VOLKSWAGEN INSURANCE COMPANY dac

Solvency and Financial Condition Report

2016

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Introduction

The new, harmonised EU-wide regulatory regime for insurance and reinsurance undertakings, known as Solvency II, came into force with effect from 1 January 2016. The regime requires new reporting and public disclosure arrangements to be put in place by undertakings.

This Solvency and Financial Condition Report ("SFCR") has been prepared by the management of VICO in line with the requirements of the Solvency II Regulations, to assist clients of Volkswagen Insurance Company dac ("VICO", "the Company") and other stakeholders in understanding the nature of our business, how it is managed, and its solvency position. This report was presented to the Board in advance of its release for their review and guidance. The reader will obtain a clear understanding of the governance that exists within the Company and how all key stakeholders contribute to its success.

This report covers the Business and Performance of the Undertaking, its System of Governance, Risk Profile, Valuation for Solvency Purposes and Capital Management. The Administrative Body that has the responsibility for all of these matters is the Undertaking's Board of Directors, with the assistance of various governance and control functions that it has put in place to monitor and manage the business.

In the twelve months since implementation of Solvency II, there have been no material changes to the Undertaking's business, governance structure, risk profile, or solvency capital position over the reporting period.

A. Business and Performance

A.1. Business and external environment

Volkswagen Insurance Company dac (VICO) is an Irish incorporated entity domiciled in the Republic of Ireland and is authorised by the Central Bank of Ireland to provide non-life insurance under the European Union (Insurance and Reinsurance) Regulations 2015 (S.I. No. 485 of 2015).

The principal activity of VICO is the acceptance of insurance business written relating to the Volkswagen group.

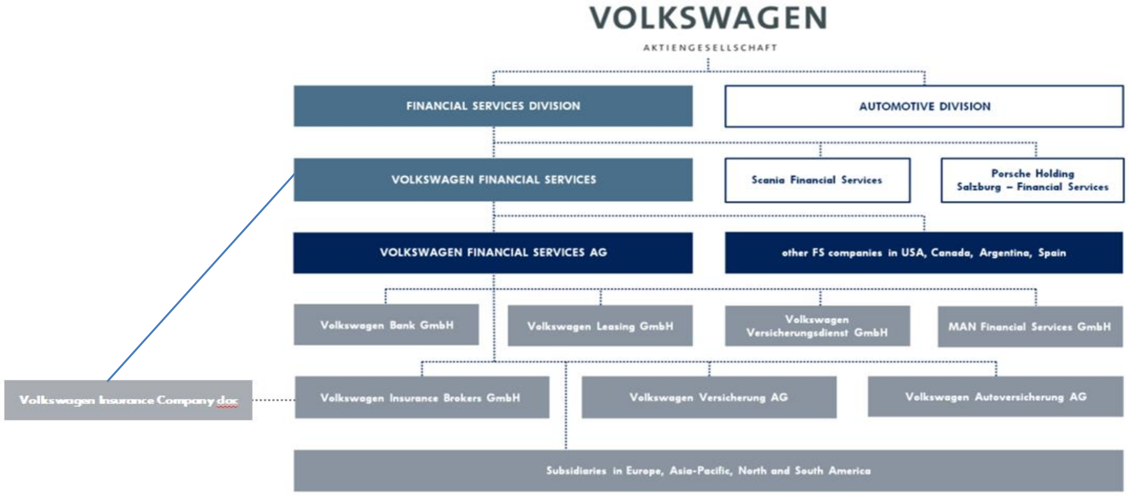
VICOs' registered office address is: Block C, Liffey Valley Office Campus, Liffey Valley, Dublin 22, D22 CF60, Ireland.

The Company's regulatory supervisor is the Central Bank of Ireland, whose address is: Central Bank of Ireland, North Wall Quay, Spencer Dock, PO Box 11517, Dublin 1, Ireland.

The Company's external auditor is PricewaterhouseCoopers, Chartered Accountants and Statutory Audit Firm, One Spencer Dock, North Wall Quay, Dublin 1, Ireland.

Please refer to "A2 Underwriting performance" for information on material lines of business, and geographical locations where the Company carries out its business.

The Company is a wholly owned subsidiary of Volkswagen Financial Services AG, incorporated in Germany. The ultimate parent company is Volkswagen AG as can be seen from the organisation chart below.



VICO is a captive insurer. A captive is defined by the Central Bank of Ireland as "An insurance or reinsurance undertaking, owned either by a financial undertaking other than an insurance or reinsurance undertaking or a group of insurance or reinsurance undertakings within the meaning of point (c) of Article 212(1) of Directive 2009/138/EC (the Solvency II Directive) or by a non-financial undertaking, the purpose of which is to provide insurance or reinsurance cover exclusively for the risks of the undertaking or undertakings to which it belongs or of an undertaking or undertakings of the group of which it is a member."

The Company is classified as a Low Impact firm under the Central Bank of Ireland's risk-based framework for the supervision of regulated firms, known as PRISM or Probability Risk and Impact SysteM and is subject to the Central Bank of Ireland's Corporate Governance Requirements for Captive Insurance and Captive Reinsurance Undertakings 2015.

A.2. Performance from underwriting activities

The following table sets out VICO's underwriting performance at an aggregate level and by line of business. The financial values are per VICO's financial statements, which have been prepared under the historical cost convention and in accordance with Financial Reporting Standards 102 & 103 ("FRS 102 & 103"), as issued by the Financial Reporting Council, and promulgated for use in Ireland by Chartered Accountants Ireland (hereinafter "Local GAAP"):

Underwriting Performance (by material line of business)	Total	Marine, aviation and transport insurance	Fire and other damage to property insurance	Medical expense insurance	Miscellaneous financial loss
31-Dec-16	€'000s	€'000s	€'000s	€'000s	€'000s
Gross Written Premium	57,487	33,929	21,334	210	2,014
Gross Earned Premium	56,537	33,929	21,334	210	1,063
Net Written Premium	10,996	5,488	3,284	210	2,014
Net Earned Premium	10,045	5,897	2,875	210	1,063
Net Incurred Claims	-1,007	1,876	-2,964	0	81
Underwriting expenses	7,940	3,268	4,348	10	314
Underwriting result	3,113	753	1,491	200	669

Overall performance is in line with expectations from prior years with the exception of our Property Damage programme where there was a release of reserves from prior year large losses.

VICO's Medical Expenses and Miscellaneous Financial Loss lines are Stop Loss programmes which have always performed well.

The following table sets out VICO's underwriting performance at an aggregate level and by material geographical area. The financial values are per VICO's Local GAAP financial statements

Underwriting Performance (by material geographical area)	Total	Germany	Mexico	Spain	Czech Rep	Other outside Top 4
31-Dec-16	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s
Gross Written Premium	57,487	29,955	4,146	3,939	2,493	57,487
Gross Earned Premium	56,537	29,955	4,146	3,939	2,493	16,004
Net Written Premium	10,996	5,104	644	2,741	163	-29,536
Net Earned Premium	10,045	5,104	644	2,741	163	1,394
Net Incurred Claims	-1,007	738	-4,010	-8	-1,003	-9,659
Underw riting expenses	-4,284	0	0	0	0	0
Underw riting result	15,337	4,366	4,654	2,749	1,166	11,053

The majority of VICO's risks are located in Germany and the other EU member states. The negative underwriting result for "Other" geographical areas is primarily due to some large claims being reported in Brazil and China which is part of Global programmes. As demonstrated by the table on the previous page, all lines of business are performing as expected.

A.3. Performance from investment activities

Investment Income	Total
31-Dec-16	**€'000s**
Deposits other than cash equivalents	71

The Company's own funds are invested in minimum A rated highly liquid cash deposits only. The income represents a yield of 0.3%, but provides full liquidity to cover any potential claims payments in a timely fashion.

A.4. Performance from other activities

VICO did not have any other material income or expenses incurred in the year, including any operating or finance leases.

A.5. Any other information

During the year the Company's name was changed to Volkswagen Insurance Company Designated Activity Company from Volkswagen Insurance Company Limited in accordance with obligations arising under the Companies Acts 2014.

B. Systems of Governance

B.1. General information on the system of governance

The VICO Board has ultimate responsibility for the governance of the Company and over time has developed a robust Risk Management System.

The VICO Board of Directors are:

Name	Status on Board	Date of Appointment
Maximilian Templer *	Executive Director and Chairman	04/07/2009
Lars Kaufmann	Executive Director	04/04/2012
Richard Tulloch	Independent Non Executive Director	01/04/2015
Aine Mc Mahon **	Executive Director and Chairman	06/02/2017

*resigned on 31st December 2016
** appointed on 6th February 2017

The general governance arrangements and Risk Management System of VICO may be described as relying on three pillars:

1) A Governance Framework aligned with VICO's strategic objectives, providing top level oversight by the Board, clear ownership and accountability for risks, appropriate independence to various risk stakeholders as well as clear escalating and reporting channels.

2) A Risk Management Function which, thanks to a clearly defined Risk Appetite framework, sets out VICO's strategic objectives in documented Risk Policies. The Risk Management System includes appropriate limits and operational checkpoints and the approach to functional identification, measurement, mitigation and monitoring processes are documented. This Risk Management System also explains the various roles and responsibilities of those stakeholders defined within the Governance framework.

