LifeStar Insurance PLC

Solvency and Financial Condition Report 2024 (SFCR)

LifeStar

SOLVENCY AND FINANCIAL CONDITION REPORT

Contents

Executive Summary

This Solvency and Financial Condition Report has been prepared by LifeStar Insurance Plc (hereinafter “LSI”) in accordance with all applicable laws and regulations. It refers to the financial year ended on 31st December 2024 (“the reference date”).

LSI is registered in Malta and regulated by the Malta Financial Services Authority. It is a provider of insurance products in Malta – offering customers a comprehensive range of protection, savings, investment and retirement life insurance products. LSI has been present in Malta for six decades with a mission to be the local leader through its personalised approach and product innovation. The insurance company operates a large network of Tied Insurance Intermediaries and forms part of The Group (LifeStar Holding plc), an insurance and financial services group. In 2024 LSI embarked on a new venture, that of passporting its products into other EU member states. We are pleased to announce that in September 2024 we started selling life protection polices throughout Italy.

An important part of the business involves managing the treasury function, investing policyholder and shareholder funds across a wide range of financial investments, including equities, fixed income securities and to a lesser extent properties. LSI results are sensitive to the volatility in the market value of these investments, either directly because the Company bears the investment risk, or indirectly because the Company earns management fees for investments managed on behalf of policyholders. Throughout 2024 investment conditions remained quite volatile, with interest rates reducing though not at the expected rate, stabilising inflation, continued Russia-Ukraine and middle-east conflicts and recession fears. There are still a number of geopolitical incidents that further add to the uncertainty in the global economies.

The Company continued to undertake restructuring and transformation activities to align the business operations with the Board approved strategy. This has helped introducing efficient working practices and improved corporate governance. Relentless efforts to differentiate ourselves from the market started during the past few years and will continue, with a stronger emphasis in 2024. The enhancements made to our product suite helped facilitate improved competitiveness and marketability, thus generating positive results. The rebranding of the insurance company undertaken in 2020 reflects the positive changes made to establish the Company as a trusted, forward looking and respected player in this segment. In line with the company’s growth strategy, a strategic decision was made to expand the business into other EU countries, starting with Italy, in order to reach new markets beyond the Maltese islands.

During 2021 the Company changed its status from a limited liability company to a public limited company listed on the Malta Stock Exchange. In this regard, LifeStar Holding gave its shareholders the opportunity to exchange their shares for those in LifeStar Insurance Plc. During this IPO the Company also issued an Unsecured 4% Subordinated Bond which is also listed on the Malta Stock Exchange.

The Company maintains a robust governance system that is considered effective in ensuring the sound and prudent management of the organization. This governance framework has continued to strengthen over the year under review. Our Non-Executive Director, Mr. Jean Paul Fabri, has consistently evaluated our structures and procedures to enhance overall governance. Throughout 2024, we sustained our commitment to an ongoing training and development program for both the Board of Directors and our staff, building on initiatives introduced in previous years. We continue to invest significantly in technology, maintaining cutting-edge systems and IT infrastructure. Additionally, we entered into a 10-year strategic agreement with Vermeg Ltd, the developers of our policy management system, Solife. We are currently transitioning most of our systems to two cloud infrastructure platforms, aligning more closely with DORA's system resilience standards.

Our risk management policy provides for a thoroughly articulated risk appetite statement and a closely monitored risk management system ensuring that the company is not exposed to any unwanted risks. Periodic workshops are conducted to ensure that any new risks are identified and mitigating measures are undertaken.

The current market conditions; including very complex geopolitical scenarios across the globe, high interest rates and stabilizing inflation, continue to impact the business in the foreseeable future. The Directors continue to monitor the market situation closely and have assessed the Company's financial position and performance for 2024 in order to mitigate the impact brought about by these external market conditions as well as its impact on capital. Such analysis was also extended to analyse the effect on the Solvency Capital Requirements (the "SCR") of the Company by reference to the stressed test scenarios in latest ORSA (Own Risk and Solvency Assessment) reports prepared by the entity.

The Company registered a loss before taxation for the year ended 31st December 2024 of €537,821 compared to a restated profit before tax of €476,550 in the prior year. The Company's total comprehensive loss for the year is €243,044 compared to restated total comprehensive income of €579,552 registered in 2023. The negative results were brought about by unfavourable performance in the investment portfolio and higher expenses. Nevertheless, the insurance revenue has increased by 5% when compared to the previous period. The net assets of the Company decreased from €25.08M in 2023 to €24.84M for the period ended December 2024.

LSI recorded an increase in premium written in most of its lines of business; including life insurance protection business, long term savings business, group life business and pension products. Insurance Revenue has increased from €5.64M in 2023 to €5.94M in 2024, an increase of 5% over the previous period. The Insurance Service Expense has increased by 68% from €1.90M in 2023 to €3.20M in 2024. The expense from Reinsurance Contracts Held decreased by 54% from €1.39M in 2023 to €0.65M in 2024. Net investment income in 2024 amounted to €14.24M compared to €8.41M in 2023, an increase of 69%. The Insurance finance expense increased by 54% from €7.97M in 2023 to €12.29M in 2024. The Net Insurance Financial result increased from €1.67M in 2023 to €1.80M in 2024.

On 1st January 2023, LSI adopted IFRS 17 'Insurance Contracts'. International Financial Reporting Standard (IFRS) 17 brought in several fundamental changes to the "traditional" financial statements that we were accustomed to reading. The ones that impacted the Balance Sheet the most were the elimination of Value -of-in-Force Business (ViF), Re-insurers share of technical provisions and technical provisions. These were replaced with Reinsurance contract assets, Insurance contract liabilities and Investment contract liabilities. All these changes have caused a change in our retained earnings. Under IFRS 4 (the old reporting standard), our retained earnings as at 2022, stood at €5.8M. With the adoption of IFRS 17, retained earnings were restated at €13.2M in 2022. This increase in retained earnings was subject to income tax and LifeStar Insurance incurred a tax liability of €3.5M. LSI has adopted the deferred tax payment mechanism and has 5 years in which to settle this tax liability in equal instalments. In 2024, the retained earnings have decreased from €13.70M in 2023 to €13.46M. This has adversely impacted our Solvency Coverage Ratio (SCR). At the reference date, the Solvency Capital Requirement amounted to €18.83M (2023: €18.7M) and the eligible own funds available to cover this requirement amounted to €26.68M (2023: €27.7M). Hence, the ratio of eligible own funds to SCR at the reference date amounted to 142% (2023: 148%). The Company expects to maintain a robust capital position which is highly resilient to stressed conditions.

A. Business Performance

A.1 Business

A.1.1 Name and legal form of undertaking

LifeStar Insurance Plc (LSI) is a public liability company incorporated under the laws of Malta on December 21, 2001 with company Registration Number: C29086.

Its registered address is: LifeStar, Testaferrata Street, Ta' Xbiex, XBX 1403, Malta.

LSI was established in 1965 through a Malta branch of British American Insurance Co. Ltd. It then became a Life Insurance Principal offering a comprehensive range of both Protection and Savings Insurance products.

In 2021 it took the bold step to become listed on the Malta Stock Exchange.

A.1.2 Supervisory authority

The Company is authorised and regulated by the Malta Financial Services Authority (MFSA) of Triq L-Imdina, Zone 1, Central Business Centre, Birkirkara, CBD 1010, Malta.

A.1.3 External Auditors

The external auditors for financial year 2023 were GrantThorton Malta. GrantThorton Malta are located at Fort Business Centre, Level 2, Triq L-Intornjatur, Zone 1, Central Business District, Birkirkara.

A.1.4 Shareholders

LSI is a subsidiary of LifeStar Holding Plc, a financial services and insurance group incorporated in Malta which is also listed on the Malta Stock Exchange. The Company is treated as a solo legal entity for insurance supervision purposes.

The main shareholders of LifeStar Holding Plc are:

Investar Plc – 60.58%

GlobalCapital Financial Management Limited as nominee for client accounts – 30.81%

General Public – 8.61%

A diagram of the structure of the group can be seen in Appendix A.

A.1.5 Material lines of business and material geographical areas where the company carries out business

The Company is authorised to carry on long-term insurance business in Malta as a principal under Class I (Life and Annuity) and Class III (Linked Long Term Contracts of Insurance) in terms of the Insurance Business Act, 1998.

LifeStar Insurance Plc is engaged principally in ordinary life assurance business (interest sensitive and term), industrial life assurance business (home service) and linked long term contracts of insurance.

It provides both single and regular premium savings and investment products and a range of life assurance products, including level and decreasing term, and group life policies. Critical illness and Permanent Total Disability coverages are also provided through mainly rider benefits attached to the main contracts.

Pursuant to Regulation 9 of the European Passport Rights for Insurance and Reinsurance Undertakings Regulations, 2015, the Malta Financial Services Authority (MFSA) has, in 2024, authorized the company to conduct the business of insurance in Italy under the EU's single market provisions. This authorization pertains to the provision of services in the following class of business on an insurance basis: Class I – Life and Annuity.

A.1.6 *Any significant business or other events that have occurred over the reporting period that have had a material impact on the undertaking*

During 2024 the Company registered an increase in the ordinary business, mainly protection, unit linked and group life business. Also, business deriving from the pension product has been increasing year on year since it was launched in 2020.

An important part of our business involves managing the treasury function, investing policyholder and shareholder funds across a wide range of financial investments, including equities, fixed income securities and to a lesser extent properties. LSI results are sensitive to the volatility in the market value of these investments, either directly because we bear the investment risk, or indirectly because we earn management fees for investments managed on behalf of policyholders. Throughout 2024, investment conditions remained quite volatile, with interest rates reducing, though not at the pace we would have expected and stabilising inflationary pressures, accompanied with wider global economic risks including geopolitical risks and recession fears. The change in the US Presidency may add further complexities to an already uncertain economic environment.

The Company continued to undertake restructuring and transformation activity to align the business operations with the Board approved strategy. Relentless efforts to differentiate ourselves from the market started during the course of the year and will continue, with a stronger emphasis in 2024. The enhancements made to our product suite helped facilitate improved competitiveness and marketability, thus generating positive results.

On 1st January 2023, LSI adopted IFRS 17 'Insurance Contracts' and IFRS 9 'Financial Instruments'. The new accounting standard governing Insurance Contracts became effective for annual periods beginning on or after 1st January 2023. The effective year to implement IFRS 9 was 2018, however LSI elected to apply the temporary exemption for qualifying insurers to apply IFRS 9 together with IFRS 17. The implementation of these two new accounting standards resulted in significant changes in accounting recognition, measurement and disclosures.

LSI registered a loss before tax of €0.54M for the year ended 31 December 2024, compared to a restated profit before tax of €0.48M in 2023. Total assets increased by 8% from 2023 to 2024, with a value of €144.34M at 31 December 2023 to €155.83M at the end of the current reporting period. Reinsurance Contract Assets increased from €2.57M in 2023 to €3.57M in 2024. Insurance Contract Liabilities increased by 10% from €105.16M in 2023 to €115.65M in the current reporting period. An increase of 29% was registered in Investment Contract Liabilities from the restated amount of €6.71M in 2023 to €8.62M in 2024. LifeStar Insurance Limited's Solvency II ratio stood at 142% as at year end.

During the previous year, some of the major changes brought about by the new accounting standard, IFRS 17, saw the eliminations of the value of in-force business, the technical reserves and the Re-Insurance' share of Technical provisions. The effect of these eliminations together with the introduction of new lines in both the Statement of profit or loss and Other comprehensive income and the Statement of financial position have materially impacted the retained earnings figure which increased from €5.8M under IFRS 4 in 2022 to a restated €13.70M under IFRS 17 in 2023, as disclosed in note 31 of the financial statements. In 2024, the retained earnings stood at €13.46M.

LifeStar Insurance experienced a positive Net Insurance Financial Result for the period ending 31 December 2024. This amounted to €1.80M compared to €1.67M at the end of the comparative period. In addition, the performance of the investment portfolio has been more positive than previous year with most of the investments in the portfolio performing well.

A.2 Underwriting performance

The Company continued to maintain a sound position in most lines of business, including protection, unit linked and pension business. Insurance Revenue has increased by 5%, from €5.64M in 2023 to €5.94M in 2024. The Insurance Service Expense in 2024 amounted to €3.20M compared to €1.90M in 2023. The Net Expense from Reinsurance Contracts Held decreased by 54% from €1.39M in 2023 to €0.65M in 2024. Net investment income in 2024 amounted to €14.24M compared to €8.41M in 2023. The Net Insurance Financial result increased by 8% from €1.67M in 2023 to €1.80M in 2024.

The Company took various initiatives to maintain and improve a strong level of business performance. Year on year, the company aims at intensifying its efforts to recapture an amount of maturing business, which it completed successfully. Additionally, the sales force of the company takes part in the annual trade fair being held with the aim of attracting new clients.

The reinsurance arrangements we have in place worked very effectively in reducing the underwriting exposure within the company's tolerance limits and to help smooth underwriting profitability as well as enable us to provide competitive premium rates for our protection business.

	2024	2023
	€	€
Insurance Revenue	5,935,707	5,638,941
Insurance Service Expense	(3,201,372)	(1,903,944)
Insurance service result from insurance contracts issued	**2,734,335**	**3,734,997**
Allocation of Reinsurance Premiums Paid	(2,260,570)	(2,284,581)
Amounts Recovered from reinsurers	1,610,853	885,840
Net Expense from reinsurance Contracts held	**(649,717)**	**(1,398,741)**
Insurance Service Result	**2,084,618**	**2,336,256**

The Company forecasts its results over its business planning horizon as part of its Own Risk and Solvency Assessment. According to our forecasts, we expect to maintain the same levels of growth and profitability to be enhanced further. In addition, there are plans to utilise our strong capital base and network of business affiliations for expanding the business to other EU regions through freedom of services upon regulatory approval.

A.3 Investment Performance

Investment performance remains key to our overall profitability as is typically the case with most life insurers. Our strategic asset allocation is determined following thorough investigations and asset liability modelling and aims to maximise returns subject to predefined risk tolerance limits safeguarding that no unwanted investment risk is taken on.

The Company's investment portfolio is managed by an independent investment manager and the portfolio performance is reviewed at least quarterly by the Company's Asset Liability Committee (ALCO) and the Board of Directors.

Management information is regularly prepared by the investment manager to the ALCO so that the portfolio can be monitored. The ALCO regularly reviews the investment performance, challenges the investment manager, sets the investment strategy and reviews investment recommendations above certain thresholds. In addition, the marginal increase in capital requirement is assessed by the Company prior to concluding any placement

LifeStar Insurance plc has two loan notes, under unlisted investments, titled Stellium Equity Notes and Stellium Credit Notes (the "Stellium Notes"). Eram Capital Advisors Luxembourg ("Eram"), in their capacity as the Calculation Agent, Advisor and Alternative Asset Manager of the Securitised Vehicles (SVs) linked to the Stellium Notes, confirmed to the company that a sales process is underway for the sale of Stellium Holdings Limited, but there is no certainty that this will be completed. Eram has also confirmed that LifeStar's held notes are valued at par as at 31 December 2024.

