Property, plant and equipment held for own use

The lease property recognised on the Solvency II balance sheet is in accordance with IFRS 16.

Equipment is included under IFRS at historical cost less accumulated depreciation and provision for impairment where appropriate. Solvency II requires property and equipment to be valued at fair value. In all respects, the IFRS carrying value is deemed not materially different from the fair value under Solvency II.

9. Goodwill and intangible assets

Goodwill is valued at nil on the Solvency II balance sheet in accordance with article 12 of Delegated Regulation (EU) 2015/35.

Intangible assets are recognised in the Solvency II balance sheet at a value other than zero only if they can be sold separately and it can be demonstrated that there is a value for the same or similar assets that is derived from quoted market prices in active markets. Intangible assets of MS AISE consist of internally developed software that do not meet these criteria. As a result, the intangible assets are valued as nil in the Solvency II balance sheet.

D.1.2 Leasing arrangements per material asset class

MS AISE entered into several non-cancellable lease arrangements for office space and cars. In accordance with IFRS16, these are recognised on the Solvency II balance sheet as property. Please refer to section A.4 for details on the Company's leases.

D.1.3 Changes made to the recognition and valuation bases used or to estimations

No material changes to recognition principles, valuation bases or estimations have been made since the last Solvency and Financial Condition Report.

D.2 Technical provisions

This section contains an analysis of the MS AISE Solvency II technical provisions.

Below is a summary bridge of the components of the technical provisions from IFRS to Solvency II. The 2022 Solvency II values have been included for comparative purposes.

	As reported under IFRS €'000	SII valuation adjustment €'000	SII balance sheet 2023 €'000	SII balance sheet 2022 €'000
Technical provisions	1,891,554	(673,434)	1,218,120	1,158,429
Reinsurance recoverables	(331,459)	201,250	(130,208)	(179,237)
Net deferred acquisition costs	(56,631)	56,631	-	-
Net technical provisions	**1,503,465**	**(415,553)**	**1,087,912**	**979,192**

The increase in Solvency II net technical provisions is a result of an increase in the gross technical provisions (€59.7 million) and a decrease in the reinsurance recoverables (€49.0 million).

The increase in the gross technical provisions compared to last year can be primarily explained by the increase of the earned and unearned claims (€107.2 million), the expenses (€31.8 million) and the risk margin (€12.9 million), partly offset by the increase in future premium (€55.0 million), driven by the business growth experienced by the Company, more profit on unincepted legally obligated business (€28.0 million) and the impact of discounting (€2.9 million).

The reinsurance movement is mainly due to a decrease in the earned claims (€41.0 million) and additional reinsurance cost due to the unincepted legally obligated inwards business (€12.5 million), partly offset by a decrease in future premium (€5.3 million).

D.2.2 Best estimate plus risk margin by Solvency II line of business

The table below shows the Solvency II technical provisions, including the amount of the best estimate and risk margin separately for each material line of business.

	Motor vehicle liability insurance €'000	Other motor insurance €'000	Marine, aviation and transport insurance €'000	Fire and other damage to property insurance €'000	General liability insurance €'000	Miscellaneous financial loss €'000	Other SII lines of business €'000	Total 2023 €'000	Total 2022 €'000
Total best estimate - gross	223,779	46,287	232,793	207,850	389,656	12,938	22,029	1,135,333	1,088,569
Less: Total best estimate - reinsurance	(8,669)	3,168	(8,015)	(34,789)	(67,199)	(3,351)	(11,353)	(130,208)	(179,237)
Total best estimate - net	**215,111**	**49,455**	**224,778**	**173,061**	**322,458**	**9,586**	**10,676**	**1,005,125**	**909,332**
Add: Risk margin	15,018	5,427	20,038	16,896	23,337	1,223	848	82,787	69,861
Technical provisions - total	**230,129**	**54,882**	**244,816**	**189,957**	**345,794**	**10,809**	**11,524**	**1,087,912**	**979,193**

D.2.3 Description of bases, methods and main assumptions

Introduction

The Solvency II technical provisions are calculated as the sum of a best estimate of the insurance liabilities and a risk margin.

The best estimate portion of the Solvency II technical provisions represents the sum of probability-weighted average future cash flows in respect of all policies that are legally obligated as at the valuation date, taking into account the time value of money (expected present value of future cash flows) using the

EIOPA risk-free rate term structure. These future cash flows include future premium receipts, future claims payments, future reinsurance spend, future reinsurance recoveries and associated future expense cash flows.

The risk margin represents the risk premium that would be required to be paid to a third party in order to take over and meet the insurance and reinsurance obligations over their lifetime.

Best estimates: the foundation of the IFRS, BEGAAP and Solvency II technical provisions

The actuarial best estimate reserves calculated as part of the IFRS and BEGAAP balance sheet form the foundation of the best estimate portion of the Solvency II technical provisions. This is adjusted to allow for Solvency II principles.

Full year projections

Projections are carried out at a reserving class level using standard actuarial techniques and incorporating actuarial judgement. Ultimate claims are selected using a reserving tool which allows a variety of standard actuarial reserving methods to be used with a high level of efficiency whilst displaying a range of key diagnostics. Input from underwriters is provided at an early stage of the process in order to capture information such as changes in the portfolio and softer information such as market conditions.

All assumptions are reviewed in light of the diagnostics and other information. All projections are subject to review by the actuarial team and by a wider audience including representatives from the underwriting, risk, claims and senior management teams.

In the case of large or catastrophe losses, the actuaries make use of expert knowledge from the claims and underwriting departments.

Actuarial judgement

The projections are subject to a certain amount of judgment as many, often conflicting, factors are considered when determining the ultimate income and losses.

Best estimate full year projections – calculation of earned portion and estimation of unearned incepted claims

In the reserving process underwriting year projections are carried out for all branches. The ultimates are split between the earned-to-date and the expected earnings in the future period, based on the earning patterns of each reserving class.

In the Solvency II process the unearned incepted claims form part of the premium provision. These are calculated by applying an initial expected prior loss ratio (‘IELR’) and net-to-gross ratio (‘N/G ratio’) to the unearned premium reserve from the IFRS balance sheet. The assumptions, including the IELR and N/G ratios, are consistent with the periodic reserving process.

The initial expected prior loss ratios are in line with the business plan, unless the most recent data available to actuaries differs materially. During the year these loss ratios will be updated if the performance of the class or new information leads to a materially different view.

Gross future premiums

Solvency II requires technical provisions to include all gross future premium cash flows except overdue premium debtors. Premiums consider to be overdue after a period of 3 months.

The starting point for this amount is the IFRS not-yet-overdue premium debtors figure. This is adjusted for specific known differences in the basis of preparation between Solvency II and IFRS which are explained below (see sections on binder adjustment and discount credit).

The resulting future premium value is allocated by class, and then split between earned (claims provision) and unearned (premium provision). This split is done by allocating cash to earned premiums first. If for a single class the cash received is higher than the IFRS earned premium, it is assumed that the earned premium is fully received, meaning that the future premium is fully allocated to unearned future premium, i.e. premium provision. If the cash received is lower than the IFRS earned premium, the difference between the two is allocated to the earned future premium, i.e. claims provision. The remainder will flow into the premium provision.

Reinsurance future premiums

The Solvency II technical provisions include:

- All future reinsurance premiums that are legally obligated; and
- A contribution towards reinsurance to be bought in the future providing cover to inwards legally obligated gross business.

Similar to gross future premiums, the basis of the legally obligated portion is the not-yet-due reinsurance premium debtors from the IFRS balance sheet, to which the minimum legally obligated unincepted reinsurance programmes' cost is added. The future cost portion is calculated on a 'correspondence' basis where the cost of the cover is shared across the relevant legally obligated and non-legally obligated gross business.

Expenses

Under Solvency II, all future expenses that will be incurred in servicing existing policies are allowed for.

Future expense cash flows are captured using expense percentage assumptions and applying those to future cash flows. Expense percentage assumptions are calibrated using the current forecast for the annual expense budget of MS AISE, scaled to allow for only the portion relating to servicing existing business.

Unincepted legally obligated contracts

IFRS only considers incepted contracts at the valuation date whereas Solvency II requires the inclusion of future cash flows in respect of all contracts that are legally obligated at the valuation date. This includes contracts that will incept after the valuation date but have been written prior to the valuation date. MS AISE takes into account that the insurance contracts have a cancellation clause of two or three months and that MS AISE is legally obligated to contracts expected to incept within this period.

Expected premiums from contracts meeting these criteria, are obtained and initial expected loss ratios are applied to calculate expected losses. Other items such as reinsurance bad debt, expenses and discount credit associated with these contracts are explained in other paragraphs of this section.