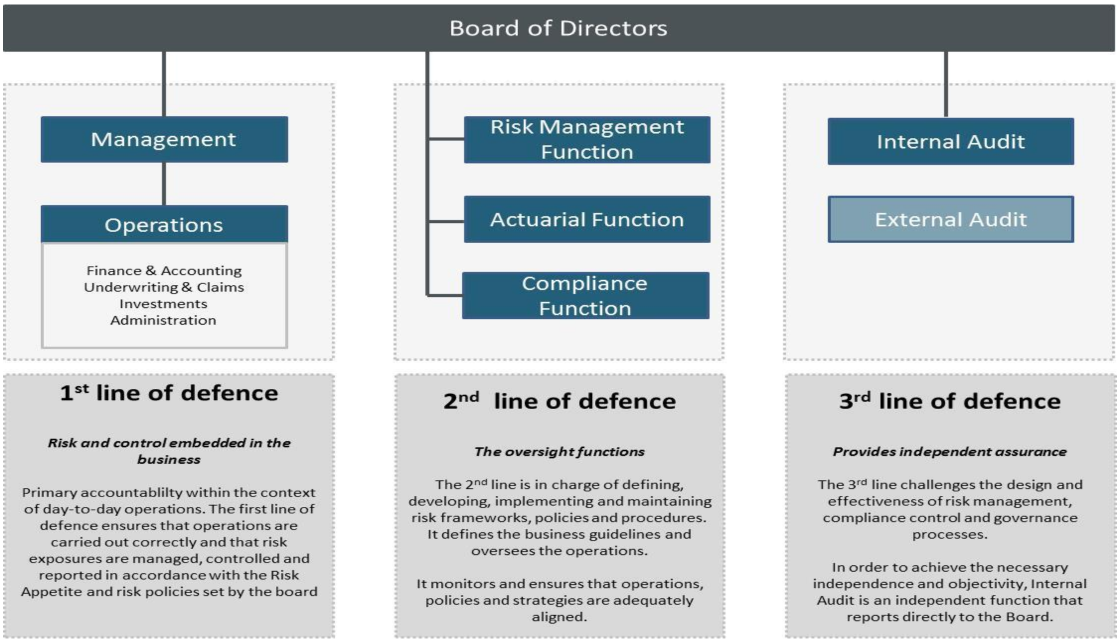
3) A Risk Register combining operational and risk management processes to deliver a descriptive analysis of material risks facing VICO's global strategic objectives.

VICO has established four key control functions - Risk Management, Actuarial, Compliance and Internal Audit. These functions are responsible for providing guidance, oversight of and challenge to the business, and for providing assurance to the Board in relation to the Company's control framework.

Key Functions	Name	Company
Head of Compliance	Kieran Creevy	Volkswagen Insurance Company dac
Chief Risk Officer	Peter Nolan	Volkswagen Insurance Company dac
Head of Actuarial Function*	Sinead Kiernan	Deloitte
Head of Internal Audit*	Ray Kelly	Eisner Ampner

**Outsourced*

The role and responsibilities of each key control function is reviewed annually by the Board to ensure each function has the required access to information and personnel (from employees, directors to outsourced providers), is independent and free from influence, and has the human and financial resources to fulfil its role. The Board retains responsibility for key activities and has not delegated such responsibility to any formal sub-committees.



B.1.1. Role of the Board of Directors

The Board of Directors is charged with the strategic management of the company. The role of each director, in addition to their fundamental fiduciary duties under Company law in Ireland, includes:

- attending each board meeting unless they are unable to do so owing to circumstances beyond their control;
- ensuring that they have a knowledge and understanding of the business, risks and material activities of VICO;
- overseeing the effective management of VICO by the Management team;
- participating actively in constructively challenging and developing strategies;
- participating actively in the Board's decision making process;
- exercising appropriate oversight over the execution of the agreed strategies, goals and to monitor reporting of performance; and
- propose strategies to the Board and following challenging Board scrutiny, overseeing the execution of the agreed strategies.

In the course of 2016, VICO held three Board meetings which were attended by all Board members. The Board actively review the prior meeting minutes and matters arising and are provided with an updated on the progress and status of any recommended tasks emanating from previous meeting.

The standard Board agenda (at a minimum) comprises of the following key areas:

- Underwriting
- Finance
- Risk
- Compliance
- Regulatory update
- Claims

Internal Audit and Actuarial Function are included on agenda at least once a year.

The Board actively discuss each area which results in take away actions and tasks. The Board guide management as to they would like each action achieved.

B.1.2. Role of the Risk Management Function

The Board has established a Risk Management Function ("RMF") with the purpose of assisting the Board in providing leadership, direction and oversight of VICO's risk appetite, tolerance, risk strategy and risk management and control framework. The RMF's primary function is to identify measure, manage, monitor and report significant risks to the achievement of VICO's business objectives. The Chief Risk Officer ("CRO") is responsible for oversight of the RMF and specific functional responsibilities include, but are not limited to:

- documenting the Risk Appetite framework of VICO;
- reporting to the Board on recommendations regarding and deviations from the Risk Appetite;
- defining and documenting policies and principles of risk management;
- carrying out the operational processes, maintenance and monitoring of the Risk Management System in collaboration with other functions;
- establishing a Risk Register and providing the Board with all relevant information concerning risks VICO is or can be exposed to;
- perform the Own Risk and Solvency Assessment (ORSA) and produce the related reporting in collaboration with the Actuarial Function;
- oversee the implementation of the policies and principles related to the underwriting risk of VICO;
- defining the acceptance of risks covered by VICO with the support of other functions and tools available;
- defining the company's reinsurance programmes and select reinsurers;
- analysing losses and monitoring the profitability of the portfolio of risks underwritten;
- updating the Board on the evolution of technical figures;

- reviewing and reporting to the Board on the adequacy of the reinsurance programme and other risk-mitigation policies on an annual basis;
- monitoring the security of reinsurers and reporting to the Board;
- advising the Board on the Operational Risk Policy, monitoring its effectiveness and reporting as appropriate to the Board; and
- ensuring that the suite of policies (e.g. Operational Risk Management policy) are in line with the agreed Risk Appetite.

The CRO has direct access to the Board and reports at least once a year to the Board or as and when requested by the Board The Board are provided with the risk report in advance of said Board meeting to allow the Board sufficient time to review.

B.1.3. Role of the Actuarial function

The Head of Actuarial Function ("HoAF") is outsourced to Deloitte. This adds an independent oversight of the Company's Actuarial Function. The responsibilities of the HoAF and the Actuarial Function, in line with regulatory guidance include, but are not limited to, the following matters:

- Co-ordinate calculation of technical provisions;
- Inform the Board of the adequacy of calculation;
- Prepare opinion on overall underwriting policy;
- Prepare opinion on adequacy of reinsurance arrangements;
- Contribute to effective risk management system;
- Provide opinion to the Board on range of risks & adequacy of the scenarios considered as part of the ORSA.

The HoAF has direct access to the Board and reports at least once a year to the Board or as and when requested by the Board The Board are provided with the actuarial function report in advance of said Board meeting to allow the Board sufficient time to review.

B.1.4. Role of the Compliance function

The compliance function has the following roles and responsibilities:

- Advice - The compliance function advises the Board on compliance with laws, rules and standards, including keeping the Board informed on developments in the area of compliance.
- Guidance and education - The compliance function assists in educating the Board on compliance issues, and acting as a contact point for compliance queries from staff members. The compliance function establishes written guidance on the appropriate implementation of compliance laws, rules and standards through policies and procedures and other documents such as compliance manuals, internal codes of conduct and practice guidelines.
- Monitoring, testing and reporting - The compliance function monitors and tests compliance by performing sufficient and representative compliance testing. The results of the compliance testing are reported to the Board on at least an annual basis.

The Compliance function, led by the General Manager as Compliance Officer, reports administratively and functionally to the Board at each Board meeting The Board is provided with a compliance update in advance of each Board meeting to allow the Board sufficient time to review.

B.1.5. Role of the Internal Audit function

The purpose of the Internal Audit Function is to serve as an independent function that objectively evaluates and recommends improvements to VICO's Internal Control System by facilitating an objective and independent assessment. The Internal Audit function is outsourced to EisnerAmper Ireland thus ensuring independence.

It assists VICO to accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes employed by VICO.

The role of the Internal Audit function includes:

- the examination and evaluation of the adequacy and effectiveness of the Internal Control Systems;
- the review of the application and effectiveness of risk management procedures and risk assessment methodologies;
- the review of the management and financial information systems, including the electronic information system and electronic banking services utilized by VICO;
- the review of the accuracy and reliability of the accounting records and financial reports;
- the review of the means of safeguarding assets;
- the testing of both transactions and the functioning of specific internal control procedures;
- the review of the systems established by the compliance function to ensure compliance with legal and regulatory requirements, codes of conduct and the implementation of policies and procedures;

The Internal Audit Function is objective and independent from the operational functions and does not have any responsibility for any other function when evaluating and reporting the audit results. The Head of Internal Audit has direct access to the Board and reports at least annually to the Board or as and when requested by the Board The Board are provided in advance of said Board meeting an Internal Audit report to allow the Board sufficient time to review.

B.1.6. Remuneration policy

VICO has implemented a Remuneration Policy which outlines the terms and conditions for the remuneration of non-executive Directors, executive Directors and senior management employees. The policy sets out to preclude the possibility of manipulation; negative incentives and undesired risk taking.

