Solvency and Financial Conditions Report ('SFCR') for the year ended 31.12.2018

Contents

1. Introduction

The structure of the Solvency and Financial Condition Report (SFCR) has been prepared as described in Chapter XII of the Delegated Acts. The subjects addressed are based on article 51 to 56 of the Solvency II directive and article 292 up to 298 of de Delegated Acts. Furthermore, the figures presented in this report are in line with the supervisor's reported Quantitative Reporting Templates.

All amounts in this report are presented in thousands of euros (€000), being the functional currency of Atlantic Insurance.

2. Business and performance

2.1. Business

2.1.1 Name and legal form

Atlantic Insurance Company Public Ltd ("the Company"; "Atlantic") was incorporated in Cyprus in 1983. Atlantic is a public company and its shares are listed in the Cyprus Stock Exchange since October 2000.

The address of the registered office is:

15 Esperidon Street, Strovolos,

Nicosia

2001 Cyprus

This Solvency and Financial Condition Report ("SFCR") covers Atlantic Insurance on a solo basis.

2.1.2 Name of the Supervisory Authority

The Supervisory Authority which is responsible for the financial supervision of the undertaking can be contacted at:

Superintendent of Insurance
Postal Address: P.O. Box 23364, 1682 Nicosia
Tel.: 22602990
Fax: 22302938
E-mail: insurance@mof.gov.cy

2.1.3 Name of external auditors

The independent auditors of the Company are:

Ernst & Young Cyprus Ltd
Jean Nouvel Tower
6 Stasinou Avenue
P.O. Box 21656
1511 Nicosia, Cyprus

2.1.4 Holders of qualifying holdings in the undertaking

The persons, to the knowledge of the Company, who were direct and indirect holders of qualifying holdings in the Company at any time during the reporting period and at the end of the financial year, were:

	%
Emilios Pyrishis[1]	33,77
AstroBank Ltd	19,91
Andreas Frangoullis[2]	20,29
Maro Marathovouniotou[3]	5,96

(1) The holding of Emilios Pyrishis includes his direct share of 20,37% and his indirect holding arising from the shares owned by his mother Nina Pyrishi (2,36%) and his brother George Pyrishis (11,04%).

(2) The holding of Andreas Frangoullis includes his direct share (20,01%) and his indirect holding arising from the shares owned by his wife Elli Frangoulli (0,10%), his children Christos, Orthodoxos and Vasilis (0,10%), his mother Vasilou Frangoulli (0,03%) and his brother Filippos Frangoullis (0,05%).

(3) The holding of Maro Marathovounioti includes her direct share (1,43%) and her indirect holding arising from the shares owned by her daughter Athena Nicolaidou (1,61%), her son Alexis Marathovouniotis (1,43%) and her son Andreas Marathovouniotis (1,49%).

2.1.5 Legal structure of the group

Atlantic Insurance does not belong to any insurance group and does not have any ultimate controlling parent company.

The Company has the following subsidiary companies which are all private limited liability companies registered in Cyprus:

Company	**Principal activities**	**Share**	**NBV**
		%	**€'000**
Lyssi Investments Ltd	Car hire	100,0	**86**
Lion Insurance Agency Ltd	General insurance agent	100,0	**141**
Atlantic Securities Limited	Brokerage and investment services	67,7	**674**
			901

2.1.6 Material lines of business and geographical areas

Material lines of business
The principal activity of the Company is the undertaking of general insurance business. For Solvency II ("SII") purposes, the Company's business includes insurance obligations that fall into the following defined Solvency II lines of business:

- Medical expense 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
- Assistance
- Miscellaneous financial loss

These SII lines of business are used when reporting the premium, claims, expenses and technical provisions in the SII QRTs.

The Company prepares its financial statements in accordance with International Financial Reporting Standards ("IFRS").

Geographical areas

The Company conducts its insurance business only in the Republic of Cyprus.

The Company operates through its headquarters that are located in Nicosia and its branches which are located in the cities of Larnaka, Limassol and Paphos.

2.1.7 Significant business events during the reporting period

There were no significant events which occurred over the reporting period and which had a material impact on the undertaking.

2.2. Performance

2.2.1 Underwriting performance

	2018	2017	%
	€	€	
Gross written premiums	23.829.900	22.892.585	4,1%
Net earned premiums	17.270.425	16.682.616	3,5%
Other insurance income	891.607	824.918	8,1%
	18.162.032	**17.507.534**	**3,7%**
Expenses			
Claims incurred	8.391.401	8.491.097	-1,2%
Commissions payable	1.071.429	964.419	11,1%
Administration expenses	4.165.362	3.979.779	4,7%
	13.628.192	**13.435.295**	1,4%
Profit from operations	**4.533.840**	**4.072.239**	**11,3%**
Non-recurring income	800.000	-	
Net finance income	362.644	509.598	-28,8%
Investment income	631.521	445.434	41,8%
Investment (losses) / gains	(3.356.328)	1.040.979	-471,7%
Loss on property revaluation	(444.149)	(45.020)	
Provision for diminution of subsidiary	(43.820)	(93.910)	
Profit before tax	**2.483.708**	**5.929.320**	**-58,1%**
Tax	(706.210)	(650.185)	8,6%
Profit for the year	**1.777.498**	**5.279.135**	**-66,3%**

Profit from insurance operations rose by 11,3% to €4,53mln (2017: €4,07mln) as a result of the increase in net earned premiums by 3,5% and the reduction in incurred claims by 1,2%. Operating margin increased to 26,25% compared with 24,41% in 2017.

Gross written premiums increased by 4,1% to €23,83mln from €22,89mln in 2017. Motor premiums increased by 2,8%, medical premiums by 4,9%, liability premiums by 21,1% and property premiums by 3,4%. Net earned premiums amounted to €17,27mln versus €16,68mln in 2017, recording an increase of 3,5%.

Claims from policyholders fell by 1,2% and amounted to €8,39mln (2017: €8,49mln). The net claims loss ratio on net earned premiums fell to 48,59% from 50,90% in the previous year. The claims ratio of the motor and property insurance class increased while the claims ratio of the other insurance classes fell.

Profitability indicators	2018	2017
Net loss ratio	48,59%	50,90%
Expenses ratio	24,12%	23,86%
Commissions ratio	6,20%	5,78%
Underwriting margin	26,25%	24,41%
Investment return	-9,92%	7,09%
Net profit margin	10,29%	31,64%
Earnings per share	4,54	13,50
Dividend per share	9,50	9,50

Administrative expenses rose by 4,7% to €4,16mln from €3,98mln in 2017. The rise is mainly attributable to the increase in staff costs by 3,7% as a result of the increase in the number of employees to 107 from 96. There was also an increase in depreciation charges, stationery, professional services and computer expenses. On the other hand discounts, electricity, advertising, vehicle expenses and provisions for bad debts recorded a decrease.

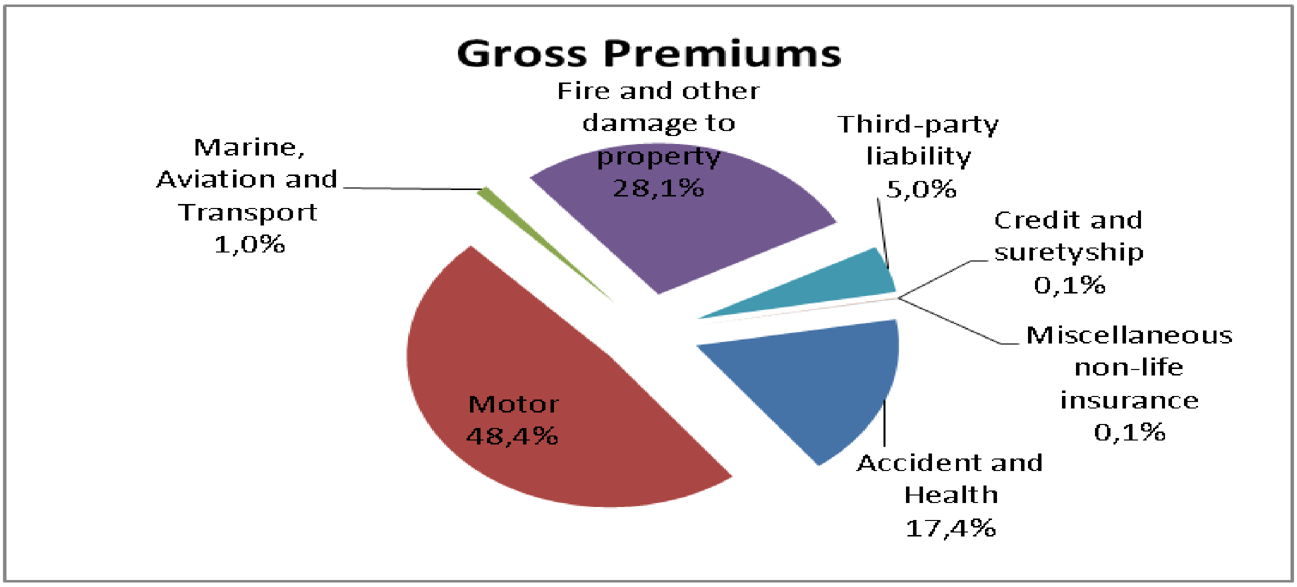
The analysis of premiums, claims and net loss ratio by line of business is presented below. The net loss ratio of all lines of business is below the industry average.