Reinsurance obligation adjustments

The Solvency II technical provisions include all future reinsurance premiums that are legally obliged and a contribution towards reinsurance to be bought in the future providing cover to inwards legally obligated gross business. The latter is done on a 'correspondence' basis where the cost of the cover is shared across the relevant legally obligated and non-legally obligated gross business.

Binder adjustment

Solvency II requires gross contracts to be recognised on a legal obligation basis. Under IFRS principles, applied by the Company, binding authorities are recognised in full at inception whereas under Solvency II, only underlying policies that are legally obligated should be included. Therefore, a look-through approach to the underlying contracts is taken. For the classes with a large binder proportion, underwriters provide the inception patterns of the underlying binder contracts. For all other classes, it is assumed that the underlying contracts incept evenly throughout the duration of the binder. Reinsurance recoveries on the gross binder adjustment are calculated by applying net-to-gross ratios to these adjustments.

Settled but unpaid claims

Gross settled but unpaid claims are transferred from insurance creditors into the Solvency II technical provisions which have a neutral impact on the Solvency II own funds.

Reinsurance bad debt

Where appropriate, an allowance is made for potential bad debt on reinsurance recoveries. Charge factors are applied to the outwards reinsurance cash flows as these run off over time. Charge factors represent the mix of reinsurer ratings for relevant lines of business, probability of default and expected recoveries given default.

Discount credit

Under Solvency II all cash flows are discounted for the time value of money. The yield curves are the risk-free interest rates issued by EIOPA with the volatility adjustment applied in the technical provisions calculation.

Segmentation

Solvency II requires technical provisions to be reported by line of business and original currency. Reserves are analysed at a level which ensures that volumes of data remain credible. Therefore, only in rare cases, an allocation is required before Solvency II technical provisions can be mapped to lines of business and original currencies.

Risk margin

The risk margin is calculated using the standard formula SCR and represents the risk premium that would be required to be paid by a third party in order to take over and meet the insurance and reinsurance obligations over their lifetime.

Conceptually, the risk margin is calculated as the discounted cost of capital required to be held in order to run off legally obligated business. Therefore, an SCR is calculated for each future year during the run-off period. A discounting factor is applied by using the EIOPA risk-free interest rate without volatility adjustment. Market risk is not included in the calculation of the SCR because, if the insurance liabilities were transferred to a third party, it would be expected that the third party would be able to switch to a risk-free investment portfolio.

The SCR is assumed to run off proportionally to the technical provisions, considering the delay in run-off of the premium risk. This assumption is a good approximation since most sub-risks are heavily influenced by the size of the technical provisions. For example, the counterparty default risk is dependent on the size of the reinsurance coverage, which in itself is closely related to the net technical provisions. The remaining risks are not material. It is a requirement to allocate the risk margin to Solvency II line of businesses and therefore the risk margin is allocated to Solvency II line of business in proportion to the future claims at the reporting date.

D.2.4 Level of uncertainty associated with the Solvency II technical provisions

Most of the uncertainty in the Solvency II technical provisions arises in the process of setting quarterly reserves. The inputs for the net earned future claims and future premiums come directly from the quarterly projections of the ultimate premiums and ultimate claims.

The assessment of the reserves is based on commonly accepted actuarial techniques applied in a consistent manner. Whilst professional judgment has been exercised in all instances, projections of future ultimate losses and loss expenses are inherently uncertain due to the random nature of claim occurrences. The accuracy of the results is dependent upon the accuracy of the underlying data and additional information supplied to the actuarial teams.

The projections are also dependent on future contingent events and are affected by many additional factors, including:

- Claim reserving procedures and settlement philosophy;
- Social and economic inflation;
- Legislative changes;
- Changing court and jury awards;
- New sources of claims;
- Changes in the frequency and/or severity of extreme weather events;
- Improvements in medical technology;
- Changes in policyholder behaviour;
- Underwriting and reserving cycles;
- Other economic, legal, geopolitical and social trends; and
- Random fluctuations, particularly on small accounts.

For long-tailed classes, where development potential exists but is not present in historical data, a specific allowance is made within the IBNR. The level of uncertainty naturally reduces over time as claims are reported and settled, depending upon the nature of the event, the complexity of the losses and the potential for disputes.

Sources of uncertainty that are more specific to the nature of underwriting risks written are explained in the remainder of this section.

Property catastrophe losses: Catastrophe losses by nature are large and often unpredictable and hence can often give rise to additional uncertainty. There is a relatively large amount of uncertainty in respect of future events.

Large (disputed) 'risk' losses: Individual large losses can give rise to relatively high levels of uncertainty, particularly where there is an element of dispute, litigation or uncertainty as to the form of the claimed losses, including reinsurance collections.

Emergence of new latent claims: Some classes are exposed to latent claims, in particular liability classes. Where new claim types have arisen, it can take many years for the full scale of the number and size of claims to emerge. For claims yet to arise there is additional uncertainty around how much allowance to consider for future unknown claim types.

Established long-tailed classes: Long-tailed classes can give rise to relatively large amounts of uncertainty due to the size of the best estimate reserves held in respect of them and the fact that the oldest years may not be fully developed. In particular, the possibility exists for legislative changes applying both prospectively and potentially retrospectively that could affect multiple accounting years. Additionally, if there are development changes in more recent years, the changes may take some time to emerge.

Changes in the mix of business/re-underwriting and case reserving procedure: Some classes have undergone a change in the mix of business written or rate changes in recent years. Other classes have undergone changes in claim handling policy. These changes impact the development profile of relevant lines of business and the expected loss ratios. For long-tailed classes this can have similar considerations in respect of uncertainty as for new long-tailed classes. The effect of rate changes and re-underwriting on more recent underwriting years is uncertain and hence less weight can be placed on the historic development.

Other components of the Solvency II technical provisions also have some uncertainty, although typically to a lesser extent. The material areas of uncertainty related to each of the other components is set out below.

Expenses: In estimating the expenses, the starting point is the expense budget for the upcoming year. Assumptions are used to estimate the proportion of annual expenses required to service existing policies and the run-off pattern of the liabilities. There is a medium level of uncertainty on all of these assumptions.

Unincepted legally obligated contracts: A large proportion of policies, underwritten by MS AISE, incept at 1 January each year. This means that for the year-end calculation there are large amounts of future premiums and future claims arising from these unincepted but legally obligated contracts. Uncertainty in these items arises not only from the same factors mentioned above, but also from the quality of the business plan used to set assumptions, including premium volumes by inception month, loss ratios, and the volume of binders written. There is also uncertainty around whether the business plan will be achievable given the commercial conditions in place at the time of writing. It is noted that for renewal business, only the policies which have passed the tacit renewal term are considered as unincepted and legally obligated.

Factors influencing whether the unincepted premium will be more or less than expected are less material to the overall technical provisions, as any difference in unincepted premium will partially be offset by a corresponding movement in the unincepted claims. Factors relating to the loss ratio and the tacit renewal, used to calculate the unincepted claims, lead to a larger level of uncertainty in the overall technical provisions.

Future reinsurance premiums: The proportion of reinsurance contracts that are losses-occurring, the earnings patterns and the nature of the reinsurance contracts (quota share or excess of loss) are important parameters in the calculation. The key assumption underlying all of these is that management will continue to buy the same/similar reinsurance programme in future years. While this assumption is reasonable based on past years, there is uncertainty over the availability and price of reinsurance in future years, which could influence management decisions.

Reinsurance bad debt: There is considerable uncertainty in this amount, driven by whether or not recoverable events occur, future economic conditions and the long term solvency of individual reinsurers. However, the reinsurance bad debt is an immaterial part of the total technical provisions, so there can be no large impact on the overall technical provisions arising from this uncertainty.

Risk margin: The methodology to calculate the risk margin is prescribed, and depends only on the SCR, which is calculated using the standard formula, and its expected run-off. Uncertainty arises from the inputs into the standard formula and the assumed cash flows used to run-off the SCR.

Discount credit: The yield curves used for discounting are prescribed by EIOPA including volatility adjustment. Uncertainty arises from assumptions around the timing of any cash flows, driven by both the timing of claim events and the period needed to settle claims and the overall level of the interest rates. Given the current economic circumstances, the uncertainty on the overall technical provisions is high.

Inflation: The level of inflation over the past two years is above the average of the past decade. A deep-dive analysis was initiated in 2022, which resulted in an additional claims allowance to the technical provisions, and a reassessment occurred during the reporting period. It is unknown if the level of inflation has stabilized, but impact and consequences will be further monitored during 2024.

D.2.5 Material differences between IFRS and Solvency II technical provisions

The adjustments required to bridge the gap from IFRS reserves to Solvency II technical provisions as at 31 December 2023 are shown below both at the total level and for the lines of business that are most material for MS AISE.

Most of the adjustments are explained in the preceding sections. Additional items are explained underneath the table. IFRS data split by Solvency II line of business represents an approximation since not all business is allocated at source to a line of business. As a result, in some cases, judgement has been used.