The objectives of the Remuneration policy are to ensure that:

- remuneration practices are aligned with VICO strategy, Risk Management Strategy and risk appetite, objectives, values and long-term interests of VICO.
- the policy applies to the undertaking as a whole in a proportionate and risk focused way, taking into account the respective roles of the personnel responsible for key functions or who make or participate in making, decisions that affect the whole, or a substantial part of VICO's business, including members of the Board of Directors.
- the remuneration practices do not foster practices adverse to the policyholders' interests
- a clear, transparent and effective governance structure around remuneration is in place
- VICO can attract and retain highly qualified Board members and employees with skills required to effectively manage VICO
- Board members and employees are compensated appropriately for the services they provide to VICO
- the remuneration motivates Board members and employees to perform in the best interests of the VICO and its stakeholders

VICO does not provide any share based or long term incentive schemes to its directors or employees. In addition, VICO does not provide any supplementary pension or early retirement schemes to its Directors or key function holders.

B.1.7. Material transactions with related parties

As a Captive insurer, the company's business requires it to deal with group-related entities. Hence the need for the company to have developed a sound system of governance to ensure appropriate controls are in place. Other than as part of the course of its normal business, there were no material transactions with the shareholders, directors' or those who exert significant influence over VICO during the year.

B.1.8. Adequacy of the systems of governance

Reviews of the corporate governance and effectiveness of the Board of VICO are carried out on a regular basis, taking into account the requirements of the Central Bank of Ireland's "Corporate Governance Requirements for Captive Insurance and Captive Reinsurance Undertakings 2015".

Management and the Board believe that the systems of governance in place are adequate and effective, and are proportionate to reflect the nature, scale and complexity of the risks inherent to the entity.

B.2. Fit and proper requirements

B.2.1. Fit and proper policy

The Company's fit and proper policy sets out VICO's approach to the assessment of the fitness and probity of persons who effectively run VICO or are responsible for other key functions.

This policy is in compliance with the any regulations around the area of Fitness and Propriety as maybe issued by regulators from time to time.

The purpose of the policy is to create transparency and consistency in our systems and processes to achieve our organisational targets and be fully compliant with all of our legal requirements at all times

B.2.2. Fit and proper assessment and requirements

Criteria for Fitness and Propriety assessments

Criteria considered as part of the determination of an individual's Fitness and Probity includes whether the individual:

- possesses the necessary skills, knowledge, expertise, diligence, relevant qualification and soundness of judgment to undertake and fulfill the particular duties and responsibilities of the particular position;
- has demonstrated the appropriate competence and integrity in fulfilling occupational, managerial or professional responsibilities previously in their professional career;
- possesses the competence, character, diligence, honesty, integrity and judgment to perform properly their duties;
- the person has a conflict of interest in performing the duties;
- has been reprimanded, or disqualified, or removed, by a professional or regulatory body in relation to matters regarding the person's honesty, integrity, or business conduct;
- has been the subject of civil or criminal proceedings or enforcement action, in relation to the management of an entity, or commercial or professional activities, and which reflected adversely on the person's competence, diligence, judgment, honesty or integrity;
- has been substantially involved in the management of a business or VICO which has failed, where that failure has been occasioned in part by deficiencies in that management;
- has sufficient time to devote to the role and associated responsibilities;
- is financially sound.

Assessments of a person's fitness and propriety for a responsible person position must be made:

- before the person is appointed;
- on at least an annual basis following appointment;
- upon the event of material information adverse to the assessment becoming known to VICO or any other circumstances whereby the fitness or probity of responsible persons may be adversely affected.

B.3. Risk Management System (including the ORSA)

B.3.1. Risk Management System

VICO has developed and implemented a risk management system which is a comprehensive process for monitoring, reviewing, understanding, and appropriately managing and mitigating the risks associated with the company's objectives over the short, medium and long term. The Risk Management System comprises of the following:

- Risk Management Strategy which outlines the framework with which VICO identifies, assesses, monitors, controls and reports on a continuous basis all key material risks facing the business;
- Risk Management Policies for each key risk class, which define the material risks faced by VICO, and sets out how the Risk Management Strategy and the relevant risk appetite shall be implemented across that risk class and the control framework in place;
- Risk Management Processes and Procedures which set out the processes and procedures that VICO employs to identify, assess, manage and monitor material risks the Company is, or might be exposed to (emerging risks) and how these risks are reported; and
- ORSA process: the process of assessing all the risks inherent in the business and thereby determining the corresponding capital needs.

They key objectives of the Risk Management Strategy are to:

- be consistent with the strategic objectives of VICO;
- operate across all the activities of VICO;
- be a continuous process;
- be referred to in all major decision-taking of VICO;
- set out the level of risk acceptable to VICO (Risk Appetite and risk tolerance);
- be further specified to each key risk class through individual Risk management policies which will act as internal guidelines on the framework that management has to take into account when exercising their responsibilities;
- set out the key risks of VICO;
- assign the overall risk management responsibilities;
- identify risks to be addressed by contingency plans.

The Risk Management Strategy is a high-level plan developed by the Board of Directors and sets out how risk should be managed and how much risk should be accepted in order for VICO to achieve its strategic objectives. The Strategy shall therefore operate across all operations of VICO and in all decision-making. A review of the Strategy will take place at least annually or periodically if required.

B.3.2. ORSA

The Own Risk and Solvency Assessment policy and procedure is a top-down strategic analysis linking the business plan to risk and capital management. It may only be amended by the approval of the Board.

The ORSA allows the Undertaking to:

- Assess the material risks it faces;
- Assess the amount of capital it requires to protect against those risks; and
- Document the assessment of risks and capital requirements to ensure that strategic decision making remains within appetite.

The ORSA is used to assess whether VICO's risk management and solvency position is adequate, and also to consider its development in the future. It represents a fundamental part of the risk management system. The ORSA is linked to VICO's business planning process and acts as a key management tool in the development of the strategy and risk and capital management.

Strategic decisions are taken into consideration in the ORSA process through a forward looking assessment process. Additionally, management is aware of the implications of its decisions on the risk profile and regulatory capital requirements of the Undertaking.

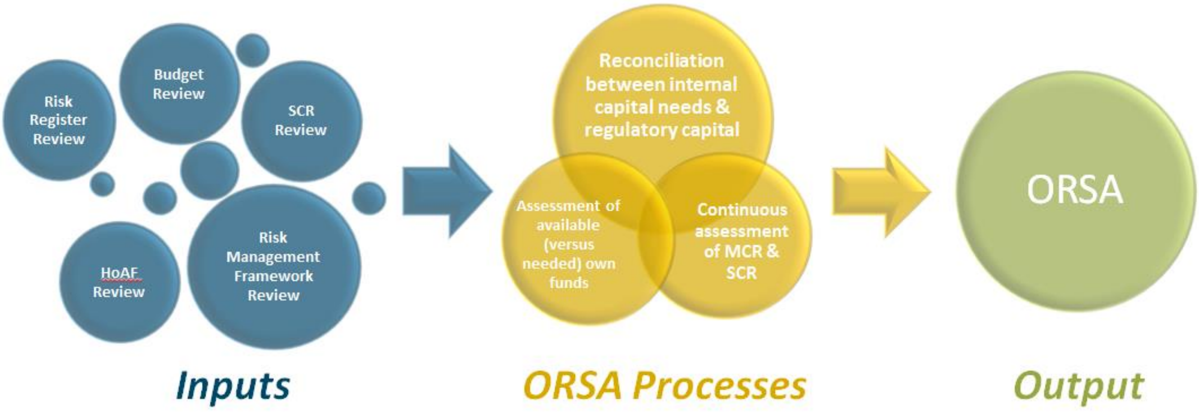
Any strategic or other major decisions that may materially affect the own funds and solvency position of VICO needs to be considered through the ORSA process before such a decision is taken. As such the ORSA considers risk, capital, performance and strategy processes, and provides management with information required to make key decisions regarding the overall risk and capital profile of the business.

VICO has processes in place to ensure that the required documentation is produced to an appropriate standard. A record of each ORSA is produced, which serves as both the internal report and support for the supervisory reporting.

The Risk Management Function is responsible for coordinating the overall process. Given its quantitative nature, actuarial skills are required to provide their views. Other areas and functions involved and asked to contribute include the insurance team but not limited to VICO insurance team, business planning and finance functions along with senior management in general. Each of these is involved iteratively as their inputs are included and the results used to define further refinements and scenarios.

The report is then presented to the Board for challenge, review and approval. However as referenced previously, there are certain events that may require the process to be run on an ad hoc basis. Such events may follow from internal decisions and external factors or if the risk profile of the Company changes significantly.

The diagram below details the key inputs, processes and outputs associated with the ORSA:



The Risk Management function validates the outputs of each process individually, and also undertakes cross-validation between the outputs of each process, to ensure that they are consistent, or that differences are understood.

VICO determined that the Solvency II standard formula would be used to calculate the required solvency capital. A three year base case projection of the Solvency II Balance Sheets and Solvency Capital Requirements ('SCR') position is produced using the standard formula, as well as actuarial and reserving assumptions. The results are subjected to a range of stress and scenario tests that is reviewed by management and challenged by the Board and, where appropriate, potential management actions are noted and conclusions drawn. Furthermore, the risk management function, management and the Board consider its view of VICO's overall solvency assessment which is subject to similar stress and scenario testing. This range of stress and scenario tests are considered in order to provide an adequate basis for the assessment of VICO's overall solvency needs.