Line of Business -€	Gross written premiums	Net earned premiums	Net claims	Net loss ratio
Accident and Health	4.156.659	3.704.469	2.701.668	**72,93%**
Motor	11.522.270	11.012.738	5.615.707	**50,99%**
Marine, Aviation and Transport	247.690	105.394	1.666	**1,58%**
Fire and other damage to property	6.684.878	1.447.100	182.234	**12,59%**
Third-party liability	1.192.127	982.632	-109.909	**-11,19%**
Credit and suretyship	13.823	13.887	-	**0,00%**
Miscellaneous non-life insurance	12.453	4.205	35	**0,83%**
Total	**23.829.900**	**17.270.426**	**8.391.401**	**48,59%**

All lines business recorded satisfactory profitability. Underwriting profits per line of business were €1,97mln for the motor insurance class, €1,17mln for property, €0,79mln for liability and €0,37mln for the accident and health line of business.

Line of Business-€	Claim costs	Acquisition costs	Maintenance costs	Reinsurance commissions	Combined cost ratio	Underwriting profit
Accident and Health	214.992	115.631	309.108	12.362	89,87%	375.432
Motor	793.730	610.683	2.025.318	4.346	82,10%	1.971.647
Marine, Aviation and Transport	7.183	23.642	34.418	47.470	18,44%	85.955
Fire and other damage to property	95.275	236.611	459.766	697.754	19,08%	1.170.968
Third-party liability	34.320	84.101	179.664	3.240	18,82%	797.697
Credit and suretyship	-	226	2.654	-	20,74%	11.007
Miscellaneous non-life insurance	513	535	237	3.564	-53,37%	6.449
Total	**1.146.013**	**1.071.429**	**3.011.165**	**768.736**	**74,41%**	**4.419.155**

Motor premiums account for 48,4% of the total gross premiums. Property premiums and accident & health premiums account for 28,1% and 17,4% respectively.



2.2.2 Investment performance

Atlantic's investment policy is aimed at striking a balance between generating returns and preventing risks. Protecting the solvency position is an important factor in this context.

Investment income

	2018	2017
	€	€
Dividends	561.418	376.919
Rents received	70.103	68.515
Interest on bonds	282.143	323.761
Investment (losses) / gains	(3.356.328)	1.040.979
Fair value gains/(losses) through equity	102.737	19.710
Loss on property revaluation	(444.149)	(45.020)
	(2.784.076)	**1.784.864**

Investment return	**-9,92%**	**7,09%**
On investment properties	-6,73%	0,41%
On transferable securities	-10,71%	9,03%

Unfavourable global market conditions especially during the last quarter of the year had a negative impact on the Company's investment portfolio and led to overall investment losses of €2,78mln against gains of €1,78mln in 2017.

The overall investment return was negative -9,92% compared to +7,09% in 2017. The Company's investment portfolio in transferable securities recorded a negative return of -10,71% (2017: +9,03%). The return on local investment properties was -6,73% (2017:+0,41%)

Interest on deposits

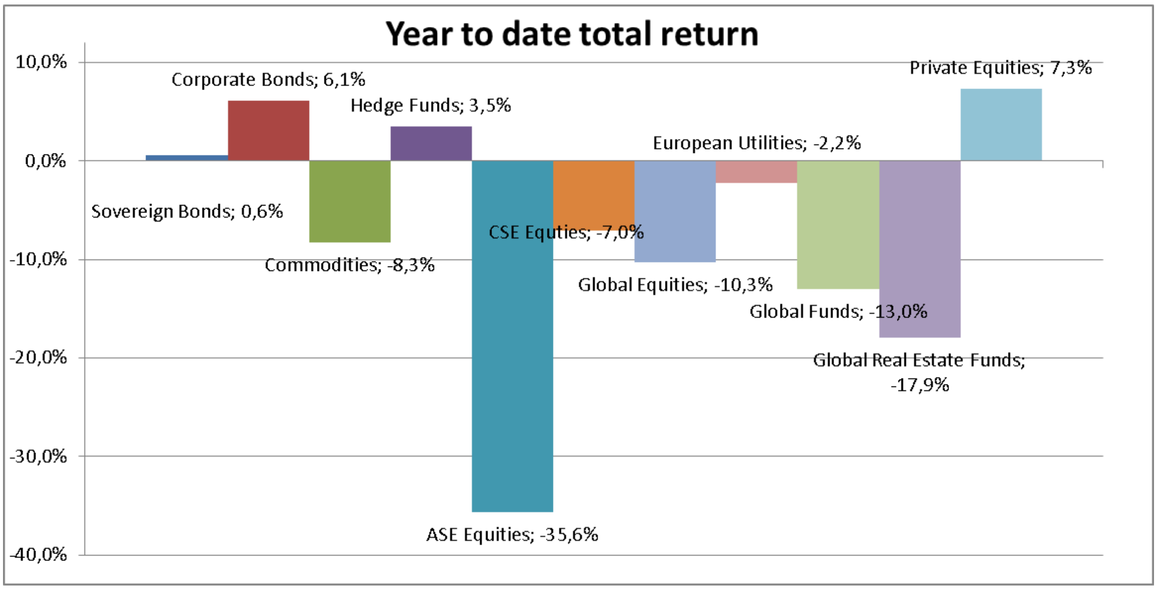
	2018	2017
	€	€
Interest on Bank deposits	133.323	248.414
Exchange losses	(2.555)	(26.766)
	130.769	**221.649**

Return on bank deposits -ex forex	1,03%	1,52%
Return on bank deposits	1,01%	1,36%

The continuing drop in interest deposit rates led to a reduction of the average return on the Company's bank deposits to 1,03% against 1,52% in 2017.

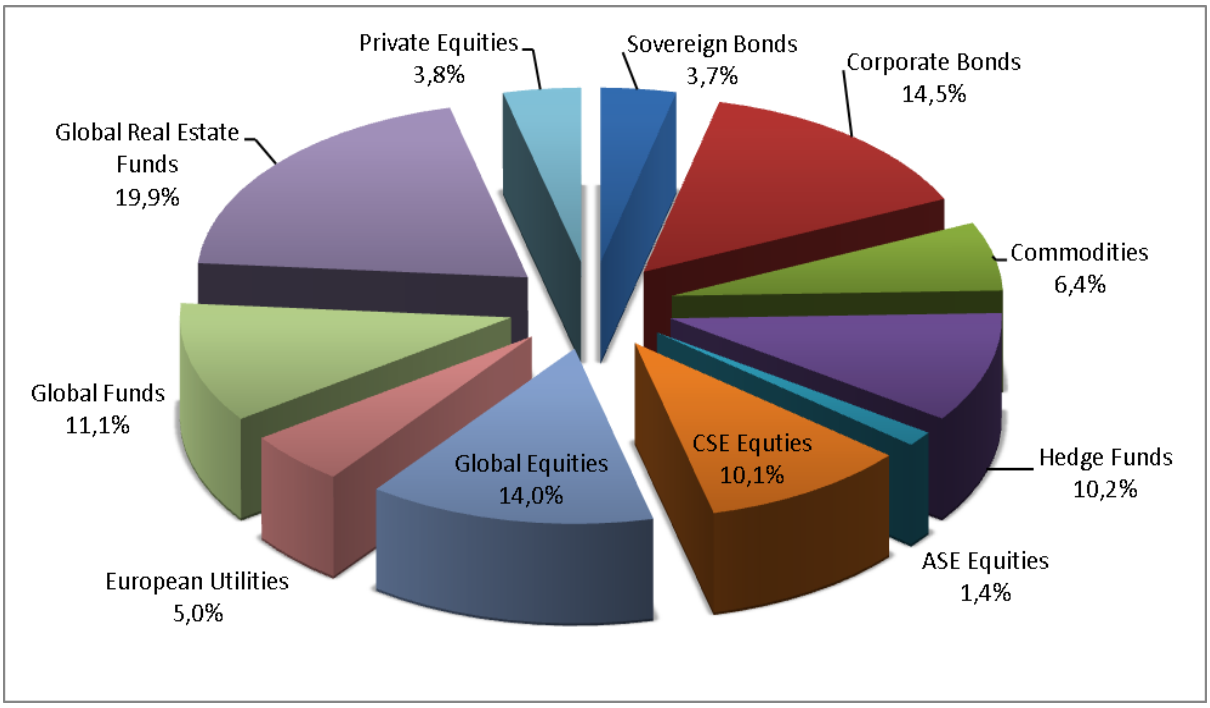
The income from bank deposits was adversely affected by foreign exchange losses of €3 k (2017: losses of €27k) which arose from bank deposits denominated in foreign currency.