	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Miscellaneous financial loss	Other SII Lines of Business	Total 2023
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
IFRS net technical provisions*	**261,986**	**89,335**	**404,629**	**278,663**	**435,392**	**20,464**	**12,995**	**1,503,464**
Removal of unearned premium, IFRS expenses and margin provisions	(40,984)	(28,444)	(139,612)	(105,775)	(73,302)	(6,888)	(1,889)	(396,894)
Settled but unpaid claims	5,651	2,977	14,067	6,279	13,221	1,534	643	44,372
Earned claims	**226,653**	**63,868**	**279,084**	**179,167**	**375,311**	**15,109**	**11,749**	**1,150,942**
Future premium and reinsurance obligation adjustment	(21,337)	(18,747)	(144,454)	(49,067)	(44,633)	(9,938)	(1,370)	(289,544)
Unearned Claims	14,656	15,487	76,581	59,760	25,043	2,977	495	195,000
Profit on unincepted legally obligated contracts	(8,138)	(14,987)	(9,085)	(31,541)	(41,273)	(3,825)	(672)	(109,522)
SII expenses	25,714	7,045	38,883	26,372	59,568	6,365	1,962	165,909
Allowance for reinsurance bad debt	29	1	53	70	334	273	8	769
Discount credit	(22,466)	(3,213)	(16,284)	(11,702)	(51,892)	(1,375)	(1,496)	(108,429)
Risk margin	15,018	5,427	20,038	16,896	23,337	1,223	848	82,787
SII net technical provisions	**230,129**	**54,882**	**244,816**	**189,957**	**345,794**	**10,809**	**11,524**	**1,087,912**

Earned claims: Starting from the IFRS net reserves, first the components which are not recognized under Solvency II are removed, namely the provision for unearned premium net of deferred acquisition costs, the IFRS expenses as well as part of the earned prudency margin. Secondly, before obtaining the earned claims under Solvency II, the settled but unpaid claims have to be added.

Future premiums and reinsurance obligation adjustment: This is a combination of the future premiums obtained (€325.1 million) and the reinsurance obligation adjustments (€35.5 million).

Unearned claims: There are the expected future claims which arise from incepted contracts and are calculated by multiplying the IFRS provision for unearned premium, net of deferred acquisition costs, with an initial expected loss ratio.

D.2.6 Matching adjustment or transitional measures

The Solvency II technical provisions calculations do not apply the matching adjustment or transitional measures referred to in Article 77b and 308d of Delegated Regulation (EU) 2009/138.

D.2.7 Reinsurance recoverables

The calculation of reinsurance recoverables is explained in more detail in prior sections (best estimate full year projections, unincepted legally obligated contracts, binder adjustment). In calculating the reinsurance recoveries and the reinsurance premiums, the characteristics of the MS AISE reinsurance programmes are considered.

The outward reinsurance contracts are written on a variety of bases, including risks attaching, losses occurring, excess of loss and quota share bases, and with a variety of reinsurers. MS AISE does not have outwards reinsurance contracts with special purpose vehicles.

D.2.8 Material changes in methodology and assumptions

There are no material changes in methodology and assumptions during the reporting year.

D.3 Other liabilities

Solvency II valuation methods and differences compared to BEGAAP and IFRS per material other liabilities class

	Note	Reported under BEGAAP €'000	IFRS adjustment €'000	Reported under IFRS €'000	SII reclass €'000	SII valuation adjustment €'000	SII balance sheet 2023 €'000	SII balance sheet 2022 €'000
Technical provisions		2,035,046	(143,492)	1,891,554	-	(673,434)	1,218,120	1,158,429
Insurance, intermediaries and reinsurance payables	1	118,001	615	118,616	-	(102,665)	15,951	15,033
Payables (trade, not insurance)	2	177,944	11,044	188,988	250	-	189,238	87,724
Derivative liabilities	3	-	1,952	1,952	916	-	2,868	6,310
Debts owed to credit institutions		-	-	-	-	-	-	-
Reinsurance share of deferred acquisition costs	4	-	7,450	7,450	-	(7,450)	-	-
Retirement benefit obligations	5	7,313	(722)	6,590	-	-	6,590	5,805
Deferred tax liabilities	6	-	7,064	7,064	-	27,609	34,673	23,930
Subordinated liabilities	7	2,789	-	2,789	(250)	-	2,539	2,486
Total Liabilities		**2,341,092**	**(116,089)**	**2,225,002**	**916**	**(755,939)**	**1,469,979**	**1,299,718**
Total Assets		**2,857,594**	**131,665**	**2,989,258**	**916**	**(706,056)**	**2,284,118**	**2,055,235**
Excess of Assets over Liabilities		**516,502**	**247,754**	**764,256**	**(0)**	**49,883**	**814,139**	**755,517**

The above table shows the reclassification of liabilities from BEGAAP to IFRS and from IFRS to Solvency II presentation. For the SII adjustments, a distinction is made between IFRS to SII reclassifications as well as SII valuation adjustments as at 31 December 2023. The 2022 Solvency II balance sheet has been included for comparative purposes.

The breakdown into liability classes in the above table is less granular than the S.02.01 QRT, as presented in the annex. This is to allow a clearer understanding of the valuation differences.

For information on the Solvency II reclassifications please refer to the explanation in section D.1 Assets. For information on technical provisions, please refer to section D.2 Technical provisions.

BEGAAP to IFRS adjustments

The BEGAAP to IFRS adjustments per asset class are highlighted below, while the IFRS to SII adjustments are discussed in the remainder of this section.

1. Insurance, intermediaries and reinsurance payables

There is no difference on the valuation of insurance, reinsurance and intermediaries payables between IFRS and BEGAAP. The BEGAAP-IFRS restatement, indicated above, relates to the reclass of certain accruals which are being presented as other payables on the BEGAAP balance sheet.

2. Payables (trade, not insurance)

Under BEGAAP, trade and other payables represent liabilities to pay for goods or services that have been received or supplied in the normal course of business, invoiced by the supplier before the balance sheet date, but for which payment has not yet been made.

Trade payables consists principally of collateral repayables on the derivative contracts, payables to other MSI Group entities and other sundry payables.

The IFRS 16 standard determines the valuation and handling of lease contracts. The lease liabilities recognised on the IFRS balance sheet are in accordance with this standard. Therefore, lease liabilities are recognised as part of the payables on the IFRS balance sheet, in accordance with IFRS 16. Under BEGAAP this standard is not being recognised which mainly explains the restatement from BEGAAP to IFRS.

3. Derivative liabilities

As mentioned in section D.1 Assets, investments (incl. derivative liabilities) are recognised at fair value under IFRS, while for BEGAAP purposes financial assets are valued at historical cost value less impairment and allowance for bad debt. Therefore, the fair value adjustments are added to the balance sheet. Any currency exchange differences recognised on the fair value adjustments are to be included on the balance sheet as well.

As the book value of the derivative liabilities is valued at zero, BEGAAP balance is nil.

4. Reinsurance share of deferred acquisition costs

As mentioned in section D.1 Assets, according to BEGAAP, the reinsurers’ share of provision for unearned premiums is calculated on the reinsurance premiums less commission expenses for acquisition. Under IFRS, however, this is not the case and the commission expenses for acquisition are not subtracted from the reinsurance premiums.

Therefore, the netting with reinsurers’ share of acquisition expenses has to be reversed and the expenses are restated as payables when adjusting from BEGAAP to IFRS.

5. Retirement benefit obligations

Under BEGAAP, the liability recognised on the balance sheet in respect of defined benefit pension plans is the fair value of plan assets less the present value of the defined benefit obligation at the reporting date, together with adjustments for restrictions on the recognition of a defined benefit asset due to an asset ceiling. The present value of the defined benefit obligation is determined by discounting the estimated future cash outflows using discount rates set on the basis of the yield of high-quality debt instruments (AA rated or equivalent) issued by blue-chip companies, with maturities consistent with those of the defined benefit obligations.

There is no difference in the valuation of defined benefit pension liability between IFRS and BEGAAP. The disclosed restatement of €0.7 million is not related to defined benefit pension plans. It covers the pension provision which has to be accrued for at the French branch according to local regulation. For completeness purposes, it has been restated out of payables (trade, not insurance) and presented as retirement benefit obligations on the BEGAAP balance sheet. However, for IFRS, this is reversed as it does not meet the IAS 19 recognition criteria.

6. Deferred tax liabilities

Please refer to section D.1 for valuation methods and details surrounding deferred tax positions.

7. Subordinated liabilities

The Company has received a subordinated loan from MS ACS for a total amount of £2.2 million. Interest is accrued at the base rate set by the Bank of England with an addition of 1%. First accrual is done on the effective date of the agreement and then on the first business day of each calendar quarter in order to be capitalised at 31 December each calendar year. This agreement is in effect and the interest is payable upon repayment of the loan.