Assessments to date indicate that, under the standard formula and ORSA scenarios presented by Management to the Board, VICO is adequately capitalised. Section E sets out the capital management structure of VICO. Capital is a key factor in understanding the solvency needs of VICO, and this is factored in by management during the overall risk management process and through the provision of a capital management plan to the Board.

B.4. Internal control system

B.4.1. Internal control system (ICS)

The Board is ultimately responsible for overseeing and maintaining the adequacy and effectiveness of the risk management systems and has addressed this by developing and implementing the system of governance, including the risk appetite framework, risk management system, the related suite of policies and procedures necessary to support it and monitoring the operation of those policies in a controlled fashion such that management and the Board are in a position to identify, understand and react to matters that require their attention

In order to achieve this, the Internal Control framework of VICO reflects the following characteristics.

Component	Contents
1) Control environment	A strong "risk and control" culture is embedded within VICO's operations through the continuous oversight of the Board of Directors and the communication to all internal stakeholders of all governance and risk principles through the present manual.
2) Risk assessment	Procedures and policies are detailed and formalized in order to disclose the way of identifying, managing, controlling, mitigating and reporting issues relating to each risk category.
3) Reporting channels	Clear and structured reporting processes are in place enabling the Board of Directors to have access to relevant, complete, reliable, correct and timely communication related to internal as well as external events.
4) Monitoring process	The appropriate escalation of significant issues to the Board of Directors, the ongoing involvement of all internal stakeholders as well as the Internal Audit process enables VICO to continuously monitor and adapt when necessary its Internal Control System.
5) Control activities	VICO developed a comprehensive set of preventive, detective or corrective control actions embedded in its daily operations, as formalized hereafter.

B.4.2. Compliance Function

The Compliance Function of VICO is structured as follows:

1. The Compliance Officer (this role is fulfilled by the General Manager) reports directly to the Board of VICO on a regular basis and at least annually. The Board ensures that the Compliance Officer has sufficient experience and qualifications and is of good repute to discharge the associated duties, in line with VICO's Fitness and Propriety Policy.
2. The Board endeavors to ensure the independence of the compliance function of VICO. The independence in respect of the day to day environment in which the Compliance Officer of VICO works is reinforced by the Board of VICO by:

   - ✓ Formal appointment by the Board;
   - ✓ Compliance Officer reports directly to the Board;
   - ✓ The Compliance Officer has complete and unfettered access to all information and personnel they require to discharge their duties;
   - ✓ Peer review of compliance tasks carried out quarterly and annually by Aon Insurances Managers (Dublin) Limited in order to confirm compliance with all regulatory requirements.

The Board has committed to at least once a year undertake a Compliance Risk Assessment for VICO to identify and assess the main compliance risk issues facing VICO. This Compliance Risk Assessment forms part of the overall Risk Management System of VICO which monitors the risks faced by VICO. The Board amends this policy as necessary to ensure that the policy continues to be relevant in addressing the compliance risks faced by VICO.

Such assessments should address any shortfalls (policy, procedures, implementation or execution) related to how effectively existing compliance risks have been managed, as well as the need for any additional policies or procedures to deal with new compliance risks identified as a result of the annual compliance risk assessment.

At least once a year, the Compliance Officer reports to the Board on the management of VICO's compliance risk, in such a manner as to assist Board members to make an informed judgment on whether VICO is managing its compliance risk effectively.

Notwithstanding this the Compliance Officer reports promptly to the Board on any material compliance failures (e.g. failures that may attract a significant risk of legal or regulatory sanctions, material financial loss, or loss to reputation) as they arise thought out the year.

VICO's Compliance Officer is subject to and must comply with the requirements of the VICO compliance policy.

B.5. Internal audit function

B.5.1. Implementation of the Internal Audit Function

Internal Audit is an independent function outsourced to an external audit firm, EisnerAmper Ireland, in line with VICO's approved outsourcing policy. The activities of the Internal Audit function are carried out by appropriately skilled and experienced individuals in line with VICO's Fitness and Probity Policy, and the Head of Internal Audit has been approved by the Central Bank of Ireland as a Pre-Approval Controlled function ("PCF") role holder. Internal Audit independently examines and evaluates the functioning, effectiveness and efficiency of VICO's internal control system and all other elements of the system of governance.

Its purpose is to provide on-going objective and independent evaluations of the effectiveness of the system of internal controls, and to perform special reviews and investigations as directed by the Board, Management, and the Parent.

Internal audit prepares an Audit Plan annually, which is presented to the Board. To prepare the Audit Plan, the following are taken into account:

- The priorities that might be determined considering VICO's risk map and/or Parent´s risks map.
- Board requirements.
- The requests of the Parent Audit and Control Committee.
- The requests of the Company.
- The experience and judgment of the Head of Internal Audit.

Internal Audit, on its own initiative or following a request of the Board, can be enabled to perform other assignments not included in the initial Audit Plan.

Internal Audit is fully authorized within its remit:

- to request the cooperation of any employee, through the relevant hierarchical line;
- to have access to the facilities where VICO conducts its business; and
- to have access to any information and documentation of VICO.

Internal Audit's activities are designed to provide advice to Management in improving the internal control environment, and monitor the implementation of strategic control initiatives and Management's remediation activity.

B.5.2. Internal audit independence

In order to maintain independence and objectivity, Internal Audit will not prepare any accounting and related records or engage in any relevant activity requiring audit review, including the development or installation of new systems, policies or procedures. The review of new systems or procedures prior to implementation shall not be considered an impairment of independence and objectivity. In addition, Internal Audit for VICO is outsourced to an independent external audit firm to ensure further independence from VICO's Board and management.

Internal Audit is included in the current organisational structure by means of a direct link to the Board of Directors, and the Internal Audit function of the Parent. The Internal Audit function is free to report its findings and appraisals and to disclose them to the Board as required. This principle of independence of the Internal Audit function entails that the Internal Audit function operates under the direct control of the Board of Directors of VICO.

B.6. Actuarial function

The Actuarial function in VICO is outsourced to Deloitte in line with VICO's approved outsourcing policy. The Head of Actuarial Function (HoAF) provides independent opinion, analysis and validation. The activities of the Actuarial function are carried out by appropriately skilled and experienced individuals in line with VICO's Fitness and Probity Policy, and have been approved by the Central Bank of Ireland.

The key responsibilities of the HoAF include:

- Co-ordination of the calculation of technical provisions. This consists of assessing the sufficiency of the provisions, assessing the uncertainty in the estimates and justifying the differences between successive periods.
- Review the appropriateness of the models and assumptions, consider the sufficiency and quality of data, and interpret deviations of best estimates against experience. There is also a requirement to consider the verifiability of assumed management actions.
- The Actuarial Function must produce an annual report for the Board. The report should cover all of the information necessary for the Board to form its own opinion on the adequacy of technical provisions and on the underwriting and reinsurance arrangements.
- In addition to responsibilities in relation to the technical provisions, and the requirements to express opinions on underwriting policy and reinsurance arrangements, the HoAF contributes to the effective implementation of the risk management system of the Company. In particular:

    - In relation to the Solvency Capital Requirement (SCR) and Minimum Capital Requirement (MCR), the HoAF reviews the output of the model used by the Company to calculate the SCR and MCR. Specifically, any perceived or possible inconsistencies or issues identified in the model results are raised.

    - ORSA - the Chief Risk Officer, Head of Finance, General Manager and HoAF, together, establish the requirements of the audience for the ORSA report, agree how the requirements will be satisfied and agree the format of the draft ORSA reports, the supporting appendices and working papers.

The management team report to the Board on the performance of the Actuarial function as often as deemed necessary and at least annually. In addition, the Head of Actuarial function will provide the Board with an annual report outlining the tasks that have been undertaken by the Actuarial function, their results and any recommendations or suggestions for improvement.

B.7. Outsourcing

B.7.1. Outsourcing Policy

VICO maintains an Outsourcing Policy which is reviewed and approved annually by the Board.

The purpose of the Outsourcing Policy is to establish a prudent approach to the management of the outsourcing arrangements and ensure compliance with the relevant regulatory requirements. The Board's objective is to ensure that outsourcing arrangements entered into are subject to appropriate due diligence, approval, written agreements and on-going monitoring and that the risks associated with entering outsourcing arrangements are effectively managed.

The Outsourcing Policy applies to all "critical or important" outsourcing agreements and covers the requirements for both external outsourcing and intra-group outsourcing.

VICO has to outsource certain business activities for the following reasons:

- Cost savings
- Focus on core business e.g. IT support outsourced to specialist IT service companies
- Operational expertise
- Capacity management

Before a business function is outsourced a "Risk Relevant Outsourcing Questionnaire" is completed by the in-house Outsourcing Officer.
When the decision is taken to outsource an activity, VICO must carry out a tender in order to choose the most suitable provider and also complete an assessment of the risks associated with the outsourcing of any function. The final outsourcing decision is not being taken until the risk analysis has been completed. A business case is then prepared for consultation with the Board of Directors which includes the outcome of the evaluation on whether the outsourcing activity is high or low risk to the group. All material outsourcing arrangements must be undertaken using a written, legally binding contract.

In line with Central Bank of Ireland guidelines and regulations, the Board has appointed a designated individual with overall responsibility for the outsourcing of key functions. This designated individual reports to the Board on all outsourcing activities.