The chart below shows the investment performance of the different asset categories of the Company's investment portfolio.



The value of the Company's transferable securities portfolio reached €22,36mln at the end of 2018 compared to €22,64mln at the beginning of the year.

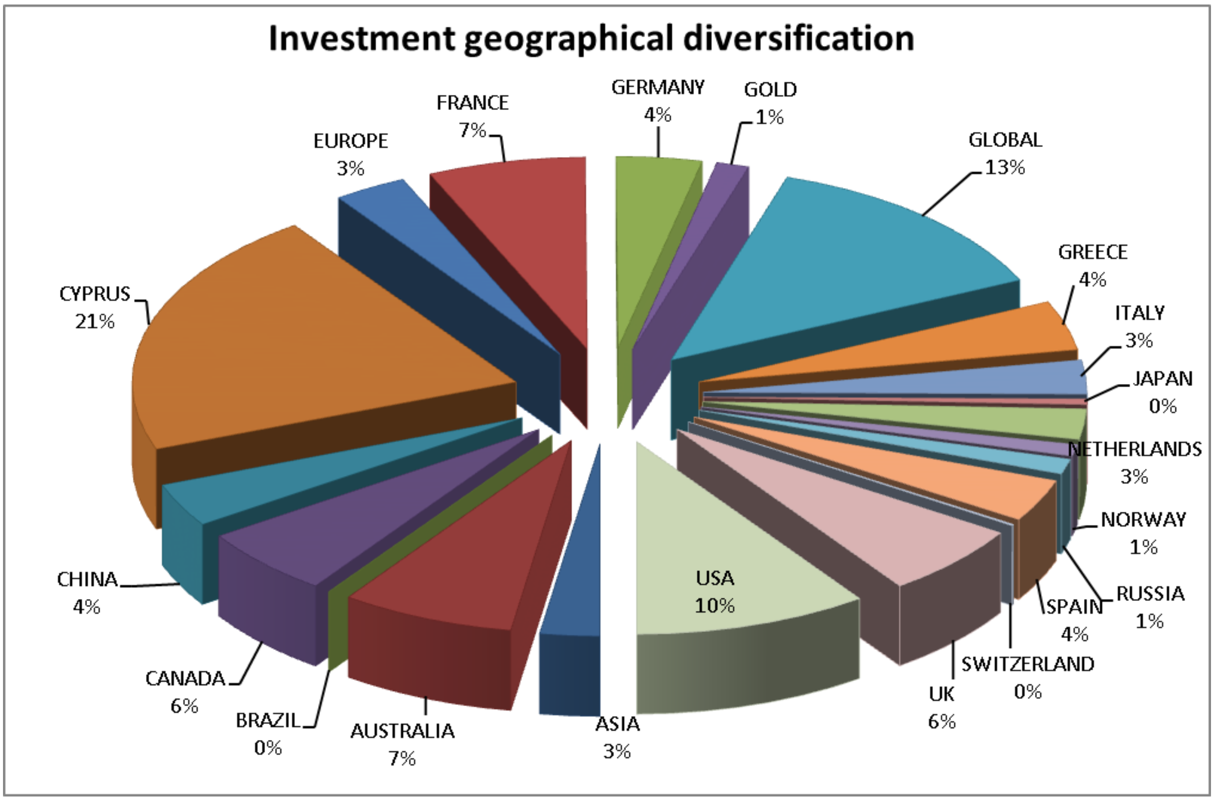
The investment allocation of the Company's portfolio is shown below:



The table below presents the changes of the of the Company's portfolio asset allocation in main investment categories.

	Dec-18	Sep-18	Jun-18	Mar-18	Dec-17
Equities	45,4%	41,9%	43,7%	39,3%	35,5%
Bonds	18,1%	22,8%	18,4%	21,3%	26,4%
Property	19,9%	19,5%	20,3%	21,3%	22,3%
Alternative	10,2%	10,7%	11,3%	11,6%	9,8%
Commodities	6,4%	5,2%	6,3%	6,5%	6,0%
	100%	**100%**	**100%**	**100%**	**100%**

The Company's investment portfolio of transferable securities is widely diversified in terms of geographical regions as indicated by the below chart.



Information about investments in securitisation

Atlantic has no investments in securitization.

2.2.3 Other material income and expenses

Non-recurring income during the year relates to the reversal of a provision of €800k for future losses from catastrophic events.

A provision of €43k (2017: €94k) was made during the year for permanent diminution in the value of the investment in the subsidiary undertaking Atlantic Consultancy Services Ltd.

2.2.4 Any other material information

No other information is applicable.

3. System of Governance

3.1. General Information

Basic strategic objective

The management's strategy has always focused on creating value for its shareholders. The management will continue to focus on its succesful business model and the adoption of policies which aim to further enhance reduction of costs and inefficiencies, effective claims handling, prudent risk management and maintaining high profitability indicators and a strong financial position.

Corporate Governance
The Company is committed to implementing a sound governance framework through which objectives are set and the means of attaining these objectives and monitoring performance is determined. For many years the Board of Directors has partly adopted the Code of Corporate Governance ('Code') issued by the Cyprus Stock Exchange since the Company is listed in the Alternative Market of the Cyprus Stock Exchange hence the adoption of the Code is voluntary and not compulsory. The report of the Board on the **Corporate Governance Code** which describes the degree of the Company's compliance and provides explanation of areas of non-conformity with the principles and articles of the Code is shown on pages 9 to 19 of the consolidated financial statements and is available on the Company's website www.atlantic.com.cy.

The Board of Directors
The BoD is the ultimate authority for the management of the Company and it maintains responsibility for its prudent management. The BoD organizes and directs the affairs of the Company in a manner that seeks to protect its policyholders' funds, maximize the value of the Company for the benefit of its shareholders, while complying with regulatory requirements and relevant governance standards.

Composition of the Board
The main objective for the determination of the composition of the Board is to ensure that the appropriate level of skill and competence required for the prudent management of the company is achieved.The composition of the Board includes **non-executive** as well as independent directors to ensure the objective external guidance and supervision.

The current composition of the Board is :

Name	Role
Emilios Pyrishis	Chairman and Managing Director
Andreas Pirishis	Vice-Chairman -Executive Director
Andreas Frangoullis	Executive Director
Triantafyllos Lysimachou	Non-Executive Director
Panayiotis Mallis	Non-Executive Director-Independent
George Pyrishis	Non-Executive Director
Nina Pyrishi	Executive Director
Charalambos Alexandrou	Non-Executive Director
Loukis Ioannou	Executive Director
Marios Savvides	Alternate Director of Mr Lysimachou-Non-Executive

The Board consists of 5 Executive Directors and 4 Non-Executive Directors, one of whom is independent.

Role and responsibilities

The Board of Directors oversees the performance of the Executive Management on behalf of the shareholders. During the execution of its overall supervision the Board inspects and evaluates the strategic and business plan of the Company, its solvency, as well as the approach of the management in addressing major risks and challenges.

The main role and responsibilities of the Board include:

- Long term strategy and business plan
- Expansion in new areas, mergers and acquisitions
- Capital structure and dividend policy
- Securing a sound internal control system and risk management
- Ensure that the solvency capital requirements are maintained at all times
- Approval of material contracts and transactions which do not fall within the ordinary activities of the Company
- Corporate governance assessment
- Approval of major policies including policies required by the Solvency II regulations

Board Committees

The BoD established the following four Board Committees, for the more effective management of the Company:

Audit Committee

Name	Role
Panayiotis Mallis *(Independent Non-Executive Director)*	Chairman
Charalambos Alexandrou *(Non-Executive Director)*	Member

Risk Management Committee (RMC)

Name	Role
Marios Savvides *(Non-Executive Director)*	Chairman
Emilios Pyrishis (Managing Director)	Member
Charalambos Alexandrou (Non-Executive Director)	Member

Appointment Committee

Name	Role
Triantafyllos Lysimachou (Marios Savvides) (Non-Executive Director)	Chairman
Panayiotis Mallis (Non-Executive Director)	Member
George Pyrishis (Non-Executive Director)	Member

Investment Committee

Name	Role
Emilios Pyrishis-Chairman	Executive director
Marios Savvides	Non-executive director
Charalambos Alexandrou	Non-executive director
Loukis Ioannou	Executive director

With a view to a more effective functioning of the Committee the Chairman invites at the meeting certain professional investment advisors and / or persons with extensive experience in the field.

Committee	Main function
Risk Management Committee	Monitor and control of the Company's risk exposures and ensure that these exposures are within the tolerance limits set by the Board.
Audit Committee	Ensures the functioning of an effective internal control system, reviews the reports and the work performed by the Internal Audit and approves the main accounting principles and assumptions used in the preparation of financial statements.
Investment Committee	Formulates recommendations regarding the investment strategy and monitors its implementation.
Appointment Committee	Review of the composition and balance of the Board and its committees. Assists the Board in finding suitable persons for appointment as Board members.