There is no difference on the presentation of subordinated liabilities between IFRS and BEGAAP.

Solvency II valuation and classification adjustments

Set out in the remainder of this section are the Solvency II valuation principles for material liability classes with a comparison to the corresponding IFRS valuation principles, if different.

1. Insurance, intermediaries and reinsurance payables

The IFRS insurance, intermediaries and reinsurance payables are held at amortised cost. Similar to the insurance and reinsurance receivables as described under section D.1, due to the short term nature of these payables, the IFRS carrying value is not materially different from the fair value under Solvency II and therefore no adjustment is made.

Under Solvency II, reclasses of €44.3 million (insurance and intermediaries payables) and €58.3 million (reinsurance payables) (2022: €44.2 million and €57.6 million respectively) have been made for settled but not paid claims and reinsurance premiums payable but not-yet-due at the balance sheet date. These amounts have been transferred to technical provisions. Please refer to section D.2 for further details on technical provisions and the valuation thereof.

2. Payables (trade, not insurance)

Similar to trade receivables (as described in section D.1 of this report), due to the short term nature of the other payables, the IFRS carrying value is considered not materially different from the fair value under Solvency II. Therefore, no material adjustment is made.

3. Derivative liabilities

Please refer to section D.1 for valuation methods and details surrounding MS AISE's investments portfolio.

4. Reinsurance share of deferred acquisition costs

Under Solvency II, deferred acquisition costs are included in the best estimate of future cash outflows for the technical provisions. Therefore, the reinsurance share of deferred acquisition costs is valued at zero on the balance sheet.

Under IFRS, the deferred acquisition costs are amortised over the period in which the related premiums are earned.

5. Retirement benefit obligations

There is no difference in the pension liability valuation between IFRS and Solvency II.

6. Deferred tax liabilities

Reference is made to section D.1 for valuation methods surrounding deferred tax positions. There is an IFRS deferred tax liability related to the Dutch branch, which is adjusted under Solvency II following the tax impact of valuation differences on assets, liabilities and technical provisions between IFRS and Solvency II.

Current tax liabilities are included in payables (trade, not insurance) and are valued at fair value under Solvency II.

No material changes in the valuation of the deferred tax liability position have taken place over the reporting period.

7. Subordinated liabilities

The IFRS value is considered a suitable approximation of the Solvency II fair value requirement. There is one reclass noted for which reference is made to the explanation on Solvency II reclassification of IFRS balances under section D.1.

8. Contingent liabilities

MS AISE does not have any material contingent liabilities to disclose under Solvency II.

D.4 Alternative methods for valuation

Methods of valuation for items other than net technical provisions recognised in the Solvency II balance sheet and valued based on quoted market prices or adjusted quoted market prices have been disclosed in section D.1 and D.3 of this report.

MS AISE's property fund investments are valued by using an alternative valuation method. The most recent net asset value provided by the fund managers is used. The net asset values, which may be a quarter in arrears, are determined by the fund managers using proprietary cash flow models. Rental growth and income are expected to be the predominant drivers of returns rather than capital appreciation. In certain instances, adjustments are made to bring the net asset value to a more current valuation. The inputs into that valuation, such as discount rates, are primarily unobservable and as a result, these assets are classified as alternative valuation methods. Where an investment is made into a new property fund the transaction price is considered to be the fair value if that is the most recent price available. The value of MS AISE's property fund portfolio is based on the net asset value provided by the investment manager, CBRE Global Collective Investors UK Limited.

MS AISE also invests into a hedge fund which is managed by BlueBay Asset Management LLP. The fund is categorised as being valued by using an alternative valuation method due to the limited liquidity of the fund, because subscriptions or withdrawals are possible once a month. The net asset value of the fund is determined by administrator JP Morgan Hedge Fund Services Ireland as at the close of business on each valuation date. The fund's net asset value is equal to the value of the respective total assets less the respective total liabilities.

The Company's investment into the fund managed by LGT Capital Partners, is also being revaluated via an alternative valuation method as it concerns private equity. The fund administrator periodically calculates the net asset value ('NAV') based on the records which are maintained independently of any other party involved. To maintain this independence, the fund administrator has separate and direct access to all documents and information provided by the general partners or managers of the underlying investments. Private equity valuations are generally based on the latest available NAV reported by the general partners or managers of the underlying investments, provided the NAV has been appropriately determined by using proper fair value principles (e.g. IFRS, USGAAP, etc.).

Furthermore, the present value of MS AISE's defined benefit pension plan obligation is determined by using an alternative valuation method (as described in section D.3 of this report).

During the reporting period, MS AISE had no other material assets or liabilities valued by using alternative valuation methods in accordance with Article 10(5) of the Delegated Regulation (EU) 2015/35.

D.5 Any other information

The risks associated with the assets and liabilities set out in sections D.1 to D.4 of this report and how these are managed in accordance to Article 260 of the Delegated Regulation (EU) 2015/35 are explained in section C of this report.

All other material information relating to the Company's valuation for solvency purposes has been disclosed in sub-sections D.1 to D.4 above.

Section E - Capital Management

E.1 Own funds

Capital management

MS AISE's approach to capital management aims to ensure that MS AISE maintains sufficient capital for regulatory and rating agency purposes, can withstand major catastrophe claims, can attract good quality business and be able to exploit opportunities for profitable growth.

MS AISE's diverse spread of underwriting risk and geographical exposure among thirty principal classes of business, spread over four material Solvency II lines of businesses which are described in section A of this report, helps to increase capital efficiency through diversification of risks.

MS AISE believes that significant value can be added over the insurance cycle, through a combination of organic growth and carefully selected acquisitions. MS AISE's goal is to maintain a diverse and balanced portfolio, which reduces volatility and enhances capital efficiency.

Capital deployment to meet short and long term business needs is balanced with the need to meet the requirements of stakeholders. MS AISE operates a planning period of three to five years. Business plans are reviewed and debated at executive level and approved by the Board. MS AISE ensures that it continuously maintains own funds of suitable quality and permanence to meet the relevant tier requirements of Solvency II, whilst making prudent use of instruments to enhance the earnings of the entity. In line with the Company's Capital Management Policy, at least 80% of the SCR should be covered by Tier 1 own funds and no more than 15% of the SCR should be covered by Tier 3 own funds (with the balance being Tier 2 basic own funds).

MS AISE's policy is to actively manage capital in order to meet regulatory requirements and contribute to the Company's target to deliver a cross-cycle return on equity after tax in excess of 10% (2022: 7%), which will be reviewed should the Company move to an internal model and away from the standard formula.

MS AISE's internal target level for the Solvency Ratio is 150% (based on the standard formula) during the reporting year, as captured in the Company's Capital Management Policy. As Solvency numbers can be volatile a tolerance of 10% is allowed around the target of 150%. This means that once the solvency ratio falls below the 140%, capital management actions will be planned to bring the ratio back to 140%. If the solvency ratio would increase to above 160%, the surplus own funds would be considered for business growth opportunities and strategic initiatives, increase in risk taking or for dividend distribution.

Differences between IFRS and Solvency II net asset value

	2023 €'000	2022 €'000
BEGAAP net asset value	**516,502**	**476,567**
Allowed items – deferred taxes and IFRS16 assets & liabilities	6,536	11,648
Reversal amortisation goodwill	26,508	23,293
Financial assets at fair value	68,141	66,937
Adjustment to IFRS technical provisions	146,569	125,678
IFRS net asset value	**764,256**	**704,122**
Disallow items – goodwill, intangible assets, prepayments and deferred acquisition costs	(117,006)	(98,380)
Solvency II technical provisions adjustment	472,183	395,200
Future premiums and claims adjustments	(280,748)	(226,726)
Deferred tax on adjustment items	(24,546)	(18,699)
Excess of assets over liabilities – Solvency II	**814,139**	**755,517**

Sections D.1 to D.3 of this report explain the Solvency II valuation methods and adjustments to the IFRS and BEGAAP net asset value.

Available own funds

As at 31 December 2023, MS AISE had available own funds of €816.7 million (2022: €758.0 million). MS AISE does not have any non-available or non-transferrable own funds. MS AISE's available own funds are made up of:

	2023 €'000	2022 €'000
Excess of assets over liabilities	814,139	755,517
Subordinated liabilities	2,539	2,486
Total basic and available own funds	**816,678**	**758,003**

MS AISE's available own funds only consists of basic own fund items. Basic own funds primarily consist of the Solvency II excess of assets over liabilities as well as subordinated liabilities presented as own funds in line with Article 73 of the Delegated Regulation (EU) 2015/35.

MS AISE does not have any ancillary own funds.