B.7.2. Outsourced Activities

The following critical or important services have been outsourced by VICO:

Provider	Service Outsourced	Jurisdiction
Deloitte	Head of Actuarial Function	Ireland
EisnerAmper	Internal Audit	Ireland

B.8. Assessment of governance

VICO's corporate governance system provides for the sound and prudent management of the business, in a manner which is proportionate to the nature, scale and complexity of the operations of the Company.

There are no further significant matters to report in relation to the company's system of governance.

C. Risk Profile

The acceptance of risk is the core business of VICO as an insurance entity. In order to achieve its strategic objectives, VICO has identified and defined all key material risks that VICO is exposed to for the purpose of monitoring the exposure to each risk.

To support the process of reviewing and monitoring these material risks, VICO has developed a risk appetite framework and risk management system and policy suite which includes the documentation of all key material risks in a risk register which forms a central part of the company's monitoring and reporting activities.

The assessment of the identified risks is performed by classifying the identified risks into categories, based on their potential impact and the estimated likelihood of occurrence.

In order to perform the assessment, a rating scale of Low, Medium, and High is used depending on the materiality of the risk exposure in case of potential financial losses, or on the severity of the impact of non-financial losses.

For the financial impacts, only the potential downside effect is taken into consideration, ignoring thus the upside effect realisation of the risk may have.

VICO continuously monitors the performance, risks, and any risk mitigations in place, related to each category below. Depending on the performance or risk development, including any foreseen risks yet to develop, risk mitigation techniques are reviewed and assessed if required.

C.1. Underwriting risk

Underwriting and reserving risk refers to the risk of loss, or of adverse change in the value of insurance liabilities, loss from exposure to risk concentrations; and the risk of inadequacy of premium income to cover expected claims and expenses.
It can be broken down into:

- Premium risk: risk of inadequacy of premiums income to cover expected claims and expenses;
- Catastrophic risk: risk resulting from extreme (severity) or irregular events (frequency).

The methods to measure the risks is based on the below metrics which are set out in VICO's Risk Appetite Statement.

- Authorised Class of Insurance: Corresponding to the licensed lines of business in which the VICO will underwrite
- Maximum limit per claim: Corresponding to the maximum amount of claim payable for a given (re)insurance programme.

- Net Loss Ratio: Net incurred losses (net claims paid plus changes in net claims reserves) divided by the net earned premiums.
- Geographical diversification of risk locations: Number of locations where VICO has accepted risk

The control and monitoring actions/principles for the Underwriting risk examine the above metrics in line with VICO's Risk Appetite framework:

- Should any proposed risk fall outside of the scope of the existing license, any application to the Central Bank of Ireland to extend that license must receive prior approval of the Board of Directors.
- VICO will only underwrite the risks of parent Group Companies. No non-group business may be written/accepted unless prior approval from the Board of VICO and the CBI is received.
- Authority to accept or decline business on behalf of VICO rests with the Board of Directors.
- When considering any proposed or renewed risks, the Risk Management Function will take into account the limits mentioned in the Risk Appetite framework to perform its technical analysis per line of business.
- The Risk Management Function performs at least once a year and/or as often as necessary an analysis of claims and technical profitability based on various metrics such as nature of risk, country, claims importance and underwriting year for each line of business separately. This analysis is submitted to the Board of Directors for consideration.
- The Risk Management Function will monitor and consider VICO's exposure to specific risk concentrations and may choose to propose action to mitigate such risk as is appropriate, considering the nature of the risk and the structure of the insurance and reinsurance programmes.

In the event that:

- the tolerance levels defined in the Risk Appetite framework are exceeded;
- a risk of reduced profitability appears;
- any event that the Risk Management Function may consider as an increase of the risk(s) VICO can be exposed to occurs,

The Risk Management Function defines appropriate measures to reduce the risk within the limits acceptable by VICO. These measures include corrective actions to be undertaken in respect of technical items and/or of a total or partial transfer of the risk to a third party. In respect of this last point, the measures and guidelines defined in the reinsurance policy apply. The said corrective measures and their related implementation plan are submitted to the Board of Directors for approval.

VICO's underwriting risk is considered material given the fact that the Company participates with large shares in the primary €50m layers of both its Property Damage and Marine Transport global programmes. VICO also participate on the excess layers of these programmes however the Board obtain the comfort that these risks are managed and mitigated against given that a long term Risk Financing programme was put in place in January 2016 to eliminate VICO's net retention. All excess layer participation is also fully reinsured. The SCR capital requirement for Premium & Reserve risk is €5.9M. VICO has no Lapse risk or Catastrophe risk charges.

The CRO updates the Board biannually on any changes or deviations and if the appetite or tolerance levels have been breached. Any changes or amendments in the risk profile are run through the SCR standard model with the results presented to the Board for review and consideration. The Board ensures that all scenarios are suitable stressed before committing to acceptance of the risk.

In the course of 2016 there were no deviations or breaches notified to the Board.

C.2. Market risk

C.2.1. Market Risk

Market risk describes the potential loss emanating from disadvantageous changes in market prices or in the parameters affecting price such as currency exchange rates, interest rates etc. VICO's risk appetite can be classified as moderate.

The investment policies are stipulated by the Investment Strategy of VICO approved by the Board of Directors. VICO mitigates against market risk by only holding highly rated short duration liquid deposits. Risk concentration is mitigated by maintaining a diverse range of highly rated bank and reinsurance counterparty panel. The SCR capital requirement for Market risk is €1.9M

C.2.2. Foreign Currency Risk

Currency risk occurs where foreign assets or liabilities are not offset by corresponding balance sheet items of the same currency. A conservative strategy is pursued in VICO where the Rules of Procedure allow VICO to hedge foreign currency liabilities by investing in foreign currency deposits. The Asset Liability matching is performed quarterly by the finance team, following the update of the balance sheet. The majority of financial assets are maintained in Euro reflecting the matching insurance liabilities. Given that 80% of VICO's risks are within a EURO geographical scope, foreign currency risk is low. The SCR capital requirement for foreign currency risk is €0.8M.

The table below highlights the split of assets/liabilities by currency

Assets/Liabilities by currency	Value of the solvency II reporting currency	Value of remaining other currencies
31-Dec-16	**€'000s**	**€'000s**
Investments (other than assets held for index-linked and unit-linked contracts)	13,003	3,125
Other assets	3,945	0
Assets held for index-linked and unit-linked contracts	0	0
Reinsurance recoverables	57,617	988
Deposits to cedants, insurance and intermediaries receivables and reinsurance receivables	15,782	0
Any other assets	750	0
Total assets	91,096	4,113
Liabilities		
Technical provisions (excluding index-linked and unit-linked contracts)	66,282	1,137
Technical provisions - index-linked and unit-linked contracts	0	0
Deposits from reinsurers and insurance, intermediaries and reinsurance payables	0	0
Derivatives	0	0
Financial liabilities	0	0
Contingent liabilities	0	0
Any other liabilities	441	0
Total liabilities	66,723	1,137

C.2.3. Interest Rate Risk

Interest rate risk comprises of the anticipated losses and decrease of capital because of changes within the market interest rate level. A conservative strategy is pursued in VICO which is aimed at guaranteeing the greatest possible security whilst ensuring secure liquidity of the business needs at all times. The Company is exposed to minimal interest rate risk.

The control of the interest change risks, which VICO outsources, is carried out by the Treasury of VW Financial Services GmbH. The finance team assesses and reports the interest change risks of VICO at least quarterly. VICO has a zero Interest rate risk SCR capital requirement.

C.2.4. Prudent Person Principle

VICO's primary objective in relation to market risk is to protect and preserve its assets. The majority of the assets on VICO's balance sheet are held in cash or demand deposits. Solvency II regulations have introduced the 'Prudent Person Principle' in relation to investing in assets. VICO is required to apply this principle, and has ensured that its investment policy is aligned with this Principle. VICO operate a review process as part of its risk appetite review which monitors the performance, financial security and concentration risk of investments. This report is presented to the Board at least annually.

As mentioned before, VICO takes a very prudent investment approach through taking mitigation steps against credit risk or the failure of a financial institution or individual security whilst ensuring appropriate liquidity to meet daily cash demands of the business.

C.3. Credit risk

Credit risk refers to the risk that a counterparty will default on its contractual obligations resulting in financial loss to the undertaking. The key areas of exposure for VICO relate to its investment portfolio and reinsurance balances recoverable.

The Credit risks can be categorised under the following headings:

- Counterparty Risk
- Reinsurance Default Risk

C.3.1. Counterparty Risk

This would be the risk of one of VICO's fronting partners or Reinsurers defaulting on premium or claims payments. VICO eliminates this risk by ensuring they include Simultaneous Payment and Cut Through Clauses in their agreements.

While the majority of VICO's risks are written on a direct basis, there is a small requirement on fronting partners. The Board of VICO have the comfort in knowing that these have been long term partners of not only VICO but the VW Group well in excess of 20 years. The number of partners is kept to a minimum of one per line of business.Counterparty risk would be considered a low risk for VICO.

C.3.2. Reinsurance Default Risk

This would be the risk of non-congruence of the primary and the reinsurance protection or the risk of one of its reinsurance partner's inability to meet its obligations.

VICO does have a significant reliance on the reinsurance market given that in 2016 the net retention was bought down. VICO have a very strict reinsurance purchasing strategy in that they only consider markets rated A- or above. Reinsurance protection is purchased from London, European and Asian capacity providers.