In compliance with the CSE regulations, the Board of Directors has also appointed the following senior officers:

Reporting Officer
- Panayiotis Mallis- Independent Non-Executive director

The reporting officer addresses any concerns and problems of shareholders which have not been resolved through other communication procedures.

Compliance Officer with the Corporate Governance Code of the CSE
- Andreas Pirishis – Vice-Chairman / Executive director

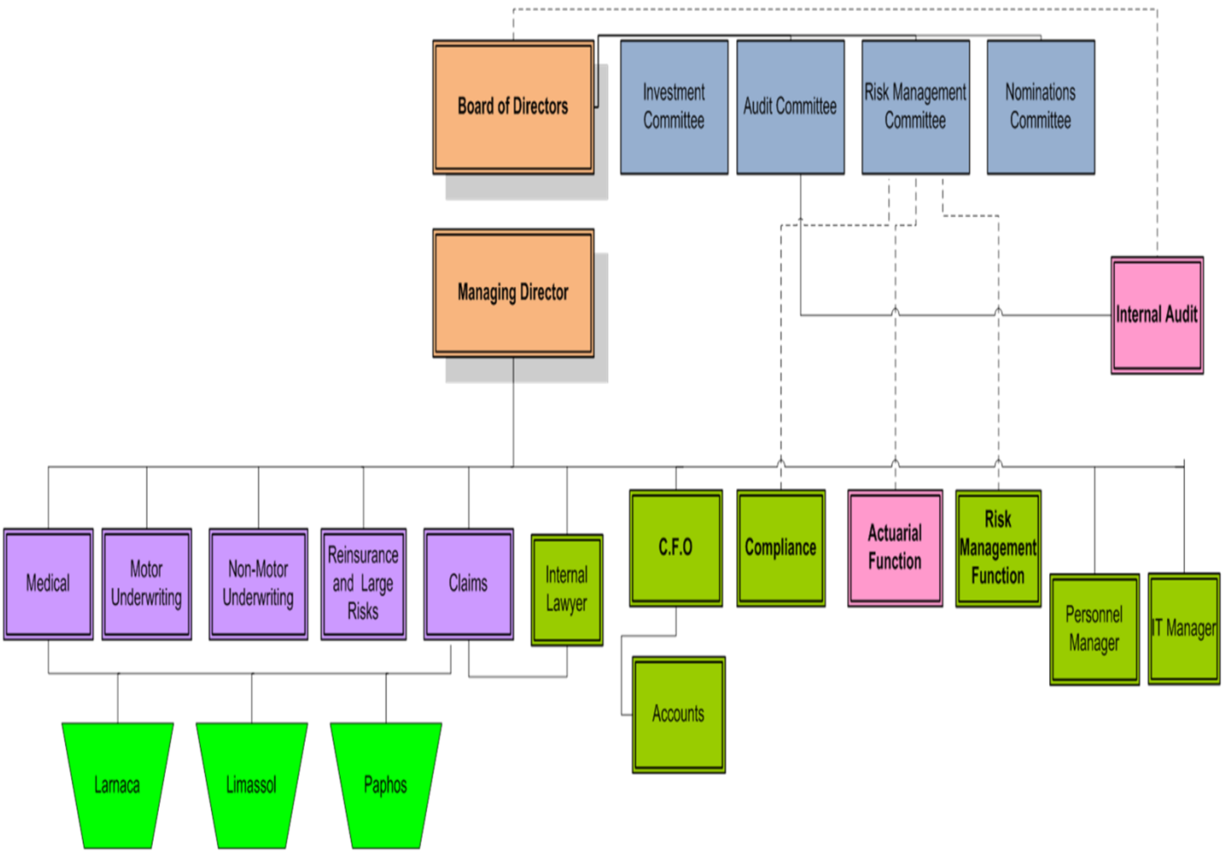
The compliance officer has the responsibility of monitoring the implementation of the Code of Corporate Governance and prepares, with the assistance of the Audit Committee, the Board of Directors ' report on corporate governance.

Investor Liaison Officer
- Andreas Pirishis – Vice-Chairman / Executive director

The investor liason officer ensures the constant communication with shareholders and the timely provision of reliable information. He also encourages greater shareholder participation at the General Meetings and represents the Company in press conferences, congresses and other activities organized by the CSE.

3.2. Organization Chart

The Company's organizational structure reporting lines are summarized on the below chart:



The **BOD** is the Company's ultimate supervisory body.

The Senior Management, through the **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 the Company through their Head 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.

The Risk, Compliance and Actuarial Functions have a direct reporting line to the Risk Management Committee of the Board in order to ensure that these functions have the ability to escalate important issues directly to the BoD.

The Company's internal audit provides independent assurance to the BoD. The Head of Internal Audit reports to the Audit Committee and to the BoD. The Internal Audit function is administratively independent from all other functions and activities of the Company.

The senior management includes the persons who are in charge of the key functions and business units who report directly to the CEO.

3.3. Material changes in the system of governance that have taken place over the reporting period

Board of Directors

George Pyrishis, Panayiotis Mallis and Andreas Pirishis who retired by rotation in accordance with the Articles of the Company's Association were re-elected at the latest Annual General Meeting dated 6 June 2018. Loukis Ioannou, who was appointed as a member of the Board of Directors on 22 June 2017, also retired and was re-elected at the latest Annual General Meeting.

Board Committees

There were no changes in the composition of the Board Committees during the year.

3.4. Remuneration report

Objective

The remuneration policy is intended to recruit and retain employees whose values are aligned to the Company's culture and values. Atlantic aims to create an environment that motivates high performance and supports the overall business strategy of the Company.

Principles of remuneration policy

- Be in line with the Company's business and risk strategy, risk profile, objectives, values, risk management practices, and long-term entity wide interests and performance
- Consider both financial and non- financial performance
- Comprehensively and properly reflect the individual and the Company's performance
- Offering pay packages that are competitive in the market to attract and retain qualified individuals with appropriate skills and professional competence;
- Remuneration practices are structured in such a way that avoids potential incentive for unauthorized or unwanted risk taking.
    - The remuneration of employees involved in risk-taking activities such as underwriting, reinsurance or investment management, is designed so as not to encourage unauthorized or unwanted risk-taking
    - The remuneration is based on an assessment of the individual's performance which is based on both quantitative and qualitative criteria
    - Remuneration policy takes into account the long-term interests of the Company and not just short-term financial results.

The senior management of the Company and the professional staff receive a fixed salary, without any variable component. The Company believes that this remuneration policy restricts conflicts of interest and prevents unwanted risk-taking.

Provident fund

The Company operates a defined contribution provident fund scheme which is separately financed and prepares its own financial statements. In accordance with the Funds' memorandum the members are entitled to the payment of certain benefits on their retirement or early termination of their employment. The Company's contribution is 5,75% on the employees gross salary.

Remuneration on retirement/ share options

The Company does not provide any remuneration or benefits on retirement. The Company does not offer any share option scheme.

Director's remuneration and fees

The remuneration policy and the analysis of directors remuneration is described in pages 16-17 of the Company's Annual Report.

Material transactions with directors, shareholders and related parties

There were no significant contracts in force by the year end to which shareholders owning directly or indirectly more than 5% of the share capital of the Company and members of the Board and the management of the Company, their spouses or minor children have or had direct or indirect material interest, with the exception of the contracts of employment of executive directors and the agreement for the appointment of Piraeus (Cyprus) Insurance Agency Ltd as an insurance agent of Atlantic Insurance Co Public Ltd as mentioned in note 32 of the financial statements.

The transactions of the Company with related parties are shown in note 29 of the financial statements. All transactions with related parties are conducted on an arm's length basis.

3.5. Fit and proper requirements

The Company ensures that all persons who effectively run the Company or have other key functions are fit to provide sound and prudent management through their professional qualifications, knowledge and experience and are proper by being of good repute and integrity.

The Company requires its Senior Management and holders of key functions to be fit and proper, to adhere to the Principles and Code of Ethics and Conduct and achieve competence.

Fitness

The assessment considers the person’s professional competence and capability in relation to the competencies and skills required for the position he holds.

- This assessment is based on the person’s previous experience, knowledge, and professional qualifications and should demonstrate due skill, care, diligence and compliance with the relevant standards for the area sector they have worked in.
- The Company will have regard to whether the person is competent, and demonstrate, through experience and training that they are able to perform the key functions.
- All individuals must maintain their competence for the role they fulfil. The HR manager in cooperation with the Senior Management is responsible for ensuring that all individuals receive appropriate training for maintaining their competence.
- Where specific professional qualifications are required for particular key function, recruitment adheres to those requirements.
- All senior officers are obliged to inform the human resources manager for any specific education and training needs which they consider necessary in the performance of their duties.