Own funds structure

	2023				2022			
	Total	Tier 1	Tier 2	Tier 3	Total	Tier 1	Tier 2	Tier 3
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Ordinary share capital	140,000	140,000	-	-	140,000	140,000	-	-
Reconciliation reserve	674,139	674,139	-	-	615,517	615,517	-	-
Subordinated liabilities	2,539	-	2,539	-	2,486	-	2,486	-
An amount equal to the value of net deferred tax assets	-	-	-	-	-	-	-	-
Total own funds	**816,678**	**814,139**	**2,539**	**-**	**758,003**	**755,517**	**2,486**	**-**

The table above shows the composition and quality of own funds as at 31 December 2023 and 31 December 2022.

Available own funds are classified into tiers based on the extent to which they possess the characteristics of permanency and subordination. Four further features are also taken into consideration, namely:

- Sufficient duration;
- An absence of incentives for redemption;
- An absence of mandatory servicing costs; and
- An absence of encumbrances.

Based on these classification criteria, called up and fully paid ordinary shares and reconciliation reserve are Tier 1 items.

The subordinated debt has been issued by MS Amlin Corporate Services Limited ('MS ACS') to MS AISE. The agreement is drafted in line with Articles 72 and 73 of the Delegated Regulation (EU) 2015/35 and therefore the subordinated liabilities have been assessed for classification purposes under Solvency II as Tier 2 capital.

Tier 3 own funds represent net deferred tax assets only. As at 31 December 2023, Tier 3 capital is nihil due to deferred tax liabilities being higher as deferred tax assets on the Solvency II balance sheet. Please refer to section D.1 for details of deferred tax valuation.

Analysis of significant changes to available own funds during the period

Movements in the reconciliation reserve

The main constituent of available own funds is the reconciliation reserve which comprises the excess of assets over liabilities as valued in the Solvency II balance sheet. The movements in the reconciliation reserve during 2023 are presented in the table below:

	€'000
Reconciliation reserve at 31 December 2022	**615,517**
Movements in Solvency II balance sheet	
Increase in financial assets	176,388
Increase in other assets	34,425
Increase in technical provisions	(108,720)
Increase in other liabilities	(43,471)
	58,621
Reconciliation reserve at 31 December 2023	**674,139**

The movements in the Solvency II balance sheet include the impact of changes to the IFRS net assets, as well as movements in the Solvency II valuation adjustments.

The business growth experienced by the Company over the reporting period leads, on the one hand, to additional premium receivables as well as an increase in financial assets due to higher cash overdraft positions from paid written premiums. This results in additional investment purchases, primarily in highly liquid assets. On the other hand, business growth also leads to higher technical provisions and insurance liability positions.

The increase in technical provisions is further described in section D.2 of this report.

Other available own funds

There were no material valuation changes to the other available own funds items.

Own funds to cover Solvency Capital Requirement and Minimum Capital Requirement

The eligible amounts by tier to cover the Solvency Capital Requirement ('SCR') and the Minimum Capital Requirement ('MCR') are shown in the table below:

	2023				2022			
	Total	Tier 1	Tier 2	Tier 3	Total	Tier 1	Tier 2	Tier 3
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Eligible own funds covering SCR	816,678	814,139	2,539	-	758,003	755,517	2,486	-
Eligible own funds covering MCR	816,678	814,139	2,539	-	758,003	755,517	2,486	-
SCR	526,195				475,622			
MCR	213,943				186,499			
Solvency ratio	155.2%				159.4%			
MCR ratio	381.7%				406.4%			

MS AISE's policy is to actively manage capital in order to meet regulatory requirements and contribute to the Company's target to deliver a cross-cycle return on equity after tax in excess of 10% (2022: 7%). As at 31 December 2023 MS AISE's Solvency Ratio was 155.2% (2022: 159.4%). This decrease is driven by the increase in SCR, offset by the increase of the own funds. For further explanation on own funds movements, reference is made to the explanations above.

There is no restriction to Tier 1 capital. Furthermore, Tier 3 capital, representing the net deferred tax assets on the Solvency II balance sheet, is nihil as at 31 December 2023 due to tax liabilities being higher as the corresponding assets. Therefore, the 15% limit imposed by Article 82 of Delegated Regulation (EU) 2015/35 is respected.

The amount of eligible own funds to cover the MCR should exclude Tier 3 capital as ineligible. However, as Tier 3 own funds is valued at zero at 31 December 2023, no specific restatement is required. There are no restrictions to Tier 1 and 2 capital in respect of MCR coverage.

The SCR is calculated using the standard formula as prescribed in the Solvency II Directive and other Delegated Regulations. The calculation is explained in section E.2 of this report.

Analysis of significant changes to Solvency II Ratio during the period

	€'000	Solvency II Ratio
Total available own funds over SCR at 1 January 2023	**282,381**	**159.4%**
Change in IFRS net assets	60,133	12.6%
Change in Solvency II valuation adjustments	(1,512)	(0.3%)
Change in subordinated liabilities value	53	(0.1%)
Change in SCR	(50,573)	(16.4%)
Available own funds over SCR at 31 December 2023	**290,483**	**155.2%**

The change in IFRS net assets includes the impact of the Company's IFRS profit after tax of €60.7 million.

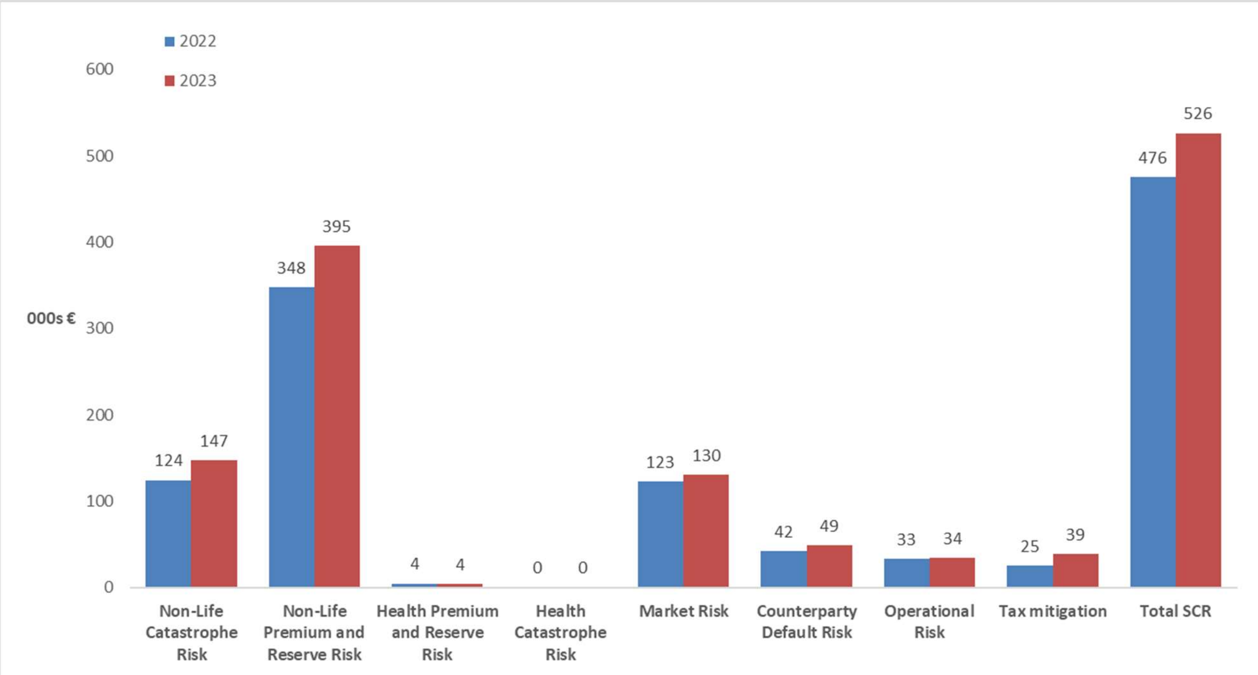
The changes in Solvency II valuation adjustments reflect those movements in sections D.1 to D.3 of this report. The change in SCR and MCR is explained in section E.2 of this report.

E.2 Minimum Capital Requirement and Solvency Capital Requirement

E.2.1 Solvency Capital Requirement ('SCR')

MS AISE uses the standard formula for the calculation of its SCR. The total SCR as at 31 December 2023 was €526.2 million, an increase of €50.6 million since 31 December 2022 (€475.6 million).

The following chart shows how the different components of the SCR have moved over the period.



The sum of the standalone risk categories is greater than the total SCR, owing to the benefits available to the Company through diversification. This is by way of the geographic, product and capital diversity MS AISE employs in managing its risks. This is also to reflect the likelihood that not all risks will emerge concurrently.

The main components driving the total SCR for MS AISE are:

1. **Non-life premium and reserve risk** (€395.4 million compared to €347.9 million in 2022), which is split evenly between premium and reserve risk.

2. **Market risk** (€130.1 million compared to €122.7 million in 2022). This is comprised of several sub-risks, the largest of which is spread risk (€69.5 million). The size of each sub-risk is heavily dependent on the chosen investment strategy.