At each Board meeting the CRO updates the Board on the financial strength of each reinsurance partner. VICO do not only rely on external rating agencies but also obtain an independent analysis from the market securities department from one of the leading insurance broking firms in the London market.

On an annual basis VICO updates its Reinsurance Strategy document which is approved by the Board of Directors. All reinsurers must be minimum A- rated. No deviation from this document is allowed without the prior approval of the Board of Directors. VICO continues to monitor its Reinsurers during the life of the Reinsurance agreements and/or for as long as any obligations remain outstanding with any changes in rating notified to the Board of Directors without delay. In 2016 VICO had no deviations to report to the Board.

The SCR capital requirement for Credit risk is €5.8M.

C.4. Liquidity risk

Liquidity risk is the risk that VICO cannot meet its obligations associated with financial liabilities as they fall due.
VICO's liquidity risk appetite can be classified as low to moderate. Sufficient liquidity is absolutely essential in VICO's business.

VICO's investment Strategy is to support underlying commercial activities. The longest duration of a deposit is one year. Sufficient cash is maintained on current account for day-to-day payments. In extreme circumstances, VICO is also able to borrow on the money markets or utilise the overdraft facility at Commerzbank.

C.5. Operational risk

Operational risk refers to the risk of loss arising from inadequate or failed internal processes, or from personnel and systems or from external events. Operational Risk may materialise through personnel execution errors, frauds, compliance breaches; outsourcing breaches and processing failures as well as through other external events either directly or in directly.

There are no operational risks that have been deemed "material" in line with VICO's risk assessment methodology taking into account the probability, impact of the risk occurring and the mitigations in place to prevent or minimise the impact of a risk.

The existing organisational and operational structure of VICO reduces the exposure to many of the risks associated with operational risk. There are strong, robust internal controls in place and a clear segregation of duties which assist with mitigating against and managing this risk. VICO also has to comply with Volkswagen Financial Services Group requirements from the Operational Risk team (OpR), which involves regular self-assessments and reporting. VICO considers the identity of various scenarios which would test the operational risk management of the Company and in all cases a financial loss or the requirement to hold economic capital to accept the risk is deemed not material.

In the event of an Operational Risk failure, the Risk Management Function defines appropriate corrective measures to reduce the risk within the limits acceptable to the VICO.

The said corrective measures and their related implementation plan are submitted to the Board of Directors for approval.

The SCR capital requirement for Operational risk is €2M.

C.6. Other material risks

VICO does not consider any other risks to be material at this time.

D. Valuation for Solvency Purposes

D.1. Assets

The Solvency II valuation method differs from the local GAAP statutory financial statements only in relation to technical provisions. Technical provisions are valued in accordance with Articles 75 to 86 of the Solvency II Directive. Additional information reading the calculation of technical provisions in provided in section D2.

Assets	Statutory Accounts Value (Local GAAP FRS 102)	Difference due to SII Valuation Principles	SII Value
31-Dec-16	**€'000s**	**€'000s**	**€'000s**
Plant and Equipment	85	0	85
Bank deposits	16,128	0	16,128
Cash and cash equivalents	3,860	0	3,860
Reinsurers share of technical provisions	77,854	-35,186	42,668
Receivables (from insurance activities)	31,524	-20	31,504
Other assets	214	750	964
Total	129,664	-34,456	95,209

D.1.1. Bases of asset valuation for material classes

For each material class of asset, the following are the bases, methods and main assumptions used in the valuation for Solvency II, together with an explanation of the material differences to those reported under Local GAAP

D.1.2. Deposits other than cash equivalents

Deposits other than cash equivalents comprise of demand deposits with specified short term maturity periods. These are carried at fair value on the Solvency II and Local GAAP balance sheets. Fair value is based upon amounts due on demand as these are highly liquid assets.

Under Local GAAP demand deposits are disclosed as cash & cash equivalents, and have been reclassified for Solvency II reporting.

D.1.3. Insurance and intermediaries' receivable

Insurance and intermediaries' receivable are stated at realisable value, and relates to the amounts due from ceding insurers linked to inward reinsurance business.

These amounts are stated at fair value under Solvency II and Local GAAP. Given these assets are relatively short term (less than one year), the Undertaking has determined that their realisable value reasonably approximates fair value.

Under Solvency II the receivable amounts that are not past due, are reclassified to be included in the cash in-flows of best estimate of liabilities. Further information on the best estimate of liabilities, its valuation methodology, basis and assumptions used can be found in Section D.2.

D.2. Technical provisions

The Solvency II valuation method differs from the local GAAP statutory financial statements only in relation to technical provisions. Technical provisions are valued in accordance with Articles 75 to 86 of the Solvency II Directive.

Under SII insurance contract liabilities required by local GAAP are replaced by an assessment of the technical provisions, comprising the Best Estimate Liability ("BEL") and the Risk Margin.

The BEL is determined as the discounted value of the projected cashflows involved in fulfilling the liabilities under the inforce business. It comprises

- Best estimate claims provisions
- Best estimate premium provisions
- Expenses
- Events not in data

For all lines of business, the best estimate corresponds to the probability weighted average of future cash-flows taking account of the time value of money. The cash-flows are discounted using the relevant risk free interest rates term structures as issued by EIOPA.

No allowance has been included in the BEL for any of the transitional adjustments set out in the Solvency II Delegated Acts (i.e. matching or volatility adjustments to the risk-free rate, or transitional adjustments to the overall technical provisions)

The Risk Margin is determined as the cost of holding the Solvency Capital Requirement (SCR) over the lifetime of the insured portfolio. This cost is determined by applying a prescribed cost of capital rate of 6% p.a. to each year's projected SCR and discounting those amounts at the risk-free rates.

In the calculation of technical provisions, it is necessary to make judgements, estimations and assumptions about the carrying amounts of assets and liabilities that are not readily apparent from other sources. The estimates and associated assumptions are based on historical experience and other factors that are considered relevant. Actual results may differ from these estimates.

Technical Provisions	Statutory Accounts Value (Local GAAP FRS 102)	Difference due to SII Valuation Principles	SII Value
31-Dec-16	€'000s	€'000s	€'000s
Best estimate liability	89,738	-25,964	63,774
Risk margin	0	2,466	2,466
Total	89,738	-23,498	66,241

A summary of the Solvency II valuation differences in provided in section D1. The main lines of business are Property and Marine which make up 99% of technical provisions.

The technical provisions represent a realistic estimate of the company's future obligations with an allowance for some deviation for plausible changes in estimation in the form of the risk margin. They are not expected to be sufficient to meet the company's obligations in all scenarios.

D.3. Other Liabilities

Other Liabilities	Statutory Accounts Value (Local GAAP FRS 102)	Difference due to SII Valuation Principles	SII Value
31-Dec-16	**€'000s**	**€'000s**	**€'000s**
Reinsurance payables	1,180	0	1,180
Payables (trade, not insurance)	337	0	337
Any other liabilities, not elsewhere shown	104	0	104
Total	1,621	0	1,621

For each material class of other liability, the following are the bases, methods and main assumptions used in the valuation for Solvency II, together with an explanation of the material differences to those reported under Local GAAP

D.3.1. Other Liabilities

Under Local GAAP insurance and intermediary payables are stated at cost. Insurance and intermediaries payable is stated at fair value on the Solvency II balance sheet. Due to the short term nature of the obligation and no consideration of own credit risk in the valuation, the carrying value under Local GAAP is not considered materially different to the fair value under Solvency II.

D.4. Alternative methods for valuation

VICO does not employ any alternative valuation techniques to its assets or liabilities, and does not have any other material information to disclose regarding the valuation for solvency purposes, other than what has been disclosed above.

D.5. Any other information

No other relevant information to report.

E. Capital Management

VICO's capital management strategy is to maximise long term shareholder value by optimising capital while maintaining VICO's regulatory and solvency requirements. The strategy is formalised through a capital management policy. The capital management policy, which is reviewed annually, is approved by the Board and day-to-day monitoring and managing of this policy is delegated to the Risk Management Function.

Capital management focuses on following aspects:

- Determine an adequate level of capital to protect against losses and provide finance for a pre-determined level of strategic growth;

- Ensuring that there is sufficient coverage of both the regulatory capital requirements (MCR and SCR) as well as the economic capital targets set; and

- Optimisation of the quality of available Own Funds, in respect of the capital position of VICO.

VICO continuously monitors and manages the quality and loss absorbing capacity of its own funds. On at least an annual basis, having regard to the results of the ORSA, management prepare a financial and capital management plan outlining the amount of available funds and their quality to the Board.

Capital needs and stresses are considered over a three year planning horizon on a rolling basis. The capital position is monitored on a quarterly basis by Management as part of the Risk Management Function. Furthermore, the capital position is reviewed as part of the ORSA process which is presented to the Board.

E.1. Own funds

The items reported in own funds are split into three categories depending on different factors such as quality, liquidity and timeline to availability when liabilities arise.

Tier one own funds include ordinary share capital, non-cumulative preference shares and relevant subordinated liabilities. Tier two own funds include cumulative preference shares, and subordinated liabilities with a shorter duration. Tier three own funds include own funds which do not satisfy the Tier one or Tier two requirements.

All of VICO's own funds, other than deferred tax assets, are categorised as Tier one for Solvency II purposes. Deferred tax assets are eligible to cover the SCR but not the MCR.