Proper

In assessing the propriety of a person the Company assesses his honesty, integrity, reputation and financial soundness.

Factors that may have an adverse impact on the assessment of the suitability of a person are:

- convictions for criminal offences,
- adverse findings in civil proceedings,
- disciplinary actions by regulators or professional bodies,
- pending investigations or enforcement actions,
- disciplinary or administrative sanctions and offences,
- bankruptcy, insolvency.

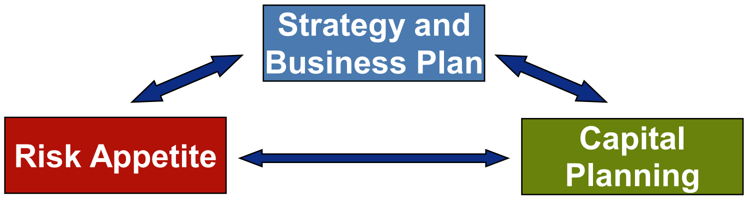
During the recruitment process of approved persons:

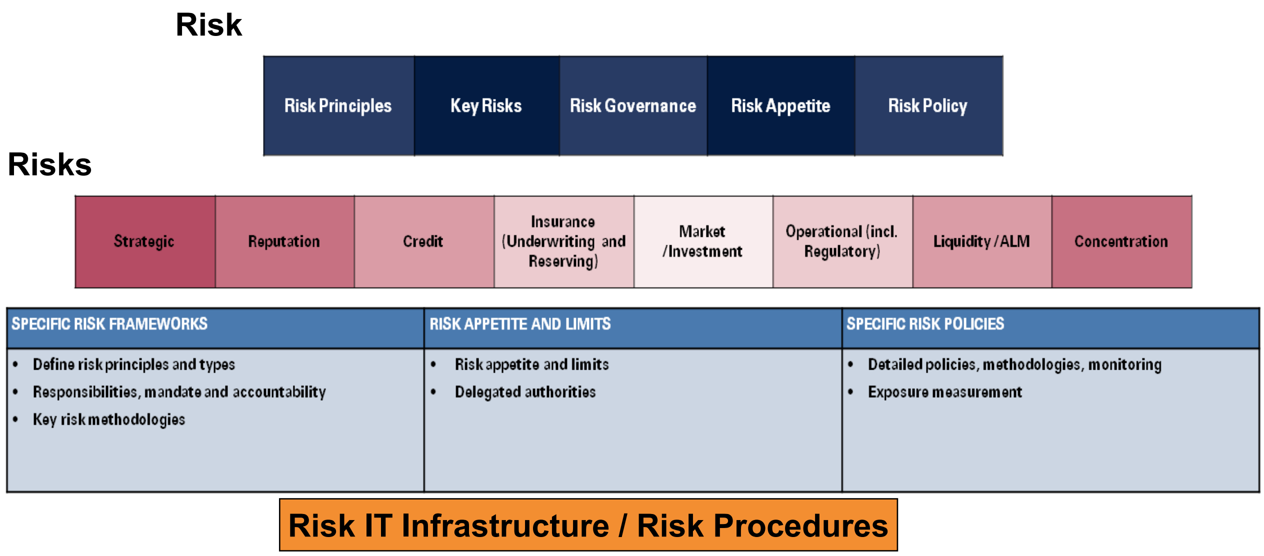
- Criminal record checks and check on professional bodies,
- At least one written reference from a former employer,
- Submission of the form ' Statement of fitness and property of senior officers'.

All approved persons are required to self-certify on an annual basis that they are fit and proper for their job position.

3.6. Risk Management

The Company has developed a comprehensive set of risk policies, frameworks and guidelines to ensure that adequate processes and procedures are in place to manage all types of risk. These documents are aligned with the current regulatory requirements under the Solvency II regime.





The Company's risk management framework, as illustrated below, is an embedded part of the business and fully interacts with the strategic planning and the capital management process.

The Company's **risk appetite is set by the BoD** and reflects its strategic objectives, shareholder and policyholders' aspirations as well as the interests of the Supervisory Body, employees and associates. The risk appetite is expressed in terms of the risk profile, which is then used in the process of setting appropriate **risk limits**.

Risk Tolerance Limits

The Company manages its risk appetite through a set of limits. Risk limits are established at three levels within the Company:

- Aggregate level –sets the overall risk profile of the Company
- Risk category level- sets the aggregate risk appetite for each of the key risk categories
- Exposure level limits for each risk

The **aggregate and risk category limits** are used by the BoD, Executive management and RMC for decision making.

Exposure level limits on the other hand are used by risk taking functions in their day to day operations to manage their exposures.

The **Risk Management Committee** of the Board has the overall responsibility for the supervision of the risk management framework. The RMC receives frequent information on the levels of risks to which the Company is exposed, in order to ensure that the Company's risk profile remains within the established risk tolerance limits. The Committee advises the Board in the formulation of the strategy and the risk management policies.

The **Risk Management function** (RMF) is responsible for the identification, measurement, monitoring, management and reporting of the significant risks the Company is exposed. The RMF reports directly to the Board through the Risk Management Committee. The composition of the RMF function is:

Name	Role
Loukis Ioannou	Head
Alexandros Chatzis	Member
Agis Charalambous	Member

Implementation of risk management system

The business units are responsible for the day to day management of risk and control within an agreed governance and risk framework.

The Risk Management Function as the second line of defence monitors the Company's actual risk exposure against risk tolerance levels and reports its findings on a quarterly basis to the Executive Management and the Risk Management Committee of the Board.

The Company's Board is responsible for taking key decisions across the organisation, but delegates some of its decision making responsibilities to the Executive Committee, Risk Management Committee and Audit Committee. The output of the risk management system is reviewed by the Executive and Risk Management Committees with a summary of key items brought to the attention of the Board. This process facilitates the integration of the risk management system in the decision making process.

All key decisions of the Company such as product initiatives, capital management, reinsurance arrangement review, investment strategy, marketing strategy, and distribution strategy, follow internal governance processes, which include an assessment of the risk exposure and mitigation strategies.

3.7. Own Risk Self-Assessment (ORSA)

ORSA ensures a comprehensive assessment of the Company's overall solvency needs in view of its business strategy, its risk profile, the risk tolerance limits it sets for itself and its responsibility to meet its financial obligations towards policyholders.

The ORSA process enables the Company to properly identify and manage the risks it faces or could face in the short and long term and project its capital needs over its 3 year business planning period.

The Risk Management Function is responsible for the preparation of the ORSA report **on an annual basis** and its submission for approval by the Company's BoD and later to the supervisor. ORSA covers all of the business units of the Company.

The assessment of risks is performed by the RMF at a business unit level using a Risk Register. The risk identification process covers existing risks as well as the emergence of new or additional risks. The Company's ORSA process covers both risks which are captured by the Standard formula as well as those which are not considered such as liquidity risk, reputational, strategic, political and business risks.

Different methodologies of stress tests are applied to all material risks and risk sensitivities are calculated.

The Company's capital planning includes projections of internal capital requirements (Pillar I and II) and own funds over the 3-year planning period. The capital plan is based on the financial projections which are prepared by the finance function and reflect the future strategic actions and business plans of the management over the next 3 years.

The RMF reports the ORSA results to the executive management and the BoD. As part of the ORSA process, the effectiveness of risk mitigating measures and planned improvement actions is assessed. This means risk management strategies are discussed, resulting in refined risk management strategies. Based on the assessment of risks and all internal as well as external factors, the main deficiencies and weaknesses are considered and, if significant, an action plan is prepared. This action plan normally includes the following measures:

- Modification of the Company's risk profile
- Improvements in governance and internal organization as well as improvements in risk management and internal control
- Gradual modification of own funds target.

3.8. Internal Control System

Internal control is a process affected by the Company's BoD, Senior 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 and non-financial information
- Compliance with applicable laws and regulations
- Achievement of Company's strategy and objectives

The Company maintains an effective internal control system which aims at reducing the possibility of unexpected losses or damage to its reputation. The system also reduces the possibility of significant errors and irregularities and assists in their timely detection when they do occur.

A high level of **integrity** is an essential part of the control culture of the Company. The **organizational structure** of the Company is appropriate for the size, nature and complexity of its operations, it sets the level of responsibility and defines appropriate and clear **internal reporting relationships**. Key duties and responsibilities are divided or **segregated among different people** to reduce the risk of error and fraud. Responsibilities and duties involving transactions and events are separated among different employees with respect to authorization, approval, processing and recording, making payments or receiving funds, review and auditing.

Operational risk management includes the identification, analysis, prioritization and management of operational risk in line with the risk appetite. The Company considers **external risks** such as technological advancements and risks posed by new legislation or regulations as well as business and economic changes. **Internal operational risks** are also addressed and they include risks associated with redesign of operating processes, disruption of information systems, personnel training, timely replacement of key employees etc.