3. **Non-life catastrophe risk** (€147.4 million compared to €124.4 million in 2022). This is mitigated by reinsurance programmes which lower the capital charge.

4. **Operational risk** (€34.1 million compared to €32.7 million in 2022). Information on the operational risks faced by MS AISE can be found in section C.5 of this report.

5. **Counterparty default risk** (€48.8 million compared to €42.1 million in 2022). This covers the risk to MS AISE of third parties defaulting on their obligations. Relevant third parties include reinsurers, counterparties providing derivative products and banks.

6. **Diversification credit** (€107.2 million compared to €98.8 million in 2022). This covers the benefit of diversification between the different SCR risk components and is dependent on the size and contribution of each subcomponent to the total SCR.
7. **Loss absorbing capacity of deferred taxes ('LAC DT')** (€38.8 million compared to €25.1 million in 2022). The LAC DT lowers the overall Solvency Capital Requirement and consists of two parts. On the one hand, tax losses carry-back potential which are future losses that can immediately be compensated by corporate income taxes paid on profits made in the current reporting year. Tax carry back facilities exist at the Dutch and French branches. On the other hand, deferred tax liabilities as recognized on the Solvency II balance sheet. No future tax loss compensation or deferred tax assets are taken into consideration by MS AISE as part of the SCR calculation.

For the calculation, no undertaking specific parameters or matching adjustments are being used. This also applies for the duration-based equity risk module which is not used. The volatility adjusted EIOPA yield curve, on the contrary, has been applied and is used in the standard formula SCR calculation.

E.2.2 SCR movement

Larger movements over the reporting year are explained below.

1. Market risk

Market risk has increased by €7.4 million over the year. This is largely driven by equity risk with additional contributing movements from interest rate risk, offset by currency risk.

- Equity risk has increased by €12.9 million following changes to the hedging and equity exposures throughout the year, the acquisition of the ANH BV participation (refer to section A.1) and the EIOPA symmetrical adjustment.
- Interest rate risk has increased by €9.2 million, driven by a considerable increase in the interest rates and yield curves during 2023.
- Currency risk has reduced by €7.3 million following better matching between assets and liabilities during 2023.
- Standalone spread risk decreased by €3.7 million over the reporting year. This movement is driven by less holdings in securitisation positions, better credit ratings of underlying exposures and lower overall duration of the financial assets.

2. Non-life underwriting risk

Non-life underwriting risk has increased by €57.5 million over the year. The majority of this stems from non-life premium and reserve risk, with a contributing increase from catastrophe risk.

- Non-life premium and reserve risk has increased by €47.5 million. The overall movement is driven by an increase in the premium and reserve risk volumes across the year. Premium volumes have increased by €126.9 million, mainly driven by the general liability, property and marine segments. Reserve volumes have also increased by €155.5 million as a result of increases in the marine and motor segments.
- Non-life catastrophe risk has increased by €23.0 million over the year. The overall movement is driven by higher exposures for the natural and man-made catastrophe scenarios.

3. Diversification benefit

Diversification credit has decreased by €8.4 million because MS AISE's risk profile has grown in the year and more risk is diversified across risk types. The proportion of individual standalone risk types to total is largely unchanged from 2022, which implies that as the total exposure increases the diversification also increases.

4. LAC DT

The SCR tax mitigation, also known as LAC DT, has increased considerably throughout 2023. As mentioned above, the parameter consists of two components being the tax losses caried-back facilities and deferred tax liabilities as recognised on the Solvency II balance sheet.

E.2.3 Minimum Capital Requirement (MCR)

The MCR calculation is a linear formula calculated using the net written premiums in the previous 12 months and the net best estimate technical provisions (excluding risk margin). This is subject to a minimum of 25% and maximum of 45% of the SCR. The MCR is subject to an absolute minimum depending on the nature of the undertaking (as defined in Article 129 (1) (d) of the Delegated Regulation (EU) 2009/138).

The total MCR as at 31 December 2023 is €213.9 million, which is 40.7% of the SCR (2022: €186.5 million and 39.2%).

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

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

E.4 Differences between the standard formula and any Internal Model used

MS AISE uses only the standard formula in the calculation of the SCR. Therefore, this section is not applicable.

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

As disclosed in section E.1, MS AISE holds sufficient capital in excess of the MCR and SCR. This helps to ensure MS AISE's eligible own funds exceed SCR and MCR requirements on a continuous basis.

There are currently no foreseeable risks that could result in non-compliance with the SCR and/or MCR requirements.

E.6 Any other information

All material information relating to the Company’s capital management up to 31 December 2023 has been disclosed in sub-sections E.1 to E.5 above.

Annex - specific Quantitative Reporting Templates (all amounts expressed in EUR thousands)

Includes the following public QRTs:

- S.01.02.e
- S.02.01.e
- S.04.05.e
- S.05.01.e
- S.17.01.e
- S.19.01.e.UY
- S.22.01.e
- S.23.01.e
- S.25.01.e
- S.28.01.e

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MS Amlin Insurance

Solvency and Financial Condition Report

Disclosures

31 December

2023

(Monetary amounts in EUR thousands)

General information

Undertaking name	MS Amlin Insurance Societas Europeae
Undertaking identification code	5493005Q3501B3PX1S31
Type of code of undertaking	LEI
Type of undertaking	Non-Life insurance undertakings
Country of authorisation	BE
Language of reporting	en
Reporting reference date	31 December 2023
Currency used for reporting	EUR
Accounting standards	Local GAAP
Method of Calculation of the SCR	Standard formula
Matching adjustment	No use of matching adjustment
Volatility adjustment	Use of volatility adjustment
Transitional measure on the risk-free interest rate	No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	No use of transitional measure on technical provisions

List of reported templates

S.02.01.02 - Balance sheet
S.04.05.21 - Premiums, claims and expenses by country: Non-life insurance and reinsurance obligations
S.05.01.02 - Premiums, claims and expenses by line of business: Non-life insurance and reinsurance obligations
S.17.01.02 - Non-Life Technical Provisions
S.19.01.21 - Non-Life insurance claims
S.22.01.21 - Impact of long term guarantees measures and transitionals
S.23.01.01 - Own Funds
S.25.01.21 - Solvency Capital Requirement - for undertakings on Standard Formula
S.28.01.01 - Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

S.02.01.02

Balance sheet

		Solvency II value
	Assets	C0010
R0030	Intangible assets	0
R0040	Deferred tax assets	16,120
R0050	Pension benefit surplus	
R0060	Property, plant & equipment held for own use	14,144
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	1,872,712
R0080	*Property (other than for own use)*	0
R0090	*Holdings in related undertakings, including participations*	973,403
R0100	*Equities*	43,967
R0110	*Equities - listed*	43,967
R0120	*Equities - unlisted*	0
R0130	*Bonds*	221,902
R0140	*Government Bonds*	15,701
R0150	*Corporate Bonds*	206,201
R0160	*Structured notes*	0
R0170	*Collateralised securities*	0
R0180	*Collective Investments Undertakings*	619,858
R0190	*Derivatives*	13,583
R0200	*Deposits other than cash equivalents*	0
R0210	*Other investments*	0
R0220	Assets held for index-linked and unit-linked contracts	
R0230	Loans and mortgages	0
R0240	*Loans on policies*	0
R0250	*Loans and mortgages to individuals*	
R0260	*Other loans and mortgages*	
R0270	Reinsurance recoverables from:	130,208
R0280	*Non-life and health similar to non-life*	130,208
R0290	*Non-life excluding health*	119,024
R0300	*Health similar to non-life*	11,185
R0310	*Life and health similar to life, excluding index-linked and unit-linked*	0
R0320	*Health similar to life*	
R0330	*Life excluding health and index-linked and unit-linked*	
R0340	*Life index-linked and unit-linked*	
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	76,358
R0370	Reinsurance receivables	27,138
R0380	Receivables (trade, not insurance)	69,685
R0390	Own shares (held directly)	
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	77,753
R0420	Any other assets, not elsewhere shown	
R0500	**Total assets**	2,284,118