Own Funds	Total	Tier 1	Tier 2	Tier 3
31-Dec-16	€'000s	€'000s	€'000s	€'000s
Share Capital	5,113	5,113	0	0
Initial funds, members' contributions	8,117	8,117	0	0
Reconciliation reserve	13,369	13,369	0	0
Deferred tax asset	750	0	0	750
Total	27,348	26,599	0	750

The difference between equity in the financial statements and basic own funds is as follows;

Reserve Item	Total
31-Dec-16	€'000s
Financial Statement Equity	38,267
Reconciliation Reserve	-10,919
Basic Own Funds	27,348

The reconciliation reserve consists of technical provision valuation differences only.

E.2. Solvency and Minimum Capital Requirement

For the purpose of this section, VICO has adopted the “Standard Formula” approach. This method uses stresses for each of the individual risks as calibrated and provided by EIOPA.

VICO’s SCR and MCR requirements at 31 December 2016 are:

Capital Requirement	Total
31-Dec-16	€'000s
Minimum Capital Requirement	3,226
Solvency Capital Requirement	12,903

It should be noted that the final SCR amount above is subject to supervisory assessment.

The table below shows the components of the SCR requirement

Solvency Capital Requirement	Total
31-Dec-16	€'000s
Market risk	1,935
Counterparty default risk	5,792
Life underwriting risk	0
Health underwriting risk	65
Non-life underwriting risk	5,905
Diversification	-2,837
Intangible asset risk	0
Basic Solvency Capital Requirement	10,860
Operational risk	2,043
SCR	12,903

VICO does not use any simplifications, or undertaking-specific parameters pursuant to Article 104(7) of Directive 2009/138/EC, in the calculation of the SCR.

E.3. Use of duration based equity risk sub-module in the SCR

The Company has not opted to use the duration-based equity risk sub-module, of the Solvency II regulations.

E.4. Internal model information

The Company applies the Standard formula model and does not use an internal model to calculate the Solvency Capital Requirement.

E.5. Non-compliance

VICO has had own funds in excess of both the SCR and MCR requirements over the reporting year.

I. Appendices – Quantitative Reporting Templates

S.02.01.02 – Balance sheet

Annex I
S.02.01.02
Balance sheet

31-Dec-16

Assets		**Solvency II value**
		C0010
Intangible assets	**R0030**	0
Deferred tax assets	**R0040**	750
Pension benefit surplus	**R0050**	0
Property, plant & equipment held for own use	**R0060**	85
Investments (other than assets held for index-linked and unit-linked contracts)	**R0070**	16,128
Property (other than for own use)	**R0080**	0
Holdings in related undertakings, including participations	**R0090**	0
Equities	**R0100**	0
Equities - listed	**R0110**	0
Equities - unlisted	**R0120**	0
Bonds	**R0130**	0
Government Bonds	**R0140**	0
Corporate Bonds	**R0150**	0
Structured notes	**R0160**	0
Collateralised securities	**R0170**	0
Collective Investments Undertakings	**R0180**	0
Derivatives	**R0190**	0
Deposits other than cash equivalents	**R0200**	16,128
Other investments	**R0210**	0
Assets held for index-linked and unit-linked contracts	**R0220**	0
Loans and mortgages	**R0230**	0
Loans on policies	**R0240**	0
Loans and mortgages to individuals	**R0250**	0
Other loans and mortgages	**R0260**	0
Reinsurance recoverables from:	**R0270**	58,605
Non-life and health similar to non-life	**R0280**	58,605
Non-life excluding health	**R0290**	58,605
Health similar to non-life	**R0300**	0
Life and health similar to life, excluding health and index-linked and unit-linked	**R0310**	0
Health similar to life	**R0320**	0
Life excluding health and index-linked and unit-linked	**R0330**	0
Life index-linked and unit-linked	**R0340**	0
Deposits to cedants	**R0350**	0
Insurance and intermediaries receivables	**R0360**	0
Reinsurance receivables	**R0370**	15,568
Receivables (trade, not insurance)	**R0380**	213
Own shares (held directly)	**R0390**	0
Amounts due in respect of own fund items or initial fund called up but not yet	**R0400**	0
Cash and cash equivalents	**R0410**	3,860
Any other assets, not elsewhere shown	**R0420**	0
Total assets	**R0500**	95,209

Liabilities		**Solvency II value**
		C0010
Technical provisions – non-life	**R0510**	67,420
Technical provisions – non-life (excluding health	**R0520**	67,132
TP calculated as a whole	**R0530**	0
Best Estimate	**R0540**	64,665
Risk margin	**R0550**	2,466
Technical provisions - health (similar to non-life	**R0560**	288
TP calculated as a whole	**R0570**	0
Best Estimate	**R0580**	288
Risk margin	**R0590**	0
Technical provisions - life (excluding index-	**R0600**	0
Technical provisions - health (similar to life)	**R0610**	0
TP calculated as a whole	**R0620**	0
Best Estimate	**R0630**	0
Risk margin	**R0640**	0
Technical provisions – life (excluding health	**R0650**	0
TP calculated as a whole	**R0660**	0
Best Estimate	**R0670**	0
Risk margin	**R0680**	0
Technical provisions – index-linked and unit-linked	**R0690**	0
TP calculated as a whole	**R0700**	0
Best Estimate	**R0710**	0
Risk margin	**R0720**	0
Contingent liabilities	**R0740**	0
Provisions other than technical provisions	**R0750**	0
Pension benefit obligations	**R0760**	0
Deposits from reinsurers	**R0770**	0
Deferred tax liabilities	**R0780**	0
Derivatives	**R0790**	0
Debts owed to credit institutions	**R0800**	0
Financial liabilities other than debts owed to credit institutions	**R0810**	0
Insurance & intermediaries payables	**R0820**	0
Reinsurance payables	**R0830**	0
Payables (trade, not insurance)	**R0840**	337
Subordinated liabilities	**R0850**	0
Subordinated liabilities not in BOF	**R0860**	0
Subordinated liabilities in BOF	**R0870**	0
Any other liabilities, not elsewhere shown	**R0880**	105
Total liabilities	**R0900**	67,861
Excess of assets over liabilities	**R1000**	27,348

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

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**											Line of Business for: **non-life insurance and**	Line of business for:				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**	0	0	0	0	0	28,778,008	13,796,863	0	0	0	0	2,074,478					44,649,349
Gross - Proportional reinsurance accepted	**R0120**	210,000	0	0	0	0	5,150,860	7,537,572	0	0	0	0	-60,298					12,838,134
Gross - Non-proportional reinsurance accepted	**R0130**																	
Reinsurers' share	**R0140**	0	0	0	0	0	28,440,701	18,050,564	0	0	0	0	0					46,491,265
Net	**R0200**	210,000	0	0	0	0	5,488,167	3,283,872	0	0	0	0	2,014,180					10,996,219
Premiums earned																		
Gross - Direct Business	**R0210**	0	0	0	0	0	28,778,008	13,796,864	0	0	0	0	975,037					43,549,909
Gross - Proportional reinsurance accepted	**R0220**	210,000	0	0	0	0	5,150,860	7,537,572	0	0	0	0	88,276					12,986,708
Gross - Non-proportional reinsurance accepted	**R0230**	0	0	0	0	0	0	0	0	0	0	0	0					0
Reinsurers' share	**R0240**	0	0	0	0	0	1,253,923	44,828,257	0	0	0	0	0					46,082,180
Net	**R0300**	210,000	0	0	0	0	32,674,945	-23,493,821	0	0	0	0	1,063,313					10,454,436
Claims incurred																		
Gross - Direct Business	**R0310**	0	0	0	0	0	22,686,644	82,438,112	0	0	0	0	0					105,124,756
Gross - Proportional reinsurance accepted	**R0320**	0	0	0	0	0	1,545,351	3,012,370	0	0	0	0	81,099					4,638,820
Gross - Non-proportional reinsurance accepted	**R0330**																	
Reinsurers' share	**R0340**	0	0	0	0	0	22,356,335	88,414,446	0	0	0	0	0	0	0	0	0	110,770,781
Net	**R0400**	0	0	0	0	0	1,875,660	-2,963,964	0	0	0	0	81,099	0	0	0	0	-1,007,205
Changes in other technical provisions																		
Gross - Direct Business	**R0410**	0	0	0	0	0	0	0	0	0	0	0	0					0
Gross - Proportional reinsurance accepted	**R0420**	0	0	0	0	0	0	0	0	0	0	0	0					0
Gross - Non- proportional reinsurance accepted	**R0430**																	
Reinsurers'share	**R0440**	0	0	0	0	0	0	0	0	0	0	0	0					0
Net	**R0500**	0	0	0	0	0	0	0	0	0	0	0	0					0
Expenses incurred	**R0550**	16,790	0	0	0	0	4,466,104	5,366,255	0	0	0	0	378,723					10,227,872
Other expenses	**R1200**																	
Total expenses	**R1300**																	