On the basis of the above, the Directors are of the opinion that given the limited information that is available due to the sales process that is underway, and on the strength of the confirmations received from ERAM as the Calculation Agent of the SVs, the Stellium Notes are to continue being carried at their face value in these financial statements. However, the outcome of the sales process is not certain and consequently, should this not materialize, part or all of the value of these investments may have to be impaired impacting the Solvency Capital Ratio (SCR).

During 2019, a new asset liability management strategy has been implemented which includes the ring-fencing of the assets to the different liability buckets.

This has contributed to a better asset liability matching and therefore has reduced the level of volatility in the investment returns.

The composition of the investment portfolio as at 31.12.2024 and 31.12.2023 was as follows:

ASSET CLASS - €' 000s	2024	2023
Fair Value through Profit or Loss		
Debt Securities: Fixed Interest rate	14,302	17,420
Equity Securities and units in unit Trusts	25,019	29,732
Assets Held to Cover linked Liabilities: CISs	65,656	46,691
Available for Sale Investments	-	-
Investments in Equity Measured at Cost	-	-
Loans and Receivables	3,299	3,134
Term Deposits	300	-
Investment Property	13,692	15,851
Cash at bank and In-Hand	1,013	3,497

A.3.1 Income and expenses arising from investments by asset class

Type - €'000s	2024	2023
Fixed Income Securities	664	844
Equities	785	590

Available for Sale Investments	-	-
Investment Property	149	249
Cash at bank and In-Hand	(61)	(59)
Loans and Receivables	253	277
Other	93	(70)

Income arising is composed of dividends, interest and rental income received.

A.3.2 *Any gains and losses recognised directly in equity*

Since the application of IFRS 9, no gains or losses are being recognised in equity.

A.4 Performance of other activities

A.4.1 *Other material income and expenses*

The Company does not have any material leasing arrangement or any other material income and expense item in addition to the underwriting and investment income and expenses outlined in the sections above.

A.5 Any other information

A.5.1 *Events after the financial reporting date*

There is no other material information regarding the business and performance of the Company which has not already been disclosed in the sections above.

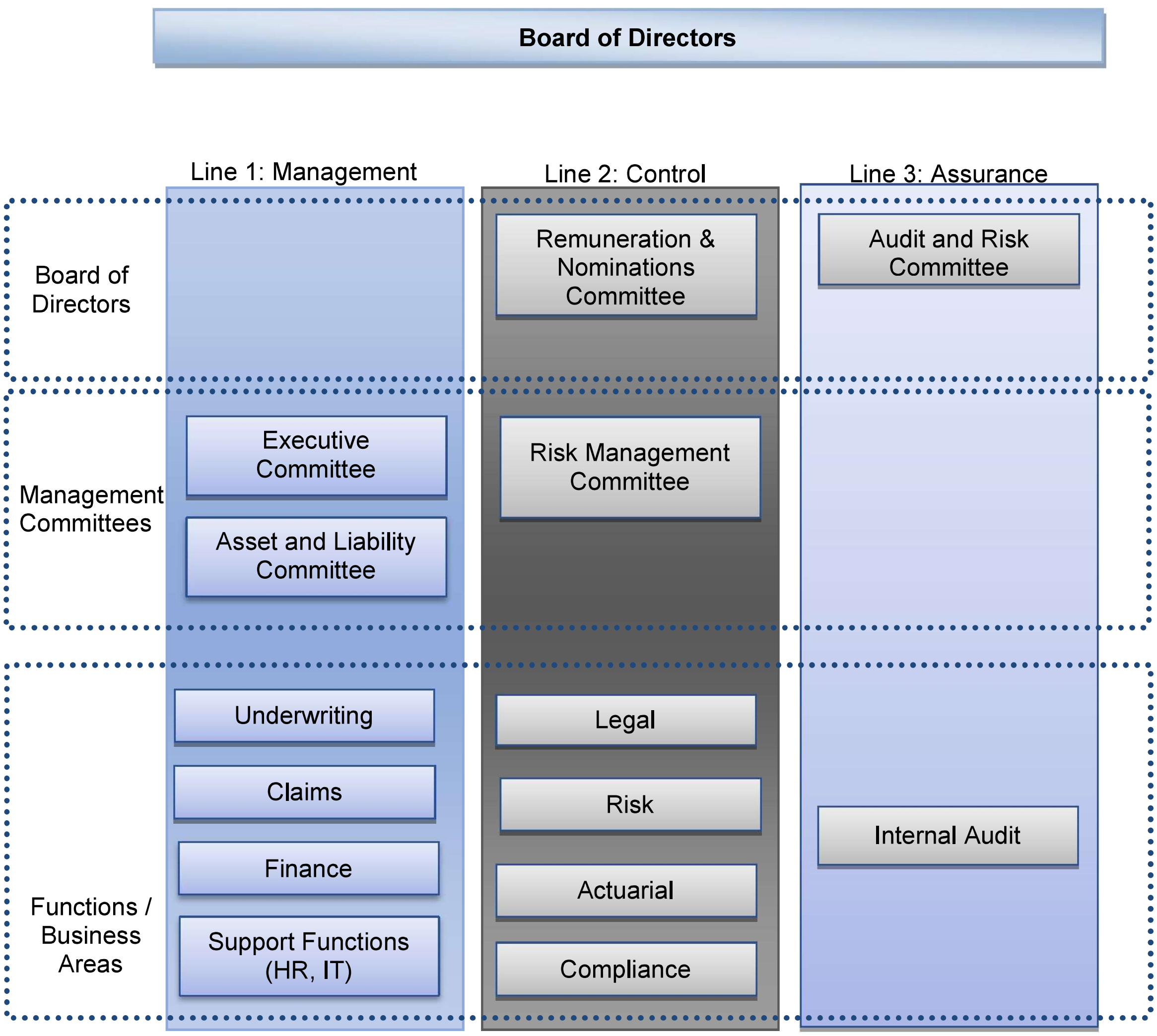
B. System of Governance

B.1 General information on the system of governance

LSI is committed to implementing a sound governance framework that provides for the sound and prudent management of the business based on the following principles:

- Transparent organisational structure;
- Strategic objectives and corporate values communicated throughout LSI;
- Clear lines of responsibility and accountability throughout LSI;
- BOD members and Senior Management are qualified for their positions, have a clear understanding of their role in the corporate governance and are able to exercise sound independent judgment about the affairs of LSI and that Fit and Proper requirements are met;
- There is appropriate oversight of LSI's activities through the three lines of defence model
- Effective utilisation of the work conducted by internal and external auditors, as well as other control functions, given their critical contribution to sound corporate governance;
- Compensation policies and practices are consistent with LSI's ethical values, objectives, strategy and control environment

The Corporate Governance framework for LSI is based on the 'three lines of defence model' as presented in the diagram below:



The “three lines of defence” model supports the implementation of a robust internal control system and is aligned with the ‘four eye principle’ that LSI endorses. In practice, there is sufficient control and challenge at all levels of the organization.

B.1.1 *The structure of the Board of Directors (BoD)*

The BoD represents the Company’s administrative, management and supervisory body. The BoD is the main body of the governance system and is ultimately accountable and responsible for the Company’s strategy, performance and risk appetite.

The BoD is responsible for leading and controlling the Company, devising strategies and plans for their implementation and reviewing and evaluating the Company’s performance against such strategies and plans.

The BoD organises and directs the affairs of LSI in a manner that seeks to protect its policyholders’ funds, maximize the value of LSI for the benefit of its shareholders, while complying with regulatory requirements and relevant governance standards.

The BoD is responsible for setting the appropriate “tone at the top” by providing appropriate Organisational values, ethics and priorities and by establishing and embedding an Organisational culture that supports the effective operation of the system of governance.

Furthermore, the members of the BoD act as advisers and counsellors to the Chief Executive Officer (CEO) and Senior Management and oversee the Senior Management’s performance.

The Directors are responsible for the general governance of LSI, its proper administration and management and for the general supervision of its affairs. The day-to-day management of LSI is delegated by the Directors to the CEO and the executive committee (the “Executive Committee”) consisting of the Company’s senior management.

B.1.1.1 Selection and Appointment of Board Members

In accordance with the Company’s articles of association, the Directors of the Company shall be elected on an individual basis by ordinary resolution of the Company in general meeting. An election of Directors shall take place at every annual general meeting of the Company, unless circumstances otherwise require.

All Directors, except a Managing Director (if any), shall retire from office at every AGM, but shall be automatically eligible for re-election after each such retirement.

The Board may appoint from its number a Chairman and a Deputy Chairman who shall hold office for a period of one (1) year unless otherwise decided by a simple majority vote of the Board. The Chairman shall not occupy the position of Chief Executive Officer Upon termination of his appointment, the Chairman (and the Deputy Chairman, if any) shall be eligible for re-appointment.

The current members of the Board of Directors of LSI are as below:

Prof. Paolo Catalfamo - Executive Chairman

Mr Joseph C Schembri - Non-Executive Director

Mr. Andreas Shakallis - Non-Executive Director

Mr. Jean Paul Fabri - Non-Executive Director

Mr. Mark Bamber - Non-Executive Director

All members of the Board and Senior Management should fulfil the Fit and Proper requirements in accordance with the Solvency II framework. LSI lays general criteria that need to be met for compliance with the Fit and Proper requirements which are documented in its Governance Policy.

B.1.1.2 Board Meetings

The BoD shall meet formally at least 4 times a year in the context of its regular duties in the annual business cycle. Additional meetings may also be held upon such need as identified by the senior management or by members of the BoD or its Committees.

B.1.1.3 Board Committees

For a more effective organisation of LSI, the Board established the below-mentioned Committees. These Board Committees are made up of independent non executive director.

Committee	Brief Terms of Reference	Composition
Audit and Risk Committee *	The Committee is accountable to the BoD and has oversight responsibility for financial reporting, internal control and audit processes across the entire Company.	Mr Joseph Schembri (Chairman) Mr. Andreas Shakallis Mr. Mark Bamber
Nominations and Remunerations Committee *	The Nominations and Remuneration Committee is responsible for making recommendations for appointment to the Board and for reviewing the constitution of the Board, in order to ensure that appointments to the Company's Board are conducted in a systematic, objective and consistent manner. It is also responsible for the review of performance of the Board members and committees, the appointment of senior executives and management and the development of a succession plan for senior executives and management. Additionally, this committee monitors, reviews and advises on the Company's remuneration policy as well as approves the remuneration packages of senior executives and management.	Mr. Mark Bamber (Chairman) Mr Joseph Schembri Mr. Jean Paul Fabri

B.1.2 Organisational Structure

The Organisational structure and reporting lines of LSI are designed to:

- Enable apportionment of responsibilities and clear accountabilities and responsibilities
- Facilitate prompt transfer of information to all persons who need it
- Prevent conflicts of interest
- Ensure the prudent and effective management of LSI
- As previously mentioned LSI's ultimate supervisory body is the BoD.

The Senior Management, through the Chief Executive Officer (CEO) has the day-to-day responsibility for the implementation of the BoD's approved strategy and reports to the BoD. Reporting to the BoD is both structured, through planned meetings and regular reporting and ad hoc as required.

The Business Functions of LSI have the responsibility for the implementation of the BoD's strategy in their business functions. They report directly to the CEO with regards to their day-to-day duties and to the management committees. In order to minimize the probability of a potential conflict of interest and preserve their operational independence, the key control functions have additional direct reporting lines to the BoD or Board Committees. These additional reporting lines are implemented in order to ensure that these functions have the ability to escalate important issues directly to the BoD. Consequently, the Risk, Internal Audit, Compliance and Actuarial Functions have a reporting line to the Board of Directors.

The Organisational structure of LSI is presented in Appendix B.

B.1.3 Management Committees

The Executive Committee (EXCO)

EXCO operates as a direct management committee under the authority of the LSI's Board of Directors and is responsible for the overall delivery of the company's strategy.
EXCO also acts as Product and Pricing Committee with the prime responsibility to approve and oversee the implementation of new products, new terms for new and existing products, marketing campaigns, to the performance of all products and ensure that the products, the product designs and the product distribution are aligned with the target market and with the identified customers' needs.
EXCO meets at least ten times a year and executes the first line in management responsibilities.

Asset and Liability Committee (ALCO)

ALCO's primary responsibilities are to report and advise the Board of Directors on all matters pertaining to the balance sheet (asset and liabilities) and investments of LSI's monies. ALCO is also responsible for managing balance sheets, associated risks and earnings (economic, IFRS) and capital levels to achieve performance objectives within prescribed risk parameters.
ALCO reviews and submits to the Board of Directors for approval the Investment Policy of the Company on an annual basis and ensures that the investments of the Company are in compliance with the Prudent Person Principle as directed by the article 132 of the Solvency II Directive.
ALCO monitors the investment performance of the Company on a regular basis and ensures that an appropriate governance framework is in place for the appointment and monitoring of the activity of external or internal asset managers.
ALCO meets at least quarterly and executes the first line management responsibilities. ALCO is co-chaired by the Group Chief Financial Officer and LifeStar Insurance CEO.

Risk Management Committee (RMC)

RMC operates as a direct management committee under the authority of the Audit Committee of the Board of Directors and is responsible for the overall enterprise-wide management of all risk within LSI or impacting LSI.
RMC is responsible for the ongoing monitoring, assessment, reporting and management of the risk environment and the effectives of the risk management framework.
RMC meets at least half yearly and executes the second line of defence responsibilities.

B.1.4 Key Functions

In accordance with the Solvency II framework they Key Functions recognised by the BoD are the following:

- Actuarial Function
- Risk Management Function
- Compliance Function
- Internal Audit Function

Details of the duties of these functions are shown in subsequent sections.

Each key function reports directly to the Board without any restrictions and the Board is ultimately responsible for reviewing the performance of the key functions and considering any recommendations made by these functions.

The Board is also responsible for ensuring that all key functions are operationally independent, which implies that each function should be free from any undue influence, control or constraint from any other key function or the Board itself.

The position of each function in the “three lines of defence model” are also clearly shown in the diagram in the previous section.

B.1.5 Remuneration policy and practices for the BoD and employees

The Company has in place a remuneration policy which ensures that any remuneration is in line with the market norms in order to enable the company to attract competent and experienced resources and ensure that any resources that it engages do not take excessive risks that could be detrimental to the company. With regards to the awarding of any performance bonuses, at the end of each financial year the CEO together with the executive management propose what global amount of the company’s profits is to be distributed by way of performance bonus to the employees. The proposed amount is forwarded to the remuneration committee and the Board of Directors for final approval, and once this is approved the total amount is distributed to employees depending on their individual performance in the preceding year.

With regards to any commission-based remuneration, the company ensures that all commission rates are in line with market rates and that these rates do not expose the company to any potential risks, primarily mis-selling and policy churning.

The remuneration policy is reviewed and maintained by the Remuneration Committee and is approved by the BoD. The BoD are responsible for the implementation of the Remuneration Policy in LSI and specifically its application to BoD.

The Company’s remuneration policy does not include any supplementary pension for the Board members or senior management.

B.2 Fit and proper requirements

Prior to the appointment of any member of the BoD, member of senior management of Key Function the company carries out an evaluation of the fitness and propriety of that individual. Furthermore, such appointments are subject to approval by the MFSA.

The function delegated with the responsibility for the Fit and Proper test is the Compliance function. The Compliance Function also bears the responsibility for monitoring the fitness and propriety of individuals on an ongoing basis.