S.02.01.02

Balance sheet

		Solvency II value
	Liabilities	C0010
R0510	Technical provisions - non-life	1,218,120
R0520	*Technical provisions - non-life (excluding health)*	1,196,607
R0530	*TP calculated as a whole*	0
R0540	*Best Estimate*	1,114,577
R0550	*Risk margin*	82,030
R0560	*Technical provisions - health (similar to non-life)*	21,513
R0570	*TP calculated as a whole*	0
R0580	*Best Estimate*	20,756
R0590	*Risk margin*	757
R0600	Technical provisions - life (excluding index-linked and unit-linked)	0
R0610	*Technical provisions - health (similar to life)*	0
R0620	*TP calculated as a whole*	
R0630	*Best Estimate*	
R0640	*Risk margin*	
R0650	*Technical provisions - life (excluding health and index-linked and unit-linked)*	0
R0660	*TP calculated as a whole*	
R0670	*Best Estimate*	
R0680	*Risk margin*	
R0690	Technical provisions - index-linked and unit-linked	0
R0700	*TP calculated as a whole*	
R0710	*Best Estimate*	
R0720	*Risk margin*	
R0740	Contingent liabilities	0
R0750	Provisions other than technical provisions	
R0760	Pension benefit obligations	6,590
R0770	Deposits from reinsurers	
R0780	Deferred tax liabilities	34,673
R0790	Derivatives	2,868
R0800	Debts owed to credit institutions	0
R0810	Financial liabilities other than debts owed to credit institutions	0
R0820	Insurance & intermediaries payables	15,951
R0830	Reinsurance payables	
R0840	Payables (trade, not insurance)	189,238
R0850	Subordinated liabilities	2,539
R0860	*Subordinated liabilities not in BOF*	
R0870	*Subordinated liabilities in BOF*	2,539
R0880	Any other liabilities, not elsewhere shown	
R0900	**Total liabilities**	1,469,979
R1000	**Excess of assets over liabilities**	814,139

S.04.05.21

Premiums, claims and expenses by country: Non-life insurance and reinsurance obligations

		Home Country	Top 5 countries (by amount of gross premiums written): non-life				
R0010			NL	GB	FR		
		C0010	C0020	C0021	C0022	C0023	C0024
	Premiums written (gross)						
R0020	Gross Written Premium (direct)	252,961	516,177	119,649	250,295		
R0021	Gross Written Premium (proportional reinsurance)	4,350	3,655	3,239	233		
R0022	Gross Written Premium (non-proportional reinsurance)						
	Premiums earned (gross)						
R0030	Gross Earned Premium (direct)	230,241	521,350	120,239	242,656		
R0031	Gross Earned Premium (proportional reinsurance)	4,236	5,508	2,831	202		
R0032	Gross Earned Premium (non-proportional reinsurance)						
	Claims incurred (gross)						
R0040	Claims incurred (direct)	130,564	295,686	96,760	118,469		
R0041	Claims incurred (proportional reinsurance)	1,623	252	1,621	230		
R0042	Claims incurred (non-proportional reinsurance)						
	Expenses incurred (gross)						
R0050	Gross Expenses Incurred (direct)	65,065	198,377	46,709	73,187		
R0051	Gross Expenses Incurred (proportional reinsurance)	1,119	1,405	1,265	68		
R0052	Gross Expenses Incurred (non-proportional reinsurance)						

S.05.01.02

Premiums, claims and expenses by line of business: Non-life insurance and reinsurance obligations

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)												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 insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Misc. financial loss	Health	Casualty	Marine, aviation and transport	Property	
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0200
	Premiums written																	
R0110	Gross - Direct Business	5,133	6,238	1,087	102,189	126,255	346,321	289,200	223,534		1,352	133	79,442					1,180,882
R0120	Gross - Proportional reinsurance accepted	0	0	0	0	0	23,431	6,137	3,908		0	0	2,672					36,147
R0130	Gross - Non-proportional reinsurance accepted																	0
R0140	Reinsurers' share	0	2	480	870	7,762	17,371	49,457	21,804		5	0	61,488					159,240
R0200	Net	5,133	6,236	606	101,318	118,493	352,380	245,880	205,637		1,347	133	20,627					1,057,790
	Premiums earned																	
R0210	Gross - Direct Business	5,143	7,859	977	100,881	132,422	331,282	271,646	228,296		1,418	136	75,757					1,155,817
R0220	Gross - Proportional reinsurance accepted	0	0	0	0	0	22,705	5,433	3,883		0	0	2,424					34,445
R0230	Gross - Non-proportional reinsurance accepted																	0
R0240	Reinsurers' share	0	2	481	870	7,664	16,948	47,425	20,342		5	0	55,822					149,559
R0300	Net	5,143	7,857	496	100,011	124,758	337,038	229,654	211,837		1,413	136	22,360					1,040,703
	Claims incurred																	
R0310	Gross - Direct Business	2,966	1,884	206	91,488	105,835	163,406	132,039	124,433		1,077	17	39,620					662,972
R0320	Gross - Proportional reinsurance accepted	0	0	0	0	0	6,541	3,030	814		0	0	0					10,386
R0330	Gross - Non-proportional reinsurance accepted																	0
R0340	Reinsurers' share	4	-6	-79	-693	1,476	138	-2,265	7,602		5	0	22,902					29,085
R0400	Net	2,962	1,890	285	92,182	104,359	169,809	137,335	117,645		1,072	17	16,718					644,273
R0550	**Expenses incurred**	2,223	3,452	467	42,251	48,492	136,606	81,993	84,497		1,324	52	3,645					405,003
R1210	**Balance - other technical expenses/income**																	
R1300	**Total technical expenses**																	405,003

S.17.01.02

Non-Life Technical Provisions

		Direct business and accepted proportional reinsurance												Accepted non-proportional reinsurance				Total Non-Life obligation
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
R0010	**Technical provisions calculated as a whole**	0	0	0	0	0	0	0	0	0	0	0	0					0
R0050	Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole																	0
	Technical provisions calculated as a sum of BE and RM																	
	Best estimate																	
	Premium provisions																	
R0060	Gross	-272	-416	122	-2,977	-11,794	-37,984	-38,621	-55,940	0	-180	-2	-29,397					-177,461
R0140	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	-30	0	114	-2,142	-3,302	-10,752	-29,298	-14,594	0	-42	0	-22,461					-82,507
R0150	**Net Best Estimate of Premium Provisions**	-242	-416	8	-835	-8,491	-27,232	-9,323	-41,346	0	-138	-2	-6,937					-94,954
	Claims provisions																	
R0160	Gross	7,945	4,320	9,056	226,757	58,081	270,778	246,471	445,596	0	1,433	22	42,335					1,312,794
R0240	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	485	1	10,615	10,811	134	18,768	64,087	81,793	0	210	0	25,812					212,716
R0250	**Net Best Estimate of Claims Provisions**	7,460	4,319	-1,559	215,946	57,947	252,010	182,383	363,804	0	1,223	22	16,523					1,100,079
R0260	**Total best estimate - gross**	7,673	3,905	9,178	223,779	46,287	232,793	207,850	389,656	0	1,253	20	12,938					1,135,333
R0270	**Total best estimate - net**	7,218	3,903	-1,551	215,111	49,455	224,778	173,061	322,458	0	1,085	20	9,586					1,005,125
R0280	**Risk margin**	498	259	0	15,018	5,427	20,038	16,896	23,337	0	89	1	1,223					82,787
R0320	**Technical provisions - total**	8,172	4,164	9,178	238,797	51,715	252,831	224,746	412,993	0	1,343	21	14,160					1,218,120
R0330	**Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total**	455	1	10,728	8,669	-3,168	8,015	34,789	67,199	0	169	0	3,351					130,208
R0340	**Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total**	7,717	4,162	-1,551	230,129	54,882	244,816	189,957	345,794	0	1,174	21	10,809					1,087,912

S.19.01.21

Non-Life insurance claims

Total Non-life business

Z0020 **Accident year / underwriting year** Underwriting Year

Gross Claims Paid (non-cumulative)

(absolute amount)

		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180
	Year					**Development year**							**In Current year**	**Sum of years (cumulative)**
		0	1	2	3	4	5	6	7	8	9	10 & +		
R0100	Prior											11,747	11,747	11,747
R0160	-9	61,241	127,310	65,085	33,997	24,346	10,795	7,517	4,246	6,152	5,230		5,230	345,918
R0170	-8	63,414	123,243	56,828	24,147	17,398	15,515	12,463	10,066	11,333			11,333	334,408
R0180	-7	66,184	113,159	51,359	28,313	15,418	11,154	10,089	9,662				9,662	305,339
R0190	-6	83,681	135,640	52,940	28,898	18,511	18,821	13,253					13,253	351,743
R0200	-5	93,682	162,855	57,068	28,018	21,742	15,219						15,219	378,585
R0210	-4	80,455	166,165	75,973	46,271	32,826							32,826	401,691
R0220	-3	74,230	158,971	82,215	79,238								79,238	394,653
R0230	-2	64,831	179,065	90,895									90,895	334,790
R0240	-1	67,163	203,838										203,838	271,001
R0250	0	66,925											66,925	66,925
R0260												**Total**	540,167	3,196,800

Gross Undiscounted Best Estimate Claims Provisions

(absolute amount)