The effectiveness of the internal control system is monitored on a continuous basis by business areas and control functions. Any deficiencies of the system which are identified are rectified in a timely manner.

The **Internal Audit function** plays a key role in establishing a formal methodology for evaluating internal controls at a level of scope and frequency which is appropriate to the operations of the Company.

Financial and regulatory reporting

The Company's financial control framework governs financial and regulatory reporting in the Company. The financial control framework is subject to annual review of the appropriateness and effectiveness of the controls. This review is conducted by the Internal Audit function and the results are submitted to the Audit Committee.

The IFRS financial statements are subject to rigorous review and control. Main accounting policies and estimates are reviewed by the Audit Committee. The technical reserves are set using best actuarial practices that are subject to review by the Risk Management function and the Actuarial Function.

Business Continuity Plan

Operational management can be disrupted significantly by unforeseen circumstances caused by a natural disaster or a man-made event. In order to ensure timely resumption of essential operations the Company has prepared a Business Continuity plan and appointed a Business continuity coordinator and a crisis management team. The plan describes clearly roles, responsibilities and emergency procedures and resumption plans.

Compliance

The Compliance Function reports to the Company's CEO. The Head of the Compliance Function, Mr Andreas Pirishis, is independent of risk taking functions such as underwriting and claims. The compliance function has a direct reporting line to the BoD, in order to ensure its operational independence and safeguard its ability to escalate important issues.

The main role of the Compliance Function is the establishment and application of suitable procedures for the purpose of achieving a timely and on-going compliance of the Company with the existing legal and regulatory framework.

The Compliance Function is reporting to senior management any breaches, or non-compliance with its policy or any other relevant policy, rules and regulations. This means that the Compliance Function shall be able to carry out its functions on its own initiative without obstruction from management and other staff members.

The function is subject to audit by the Internal Audit Function.

3.9. Internal Audit

The Board of Directors acknowledges Internal Audit's importance as a third line of defense in the internal control system's design framework, and is therefore committed to meeting or exceeding all relevant requirements of both the Solvency II Regulation (EU) 2015/35 and the CSE's Corporate Governance Code.
In particular the Board of Directors recognizes that the key pillars of an effective Internal Audit Function (IAF) are:

- independence both in terms of reporting line and from the functions being reviewed
- objectivity and professionalism
- adequate resourcing

Independence
The Internal Audit Function is administratively independent of all the other functions of the Company. The two members of the Internal Audit Function carry out exclusively internal audit related tasks, and are not involved in any way in the operations being reviewed.

At its meeting of 2 May 2018, the Audit Committee formally reviewed IAF's independence, competence, and adequacy of resources and found them to be of an appropriate standard.

Process and Frequency of Review

Potential revision of the Internal Audit Policy may be warranted by changes in regulations or the Company's organizational set up and nature of activities or other factors. In any event, the Internal Audit Policy is subject to at least annual review by the Internal Audit Committee to ensure that it stays current. The Audit Committee formally reviewed the Internal Audit Policy at its meeting of 2 May 2018 and concluded that no revision fell due.

Work performed and follow- up action

Internal audit reports raise both control recommendations as well operational performance recommendations.

Internal Audit reports include both management feedback on each control recommendation raised and an agreed date for implementation. Line managers are responsible for initiating action towards this end. Progress against agreed deadlines is monitored by internal audit through receipt of quarterly returns from each department noting whether a recommendation is pending, partially implemented, or fully implemented.

3.10. Actuarial function

The Actuarial function reports to the CEO and to the BoD through the Risk Management Committee. The Actuarial Function is subject to the audit of the Internal Audit Function regarding the adequacy and effectiveness of its procedures.

The Actuarial function is a specialist function that advises the Senior Management of the Company on the calculation of technical provisions and on the technical aspects of risk management and modeling.

The Company has outsourced it actuarial function to the qualified actuary Markos Markides of Numisma Advisors Ltd.

The main tasks and responsibilities of the Actuarial function are:
- coordinate the calculation of technical provisions;
- ensure the appropriateness of the methodologies, underlying models and the assumptions made in the calculation of technical provisions;
- assess the sufficiency and quality of the data used in the calculation of technical provisions;
- compare best estimates against experience;
- inform the administrative, management or supervisory body of the reliability and adequacy of the calculation of technical provisions;
- express an opinion on the overall underwriting policy;
- express an opinion on the adequacy of reinsurance arrangements; and
- contribute to the effective implementation of the risk management system

3.11. Outsourcing

The Company's Outsourcing Policy is outlined below:

Outsourcing Suitability Assessment
When considering outsourcing arrangements, the Company takes into account how it will fit into the reporting structure, business strategy and its ability to meet regulatory requirements.

Service Provider Selection
A tender process is conducted and due diligence is carried out to assess among other things financial viability, personal data protection, conflicts of interest, personnel, information and asset security, business continuity and disaster recovery, risk concentrations and regulatory permissions.

Contractual Requirements
Outsourcing relationships for critical functions must be established with a set of written agreements which set out the expectations and obligations of each party.

Approval
Outsourcing arrangements require internal approval in line with the Company's contract approval process. In the case of outsourcing of critical functions final approval by the managing director is required.

Monitoring of outsourced activities
Since the Company remains fully responsible for all outsourced functions and activities, it has established a process for monitoring and reviewing the quality of the service provided. For each outsourcing of a critical operational function the Company appoints a responsible person of the staff for the monitoring of the service provided.

The Company's critical functions which have been outsourced and the jurisdiction in which the service provider is located are shown below:

Outsourced Function or Activity	Jurisdiction of service provider
1. Actuarial Function	Cyprus
2. Internal Audit	Cyprus
3. Software programs	
a) Insurance software	Cyprus
b) Accounting software	Cyprus
4. Road assistance and accident care	Cyprus
5. Discretionary asset management	UK

3.12. Other material information

Other material information about the system of governance does not apply.

4. Risk profile

4.1. Risk Management

Atlantic applies an integrated approach in managing risks, ensuring that our strategic goals (customer interests, financial solidity and efficiency of processes) are maintained. This integrated approach ensures that value will be created by identifying the right balance between risk and return, while ensuring that obligations towards our stakeholders are met.

Risk management supports the Company in the identification, measurement and management of risks and monitors on a regular basis risk exposures against risk tolerance levels and ensures that appropriate actions are taken in the event of changes in Atlantic's risk profile.

The Company identifies and records all material risk exposures that arise from its activities. Risks are identified and registered both formally, through the annual review of the Company's Risk Register and the ORSA process, and informally as they arise in the course of business. Risk identification is performed for both existing and emerging risks.

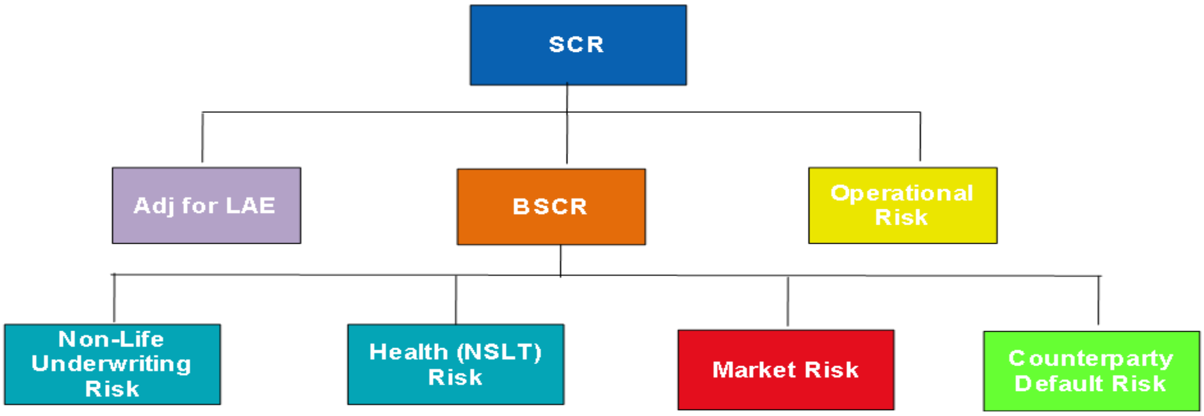
The Risk Management Function has the responsibility to assess whether the risks in the risk universe of the Company are material e.g. their impact on capital or earnings is above the materiality threshold set by the Company. Materiality is usually assigned based on a high level qualitative assessment of risk. Risks that appear material are being considered more carefully to measure their impact precisely using qualitative and quantitative techniques.

The Risk Management Function has the responsibility to ensure that all material risk exposures are monitored on an ongoing basis and that any risks that fall outside the approved risk appetite of the Company are identified and appropriately escalated to the Risk and Reserving Committee. When monitoring the risk exposures against the risk appetite, the Risk Management Function produces management reports that provide information on the current risk exposures against risk appetite limits and highlight any breaches.