The fit and proper test criteria satisfy at a minimum the relevant regulatory requirements as well as additional criteria laid down by the Company.

The Fitness test assesses the individual’s professional and technical competence through a consideration of:

- previous experience, knowledge and professional qualifications and whether these are adequate to enable sound and prudent management of the Company;
- proof of skill, care, diligence and compliance with the relevant standards of the area/sector he/she has previously worked in;

The Propriety test assesses honesty, integrity, reputation and financial soundness of the individual by considering their:

- reputation, including an enquiry as to whether there have been any criminal or financial antecedents or past experience with regulatory authorities which may cast doubt on the ability of that person to adequately discharge his/her duties in line with applicable rules, regulations and guidelines.

The assessment is facilitated through:

- personal questionnaires
- academic and/or professional qualification certificates
- certificate of non-bankruptcy
- clear criminal record certificate

- personal resume and
- personal declaration.

In particular, with regards to members of the BoD they must always have the collective knowledge of the financial and insurance market, business strategy, system of governance, financial and actuarial analysis and the regulatory framework and requirements.

The detailed criteria and documentation requirement in the context of the fit and proper test are describe in the company's governance policy which is also subject to review on an annual basis.

The fitness of employees is the responsibility of the Human Resources department and is implemented through the recruitment process.

Furthermore, all Directors and members of staff must comply with the Company's code of conduct.

The table below sets out the roles which are considered to require enhanced fit and proper checks:

Function	Function Holder
Board of Directors	
Executive Chairman	Prof Paolo Catalfamo
Director	Mr. Joseph Schembri
Director	Mr. Andreas Shakallis
Director	Mr. Mark Bamber
Director	Mr. Jean Paul Fabri
Committees Members	
Members of Audit and Risk Committee	
Members of Nomination and Remuneration Committee	
Key Functions	
CEO	Mr. Roberto Apap Bologna
Actuarial Function	Ms. Maria Michaelides (Deloitte Cyprus)
Risk Function	Mr. Dimitris Dimitriou (Deloitte Cyprus)
Appointed Actuary	Mr. Marios Schizas (Deloitte Cyprus)
Compliance Officer	Dr Enrico Depasquale
Money Laundering Risk Officer (MLRO)	Mr. Edward Duncan
Internal Auditor	BDO Malta - Mr. Dhayalaruban Thangaraja (Ruban)
Other Key and Important Functions	
Chief Operations Officer	Mr Jonathan Camilleri
Chief Financial Officer	Ms. Amanda Mifsud
Chief Information Officer	Mr Adrian Mizzi
Head of Legal and Compliance	Mr Michael Schembri
Investment Manager	Mr Konrad Camilleri
Head of Sales	Mr Chris Chetcuti
Head of Life Operations	Mr Jonathan Portelli
Head of Human Resources	Mr. John Bezzina
Company Secretary	Dr. Clinton Calleja
Independent Investment Advisor	Mr. Keith Huber

B.3 Risk management system

B.3.1 Description of the company's risk management system

The Company has implemented an effective risk management system which is designed to ensure timely identification and assessment of existing and emerging risk exposures as well their effective management. The risk management system is comprehensively addressed in the company's risk management policy which provides for the **risk governance**, a **risk appetite** statement and the **risk management framework**.

The risk management policy comprises of sub-policies for all main categories of risk namely: Underwriting Risk, Investment and Asset Liability Risk, Credit Risk, Liquidity Risky, Concentration Risk, Operational Risk and Reinsurance. It is approved by the BoD and is reviewed at least once a year.

B.3.1.1 Risk Appetite Statement

The Company's vision is to be the local leader for product innovation and provide value for money insurance solutions.

The risk appetite statement lays down the level and nature of risks that are considered acceptable for the Company and the constraints within which it should operate in pursuing its strategy.

LSI manages its risk appetite through a set of limits. The aggregate risk limits and the risk category limits are to be used by the Risk Management Function for the monitoring and reporting of overall risk exposure and by the BoD and Risk Committee for making decision on the Company's risk profile.

The Company aims to maintain sufficient available capital to adequately cover all risks faced by the Company and to meet regulatory solvency requirements.

The Company has a target solvency ratio of **140%.** The Company aims to maintain a solvency ratio at all times in excess of 125%. Tactical deviations from this ratio are tolerable only in exceptional circumstances and upon prior communication to the BoD. In any case the SCR coverage ratio must not fall below 115% at any time.

In this context, tolerance limits are set for all risk categories to ensure that on a worst-case scenario basis, risk exposures will not lead to losses threatening this target solvency ratio.

B.3.1.2 Risk Governance

The risk governance of the Company forms an integral part by defining the role of each function of the company in the Risk Management Framework. It is organised in a way that ensures the establishment of clear responsibility boundaries, the proper segregation of duties and the avoidance of conflicts of interest at all levels.

As mentioned in previous sub-sections, the system of governance is based on the "three lines of defence model" safeguarding that risk management is embedded into the organisational structure and decision-making processes of the company and that the risk management system is supported by appropriate internal controls and by information systems that provide relevant, accurate and reliable information.

The roles of the key functions in the Risk Management System are outlined below:

Body / Function	Roles in the risk management framework
BoD	• The responsibility for the approval and periodic review of the risk profile and risk appetite, as well as the risk strategy and the policies for managing risks, lies with the BoD, so as to ensure that the BoD takes all measures necessary for the monitoring and control of risks, in accordance with the approved risk strategy and policies. This information reaches the BoD through the Risk Management Committee.
Risk Management Committee (RMC)	• RMC is responsible for the ongoing monitoring, assessment, reporting and management of the risk environment and the effectives of the risk management framework; • RMC should drive a consistent and sustainable risk profile that reflects LSI's risk appetite and ensure timely recognition and remediation of current and emerging risks; • Ensure that the Risk Appetite Framework approved by the Board of Directors is embedded in all relevant areas of the business and monitor risk exposures versus appetite; • Review, monitor and report any breaches of risk limits and the adequacy of proposed actions; • Review the embeddedness and effectiveness of the Company's internal controls and risk management systems; • Assess and monitor the impact of any risk-related matters that transcend, or relate to, boundaries with other Group Business and/or Functions; • Oversight of risk emerging from the use of services provided by Group and third party providers; • Promote a supportive business culture in relation to risk management and controls;
Risk Management Function (RMF)	• Supports the BoD in the determination and implementation of the risk strategy and capital planning; • Coordinates the implementation of the risk management framework and is the main unit for risk management responsibilities; • Regular reporting to the Senior Management and Risk Management Committee • Risk management training to the BoD, Committees, Senior Management and Risk taking functions directly involved in the management and oversight of risk, on the contents of the current and other risk-specific policies, and for providing guidance on their application; • Moreover, the RMF continuously reviews the compliance of the Risk Management Policy with Solvency II requirements and the appropriateness of risk strategy with Company objectives, appetite and limits, and informs the Risk Management Committees of any changes that may be required; • Monitors the risk profile of the Company against the BoD's risk appetite; • Develops internal risk methodologies and models; • The RMF also brings to the attention of the Risk Management Committee and the Board of any breaches of the Risk Management Policy; • The full responsibilities of the RMF are documented in the Risk Management Policy
CEO and Senior Management with risk taking capacity	• The Company's CEO and Senior Management is responsible for the implementation of the risk strategy, as this has been approved by the BoD, and for the development of the policies, methodologies and procedures required to

	identify, measure, monitor and control every type of risk, in accordance with the nature and complexity of the Company's operations • They also have the responsibility to apply the framework in their day to day activities
Business Units	• The individual business units under the direction of their Heads have the responsibility to know and apply the requirements of the risk strategy and Policies in their area of business
Actuarial Function	• The Actuarial function is a specialist function that advises the Senior Management of the Company on the calculation of technical provisions and capital requirements, as well as on the technical aspects of risk management and modelling.
Compliance Function	• The Compliance Function applies suitable procedures for the purpose of achieving a timely and on-going compliance of the Company's risk management framework with existing and new laws and regulations.
Financial Crime Compliance Function	• The Financial Crime Compliance Function applies suitable procedures for the purpose of achieving a timely and on-going compliance of the Company's money laundering management framework with existing and new laws and regulations.
Internal Audit	• The Internal Audit Function undertakes independent reviews and testing of the risk management framework or of specific components of the framework and reports the results to the Audit Committee. The responsibilities of Internal Audit are governed by the Internal Audit Policy

B.3.1.3 Risk Management Processes

The risk management framework is a continuous process encompassing of the following key stages:

Risk Identification

The identification process is facilitated by a continuous use and review of internal and external sources of information.

Quantitative risks are identified through observation of the company's exposures through its financial records. Emerging risks are identified through external data or information.

Qualitative risks are identified through identification of events, actions or inactions (risks) that have the potential to materially impact the achievement of the objectives or the intended operation of functions and business processes. These can relate to both threats to operations or failures to take advantage of opportunities.

Stress testing, scenario analysis and sensitivity analysis are also adopted for the purposes of identifying risk exposures over the business planning horizon through the ORSA process which is described in the next section.

Risk Assessment / Measurement

The main metric for assessing quantifiable risk exposures is the 99.5% value at risk. This is a measurement of the maximum loss occurring from predefined events with a probability of 1 in 200. Additional risk metrics are a predefined set of key risk indicators encompassing all risk areas. All risk metrics correspond to a risk tolerance limit explicitly stated within the risk appetite statement. This enables the comparison of actual risk exposures against the company's tolerances indicating where further mitigating action is necessary.

Non-quantifiable risks are measured and ranked based on established criteria for frequency and severity. The frequency and severity associated with risks are assessed on an inherent and residual basis, having considered both the existence and effectiveness of the controls, by following a four-step process:

- Assessing the frequency of risk events and their resulting severity (inherent risk);
- Identifying the controls in place that prevent or detect the occurrence of the risk event or mitigate its severity;
- Assessing the design and performance of each control; and
- Assessing the frequency of risk events and their resulting severity, having considered the effectiveness of existing controls (residual risk).

Once identified and measured, material risks are documented in the Risk Register. Risk and control owners are assigned to each risk to ensure accountability for managing all material risks and the related controls. The Risk Register is monitored regularly and amended where necessary to capture changes in risks facing the business or in the controls used to mitigate existing risks.

Risk Control and Mitigation

The Company has a strong risk controls culture to ensure the mitigation of all risks in its risk universe. Controls are developed and used to safeguard the integrity of the Company's processes and systems.

Additionally, the Risk Management Function (RMF) evaluates and adopts appropriate risk transfer methods to mitigate its exposure to the identified risks. Such methods may include purchasing reinsurance coverage, using derivatives as hedging instruments.

Unexpected risks exposures are also covered by own funds, in accordance with the Solvency II requirements.

LSI's policies on risk transfer including the use of reinsurance or other instruments is documented in the Company's Reinsurance and Other Risk Mitigation Techniques Policy.

Once LSI has identified and quantified its risks, it can implement a strategy for mitigating them with appropriate policies, procedures, systems, and controls. Within the established risk appetite and tolerance, LSI would retain a certain portion of risk, transfer another portion (through insurance), and then finance those risks it could not insure.

Risk Monitoring and Reporting

The RMF has the responsibility to ensure that all material risk exposures are monitored on an on-going basis and that any risks that fall outside the approved risk appetite of the Company are identified and appropriately escalated to the Risk Management Committee and the BoD.

Specifically, the RMF monitors the following for each risk:

- Actual exposure vs. Limit
- Key Risk Indicators
- Risk data and model validation
- Appropriateness and assumptions of risk measurement methodologies
- Unusual or material events
- Early warning indicators (in the internal and external environment of the Company)
- Policy breaches

In addition, on an annual basis:

- the Risk Register is formally reviewed by the Risk Management Function and any actions deemed necessary following such review are brought to the attention of the Board; and

- the Risk Management Function runs stress and scenario tests and reports the results and suggested courses of action to the Board.

B.4 Own Risk and Solvency Assessment (ORSA)

B.4.1.1 ORSA Process

ORSA can be defined as the entirety of the processes and procedures employed to identify, assess, monitor, manage and report the short and long term risks the Company faces or may face and to determine the own funds necessary to ensure that the Company's overall solvency needs are met at all times. The ORSA policy is the policy which governs the ORSA process.

Strategic decisions such as the introduction of new products, utilisation of additional distribution channels etc. are assessed and evaluated in the light of their effect on the Company's risk situation and risk-bearing capacity.

The Company follows the steps below to implement its ORSA:

i. ***Identify and classify risks, including governance*** **-** The Company identifies the material risks it faces at a particular point in time. This includes risks considered in the SCR formula, as well as risks not included in the standard formula such as liquidity, strategic and business risks. The risks are documented in the Risk Register.

ii. ***Assessment and measurement of risks*** **-** the Company collects data, quantifies and aggregates risks using different approaches such as Value at Risk and stress testing. The assessment is done using predefined risk metrics. This also includes and assessment of the Solvency II standard formula and whether it adequately reflects the underlying risk profile of the company.

iii. ***Capital Allocation*** **–** According to its risk profile, the Company determines the necessary risk capital required at that point in time.

iv. ***Capital planning*** **–** The Company projects its risk profile based on its business plan and prepares a capital plan over the business planning horizon. The capital plan depends on its strategic objectives and financial projections and assumptions on future economic conditions.

v. ***Stress testing*** **-** The Company applies stress and scenario testing to the forward-looking capital plan and develops actions that can be taken in unforeseen circumstances in the future. Stress tests complement the use of the standard formula by assessing the financial effect of events or sequence of events that lead to specific adverse scenarios. Thus, they can be used to understand the Company's vulnerability to its various risk exposures and the level of financial strain that it can withstand.

vi. ***Communicate and document the results*** **–**The results are being discussed by the senior management and are then being presented to the BoD. The BoD reviews and challenges the results of the ORSA through minuted discussions.

B.4.1.2 Governing the ORSA

The ultimate responsibility for the ORSA process lies with the BoD. The BoD defines the corporate objectives and the risk strategies of the company which form significant inputs to the ORSA. The BoD also defines the stress testing program and also reviews, challenges and approves the ORSA Report. The BoD also sets the ORSA policy and reviews it every year.

The function mostly responsible for carrying out the ORSA is the Risk Management Function. However, due to its very nature, the ORSA requires input from across the whole Company and hence the Risk Management Function coordinates the ORSA process in conjunction with all the other functions as risk owners.

Significant input is required from the finance function for the preparation of the financial projections in accordance with the company's business plan and from the Actuarial function in quantifying future risks and assisting with the financial modelling of forecasted solvency assessments.

B.4.1.3 ORSA and decision-making processes

ORSA is considered as a very valuable assessment in addressing the risks inherent within the company's strategy and the BoD confirms that it is embedded in the decision-making processes of the company. In particular, the ORSA allows the management to consider all the risks associated with the Company's business strategies and the required level of capital that the Company requires to commit, explore alternative options and assess their impact and decide on the optimal strategy and advise to BoD accordingly.

B.4.1.4 Frequency of the ORSA

The Company currently intends to perform the ORSA at least annually. Furthermore, the assessment will be performed immediately following any significant changes to the environment that the company operates within.