S.05.02.01 – Premiums, claims and expenses by country

Annex I
S.05.02.01
Premiums, claims and expenses by country

		Home Country	Top 5 countries (by amount of gross premiums written) - non-life obligations					Total Top 5 and home country
		C0010	C0020	C0030	C0040	C0050	C0060	C0070
	R0010		Germany	Mexico	Spain	Czech Republic	United Kingdom	
		C0080	C0090	C0100	C0110	C0120	C0130	C0140
Premiums written								
Gross - Direct Business	R0110	0	23,656,856	3,273,965	3,110,462	1,969,020	1,829,365	33,839,668
Gross - Proportional reinsurance accepted	R0120	0	6,802,112	941,371	894,358	566,157	526,002	9,730,000
Gross - Non-proportional reinsurance accepted	R0130	0	0	0	0	0	0	0
Reinsurers' share	R0140	0	24,632,770	3,409,026	3,238,777	2,050,248	1,904,832	35,235,652
Net	R0200	0	5,826,198	806,310	766,043	484,929	450,535	8,334,016
Premiums earned								
Gross - Direct Business	R0210	0	23,074,332	3,193,347	3,033,870	1,920,535	1,784,319	33,006,403
Gross - Proportional reinsurance accepted	R0220	0	6,880,832	952,265	904,709	572,709	532,089	9,842,605
Gross - Non-proportional reinsurance accepted	R0230	0	0	0	0	0	0	0
Reinsurers' share	R0240	0	24,416,022	3,379,029	3,210,279	2,032,207	1,888,071	34,925,608
Net	R0300	0	5,539,142	766,584	728,300	461,037	428,337	7,923,400
Claims incurred								
Gross - Direct Business	R0310	0	55,698,935	7,708,394	7,323,433	4,635,963	4,307,152	79,673,878
Gross - Proportional reinsurance accepted	R0320	0	2,457,816	340,147	323,160	204,570	190,061	3,515,754
Gross - Non-proportional reinsurance accepted	R0330	0	0	0	0	0	0	0
Reinsurers' share	R0340	0	58,690,405	8,122,396	7,716,759	4,884,950	4,538,480	83,952,991
Net	R0400	0	-533,654	-73,854	-70,166	-44,417	-41,267	-763,359
Changes in other technical provisions								
Gross - Direct Business	R0410	0	0	0	0	0	0	0
Gross - Proportional reinsurance accepted	R0420	0	0	0	0	0	0	0
Gross - Non- proportional reinsurance accepted	R0430	0	0	0	0	0	0	0
Reinsurers'share	R0440	0	0	0	0	0	0	0
Net	R0500	0	0	0	0	0	0	0
Expenses incurred	R0550	0	0	0	0	0	0	0
Other expenses	R1200							
Total expenses	R1300							

S.17.01.02 – Non Life technical provisions

Annex I

S.17.01.02

Non-life Technical Provisions

		Direct business and accepted proportional reinsurance									Direct business and accepted			Accepted non-proportional reinsurance				
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	Total Non-Life obligation
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
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	**R0050**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Technical provisions calculated as a sum of BE and RM																		
Best estimate																		
Premium provisions																		
Gross	**R0060**	-	-	-	-	-	- 12,999	2,147	-	-	-	-	621	-	-	-	-	- 10,232
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	**R0140**	-	-	-	-	-	- 18,229	- 1,559	-	-	-	-	-	-	-	-	-	- 19,788
Net Best Estimate of Premium Provisions	**R0150**	-	-	-	-	-	5,230	3,706	-	-	-	-	621	-	-	-	-	9,556
Claims provisions																		
Gross	**R0160**	288	-	-	-	-	11,720	63,200	-	-	-	-	- 23	-	-	-	-	75,185
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	**R0240**	0	-	-	-	-	19,416	58,976	-	-	-	-	0	-	-	-	-	78,393
Net Best Estimate of Claims Provisions	**R0250**	288	-	-	-	-	- 7,697	4,224	-	-	-	-	- 23	-	-	-	-	- 3,208
Total Best estimate - gross	**R0260**	288	-	-	-	-	- 1,279	65,347	-	-	-	-	597	-	-	-	-	64,953
Total Best estimate - net	**R0270**	288	-	-	-	-	- 2,467	7,930	-	-	-	-	597	-	-	-	-	6,348
Risk margin	**R0280**	-	-	-	-	-	942	1,447	-	-	-	-	77	-	-	-	-	2,466
Amount of the transitional on Technical Provisions																		
Technical Provisions calculated as a whole	**R0290**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Best estimate	**R0300**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Risk margin	**R0310**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Technical provisions - total																		
Technical provisions - total	**R0320**	288	-	-	-	-	- 337	66,794	-	-	-	-	675	-	-	-	-	67,420
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	**R0330**	0	-	-	-	-	1,188	57,417	-	-	-	-	0	-	-	-	-	58,605
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	**R0340**	288	-	-	-	-	- 1,525	9,377	-	-	-	-	675	-	-	-	-	8,814

S.19.01.21 – Claims Developments

Annex I
S.19.01.21
Non-life Insurance Claims Information

Total Non-Life Business

Accident year / Underwriting year	Z0010	

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

	Year	0	1	2	3	4	5	6	7	8	9	10 & +		In Current year	Sum of years (cumulative)
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110		C0170	C0180
Prior	R0100												R0100		
N-9	R0160												R0160		
N-8	R0170												R0170		
N-7	R0180												R0180		
N-6	R0190					309,695							R0190		309,695
N-5	R0200				803,890	187,376							R0200		991,266
N-4	R0210			9,919,050	569,152	- 448,878							R0210	- 448,878	10,039,324
N-3	R0220		26,524,433	5,023,680	203,330								R0220	203,330	31,751,443
N-2	R0230	7,281,357	11,948,246	2,136,671									R0230	2,136,671	21,366,274
N-1	R0240	14,439,664	13,163,886										R0240	13,163,886	27,603,551
N	R0250	41,022,535											R0250	41,022,535	41,022,535
													Total R0260	56,077,544	133,084,088

Gross undiscounted Best Estimate Claims Provisions
(absolute amount)

	Year	0	1	2	3	4	5	6	7	8	9	10 & +		Year end (discounted
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300		C0360
Prior	R0100												R0100	
N-9	R0160												R0160	
N-8	R0170									371,801			R0170	-
N-7	R0180								3,441,625				R0180	3,438,183
N-6	R0190							276,597					R0190	276,321
N-5	R0200						436,395						R0200	435,959
N-4	R0210					233,099							R0210	232,866
N-3	R0220				1,092,892								R0220	1,091,799
N-2	R0230			867,217									R0230	866,350
N-1	R0240		9,524,140										R0240	9,514,616
N	R0250	72,243,060											R0250	72,170,817
													Total R0260	83,643,582

S23.01.01 – Own Funds

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 (EU) 2015/35						
Ordinary share capital (gross of own shares)	R0010	5,113	5,113		-	
Share premium account related to ordinary share capital	R0030	-	-		-	
Iinitial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	8,117	8,117		-	
Subordinated mutual member accounts	R0050	-		-	-	-
Surplus funds	R0070	-				
Preference shares	R0090	-		-	-	-
Share premium account related to preference shares	R0110	-		-	-	-
Reconciliation reserve	R0130	13,369	13,369			
Subordinated liabilities	R0140	-		-	-	-
An amount equal to the value of net deferred tax assets	R0160	750				750
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					
Deductions						
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	R0290	27,348	26,598	-	-	750
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 ancillary own funds	R0400	-			-	-
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	27,348	26,598	-	-	750
Total available own funds to meet the MCR	R0510	26,598	26,598	-	-	
Total eligible own funds to meet the SCR	R0540	27,348	26,598	-	-	750
Total eligible own funds to meet the MCR	R0550	26,598	26,598	-	-	
SCR	R0580	12,903				
MCR	R0600	3,226				
Ratio of Eligible own funds to SCR	R0620	212%				
Ratio of Eligible own funds to MCR	R0640	825%				

		C0060	
Reconciliation reserve			
Excess of assets over liabilities	R0700	27,348	
Own shares (held directly and indirectly)	R0710	-	
Foreseeable dividends, distributions and charges	R0720	-	
Other basic own fund items	R0730	13,979	
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	-	
Reconciliation reserve	R0760	13,369	
Expected profits			
Expected profits included in future premiums (EPIFP) - Life business	R0770	-	
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	-	
Total Expected profits included in future premiums (EPIFP)	R0790	-	

S25.01.21 – SCR using standard formula

Annex I

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0100
Market risk	R0010	1,935		
Counterparty default risk	R0020	5,792		
Life underwriting risk	R0030	-		
Health underwriting risk	R0040	65		
Non-life underwriting risk	R0050	5,905		
Diversification	R0060	- 2,837		
Intangible asset risk	R0070			
Basic Solvency Capital Requirement	R0100	10,860		

Calculation of Solvency Capital Requirement		C0100
Operational risk	R0130	2,043
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	-
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
Solvency capital requirement excluding capital add-on	R0200	12,903
Capital add-on already set	R0210	
Solvency capital requirement	R0220	12,903
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	-

S28.01.01 – MCR

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

		C0010
MCR_{NL} Result	R0010	2,140

		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	288	210
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	-	5,488
Fire and other damage to property insurance and proportional reinsurance	R0080	7,930	3,284
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	597	2,014
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	

		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		
Obligations with profit participation - future discretionary benefits	R0220		
Index-linked and unit-linked insurance obligations	R0230		
Other life (re)insurance and health (re)insurance obligations	R0240		
Total capital at risk for all life (re)insurance obligations	R0250		

Overall MCR calculation

		C0070
Linear MCR	R0300	2,140
SCR	R0310	12,903
MCR cap	R0320	5,806
MCR floor	R0330	3,226
Combined MCR	R0340	3,226
Absolute floor of the MCR	R0350	2,500
		C0070
Minimum Capital Requirement	R0400	3,226