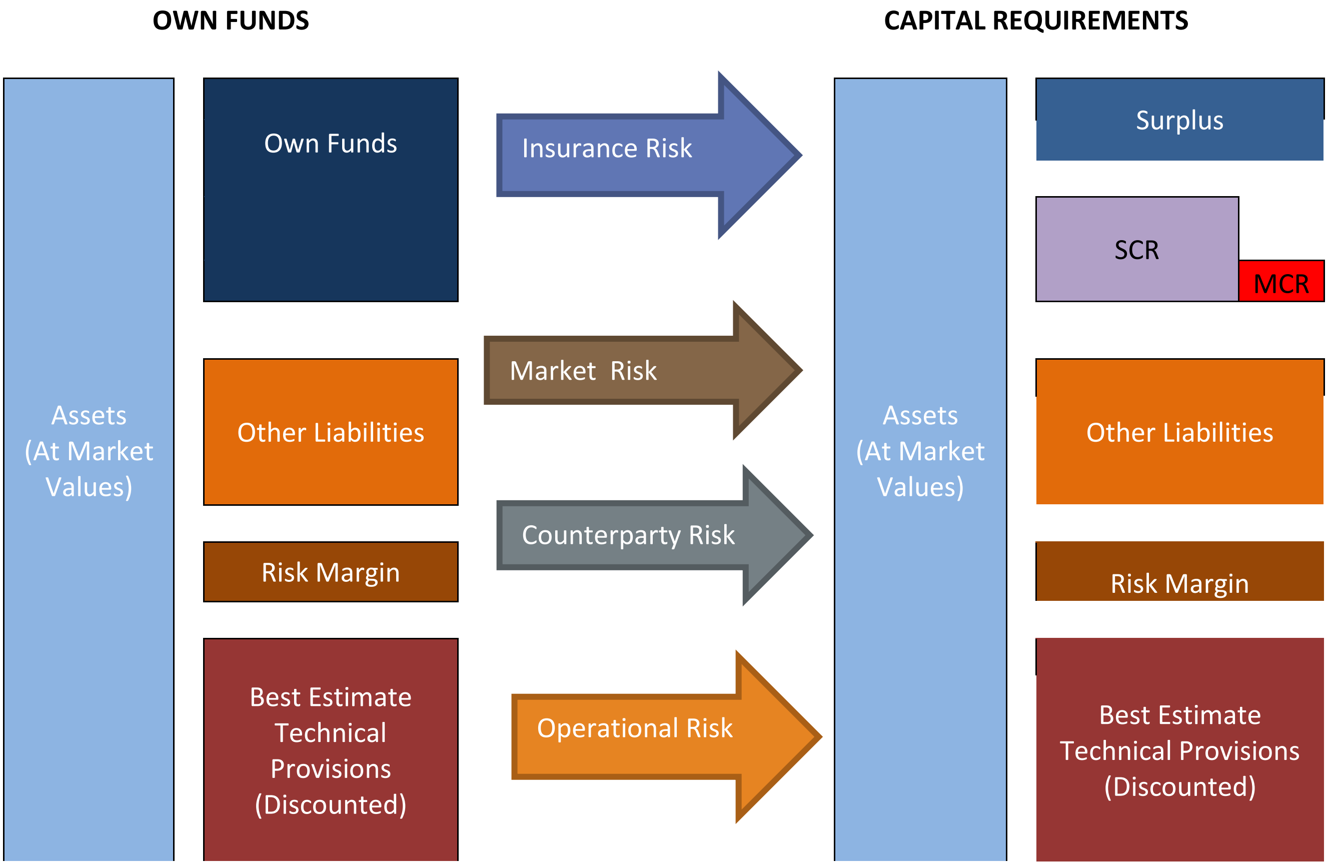
The Company has identified several risks that may potentially impact on the successful implementation of its business plan and its ability to generate adequate future profits. The risk appetite of the Company establishes a framework that supports an effective selection of risks.

The main risks the Company is exposed are market risk, underwriting risk and counterparty default risk. The Company's risk management framework supports the effective management of those risks.

Atlantic measures its risks based on the **standard model** as prescribed by the Solvency II regime. The Solvency Capital Requirement (SCR) is determined as the change in own funds caused by a predetermined shock which is calibrated to a 1-in-200 year event. The basis for these calculations is the Solvency II technical provisions which are calculated as the sum of a best estimate and a risk margin.



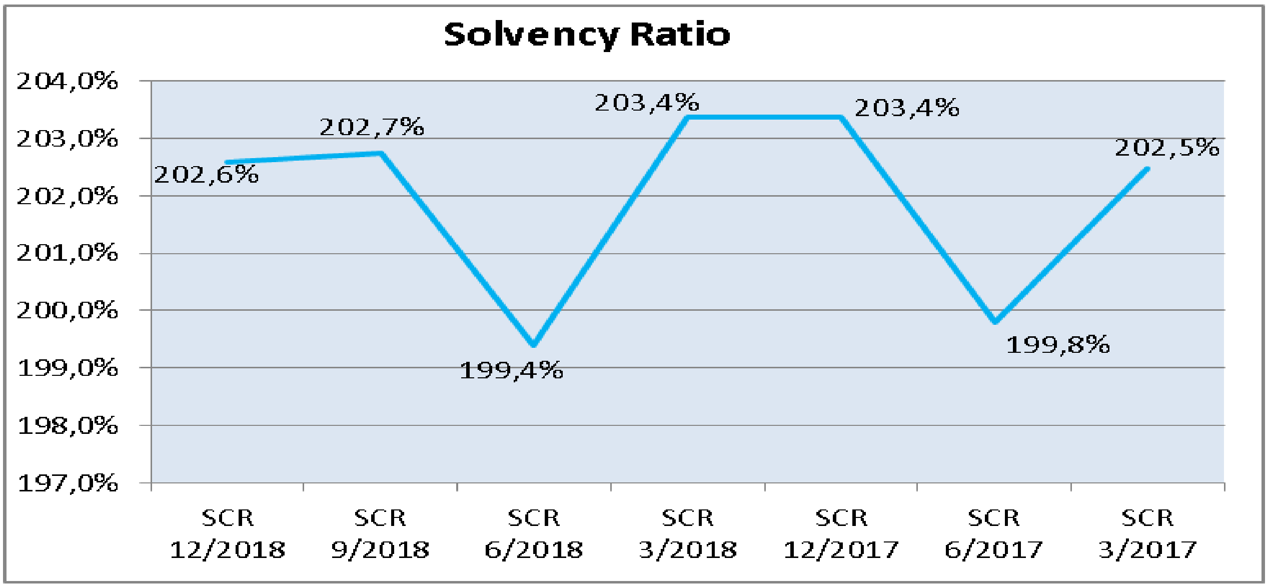
The structure of the SCR risk charges in the standard formula is summarised in the following diagram:



Solvency ratio in 2018

At the end of 2018 the solvency ratio of Atlantic was 202,6%. During 2018 the solvency ratio fluctuated between 199,4% and 203,4%.

The fluctuation of the Company's solvency ratio over the last 7 quarters is presented in the below chart.



4.2. Non-life insurance risk

Insurance risk is the risk of loss, or of adverse change in the value of insurance liabilities, due to inadequate pricing and provisioning assumptions. Underwriting risk and Reserving risk includes the fluctuations in the timing, frequency and severity of insured events, with relation to the Company's expectations at the time of underwriting. This risk can also refer to fluctuations in the timing and amount of claims settlements.

Non-life Insurance risk can be broken down into:

• Premium and reserve risk

• Non-life catastrophe risk

Premium- and reserve risk

The premium risk is the risk that the premium is not adequate for the underwritten risk. The premium risk is calculated over the maximum of the expected written premium for the next year, and the written premium for the current year.

The required capital for Non-life insurance risk amounts to €5,43mln before diversification and €4,54mln after the diversification effects are taken into account. Non-life insurance risk accounts for 20,1% of the undiversified SCR.

€000	**2018**	**2017**	**2016**	**Change**
Non-Life underwriting risk	**4.542**	**4.639**	**4.731**	**-2,1%**
Diversification effects	-892	-902	-910	-1,1%
Sum of risk components	5.434	5.541	5.641	-1,9%
Premium and reserve risk	3.921	4.018	4.110	-2,4%
Non-life CAT risk	1.513	1.523	1.531	-0,6%

For the non-life portfolio, the technical provisions under Solvency II at year-end 2018 can be broken down:

	€000
Best estimate	29.131
Risk margin	933
Technical provisions	**30.064**

The risk margin accounts for 3,20% (2017: 2,47%) of the best estimate.

Non-life Catastrophe Risk Module

Catastrophe risk is defined as the risk of loss or adverse change in the value of insurance liabilities, resulting from significant uncertainty of pricing and provisioning assumptions related to extreme or exceptional events. The Non-life SCR Catastrophic Risk Module consists of natural catastrophe risk (Earthquake), man-made catastrophe risk (Fire, Motor, Liability and credit) and other Non-life catastrophe risk.