These changes include, but are not limited to:

- Significant changes to the financial and political environment in which the Company operates
- Significant operational losses
- Material changes to the new business volumes
- Planned changes to the operating model of the company
- Significant changes in the Company's risk profile

B.4.1.5 Solvency needs and Risk Profile

In 2021, the Company undertook a detailed risk and solvency assessment as well as a forward-looking assessment of capital requirements. These assessments encompass all material risks that the Company faces or could expect to face over its planning period.

The assessment also addressed the adequacy of the standard formula and how it relates to the underlying risk profile of the company. The assessment provided satisfactory evidence for the adequacy of the standard formula and comfort that we can continue using this as a key risk metric. Furthermore, it provided confidence that the capital requirements address the material risk exposures and the available own funds provide a satisfactory buffer in safeguarding business continuity beyond the 99.5% confidence threshold.

Any risks not covered by capital are believed to be adequately mitigated through the control measures applied internally and no additional capital beyond the SCR was deemed necessary.

The BoD confirms that it has adequate capital availability for implementing its strategy.

B.5 Internal control system

B.5.1 Description of the undertaking's internal control system

Internal control is a process effected by LSI's Board of Directors, management, and other personnel and is designed to provide reasonable assurance regarding the achievement of objectives in the following categories:

- Effectiveness and efficiency of operations;
- Reliability of financial reporting;
- Compliance with applicable laws and regulations.

Every member of LSI has a role in the system of internal control. Internal control is people-dependent and its strength depends on people's attitude toward internal control and their attention to it:

- The Board is responsible for setting the strategy, tone, culture and values of the Company;
- Management, Operations, Risk Management, Compliance and Actuarial function design policies and procedures to ensure that an effective internal control system is established within the Company;
- The Internal Audit function monitors the effectiveness of the internal control system.

There are five interrelated components of effective internal control, which are discussed in the following sections:

- Control Environment;
- Risk Management;
- Control Activities;
- Reporting;
- Monitoring.

Each of these are outlined below:

B.5.1.1 Control environment

The control environment sets the tone of the Company, influencing the control consciousness of its people. It is the foundation for all other components of the Company's internal control system, providing discipline and structure. Control environment factors include:

- Integrity and ethical values;
- Commitment to competence;
- Management's philosophy and operating style;
- Organisational structure;
- Assignment of authority and responsibility;
- HR policies and practices;

B.5.1.2 Risk Management

The risk management system entails the identification and analysis of relevant risks which threaten the achievement of the Company's objectives, forming a basis for determining how the risks should be managed. As an integral part of its Risk Management system, the Company identifies all reasonably foreseeable material risks and assesses the frequency and severity of such risks, recording such identification and assessment in the Risk Register.

The process is overseen by the Risk Management Committee and Risk Management function. The risk management process is described in detailed in the Company's Risk Management Policy.

B.5.1.3 Control Activities

Control activities are the policies and procedures that are designed to ensure that management directives are carried out, strategies are properly implemented and the necessary actions are taken to address material risks to the achievement of the Company's objectives. Control activities occur throughout the entire Company, at all levels and in all functions. They include a range of activities as diverse as:

- approval and authorization requirements, as required by the Company's procedure manual;
- segregation of duties, as reflected in the Company's organisational structure and in other controls outlined in the procedure manual;
- controls required by the Company's various policies, such as the Outsourcing Policy;
- verifications, reconciliations, reviews, controls over assets and other controls as identified in the procedure manual and which are primarily aimed at implementing the four-eyes principle.

The Company has appropriate documented policies, procedures, techniques, and mechanisms in place for each of its business areas (e.g. Underwriting, Claims) and control functions (Risk and Compliance). All relevant objectives and associated risks for each significant activity are identified in conjunction with conducting the risk identification process.

Up to date Company policies and procedures are distributed to all relevant personnel, who read and understand them. Management oversees the implementation of the Company's policies and procedures and ensure that control activities are properly applied. Monitoring personnel review the functioning of established control activities and remain alert for instances in which excessive control activities should be streamlined. They act timely on exceptions, implementation problems, or information that requires follow-up.

Control activities are regularly evaluated to ensure that they are still appropriate and working as intended.

B.5.1.4 Reporting

Financial and other information must be identified, captured and communicated in a form and timeframe that enables the management and the BoD to carry out their responsibilities. Management accounts, solvency assessments and risk reports are submitted to the BoD (directly or through Board committees) on a quarterly basis. Moreover, all key functions report to the Board on a regular basis on their activities, the adherence to their respective company policies together with any proposals for changes to the policy as considered necessary by the relevant function.

B.5.1.5 Monitoring of internal controls

The Company has established the necessary monitoring mechanisms that facilitate the understanding of the Company's situation and provide the Board with relevant information for the decision-making process. Management and monitoring personnel know their responsibilities for internal control and make control and control monitoring part of their regular operating processes.

Regular monitoring occurs during normal operations and includes on-going Management activities and actions taken by all personnel when performing their duties. It is performed continually and on a real-time basis, reacts dynamically to changing conditions and is ingrained in the Company's operations.

The effectiveness of the internal control system is monitored on a continuous basis by business areas and control owners, any deficiencies of the system are identified and rectified in a timely manner. As part of the internal control monitoring, the quality of performance over time is assessed and the findings of audits and other reviews are promptly resolved.

B.5.2 *Compliance Policy and Compliance Function*

The Company's Compliance Department is sufficiently resourced to cater for the overall Compliance function of all the Group's licensed entities. The resources within the department are adequate both in terms of number, as well as in terms of expertise, in order to ensure compliance with all the applicable regulation and legislation. The resources within the compliance department have unhindered access to all areas of the company's operations at all times to enable them to fulfil their compliance function to the full.

The Compliance Function ensures that compliance awareness is promoted internally and externally and that compliance is an integral part of the corporate culture of all licensed entities within the group, including LSI. Employees within the organization receive adequate training on compliance, data protection and Anti-Money Laundering issues on a set periodic basis and are encouraged to identify and report all breaches as necessary so that corrective action can be immediately taken and risks mitigated.

The role of the Compliance Function includes:

a) advising the BoD on compliance with any legislation, regulations and any other applicable laws, in so far as they apply to the company;

b) the assessment of possible impact as regards changes in the legal environment on the company;

c) the identification and assessment of any compliance/regulatory risks.;

d) providing the BoD with regular reports on the progress of the Compliance plan, and any other matters which need to be brought to the attention of the Board of Directors

The Company has in place a Compliance Plan and a Compliance Policy. The compliance Policy delineates the responsibilities of the Board of Directors together with the delegated responsibilities of the resources within the Compliance Department and more specifically the responsibilities of the Compliance Function and its Holder. The Compliance Policy is reviewed every year by the Board of Directors, and if required, it is updated to ensure that it remains relevant to the company and in line with the regulation. On the other hand, the annual compliance plan is drawn up every year by the Compliance Function and is approved by the BoD.

B.6 Internal audit function

The Company's Internal Audit Policy establishes and maintains an Internal Audit Function, the objectives of which are:

- to independently examine and evaluate the functioning and effectiveness of the internal controls and all other elements of the system of governance;
- to assess compliance with internal strategies, policies, processes and reporting procedures.

The Company outsources its Internal Audit Function to BDO Malta thus ensuring the independence and objectivity from any functions which have operational responsibilities. The Internal Audit Function reports to the Board through the Audit Committee.

The Internal Audit Function has an unrestricted right to obtain information relevant to the discharge of its responsibilities. This entails the prompt provision of all necessary information, the availability of all essential documentation and the ability to look into all activities and processes of the Company. To this effect, the Internal Audit Function has full, free and unrestricted access to all the personnel of the Company who shall, in turn, ensure that the Internal Audit Function obtains the necessary information about, and has the necessary access to, the Company's outsourced functions.

B.7 Actuarial Function

The Actuarial Function is a critical function for LSI given the nature of its product suite and its operations. It is subject to the fit and proper criteria and according to the relevant legislation it should at all times be carried out by persons who are fit and proper to carry out the duties outlined below, in an objective manner and free from any undue influences. The Actuarial Function of LSI is outsourced to Deloitte Actuarial Services Limited (Cyprus) and is executed by a Fellow of the Institute and Faculty of Actuaries who fulfils all above criteria.

The Actuarial Function reports to the CEO and to the BoD and is subject to the audit of the Internal Audit Function regarding the adequacy and effectiveness of its procedures. LSI has also assigned a Board member with the duty to oversee the Actuarial Function. The operating procedures of the function are described in detail in the Actuarial Function Manual.

The role of the Actuarial Function is to establish and maintain appropriate procedures, processes and systems sufficient to allow the Company to reasonably estimate its insurance obligations and exposures and the related capital requirements, in line with applicable laws and recognised professional standards. In this context, the Actuarial Function coordinates the assessment and validation of internal data to determine the level of compliance with recognised standards for data quality and, if necessary, recommends improvements.

Furthermore, the Actuarial Function is involved in the profit testing process of new products assessing them for profitability, capital intensiveness, risk profile, system compatibility and marketability. It also contributes all financial modelling in relation to risk management activities and the ORSA in particular.

The activities of the Actuarial Function during 2024 were as follows:

- Carried out the calculation of technical provisions and reserves for financial reporting on a quarterly basis in accordance with all relevant regulatory requirements;
- Submitted reports in relation to the above calculations to the senior management and the BoD;
- Provided modelling assistance for the calculation of Solvency Capital Requirements on a quarterly basis;
- Assessment of data quality;
- Expressed opinion on adequacy of Reinsurance Arrangements;
- Expressed opinion on the company's underwriting policy;
- Worked closely with the management and addressed areas of its expertise in relation to the company's ongoing operations;
- Provided the modelling for carrying out the financial and solvency projections of the ORSA;
- Attended meetings of the BoD and Management Committees;
- Carried out investigations to the company's experience in terms of claims, lapses, expenses and new business volumes.
- Carried out profit testing as and when required.
- Provided advice and input on relation to IFRS 17

B.8 Outsourcing

LSI outsources the following key and important functions:

Function	Entity	Person Responsible
Actuarial Function	Deloitte Actuarial Services Ltd	Maria Michaelides
Risk Management Function	Deloitte Actuarial Services Ltd	Dimitris Dimitriou
Appointed Actuary	Deloitte Actuarial Services Ltd	Marios Schizas
Internal audit	BDO	Dhayalaruban Thangaraja (Ruban)
Investment Management	GlobalCapital Investment Management	Konrad Camilleri

LSI has opted to outsource these functions given the high level of specialisation and the limited availability of such skills in the domestic market. Furthermore, we have selected providers with significant expertise in their areas who can introduce knowhow and skillset in a beneficial way for the company. Outsourcing is also believed to be a cost-efficient approach for the selected functions.

Additional benefits of outsourcing include the safeguarding the continuity of services since LSI does not rely on one person but a firm with a contractual obligation to provide the requested services under all circumstances.

It also saves on infrastructure and technology since the company does not need to invest in specialised software and relevant IT solutions.

The selected partners have over the years proven to be efficient in their dealings with the Company and provide comfort to the BoD in the quality of their service and the value they add to LSI.

The Company acknowledges that outsourcing does not in any way relieve the Company of ultimate responsibility for the outsourced functions. In line with regulatory requirements, LSI has appointed one member of senior management and one from the Board per Function with the responsibility of their oversight. Furthermore, the performance of providers is regularly reviewed and monitored by the BoD.

B.8.1 Outsourcing Policy

The criteria for the selection of service providers and the process for their appointment is laid down in the company's outsourcing policy which is approved by the BoD and reviewed once a year. In particular the Outsourcing Policy states that when choosing a service provider for any critical or important functions or activities LSI ensures that:

- The potential service provider has the ability and capacity and any authorisation required by law to deliver the required functions or activities satisfactorily, taking into account the undertaking's objectives and needs;
- The service provider has adopted all means to ensure that no explicit or potential conflict of interests with LSI impairs the needs of the outsourcing undertaking;
- It enters into a written agreement with the service provider which clearly allocates the respective rights and obligations of the undertaking and the service provider;
- The general terms and conditions of the outsourcing agreement are authorised and understood by the authorised signatories. The outsourcing does not represent a breach of any data protection regulation or any other laws;
- The service provider is subject to provisions on the safety and confidentiality of information relating to LSI or to its policyholders or beneficiaries.

In order to ensure against an undue increase in Operational Risk, when outsourcing critical or important functions or activities the Company shall:

- Verify that the service provider has adequate financial resources to take on the additional tasks LSI plans to transfer and to properly and reliably discharge its duties towards LSI and that the staff of the service provider is chosen on the basis of criteria that give reasonable assurance that they are sufficiently qualified and reliable;
- Make sure the service provider has adequate contingency plans in place to deal with emergency situations or business disruptions and has periodic testing of backup facilities where that is necessary having regard to the function, service or activity outsourced.

Furthermore, the Policy lays down the minimum required contents of an outsourcing agreement safeguarding the quality of service provided, protecting the interests of LSI, ensuring that conflicts of interest are avoided and that the service provider cooperates with internal or external auditors as well as the regulators.

B.9 Adequacy of the system of governance

The system of governance has been designed to ensure that the management are able to provide the appropriate levels of oversight whilst allowing decisions to be made more quickly and ensuring that the Company's employees are empowered to make decisions at the right levels of the Company.

The Company continues to align its management and governance structure to proactively respond to the business and regulatory needs.

The BoD has the overall responsibility for setting the company's strategy and to safeguard that the strategy does not expose the Company to any unwanted levels of risk as defines in its risk appetite statement.

The Committees at BoD level and Management level have clearly defined terms of reference are empowered to make decisions within their limits of authority thereby allowing the company to adapt to changes in an agile and flexible manner.

Once the strategy and the business plan are agreed the executive management are delegated with the responsibility to implement it and to operate within these constraints. The organisation of LSI is such that enables the implementation of the BoD strategy in an effective manner whilst adequate oversight is taking place through the second line of defence functions.

The risk management system is integrated into the strategy and the business planning process and is generally embedded in the decision-making processes of the Company. This ensures that the strategy results in an acceptable risk profile. It also facilitates awareness of the risk exposures of the Company and provides early warning signals for the management to take corrective action and ensure sufficient and smooth emergence of profits.

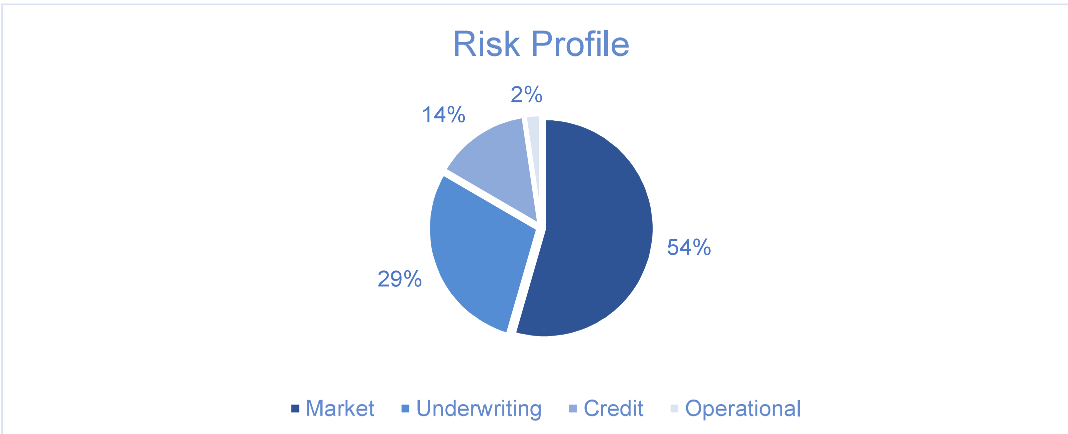
B.10 Any other information

There is no other information to be disclosed in relation to the system of governance that has not been disclosed in other section mentioned above.