		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360
	Year					**Development year**							**Year end (discounted data)**
		0	1	2	3	4	5	6	7	8	9	10 & +	
R0100	Prior											93,575	86,738
R0160	-9	0	0	68,395	50,695	40,852	30,414	25,224	23,091	21,954	19,668		18,197
R0170	-8	0	134,814	92,452	73,606	56,336	41,023	38,298	30,561	51,522			47,089
R0180	-7	230,063	159,232	115,843	83,587	73,072	59,147	54,128	32,483				30,212
R0190	-6	351,762	164,887	102,827	77,560	64,408	55,999	46,012					42,413
R0200	-5	280,922	135,398	100,720	78,694	70,471	57,089						52,768
R0210	-4	356,756	251,660	194,731	163,196	149,083							140,961
R0220	-3	281,998	211,815	147,293	114,016								105,464
R0230	-2	301,435	249,836	176,207									163,596
R0240	-1	410,040	286,434										267,618
R0250	0	387,833											357,715
R0260												**Total**	1,312,772

S.22.01.21

Impact of long term guarantees measures and transitionals

		Amount with Long Term Guarantee measures and transitionals	Impact of transitional on technical provisions	Impact of transitional on interest rate	Impact of volatility adjustment set to zero	Impact of matching adjustment set to zero
		C0010	C0030	C0050	C0070	C0090
R0010	Technical provisions	1,218,120	0	0	8,783	0
R0020	Basic own funds	816,678	0	0	-7,560	0
R0050	Eligible own funds to meet Solvency Capital Requirement	816,678	0	0	-7,560	0
R0090	Solvency Capital Requirement	526,195	0	0	989	0
R0100	Eligible own funds to meet Minimum Capital Requirement	816,678	0	0	-7,560	0
R0110	Minimum Capital Requirement	213,943	0	0	743	0

S.23.01.01

Own Funds

	Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35	Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
R0010	Ordinary share capital (gross of own shares)	140,000	140,000		0	
R0030	Share premium account related to ordinary share capital	0	0		0	
R0040	Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings	0	0		0	
R0050	Subordinated mutual member accounts	0		0	0	0
R0070	Surplus funds	0	0			
R0090	Preference shares	0		0	0	0
R0110	Share premium account related to preference shares	0		0	0	0
R0130	Reconciliation reserve	674,139	674,139			
R0140	Subordinated liabilities	2,539		0	2,539	0
R0160	An amount equal to the value of net deferred tax assets	0				0
R0180	Other own fund items approved by the supervisory authority as basic own funds not specified above	0	0	0	0	0
R0220	**Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds**	0				
R0230	**Deductions for participations in financial and credit institutions**	0				
R0290	**Total basic own funds after deductions**	816,678	814,139	0	2,539	0
	Ancillary own funds					
R0300	Unpaid and uncalled ordinary share capital callable on demand	0				
R0310	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	0				
R0320	Unpaid and uncalled preference shares callable on demand	0				
R0330	A legally binding commitment to subscribe and pay for subordinated liabilities on demand	0				
R0340	Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	0				
R0350	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	0				
R0360	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0				
R0370	Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0				
R0390	Other ancillary own funds	0				
R0400	**Total ancillary own funds**	0			0	0
	Available and eligible own funds					
R0500	Total available own funds to meet the SCR	816,678	814,139	0	2,539	0
R0510	Total available own funds to meet the MCR	816,678	814,139	0	2,539	
R0540	Total eligible own funds to meet the SCR	816,678	814,139	0	2,539	0
R0550	Total eligible own funds to meet the MCR	816,678	814,139	0	2,539	
R0580	**SCR**	526,195				
R0600	**MCR**	213,943				
R0620	**Ratio of Eligible own funds to SCR**	155.20%				
R0640	**Ratio of Eligible own funds to MCR**	381.73%				

	Reconcilliation reserve	C0060
R0700	Excess of assets over liabilities	814,139
R0710	Own shares (held directly and indirectly)	0
R0720	Foreseeable dividends, distributions and charges	
R0730	Other basic own fund items	140,000
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	0
R0760	**Reconciliation reserve**	674,139
	Expected profits	
R0770	Expected profits included in future premiums (EPIFP) - Life business	
R0780	Expected profits included in future premiums (EPIFP) - Non- life business	260,015
R0790	**Total Expected profits included in future premiums (EPIFP)**	260,015

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
R0010	Market risk	130,101		
R0020	Counterparty default risk	48,770		
R0030	Life underwriting risk	0		
R0040	Health underwriting risk	4,021		
R0050	Non-life underwriting risk	455,192		
R0060	Diversification	-107,176		
R0070	Intangible asset risk	0		
R0100	**Basic Solvency Capital Requirement**	530,907		

USP Key

For life underwriting risk:
1 - Increase in the amount of annuity benefits
9 - None

For health underwriting risk:
1 - Increase in the amount of annuity benefits
2 - Standard deviation for NSLT health premium risk
3 - Standard deviation for NSLT health gross premium risk
4 - Adjustment factor for non-proportional reinsurance
5 - Standard deviation for NSLT health reserve risk
9 - None

For non-life underwriting risk:
4 - Adjustment factor for non-proportional reinsurance
6 - Standard deviation for non-life premium risk
7 - Standard deviation for non-life gross premium risk
8 - Standard deviation for non-life reserve risk
9 - None

	Calculation of Solvency Capital Requirement	C0100
R0130	Operational risk	34,060
R0140	Loss-absorbing capacity of technical provisions	0
R0150	Loss-absorbing capacity of deferred taxes	-38,772
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0
R0200	**Solvency Capital Requirement excluding capital add-on**	526,195
R0210	Capital add-ons already set	0
R0211	*of which, capital add-ons already set - Article 37 (1) Type a*	0
R0212	*of which, capital add-ons already set - Article 37 (1) Type b*	0
R0213	*of which, capital add-ons already set - Article 37 (1) Type c*	0
R0214	*of which, capital add-ons already set - Article 37 (1) Type d*	0
R0220	**Solvency capital requirement**	526,195
	Other information on SCR	
R0400	Capital requirement for duration-based equity risk sub-module	0
R0410	Total amount of Notional Solvency Capital Requirements for remaining part	0
R0420	Total amount of Notional Solvency Capital Requirements for ring fenced funds	0
R0430	Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	0
R0440	Diversification effects due to RFF nSCR aggregation for article 304	0

		Yes/No
	Approach to tax rate	C0109
R0590	Approach based on average tax rate	Yes

	Calculation of loss absorbing capacity of deferred taxes	**LAC DT**
		C0130
R0640	LAC DT	-38,772
R0650	LAC DT justified by reversion of deferred tax liabilities	-34,673
R0660	LAC DT justified by reference to probable future taxable economic profit	0
R0670	LAC DT justified by carry back, current year	-4,099
R0680	LAC DT justified by carry back, future years	0
R0690	Maximum LAC DT	0

S.28.01.01

Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

	Linear formula component for non-life insurance and reinsurance obligations	C0010
R0010	MCR_{NL} Result	213,943

		Net (of reinsurance /SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	C0030
R0020	Medical expense insurance and proportional reinsurance	7,218	5,133
R0030	Income protection insurance and proportional reinsurance	3,903	6,236
R0040	Workers' compensation insurance and proportional reinsurance	0	606
R0050	Motor vehicle liability insurance and proportional reinsurance	215,111	101,318
R0060	Other motor insurance and proportional reinsurance	49,455	118,493
R0070	Marine, aviation and transport insurance and proportional reinsurance	224,778	352,380
R0080	Fire and other damage to property insurance and proportional reinsurance	173,061	245,880
R0090	General liability insurance and proportional reinsurance	322,458	205,637
R0100	Credit and suretyship insurance and proportional reinsurance	0	0
R0110	Legal expenses insurance and proportional reinsurance	1,085	1,347
R0120	Assistance and proportional reinsurance	20	133
R0130	Miscellaneous financial loss insurance and proportional reinsurance	9,586	20,627
R0140	Non-proportional health reinsurance	0	0
R0150	Non-proportional casualty reinsurance	0	0
R0160	Non-proportional marine, aviation and transport reinsurance	0	0
R0170	Non-proportional property reinsurance	0	0

	Linear formula component for life insurance and reinsurance obligations	C0040
R0200	MCR_{L} Result	0

		Net (of reinsurance /SPV) best estimate and TP calculated as a whole	Net (of reinsurance /SPV) total capital at risk
		C0050	C0060
R0210	Obligations with profit participation - guaranteed benefits		
R0220	Obligations with profit participation - future discretionary benefits		
R0230	Index-linked and unit-linked insurance obligations		
R0240	Other life (re)insurance and health (re)insurance obligations		
R0250	Total capital at risk for all life (re)insurance obligations		

	Overall MCR calculation	C0070
R0300	Linear MCR	213,943
R0310	SCR	526,195
R0320	MCR cap	236,788
R0330	MCR floor	131,549
R0340	Combined MCR	213,943
R0350	Absolute floor of the MCR	2,700
R0400	**Minimum Capital Requirement**	213,943