C. Risk Profile

LifeStar believes that a robust and effective risk management framework is crucial to maintaining successful business operations and delivering sustainable, long-term profitability. Quantifiable risks are assessed through the 99.5% Value at risk as measured with the Solvency II standard formula (SCR). The Company aims to hold sufficient capital at all times to protect itself from losses occurring due to such risks. Non-quantifiable risks are measured through qualitative analyses and a frequency/severity approach.

In addition to capital, the company manages all risks through its processes and procedures and its internal control framework and by monitoring exposures and benchmarking those against its risk appetite.



The Company's risk profile is mainly driven by its exposure to the investment markets. Market risk forms around 54% of the total risk portfolio of LifeStar. The second most material risk exposure of LifeStar, underwriting risk, is the result of the insurance operations of the Company and forms around 29% of the total risk portfolio of LifeStar. The third largest exposure (14% of undiversified SCR) arises from credit risk mainly in relation to investment holdings (bonds, deposits, cash at bank), intercompany loans and reinsurance recoverables. The exposure to operational risk is relatively small.

The risk profile of LifeStar as at 31 December 2024 was in line with its risk strategy.

C.1 Underwriting Risk

C.1.1 Overview of any material risk exposures anticipated over the business planning period

LifeStar's key underwriting risks in order of magnitude are:

- Lapse risk: Risk of higher lapse rates or lower lapses than expected, as well as the risk of mass lapse (an instantaneous one-of shock lapse event)
- Expense risk: risk of higher than anticipated acquisition costs or maintenance expenses.
- Mortality risk: risk of higher mortality experience than expected at the time of underwriting.
- Life catastrophe risk: risk of a catastrophic event occurring which would lead to an instantaneous one-of shock mortality event
- Disability-morbidity risk: the risk of higher disability, sickness and morbidity rates than expected

In September 2024, the Company has released a new product, Passporting, making the start of underwriting policies in Italy. As a result, the business mix may have lightly changed compared to previous years, in terms of lines of business, underwriting profile and geographical location. The structure of the new passporting protection plan, and specifically the front-loaded commissions and the additional payouts at certain policy durations, may increase the Company's exposure to higher underwriting risk. Nevertheless, business volumes and overall mix should be closely monitored to ensure they remain aligned with the Company's expectations.

C.1.2 Risk Assessment/Measurement

LifeStar measures its Underwriting risk primarily using the standard formula, the adequacy of which was assessed during the latest ORSA. The measurement addresses four sources of risk; Mortality Risk, Lapse Risk, Expense Risk and Catastrophe risk. These exposures are assessed by calculating the impact on the Best Estimate Liabilities whilst allowing in the projections for a number of risk events as listed below:

- An instantaneous permanent increase of 15% in the mortality rates
- An instantaneous permanent increase of 50% on lapse rates
- An instantaneous permanent decrease of 50% on lapse rates
- The discontinuance of 40% of the insurance policies (one-off)
- Expenses loaded by 10% plus an increase of 1 percentage point to the expense inflation rate
- Catastrophe scenario assuming one-off instantaneous increase of 0.15 percentage points to the mortality rates

LifeStar also adopts other risk assessment tools such as stress and scenario testing, maintenance of a risk register, comparison of actual exposure and risk tolerance limits and use of Key Risk Indicators.

LifeStar currently ranks its overall residual exposure to underwriting risk as a high risk exposure (within risk appetite), primarily driven by lapse and expense risk.

C.1.3 Risk Concentration

C.1.3.1 Information on any material risk concentrations the undertaking is exposed to

No material risk concentrations have been identified. This is because of:

- LifeStar's well-diversified insurance portfolio: The portfolio enjoys high levels of diversification with respect to age, gender, smoker status, socio- economic class, level of life insurance cover, type of insurance cover and degree of underwriting applied at inception of the cover.
- Low catastrophe risk: The net catastrophe risk (assessed using the two scenarios prescribed by the standard formula) is very low (€0.1m).
- Reinsurance: LifeStar manages its exposure to any one risk and to catastrophic events using reinsurance. Thus, the loss to LifeStar is generally limited to its retention.

Some underwriting risk concentration emerges from the current absence of geographical diversification as the policyholders are primarily residents of Malta. This may increase over time, as the new product has recently been launched in Italy.

C.1.4 Risk Mitigation

C.1.4.1 Information on the techniques currently used

C.1.4.1.1 Product design process

All new products, prior to their launch are thoroughly assessed through a profit testing analysis carried out by the Actuarial Function. This analysis considers the underlying profitability of the product and its sensitivity, the capital intensiveness and any inherent risks. Furthermore, market research and internal analyses help assess the marketability and competitiveness of our products. Training is also provided to the TIIs to ensure that products are targeted to the appropriate clientele.

IT is also engaged in ensuring that proposed products are compatible with the Company's systems and IT infrastructure. Availability of reinsurance is critical prior to the launch of any new product.

C.1.4.1.2 Reinsurance

LifeStar uses reinsurance to protect against claims volatility. A proportional reinsurance arrangement is in place for all product lines. Any single policy with a sum insured beyond the treaty limits is reinsured on a facultative basis. A detailed analysis is undertaken on an annual basis to assess the most appropriate reinsurance structure in accordance to the business, capital and risk strategies of the company. The Actuarial Function also issues an opinion on the adequacy of reinsurance arrangements annually. The credit rating and the financial condition of the key reinsurance counterparties are reviewed on a quarterly basis, so that corrective action is taken in the event of a deterioration in their credit quality.

C.1.4.1.3 Portfolio Monitoring

The Executive Committee receives and reviews regular reports on the gross written premium, risks written (Sum Assured), claims, surrenders and reserves.

The management of the Company undertakes the reviews above to ensure that the company is protected against the risk of inadequate pricing. The frequency of the reviews enables the management to take quick action to resolve any issues identified.

C.1.4.1.4 Clear delegation of underwriting and claims authorities

There is a clear delegation of underwriting and claims authorities within the company and peer review requirements, with the most complex risks and claims requiring review and sign-off by the CEO. This ensures that the risks and claims are assessed by personnel of appropriate experience and expertise and the premium charged reflects the characteristics of each risk and appropriate claim provisions are put in place.

Clear delegation of underwriting and claims authorities and peer review ensures that operational risks related with underwriting, claims and reserving; risk of insuring unintended exposures, risk of fraudulent claims or claims overpayment and the risk of inadequate pricing or under-reserving are reduced.

C.1.4.1.5 Lapses/surrenders

Dedicated, experienced staff handles all surrenders and lapse requests. This is to ensure, through discussion with the policyholder, that the decision to surrender is indeed the most appropriate for the policyholder and LifeStar may recommend other products that would better satisfy their needs.

Persistency analyses are carried out regularly and these are segmented by product type to provide an early warning signal of increases in lapses/surrenders. Where this is observed, the management investigates the underlying reason and takes corrective action to remediate this. Furthermore, continuous training is provided to the TIIs to minimise the risk of mis-selling.

C.1.5 *Risk Sensitivity*

The risk management function carries out stress tests as part of its annual risk assessment. This ensures that potential adverse scenarios are considered, and negative outcomes can be adequately mitigated either through controls implemented, through timely remedial actions or through the commitment of additional capital.

The stress tests performed in relation to underwriting risk were as follows:

– A 10% increase in the budgeted expenses

– A 15% increase in future expense inflation assumption

– A 50% increase in the lapse rates

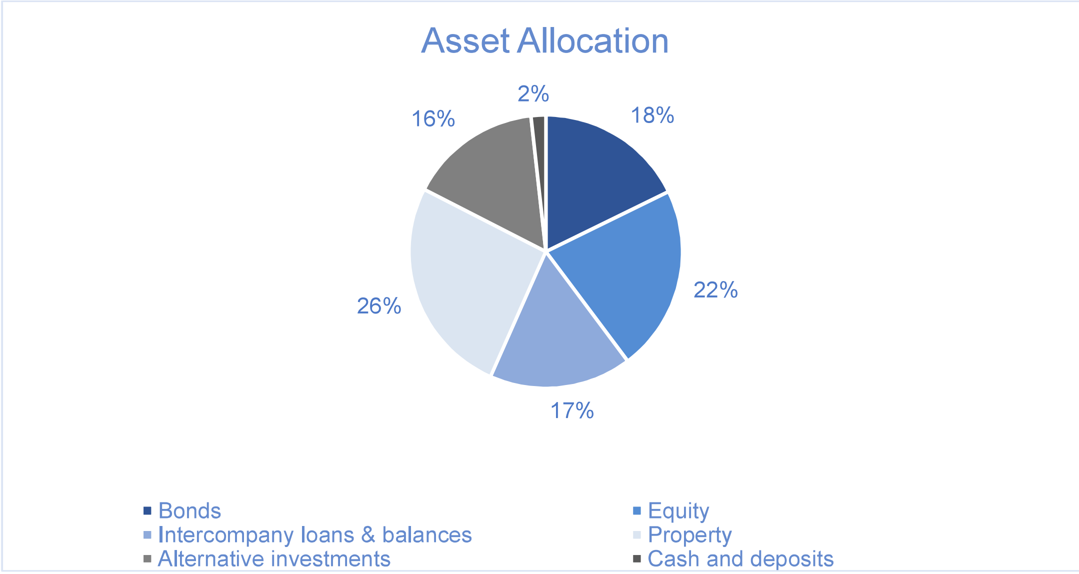
– A 50% decrease in the lapse rates

– A 10% increase in the mortality rates

C.2 Market risk

C.2.1 Overview of any material risk exposures anticipated over the business planning period and how they are managed

The Company is exposed to market (Investment) risk through its asset portfolio and in particular from the level or volatility of market prices of financial instruments which have an impact upon the value of the assets and liabilities of the Company.



As at 31 December 2024, LifeStar's assets include property, equity, bonds, cash, alternative investments and intercompany loans and balances. Investments are subject to credit risk (including counterparty default risk, spread risk and concentration risk relating to credit risk) and liquidity risk which are dealt with in the respective sections below. Market risk arises in the following forms both on the asset and on the liability side as the value of technical provisions depends on market conditions:

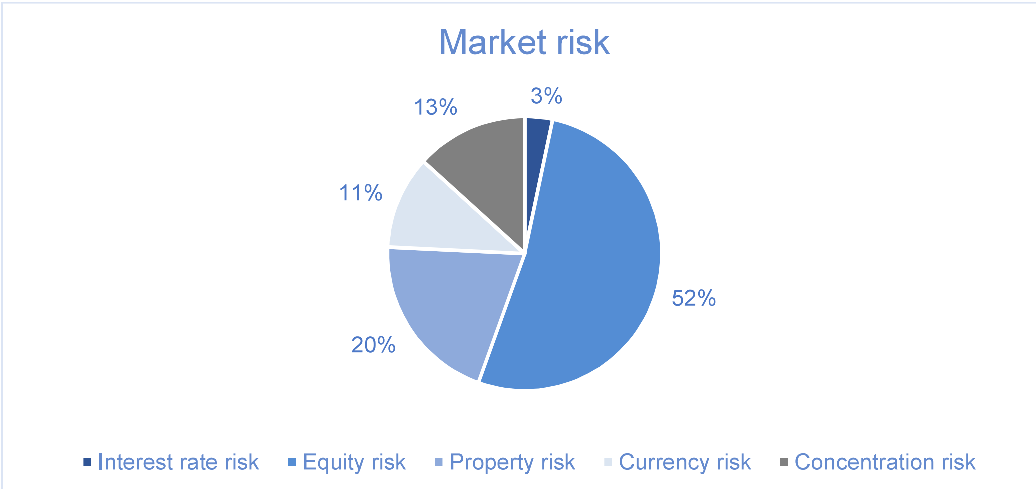
- Interest rate risk: *the sensitivity of the values of assets, liabilities and financial instruments to changes in the term structure of interest rates, or in the volatility of interest rates*
- Equity risk: *the sensitivity of the values of assets, liabilities and financial instruments to changes in the level or in the volatility of market prices of equities*
- Property risk: *the sensitivity of the values of assets, liabilities and financial instruments to changes in the level or in the volatility of market prices of real estate*
- Currency risk: *the sensitivity of the values of assets, liabilities and financial instruments to changes in the level or in the volatility of currency exchange rates*
- Concentration risk: *additional risks to an insurance undertaking stemming from lack of diversification in the asset portfolio*

C.2.2 *Risk Assessment/Measurement*

LifeStar measures its market risk using the standard formula, the adequacy of which was assessed during the latest ORSA. The measurement is done separately for the sub-categories mentioned above. Then the aggregate market risk measure allows for diversification between its components.

LifeStar also adopts other risk assessment tools such as stress and scenario testing (both on the current position and over the business planning horizon), maintenance of a risk register, comparison of actual exposure and risk tolerance limits and use of Key Risk Indicators.

With the support of the RMF, through the Asset and Liability Committee (ALCO), the Company assesses the impact of any material investment decisions on its solvency coverage ratio.



The primary sources of market risk are equity risk and property risk arising from exposure to such investment securities. The overall current market risk exposure is considered to be high.

C.2.3 *Risk Concentration*

Overall, the investment portfolio of LifeStar is well diversified across and within different asset classes, with respect to issuers/counterparties, industries, countries. Part of the Company's investments are held through collective investment vehicles which further enhance the level of diversification within the portfolio.

Risk concentration is present within the investment portfolio with regards to country. The Company has a high exposure overall to Malta in terms of cash at bank, government bonds, property and listed equities. Nonetheless, the high creditworthiness of banks in Malta and of Malta government stocks reduce the overall risk.

C.2.4 *Risk Mitigation*

Market risk is mitigated through the investment policy adopted by LifeStar which safeguards limited exposure to risky asset classes and minimum diversification limits.

The ALCO reviews investment related information regularly to ensure that the portfolio is invested in line with the investment guidelines and the risk appetite of the Company. In addition, the Risk Management Function regularly prepares Investment Key Risk Indicators (KRIs) which are presented to and discussed with the Risk Committee.

The continued effectiveness of the risk mitigation techniques and controls is monitored through the ALCO and additional oversight is provided by the Board of Directors.

C.2.5 *Prudent Person Principle*

The Solvency II regulations require investment of assets in accordance to the "Prudent Person Principle". In light of this, the Company has aligned its investment policy and ALM strategy with this principle.

LifeStar regularly reviews the financial condition of its investment counterparties and ensures that the currency, nature and duration of assets is appropriate to the characteristics of its liabilities, avoiding excessive reliance on any one counterparty or asset class or geographical location.

Prior to any material investment especially on the alternative space an SCR impact is generated that helps the investment manager and the ALCO understand the marginal impact on the SCR and the solvency coverage ratio of the proposed investment.

The Company has not invested in derivatives or other inadmissible financial instruments.

C.2.6 *Risk Sensitivity*

C.2.6.1 *Stress tests and scenario analyses*

The risk management function carries out stress tests as part of its annual risk assessment. This ensures that potential adverse scenarios are considered, and negative outcomes can be adequately mitigated either through controls implemented, through timely remedial actions or through the commitment of additional capital.

The stress tests performed in relation to market risk were as follows:

- TVOG stress: Future market volatility 50% higher than expected which impacts the time value of the guarantees inherent in the interest sensitive portfolio.
- A 20% decrease in property market values
- Black Monday: An instantaneous decrease in equity market values by 20%.

The results of the testing above indicated that the Company is sufficiently capitalised and able to withstand an extreme market event and maintain a strong solvency position.

C.3 Credit risk

C.3.1 *Overview of any material risk exposures anticipated over the business planning period and how they are managed*

Credit risk refers to the risk of loss or of adverse change in the financial situation, resulting from fluctuations in the credit standing of counterparties. LifeStar is exposed to credit risk arising from the following exposures:

- Cash at bank
- Bonds and deposits
- Intercompany loans
- Reinsurance recoverables and receivables
- Premium receivables

C.3.2 *Risk Assessment/Measurement*

LifeStar measures its credit risk using the standard formula, the adequacy of which was assessed during the latest ORSA. With respect to exposures to banks, bond issuers, loan holders and reinsurers the assessment depends highly on the credit rating of the counterparties which defines the probability of default. On the other hand, for premium receivables the assessment is based on how long overdue these are and the probability of default is determined based on that.

Credit risk as measured through the SCR is composed of concentration risk by 53%, spread risk by 38%, and counterparty default risk by 9%. Credit risk forms 14% of the total undiversified SCR.

LifeStar also adopts other risk assessment tools such as stress and scenario testing (both on the current position and over the business planning horizon), maintenance of a risk register, comparison of actual exposure and risk tolerance limits and use of Key Risk Indicators.

The overall credit risk exposure is considered to be Medium primarily driven by concentration and spread risk.

C.3.3 *Risk Concentration*

Risk concentration with respect to credit risk arises primarily from the following:

- Exposure to reinsurance counterparties
- Intercompany loans
- High exposure to a credit institution (cash at bank)

C.3.4 *Risk Mitigation*

The Company mitigates its credit risk, through the credit risk policy, which prescribes minimum creditworthiness requirements for its investment counterparties and reinsurers and by ensuring an adequate level of diversification in its investment portfolio.

The credit rating and the financial condition of all key counterparties are reviewed at least quarterly, and management is ready to take action in the event of a deterioration in the credit quality.

Moreover, the terms and conditions of the reinsurance contracts stipulate exit terms in the event of changes in the financial conditions of the counterparties.

C.3.5 *Risk Sensitivity*

The risk management function carries out stress tests as part of its annual risk assessment. This ensures that potential adverse scenarios are considered, and negative outcomes can be adequately mitigated either through controls implemented, through timely remedial actions or through the commitment of additional capital.

The stress test performed in relation to credit risk examined the impact of an instantaneous deterioration of the credit quality of all counterparties by one step. The output of the stress test indicated that the Company is able to maintain a strong solvency position in excess of its risk appetite under these conditions.

C.4 Liquidity risk

C.4.1 *Overview of any material risk exposures anticipated over the business planning period*

Liquidity risk is defined as the risk that the Company is unable to realise investments and other assets (or realise them at excessive cost) in order to settle its financial obligations when they fall due.

The liquidity risk of the company is generally very low as a significant proportion of the assets is invested in short-terms products, including cash and bank deposits. The composition of the asset portfolio is not expected to change over the business planning horizon in a way that would introduce liquidity risk.

C.4.1 *Risk Assessment/Measurement*

LifeStar's liquidity requirements are assessed monthly in order to meet the Company's stated liquidity objectives. A projection is performed each month from the accounts department to assess whether all obligations due will be met by the expected cash inflows mainly from premiums due.

C.4.2 Risk Concentration

Sources of cash in and cash out flows such as insurance receivables, claims (deaths, surrenders), expenses etc., are diversified and to a large extent independent. Thus, risk concentration within liquidity risk is limited.

C.4.3 Risk Mitigation

The company has developed investment guidelines (reviewed and approved by the Board) which, among others limit investment in illiquid assets and ensure appropriate number of counterparties and levels of asset diversification are in place.

The Company adopts a prudent liquidity risk management approach by maintaining a sufficient proportion of its assets in cash and marketable securities through the ability to close out market positions. The Executive Committee and ALCO are updated on a regular basis on the cash position of the Company illustrating, inter alia, actual cash balance net of operational commitments falling due in the short term as well as investment commitments falling due in the medium and long term.

LifeStar also minimizes liquidity risk by:

- ensuring that the Accounting function designs and implements proper controls, documented in the procedure manual, to ensure that inflows are actively managed, monitored and followed up;
- ensuring that income generated from the investment portfolio is duly received by the Company;
- catering for unexpected cash flows, since the quota for highly liquid assets provides a good buffer over and above the maximum historic cash outflows;
- considering the effect of any proposed new business on liquidity and liquidity risk at Board level;
- closely monitoring the timing of claims payments and reinsurance recoveries.

C.4.4 Expected profit included in future premiums

The following table shows the expected profit included in the future premiums per line of business.

€'000s	UNIT-LINKED INSURANCE	INSURANCE WITH PROFIT PARTICIPATION	OTHER LIFE INSURANCE	TOTAL
Expected profits included in future premiums	8,139	-	7,803	**15,942**

C.4.4.1 Methods and main assumptions used to calculate the expected profit included in future premiums

The expected profits included in future premiums are calculated as the difference between the best estimate liability calculated in accordance with Article 77 of that Directive and a calculation of the best estimate liability under the assumption that the premiums relating to existing insurance contracts that are expected to be received in the future are not received for any reason other than the insured event having occurred, regardless of the legal or contractual rights of the policyholder to discontinue the policy. The methodology used in the computation of this figure is in line with the relevant guidelines issued by EIOPA.

For the unit-linked insurance and insurance with profit participation portfolios, the calculation is based on the assumption that all policies are paid-up and for the other life insurance portfolio that all policies lapse as these contracts will cease being in-force if premiums are not paid at the next policy anniversary according to the products term and conditions.

C.4.1 *Risk Sensitivity*

Given that liquidity is not a material risk for the Company, no specific risk sensitivity is performed.

C.5 Operational risk

Operational risk refers to the risk of loss arising from inadequate or failed internal processes, people, systems, or from external events. This risk encompasses all exposures faced by the Company's functions in the course of conducting the Company's business, including but not limited to, accounting and financial reporting, business continuity, claims management, information technology and data processing, legal and regulatory compliance, outsourcing and reinsurance. The company is exposed to the following types of operational risk:

Type	Description
Business Disruption & Systems Failure	Interruption of business activity due to system or communication failures
Financial Integrity & Reporting	Disclosure of materially incorrect or untimely information
External Fraud	Acts intended to defraud, misappropriate property or circumvent the law by an external party
Internal Fraud	Acts intended to defraud, misappropriate property or circumvent the law by an internal party
Process Risks	Failure to execute or process transactions timely and accurately with clients and other counterparties
Clients, Products and Business Practices	Lack of productivity and poor customer service
Damage to Physical Assets	Losses arising from loss or damage to physical assets from natural disaster or other events
Employment Practices and Workplace Safety	Inconsistency with employment, health or safety laws or agreements from payment of personal injury claims, or from diversify/discrimination events

C.5.1 *Risk Assessment/Measurement*

LifeStar measures operational risk through the following:

- a qualitative assessment of operational risks is performed at least once a year during which potential sources of risk are identified, then a frequency severity assessment is performed both before and after any risk mitigation/control actions taken thus measuring inherent and residual risk.
- a quantitative assessment based on the standard formula.

The most material operational risk during the year related to challenges and obstacles experienced during the IFRS 17 implementation journey. Actions will be taken during the year to streamline the reporting process and to make the Finance Department more robust in terms of in-house knowledge and expertise on insurance accounting and investments.

The Company is vulnerable to operational risk. This has been particularly observed during the recent years, as LifeStar has experience significant turnover of key personnel, causing several procedural issues.

C.5.2 *Risk Concentration*

Currently there are no material operational risk concentrations.

C.5.3 *Risk Mitigation*

The Company addresses its operational risk through the following:

- an Operational Risk Policy is in place to ensure that operational risks are properly identified, recorded, addressed and controlled
- an Outsourcing Policy is in place to minimise the operational risks that result from outsourcing
- an internal control system is in place
- a business continuity plan is in place to ensure continuity and regularity in the performance of activities
- Regular Internal Audit
- Performance management and reviews to ensure employees are satisfied with their work and perform to the best of their abilities
- Legal advice is sought at the earliest opportunity from specialised lawyers
- Peer review of material work and appropriate underwriting, claims and other authority limits in place
- Insurance against property damage that could cause business disruption

C.5.4 *Risk Sensitivity*

As part of the business and capital planning processes, the risk management function carries out stress tests to feed into the ORSA. With regards to operational risk, the impact of a reputational damage scenario leading to 20% lower new business volumes is assessed.

The results of the testing above indicated that the company is sufficiently capitalised and able to withstand such extreme operational loss event and maintain a strong solvency position.

D. Valuation for solvency purposes

D.1 Assets

D.1.1 Value of assets

All assets and liabilities, listed in the Table below are valued in accordance with the Solvency II Framework. Assets and liabilities are valued on the assumption that the Company will pursue the business as a going concern.

On 1st January 2023, LSI adopted two new accounting standards, IFR 17 'Insurance Contracts' and IFRS 9 'Financial Instruments'. IFRS 17 as adopted by the EU, became effective for annual periods beginning on or after 1st January 2023, while IFRS 9, although effective for years beginning on or after 1st January 2018, LSI applied the temporary exemption for qualifying insurers to apply such standard together with IFRS 17. IFRS 17 resulted in significant changes in accounting recognition, measurement, and disclosures.

The Company does not have any off-balance sheet assets or liabilities.

	Solvency II	Valuation
Assets	**2024 (€'000)**	**2023 (€'000)**
Investments	59,070	68,256
Deferred Tax Asset	0	0
Reinsurance Assets	0	0
Property	7,333	5,179
Goodwill	0	0
Other Assets	86,820	69,480
Total Assets	**153,223**	**142,915**

D.1.2 Description of bases, methods and main assumption used for valuation for solvency purposes and Differences between IFRS and Solvency II valuation

Investments

All investments must be measured at fair value on the Solvency II balance sheet, regardless of the accounting portfolio under which they are classified. The determination of fair value is performed by following the same procedures and methodology used for determining fair value based on IFRS 13.

IFRS 13 defines fair value as the price received in exchange for an asset or paid for transferring a liability during an orderly transaction between market participants at the valuation date. In a fair value valuation, the transaction should take place in the main asset or liability's market, and where this does not exist, in the most advantageous market. Valuation techniques appropriate to the circumstances for which there is sufficient data to conduct a fair value measurement must be used, maximizing the use of relevant observable variables while minimizing the use of variables which cannot be observed.

In order to increase the coherence and comparability of the fair value measurements, IFRS 13 establishes a fair value hierarchy making it possible to classify the valuation technique variables used to determine fair value in three different levels.

Although not all assets and liabilities may have available observable market transactions or information, in any case the purpose of a fair value appraisal is always the same: estimate the price for an orderly transaction for selling or transferring the liability between market participants at the valuation date in present market conditions. We refer to “Section A3 – Investment Performance” (Page 10) regarding two loan notes linked to the UK-based data centre, Stellium Holdings Limited (UK Registration No 12130247). As noted in this section, the level of uncertainty surrounding these loan notes remains unclear, and any potential impact on the **Solvency Capital Ratio (SCR)** cannot currently be determined.

Under “Investments”, based on the Solvency II balance sheet, the following investments are included:

- ***Property (other than for own use)***

In accordance with Solvency II criteria, properties which are not considered for own use and are used to earn payments, capital gains or both must be measured at fair value.

Under IFRS, such properties are valued at its appraisal value, determined by an external, independent and qualified architect. The most recent valuation by such architect was done during 2023.

The appraisal value, which is still considered appropriate, has been considered as its fair value under Solvency II and therefore no adjustment to the valuation was needed.

- ***Holdings in related companies***

In accordance with Article 212 of the Solvency II Directive 2009/138/EC, related parties and subsidiaries are companies in which there is an investment or over which there is a dominant or significant influence.

Wherever possible, investments in related companies are measured at their listed prices on active markets as regards the Solvency II balance sheet.

- ***Equities, bonds and collective investment undertaking***

<u>Equities and collective investment undertakings</u>

Equities and collective investment undertakings are recognised at fair value on the financial statements and therefore do not reflect valuation differences in comparison with the Solvency II values.

<u>Bonds</u>

Under IFRS, accrued interest for bonds is accounted for as “Any other assets, not elsewhere shown”, whilst the Solvency II value of the bonds is equal to the market value.

Deferred Tax Assets

Deferred tax assets are recognised for unused tax losses, unused tax credits and deductible temporary differences to the extent that it is probable that taxable profit will be available against which these deferred tax assets can be utilised.

Reinsurance Recoverables

The benefits to which the Group is entitled under its reinsurance contracts held are recognised as Reinsurance Contract Assets or receivables from reinsurers (unless netted off against amounts payable to reinsurers). These assets consist of short term balances due from reinsurers (classified within receivables), as well as longer term receivables (classified as reinsurance contract assets) that are dependent on the expected claims and benefits arising under the related reinsurance contract assets.

Reinsurance recoverables represent the difference between Gross and Net provisions. On a solvency II valuation these are valued on a best estimate basis, considering the timing difference between collection and direct payments, as well as the expected losses from the counterparty default. In line with the calculation of the best estimate of liabilities, cash flows relating to reinsurance recoverables are projected over the entire outstanding term of each contract in force.

Properties

Investment properties are initially measured at cost including related transaction costs. Investment properties are subsequently carried at fair value, representing open market value determined annually by external valuers, or by virtue of a Directors' valuation. Fair value is based on active market prices, adjusted, if necessary, for any difference in the nature, location or condition of the specific asset. If this information is not available, the Group uses alternative valuation methods such as recent prices on less active markets or discounted cash flow projections. The fair value of investment properties reflects, among other things, rental income from current leases and assumptions about rental income from future leases in the light of current market conditions.

Intangible assets

Under IFRS, intangible assets are measured at cost less their accumulated amortisation and where applicable, possible impairment. LifeStar mainly recognises computer software which relates to the Company's policy administration system.

Under Solvency II, an intangible asset other than goodwill is only recognised at a value not equal to zero if it can be sold separately and the undertaking can demonstrate the existence of a market value for the same or similar assets. The Company considers that computer software do not meet the conditions established in the Solvency II regulations for market value recognition, and therefore is reported at a zero value.

Property, plant & equipment held for own use

In accordance with Solvency II criteria, property, plant & equipment must be measured at fair value. Under IFRS, property, plant, and equipment for own use is stated at historical cost less depreciation and impairment losses. Historical cost includes expenditure that is directly attributable to the acquisition of the items. This value has been considered as its fair value under Solvency II and therefore no adjustment to the valuation was needed.

Receivables (trade, not insurance)

This heading includes operational receivables, which are not involved in insurance transactions, and therefore are not reflected in the above two sections. For the purposes of the Solvency II balance sheet, these were valued in accordance with IFRS, based on their face value.

Trade receivables are classified with current assets and are stated at their nominal value. Trade receivables which do not have a significant financing component are initially measured at their transaction price and are subsequently stated at their nominal value less any loss allowance for ECLs. Appropriate allowances for expected credit losses ('ECLs') are recognised in profit or loss in accordance with the Group's accounting policy on ECLs.

Any other assets, not elsewhere shown

The difference between the IFRS value and the Solvency II value relates to the accrued interest of bonds, which under IFRS is accounted for under "Any other assets, not elsewhere shown".

D.2 Technical provisions

D.2.1 *Value of Technical Provisions*

The value of the Company's technical provisions is equal to the sum of the best estimate and the risk margin, which are calculated separately. The table below shows the value of technical provisions as at 31 December 2024 both gross and net of reinsurance (RI) recoverables by line of business.

€'000s	INSURANCE WITH PROFIT PARTICIPATION	UNIT-LINKED INSURANCE	OTHER LIFE INSURANCE	TOTAL
Gross Best Estimate	54,235	61,403	-7,390	108,248
Risk Margin	3,441	3,624	567	7,632
GROSS TECHNICAL PROVISIONS	**57,676**	**65,027**	**-6,823**	**115,880**
RI Recoverables	-	1,045	2,826	3,872
NET TECHNICAL PROVISION	**57,676**	**63,982**	**-9,649**	**112,008**

D.2.1 *Description of the bases, methods and main assumptions used*

The best estimate corresponds to the probability-weighted average of future cash-flows, taking account of the time value of money, using the risk-free interest rate term structure prescribed by EIOPA for the valuation date,

The estimated future cash flows take into account all the cash inflows and outflows that are expected to be required to settle the insurance obligations over the lifetime thereof, including expenses expected to be incurred in servicing these obligations,

The estimates consider the uncertainties surrounding the cash flow projections,

Future policyholder behaviour relating to contractual options, namely the likelihood of policy lapse during the remaining period is duly considered where applicable,

The projected future cash flows are based on the Company's past experience and the actuary's expectations regarding the future cash flows that are expected to arise from the underlying insurance contracts,

The best estimate is calculated on a gross basis i,e, without deduction of the amounts recoverable from reinsurance contracts and on a net basis.

D.2.1.1 Insurance with profit participation

For the Insurance with profit participation policies the best estimate liability (BEL) has been derived from the accumulated account value of each policy as at 31 December 2024 and the present value of the expected future cashflows related to these policies, The cash flow projections are performed on a best estimate basis (i,e, without any prudence margins) and discounting is performed using the EUR risk free curve (with no volatility adjustment) as at the valuation date, published by EIOPA.

D.2.1.2 Unit-Linked Insurance

For the Unit-Linked Business the best estimate liability (BEL) has been derived from the value of the units allocated to the policies that were in force on the valuation date and the present value of the expected future cashflows related to these policies, The cash flow projections are performed on a best estimate basis (i,e, without any prudence margins) and discounting is performed using the EUR risk free curve (with no volatility adjustment) as at the valuation date, published by EIOPA.

D.2.1.3 Other Life Insurance

The BEL for Other Life Insurance is calculated as the expected present value of all future cashflows arising in relation to other life insurance policies (premiums, expenses, claims etc,), The cash flow projections are performed on a best estimate basis (i,e, without any prudence margins) and discounting is performed using the EUR risk free curve (with no volatility adjustment) as at the valuation date, published by EIOPA.

D.2.2 Risk Margin

The Risk Margin is designed to ensure that the value of technical provisions is equivalent to the amount that a third undertaking would be expected to require in order to take over and meet the Company's insurance obligations. The risk margin is calculated by determining the cost of providing an amount of eligible own funds equal to the SCR necessary to support the Company's reinsurance obligations over their lifetime thereof, This rate, called the Cost-of-Capital, is prescribed at 6%.

D.2.1 Recoverables

Reinsurance recoverables represent the difference between Gross and Net best estimates, A reduction of reinsurance recoverables has been made to allow for expected losses due to the default of a counterparty.

D.2.2 Description of the level of uncertainty associated with the value of technical provisions

Uncertainty relates primarily to how future actual experience will differ from the best estimate assumptions used to calculate the technical provisions, The key assumptions are expenses, lapse rates, mortality rates, A robust assumption setting process, which includes the performance of experience investigations on at least an annual basis, is followed in order to ensure the uncertainty is well understood and minimised, The comparison of best estimates against experience, the checks on data and controls incorporated throughout the valuation process further reduce the level of uncertainty.

D.2.3 Differences between IFRS and Solvency II valuation

The estimation of liabilities for insurance contracts involves calculation of the present value of future cash flows under both Solvency II and IFRS 17 frameworks, While there are similarities in the methodologies used for this calculation, there are notable differences in the assumptions and methodologies applied,

Main differences under the two valuation basis:

- Under the statutory basis, some Unit Linked products are classified as financial contract liabilities and are measured under IFRS 9 with a floor value at the deposit element, whereas under Solvency II these are measured consistently with other long term insurance liabilities,
- Different expense assumptions between the two valuation basis as under Solvency II all expenses are considered whereas under IFRS 17 only those that are considered as directly attributable,
- Different economic assumptions between the two valuation basis, For Solvency II, all projections are based on the EUR Risk-free rates, ignoring any volatility adjustment, For IFRS17, these are based on the EUR risk-free rates with volatility adjustment, as these are published by EIOPA,
- Different grouping of riders into classes of business under Solvency II and groups of contracts under IFRS 17,
- Reclassification of current balances such as commissions payable, premiums receivable within the insurance contract liabilities under IFRS 17,

- Under IFRS 17 there is an explicit allowance for prudence reflected by the Risk Adjustment which is eliminated under Solvency II
- Within the Solvency II Technical Provisions there is an allowance for the cost of capital associated with these liabilities which is reflected by the Risk Margin described above,
- Within the IFRS 17 Insurance Contract Assets there exists an additional liability related to future expected profits and reflected by the Contractual Service Margin.

- Solvency II	
Reinsurance recoverables from:	**3,872**
Life excluding unit-linked	2,826
Life unit-linked	1,045
Technical provisions – life (excluding unit-linked)	**50,853**
Best Estimate	46,845
Risk margin	4,008
Technical provisions – unit-linked	**65,027**
Best Estimate	61,403
Risk margin	3,624
Net Technical Provisions	**112,009**

Statutory	
Reinsurance contract Assets	**3,571**
Insurance contract liabilities	**115,646**
Investment contract liabilities	**8,620**
Net Insurance & Investment contract liabilities	**120,700**

D.2.4 Other Information

LifeStar has not used any of the following:

- The volatility adjustment referred to in Article 77d of Directive 2009/138/EC
- The transitional risk-free interest rate-term structure referred to Article 308c of Directive 2009/138/EC
- The transitional deduction referred to in Article 308d of Directive 2009/138/EC

D.3 Valuation of other liabilities

Other liabilities include trade payables and accruals and deferred income which stand at equal values under both SII and IFRS reporting.

D.4 Any other information

Disclosure of any other material information regarding the valuation of assets and liabilities for solvency purposes.

E. Capital Management

E.1 Own Funds

E.1.1 Objectives, policies and processes employed for managing its own funds

The objective of capital management is to maintain, at all times, sufficient own funds to cover the SCR and MCR with an appropriate buffer, These should be of sufficient quality to meet the eligibility requirements in Article 82 of the Delegated Regulation, The Company holds regular meetings of the Risk Committee and BoD, which are at least quarterly, in which the ratio of eligible own funds over SCR and MCR are reviewed, As part of own funds management, the Company prepares annual solvency projections and reviews the structure of own funds and future requirements, The business plan, which forms the base of the ORSA, contains a three-year projection of funding requirements and this helps focus actions for future funding,

E.1.2 Information on the structure, amount and quality of own funds at the end of the reporting period and at the end of the previous reporting period

The following table shows the structure of own funds as at 31 December 2024 and 2023:

OWN FUNDS (€000s)	DEC-24	DEC-23
Ordinary share capital	9,170	**9,170**
Preference shares	-	**-**
Reconciliation reserve	16,045	**17,622**
Subordinated liabilities	2,431	**2,431**
An amount equal to the value of net deferred tax assets	-	**-**
Other Own Funds	-	**-**
Own funds that do not meet the criteria to be classified as Solvency II own funds	-961	**-1,483**
TOTAL BASIC OWN FUNDS	**26,685**	**27,740**

E.1.3 Eligible amount of own funds to cover SCR & MCR

The composition of Own Funds as at 31 December 2024 and the classification into tiers is shown below:

ELIGIBLE OWN FUNDS €'000	TOTAL	TIER 1	TIER 2	TIER 3
Ordinary share capital (net of own shares)	9,170	9,170		
Preference shares	0		0	
Deferred tax assets	0			0
Reconciliation reserve	16,045	16,045		
Subordinated liabilities	2,431		2,431	
Other own funds not specified above	0	*0*	0	0
Own funds that do not meet the criteria to be classified as Solvency II own funds	-961			
TOTAL ELIGIBLE OWN FUNDS	**26,685**	**24,253**	**2,431**	**0**

As shown above, own funds are composed of Tier 1 ordinary share capital and retained profits as well as Tier 2 subordinated liabilities, Tier 1 own funds items have no maturity or call dates and therefore their duration expands beyond the duration of liabilities, whereas Tier 2 own funds have a duration of 10 years which may be delayed subject to conditions,

In June 2020, LifeStar Holding p,l,c, (LSH) was granted a €3m COVID-19 Assist loan by Bank of Valletta (BOV) and Malta Development Bank (MDB), As per loan agreement between BOV and LSH, LifeStar provided a guarantee in favour of BOV for €3m, the balance of which accordingly encumbered the eligible own funds.

E.1.4 *IFRS Equity vs Own Funds*

The following summary table shows the comparisons and movement in the IFRS and Solvency II valuation of assets, liabilities and Own Funds,

The movement in the valuation of assets and liabilities arises from the differences in the valuation of IFRS and Solvency II standards, below:

	IFRS €'000s	SOLVENCY II €'000s	MOVEMENT €'000s
Total Assets	158,487	153,223	5,264
Total Liabilities	133,648	128,009	5,639
Total Own Funds	**24,839**	**25,214**	**-375**

The movement in the valuation of assets and liabilities arises from the differences in the valuation of IFRS and Solvency II standards, below:

- Intangibles are usually not included under Solvency II
- Differences in gross technical provisions and reinsurance recoverables (as explained in the previous section)
- Recalculation of the deferred tax asset to allow for the tax associated with the different profits recognised in the Solvency II balance sheet,
- Different valuation basis for the PPE held for own use
- Difference in the tax payable balance by allowing for the time value of money based on the expected tax payment schedule

E.1.5 *Plans to raise additional own funds*

On the basis of the projections made in the ORSA, the BoD of LifeStar is confident that according to its corporate strategy, sufficient profits will emerge over the projection horizon to cover for the increasing capital requirements as the volume of business increases, The BoD is of the opinion that the Company is sufficiently capitalised and that the risk of a potential insolvency over the business projection horizon is of no concern,

Although based on the projections the Company is, presently and for the projected future, sufficiently capitalised, reasonable plans as to how to raise additional capital, if and when required, are in place and are described below,

- Access to capital markets

  Being a public entity leads to creation of additional financing sources, enhanced visibility and credibility of the business and provides the resources for the business as it needs to grow, Being listed significantly increases the Company's profile, It highlights the Company's ambitions, organisational structure and financial strength as part of meeting the required quality standards and transparency objectives, The benefits of better visibility and reputation is often quoted by issuers as an important impact towards its network of suppliers and providers, and is also used to expand business activities with existing clients and new prospects,

- Dependence on a particular investor base, investors or other members of the group Investar plc is LifeStar Plc's largest shareholder, which in its capacity remains committed to support the financial needs of the life company,

- Impact of other undertakings seeking to raise own funds at the same time (at solo and parent level), All other undertakings forming part of the Group are adequately capitalised and based on the projected horizon, the need is not foreseen to raise capital to sustain the intended growth plans,

- Ability to raise own funds of an appropriate quality and in an appropriate timescale,

E.2 Solvency Capital Requirement and Minimum Capital Requirement

E.2.1 Amounts of SCR and MCR

As at 31 December 2024 the SCR of LifeStar was calculated at €18,828K and the MCR at €4,707K,

E.2.1 Breakdown of SCR by risk modules

The following table shows the SCR split by risk modules:

SOLVENCY CAPITAL REQUIREMENT	€'000s
Market risk	19,934
Counterparty default risk	362
Life Underwriting risks	8,540
Health underwriting risk	0
Non-Life underwriting risk	0
Sum of risk components	**28,836**
Diversification effects	*-5,157*
Diversified risk	**23,679**
Intangible asset risk	0
Basic SCR	**23,679**
Operational risk	694
Adjustments	-5,545
SCR	**18,828**

E.2.2 Simplifications

No simplifications have been used for any of the modules or sub-modules of the SCR.

E.2.3 Undertaking-specific parameters

LifeStar has not used undertaking-specific parameters for any of the parameters of the standard formula.

E.2.4 Loss absorbing capacity of deferred taxes

Lifestar's total SCR as at December 2024 includes an adjustment for the Loss Absorbing Capacity of Deferred Taxes (LACDT) which amounts to €5,545K, As per the Maltese legislation, tax benefit can be carried forward indefinitely, A detail modelling exercise was undertaken as part of the ORSA, in which it was demonstrated that it is expected that adequate profits will be generated in a 3 to 5-year horizon that will allow the Company to utilise the DTA that will be generated under the LACDT scenario, Additional stresses have been implemented to demonstrate the resilience of the Company and future profitability under adverse scenarios.

E.2.5 *Information on the inputs used to calculate the MCR*

The inputs used in the calculation of the MCR are presented in the table below:

MINIMUM CAPITAL REQUIREMENT	€'000s
Linear MCR	4,135
SCR	18,828
MCR cap	8,473
MCR floor	4,707
Combined MCR	4,707
Absolute floor of the MCR	4,000
MCR	**4,707**

E.3 Non-compliance with the MCR and non-compliance with the SCR

E.3.1 *Non-compliance with the MCR & SCR*

LifeStar has been continuously compliant with the both the MCR and the SCR throughout the year.

E.3.2 *Any reasonably foreseeable risk of non-compliance with the MCR or SCR*

Based on the projections of the solvency position performed as part of the ORSA and on the resilience the Company has shown to the stress tests performed, there is no reasonably foreseeable risk of non-compliance with the MCR or SCR.

E.3.3 *Plans to ensure compliance with SCR and MCR is maintained*

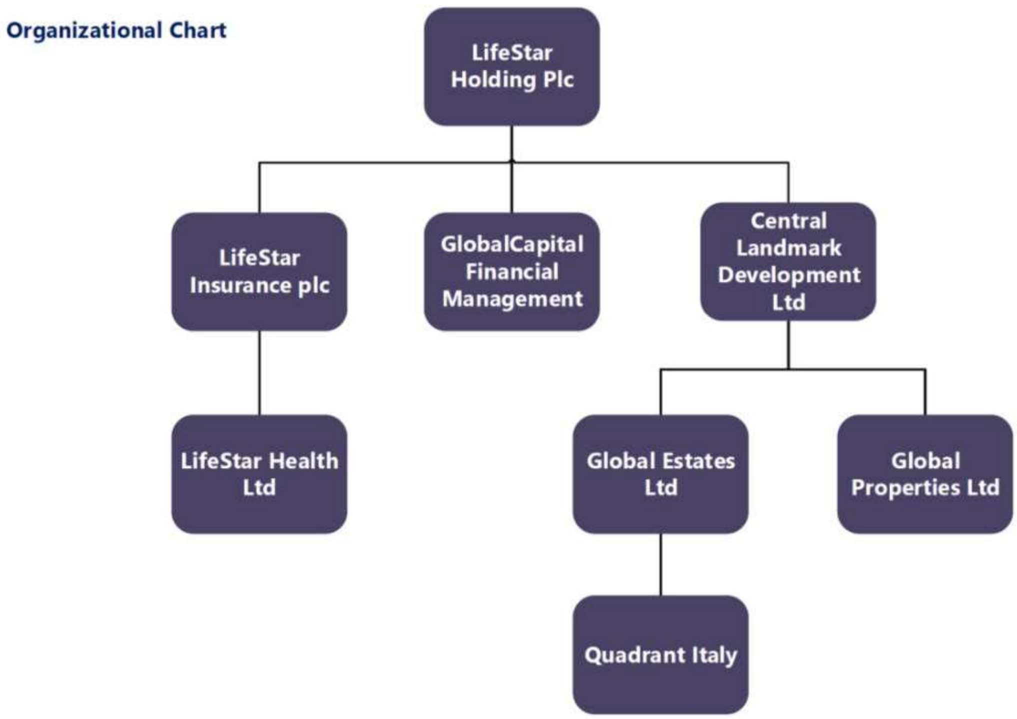
LifeStar will closely monitor actual experience compared to what was assumed in the ORSA projections, Should any material deviation occur, an investigation will take place to identify the underlying source and take corrective actions.

Moreover, ORSA projections will continue to be performed every year so as to ensure each and every year that the business strategy of the Company will be in line with its target solvency ratio.

Despite being sufficiently capitalised (based on the above projections), a medium-term capital management plan has been developed which includes realistic plans as to how to raise additional capital if and when required.

APPENDICES

Appendix A: LifeStar Holdings Plc Group Structure



Appendix B: Quantitative Reporting Templates (QRTs)

- S.02.01 – Balance sheet
- S.12.01 – life and health SLT Technical Provisions
- S.23.01 - own funds
- S.25.01 – SCR for Standard Formula
- S.28.01 – MCR only life or only non-life
- S.05.01 – premiums claims and expenses by LOB

Annex I
S.02.01.02
Balance sheet

		Solvency II value
Assets		**C0010**
Intangible assets	**R0030**	
Deferred tax assets	**R0040**	
Pension benefit surplus	**R0050**	
Property, plant & equipment held for own use	**R0060**	7,333
Investments (other than assets held for index-linked and unit-linked contracts)	**R0070**	59,070
Property (other than for own use)	**R0080**	13,692
Holdings in related undertakings, including participations	**R0090**	1,048
Equities	**R0100**	20,466
Equities - listed	**R0110**	12,226
Equities - unlisted	**R0120**	8,240
Bonds	**R0130**	22,000
Government Bonds	**R0140**	7,790
Corporate Bonds	**R0150**	14,210
Structured notes	**R0160**	
Collateralised securities	**R0170**	
Collective Investments Undertakings	**R0180**	1,554
Derivatives	**R0190**	
Deposits other than cash equivalents	**R0200**	311
Other investments	**R0210**	
Assets held for index-linked and unit-linked contracts	**R0220**	65,561
Loans and mortgages	**R0230**	13,704
Loans on policies	**R0240**	22
Loans and mortgages to individuals	**R0250**	
Other loans and mortgages	**R0260**	13,681
Reinsurance recoverables from:	**R0270**	3,872
Non-life and health similar to non-life	**R0280**	
Non-life excluding health	**R0290**	
Health similar to non-life	**R0300**	
Life and health similar to life, excluding health and index-linked and unit-linked	**R0310**	2,826
Health similar to life	**R0320**	
Life excluding health and index-linked and unit-linked	**R0330**	2,826
Life index-linked and unit-linked	**R0340**	1,045
Deposits to cedants	**R0350**	
Insurance and intermediaries receivables	**R0360**	270
Reinsurance receivables	**R0370**	957
Receivables (trade, not insurance)	**R0380**	504
Own shares (held directly)	**R0390**	
Amounts due in respect of own fund items or initial fund called up but not yet paid in	**R0400**	
Cash and cash equivalents	**R0410**	1,111
Any other assets, not elsewhere shown	**R0420**	843
Total assets	**R0500**	153,224

		Solvency II value
Liabilities		**C0010**
Technical provisions – non-life	**R0510**	
Technical provisions – non-life (excluding health)	**R0520**	
Technical provisions calculated as a whole	**R0530**	
Best Estimate	**R0540**	
Risk margin	**R0550**	
Technical provisions - health (similar to non-life)	**R0560**	

Annex I

S.02.01.02

Balance sheet

Technical provisions calculated as a whole	**R0570**	
Best Estimate	**R0580**	
Risk margin	**R0590**	
Technical provisions - life (excluding index-linked and unit-linked)	**R0600**	50,853
Technical provisions - health (similar to life)	**R0610**	
Technical provisions calculated as a whole	**R0620**	
Best Estimate	**R0630**	
Risk margin	**R0640**	
Technical provisions – life (excluding health and index-linked and unit-linked)	**R0650**	50,853
Technical provisions calculated as a whole	**R0660**	
Best Estimate	**R0670**	46,845
Risk margin	**R0680**	4,008
Technical provisions – index-linked and unit-linked	**R0690**	65,027
Technical provisions calculated as a whole	**R0700**	
Best Estimate	**R0710**	61,403
Risk margin	**R0720**	3,624
Contingent liabilities	**R0740**	
Provisions other than technical provisions	**R0750**	
Pension benefit obligations	**R0760**	
Deposits from reinsurers	**R0770**	
Deferred tax liabilities	**R0780**	1,800
Derivatives	**R0790**	
Debts owed to credit institutions	**R0800**	
Financial liabilities other than debts owed to credit institutions	**R0810**	
Insurance & intermediaries payables	**R0820**	4,674
Reinsurance payables	**R0830**	2,664
Payables (trade, not insurance)	**R0840**	
Subordinated liabilities	**R0850**	2,431
Subordinated liabilities not in Basic Own Funds	**R0860**	
Subordinated liabilities in Basic Own Funds	**R0870**	2,431
Any other liabilities, not elsewhere shown	**R0880**	559
Total liabilities	**R0900**	128,009
Excess of assets over liabilities	**R1000**	25,215

Annex I
S.05.01.02
Premiums, claims and expenses by line of business

		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	Miscellaneous financial loss	Health	Casualty	Marine, aviation, transport	Property	
		C0010	**C0020**	**C0030**	**C0040**	**C0050**	**C0060**	**C0070**	**C0080**	**C0090**	**C0100**	**C0110**	**C0120**	**C0130**	**C0140**	**C0150**	**C0160**	**C0200**
Premiums written																		
Gross - Direct Business	**R0110**																	
Gross - Proportional reinsurance accepted	**R0120**																	
Gross - Non-proportional reinsurance accepted	**R0130**																	
Reinsurers' share	**R0140**																	
Net	**R0200**																	
Premiums earned																		
Gross - Direct Business	**R0210**																	
Gross - Proportional reinsurance accepted	**R0220**																	
Gross - Non-proportional reinsurance accepted	**R0230**																	
Reinsurers' share	**R0240**																	
Net	**R0300**																	
Claims incurred																		
Gross - Direct Business	**R0310**																	
Gross - Proportional reinsurance accepted	**R0320**																	
Gross - Non-proportional reinsurance accepted	**R0330**																	
Reinsurers' share	**R0340**																	
Net	**R0400**																	
Expenses incurred	**R0550**																	
Balance - other technical expenses/income	**R1200**																	
Total expenses	**R1300**																	

		Line of Business for: **life insurance obligations**						**Life reinsurance obligations**		Total
		Health insurance	Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	Health reinsurance	Life reinsurance	
		C0210	**C0220**	**C0230**	**C0240**	**C0250**	**C0260**	**C0270**	**C0280**	**C0300**
Premiums written										
Gross	**R1410**		4,006	16,107	5,531					25,644
Reinsurers' share	**R1420**		59	315	1,923					2,297
Net	**R1500**		3,947	15,792	3,609					23,347
Premiums earned										
Gross	**R1510**		4,006		5,531					9,537
Reinsurers' share	**R1520**		59	315	1,923					2,297
Net	**R1600**		3,947	-315	3,609					7,240
Claims incurred										
Gross	**R1610**		6,091	294	1,828					8,213
Reinsurers' share	**R1620**			172	1,183					1,355
Net	**R1700**		6,091	122	645					6,858
Expenses incurred	**R1900**		673	3,504	1,511					5,688
Balance - other technical expenses/income	**R2500**									2,902
Total expenses	**R2600**									8,590
Total amount of surrenders	**R2700**		5,337	22	49					5,409

Annex I
S.12.01.02
Life and Health SLT Technical Provisions

		Insurance with profit participation	Index-linked and unit-linked insurance			Other life insurance			Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Accepted reinsurance	**Total (Life other than health insurance, incl. Unit-Linked)**	Health insurance (direct business)			Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Health reinsurance (reinsurance accepted)	**Total (Health similar to life insurance)**
				Contracts without options and guarantees	Contracts with options or guarantees		Contracts without options and guarantees	Contracts with options or guarantees					Contracts without options and guarantees	Contracts with options or guarantees			
		C0020	**C0030**	**C0040**	**C0050**	**C0060**	**C0070**	**C0080**	**C0090**	**C0100**	**C0150**	**C0160**	**C0170**	**C0180**	**C0190**	**C0200**	**C0210**
Technical provisions calculated as a whole	**R0010**																
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	**R0020**																
Technical provisions calculated as a sum of BE and RM																	
Best Estimate																	
Gross Best Estimate	**R0030**	54,235		61,403			-7,390				108,248						
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	**R0080**			1,045			2,826				3,872						
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	**R0090**	54,235		60,358			-10,216				104,377						
Risk Margin	**R0100**	3,441	3,624			567					7,632						
Technical provisions - total	**R0200**	57,676	65,027			-6,823					115,881						

Annex I
S.23.01.01
Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	**R0010**	9,170	9,170			
Share premium account related to ordinary share capital	**R0030**					
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	**R0040**					
Subordinated mutual member accounts	**R0050**					
Surplus funds	**R0070**					
Preference shares	**R0090**					
Share premium account related to preference shares	**R0110**					
Reconciliation reserve	**R0130**	16,045	16,045			
Subordinated liabilities	**R0140**	2,431			2,431	
An amount equal to the value of net deferred tax assets	**R0160**					
Other own fund items approved by the supervisory authority as basic own funds not specified above	**R0180**					
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	**R0220**	961				
Deductions						
Deductions for participations in financial and credit institutions	**R0230**					
Total basic own funds after deductions	**R0290**	26,685	24,253		2,431	
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	**R0300**					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	**R0310**					
Unpaid and uncalled preference shares callable on demand	**R0320**					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	**R0330**					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	**R0340**					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	**R0350**					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	**R0360**					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	**R0370**					
Other ancillary own funds	**R0390**					

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Total ancillary own funds	**R0400**					
Available and eligible own funds						
Total available own funds to meet the SCR	**R0500**	26,685	24,253		2,431	
Total available own funds to meet the MCR	**R0510**	26,685	24,253		2,431	
Total eligible own funds to meet the SCR	**R0540**	26,685	24,253		2,431	
Total eligible own funds to meet the MCR	**R0550**	25,195	24,253		941	
SCR	**R0580**	18,828				
MCR	**R0600**	4,707				
Ratio of Eligible own funds to SCR	**R0620**	141.73%				
Ratio of Eligible own funds to MCR	**R0640**	535.26%				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	**R0700**	25,215
Own shares (held directly and indirectly)	**R0710**	
Foreseeable dividends, distributions and charges	**R0720**	
Other basic own fund items	**R0730**	9,170
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced fu	**R0740**	
Reconciliation reserve	**R0760**	16,045
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	**R0770**	15,942
Expected profits included in future premiums (EPIFP) - Non-life business	**R0780**	
Total Expected profits included in future premiums (EPIFP)	**R0790**	15,942

Annex I
S.25.01.21
Solvency Capital Requirement - for undertakings on Standard Formula

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
Market risk	R0010	19,934		
Counterparty default risk	R0020	362		
Life underwriting risk	R0030	8,540		
Health underwriting risk	R0040			
Non-life underwriting risk	R0050			
Diversification	R0060	-5,157		
Intangible asset risk	R0070			
Basic Solvency Capital Requirement	R0100	23,679		

		C0100
Calculation of Solvency Capital Requirement		
Operational risk	R0130	694
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	-5,545
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
Solvency capital requirement excluding capital add-on	R0200	18,828
Capital add-on already set	R0210	
of which, capital add-ons already set - Article 37 (1) Type a	R0211	
of which, capital add-ons already set - Article 37 (1) Type b	R0212	
of which, capital add-ons already set - Article 37 (1) Type c	R0213	
of which, capital add-ons already set - Article 37 (1) Type d	R0214	
Solvency capital requirement	R0220	18,828
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirement for remaining part	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

Annex I
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

		MCR components
		C0010
MCR_{NL} Result	R0010	

		Background information	
		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	C0030
Medical expense insurance and proportional reinsurance	R0020		
Income protection insurance and proportional reinsurance	R0030		
Workers' compensation insurance and proportional reinsurance	R0040		
Motor vehicle liability insurance and proportional reinsurance	R0050		
Other motor insurance and proportional reinsurance	R0060		
Marine, aviation and transport insurance and proportional reinsurance	R0070		
Fire and other damage to property insurance and proportional reinsurance	R0080		
General liability insurance and proportional reinsurance	R0090		
Credit and suretyship insurance and proportional reinsurance	R0100		
Legal expenses insurance and proportional reinsurance	R0110		
Assistance and proportional reinsurance	R0120		
Miscellaneous financial loss insurance and proportional reinsurance	R0130		
Non-proportional health reinsurance	R0140		
Non-proportional casualty reinsurance	R0150		
Non-proportional marine, aviation and transport reinsurance	R0160		
Non-proportional property reinsurance	R0170		

Linear formula component for life insurance and reinsurance obligations

		C0040
MCR_L Result	R0200	4,135

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

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0050	C0060
Obligations with profit participation - guaranteed benefits	R0210	54,235	
Obligations with profit participation - future discretionary benefits	R0220		
Index-linked and unit-linked insurance obligations	R0230	60,358	
Other life (re)insurance and health (re)insurance obligations	R0240		
Total capital at risk for all life (re)insurance obligations	R0250		2,436,419

Overall MCR calculation

		C0070
Linear MCR	R0300	4,135
SCR	R0310	18,828
MCR cap	R0320	8,473
MCR floor	R0330	4,707
Combined MCR	R0340	4,707
Absolute floor of the MCR	R0350	4,000
Minimum Capital Requirement	R0400	4,707