The required capital for Non-life catastrophe risk at the end of the year amounts to €1,51mln.

€000	Gross	Mitigation	Net
SCR Non-Life Catastrophe Risk	**701.174**	**699.661**	**1.513**
Sum of risk components	**739.369**	**737.520**	**1.849**
Natural catastrophe	39.297	37.833	1.463
Non-Proportional Reinsurance	0	0	0
Man Made catastrophe	700.072	699.687	385
Other catastrophe	0	0	0

	Nat CAT	NP_Reinsurance	Man Made	Other CAT
Nat CAT	100%	100%	0%	0%
NP_Reinsurance	100%	100%	0%	0%
Man Made CAT	0%	0%	100%	0%
Other CAT	0%	0%	0%	100%

Earthquake is calculated based on insured values per cresta zone as at 31 December 2018. Insured values include all earthquake policies including static marine.

The **man made catastrophe risk** is broken down below:

€000	Gross	Mitigation	Net
SCR for NL CAT Man Made	**700.072**	**699.687**	**385**
Sum of risk components	**711.131**	**710.553**	**578**
Motor [1]	10.012	9.812	200
Marine	0	0	0
Fire [2]	700.000	700.000	0
Liability [3]	1.066	741	325
Credit [4]	53	0	53

	Motor	Marine	Aviation	Fire	Liability	Credit
Motor	100%	0%	0%	0%	0%	0%
Marine	0%	100%	0%	0%	0%	0%
Fire	0%	0%	0%	100%	0%	0%
Liability	0%	0%	0%	0%	100%	0%
Credit	0%	0%	0%	0%	0%	100%

1. The motor calculation is based on the number of insured vehicles at the end of the year.
2. The fire calculation is based on the largest sum insured of buildings located within a radius of 200 metres.
3. The liability risk is calculated based on the gross and net premiums and the largest liability limit provided for each of the following classes: professional indemnity, employer's liability, public liability and director's liability.
4. Credit catastrophe risk is based on the 2 largest risks by insured amount.

The sensitivity of regulatory solvency II capital to non-life underwriting risk is shown below:

Risk sensitivities			
Effect on:	***Available capital***	***Required Capital***	***SCR Ratio***
Type of Risk (%)	*€'000*	*€'000*	*%*
Increase in Non-life risk by 10%	*-*	*255*	*-3,25%*
Increase in BE Provisions by 5%	*-747*	*38*	*-5,25%*
Increase in loss ratio by 2%	*-199*	*7*	*-1,36%*

Health insurance risk

The Health insurance portfolio of Atlantic contains the following insurance risks:

a) NSLT Health risk

The premium risk is the risk that the premium is not adequate for the underwritten risk. The premium risk is calculated over the maximum of the expected written premium of the next year, and the written premium of the current year. The calculation is factor-based.

b) Health Catastrophe risk

A health catastrophe is an unexpected future event with duration of one year. In the case of medical expenses the risk is affected by the number of insured persons and the average claim cost. The following 3 scenarios are calculated:

- ***Pandemic scenario-*** In this scenario, there is a pandemic, which causes 1% of those affected to be hospitalized and 20% to see a local practitioner.
- **Mass accident scenario** - In this scenario, an accident takes place during a major public event. The risk is that 10% of the attendees are killed, 1.5% are permanently disabled, 5% are disabled for 10 years, 13.5% are disabled for 12 months and 30% need medical attention
- **Accident concentration scenario**-In this scenario, an accident takes place on site, with the most of our insured at the same location. The risk is that 10% of those present are killed, 1.5% are permanently disabled, 5% are disabled for ten years, 13.5% are disabled for 12 months and 30% need medical attention.

The required capital for health risk amounts to €0,63mln and is broken down as follows:

Capital requirement for Health underwriting risk-€000	**633,7**
Diversification effects	-77,7
Sum of risk components	711,4
SLT Health (similar to life technique) underwriting risk	0,0
Non-SLT Health (similar to non-life technique)	594,1
Health CAT	117,3

The analysis of health catastrophe risk is shown below:

Health catastrophe risk-€000	SCR
Mass accident risk	8,3
Accident concentration risk	37,0
Pandemic risk	111,0
Diversification within health catastrophe risk	-39,0
Total health catastrophe risk	**117,3**

Managing non-life insurance risk

Insurance risk is managed by monitoring claims frequency, the size of claims, claims development over time, risk concentration, claims handling time and claims costs. The risk is managed through effective underwriting procedures, internal underwriting limits, pricing, stricter acceptance criteria and effective claims management.

Claims frequency, size of claims and inflation
In order to limit claims and/or ensure that prices are adjusted correctly, the acceptance policy is continually refined using a number of indicators and statistical analyses. The product lines also use knowledge or expectations with respect to future trends to estimate the frequency, size and inflation of claims.

To mitigate the risk of claims, the Company bases its underwriting policy on claims history and risk models. The policy is applied to each client segment and to each type of activity. The risk of unexpected major damage claims is contained by policy limits, the concentration of risk management and reinsurance contracts.

Handling time
The time required for handling and settling claims is an important factor. The settlement of claims that have a long handling time, such as liability claims, can take many years. Analyses are performed regularly and based on the Company's experience in similar cases, historical trends – such as the pattern of liabilities – increases in risk exposure, payment of damages, the scale of current and not yet settled damage claims, court rulings and economic conditions.

Benefit and claims handling costs
Taking estimated future inflation into account, benefit and claims handling costs are managed on the basis of regular reviews and related actions.

Reinsurance

The Company enters into reinsurance agreements to mitigate non-life insurance risks. Reinsurance can be taken out for each separate claim (per risk), for the accumulation of claims due to natural disasters or to human actions (per event), or for both these risks.

The level of retention in the various reinsurance contracts is aligned with the size and the risk profile of the underlying portfolios, taking account of the cost of reinsurance on the one hand, and the risk that is retained on the other. The impact on the Company's financial and solvency position is taken into account as well in determining the level of retention.

To limit risk concentration, excess of loss reinsurance contracts are placed with various reinsurance companies. The Company sets minimum credit rating criteria and maximum exposure per reinsurer.

4.3. Counterparty Default Risk

Counterparty default risk is the risk of loss, or of adverse change in the financial situation resulting from fluctuations in the credit standing of any debtors, counterparties and issuers of securities to which the Company is exposed.

The **main source** of counterparty default risk is the Company's exposure to reinsurance and the amounts due by policyholders and intermediaries.

Solvency II makes a distinction between **two types of exposures**:

- Type 1: These counterparties generally have a rating (reinsurance, derivatives, current account balances, deposits)
- Type 2: These counterparties are normally unrated (receivables from intermediaries and policyholders, prepayments, other debtors, amounts due from subsidiaries and related companies). These exposures are generally diversified.

The **Solvency capital** required for Counterparty Default Risk as at 31 December 2018 was €6,75mln as shown in the following table.

€000	2018	% Total	2017	% Change
Counterparty default risk	**6.747**		**6.843**	**-1,4%**
Diversification effects	-298	-4,2%	-263	13,2%
Sum of risk components	**7.045**	**100%**	**7.106**	**-0,9%**
Counterparty default risk of type 1 exposures	5.571	82%	5.852	-4,8%
Counterparty default risk of type 2 exposures	1.474	18%	1.254	17,6%
CDR Reins Risk (Included in CDR Type 1)	*5.324*	*95,6%*	*5.507*	*-3,3%*

The largest part of the Company's counterparty default risk arises from reinsurance recoverables and especially the reinsurance cover of the fronting policy of the Electricity Authorities of Cyprus.

CDR Type 1 represents 82% of the undiversified amount of SCR. Over 95% of this exposure relates to reinsurance risk.

CDR Type 1-Composition	2018
Reinsurance	95,6%
Bank current and trading accounts	4,4%
	100,0%

Reinsurance

The Company has set maximum risk exposure limits and minimum credit rating criteria for **reinsurers.** As regards the major reinsurance treaties the minimum acceptable credit rating is A. The breakdown of reinsurance exposure as measured by the Solvency II loss given default amounts is as follows:

Reinsurers Rating	2018 % LGD	2017 %LGD
AA	56,6%	56,7%
A	43,0%	43,3%
BBB	0,0%	0,0%
unrated	0,4%	0,0%
Total	**100,0%**	**100,0%**

The sensitivity of regulatory solvency II capital to reinsurance risk is shown below:

Risk sensitivities			
Effect on:	**Available capital**	**Required Capital**	**SCR Ratio**
Type of Risk (%)	€'000	€'000	%
Credit rating of largest reinsurer	-	668	-8,28
Credit rating of 2 largest reinsurers	-	1.157	-13,93

Description of Scenario
Measured as the impact on SCR by the fall of the credit rating of the largest reinsurer by one credit quality step
Measured as the impact on SCR by the fall of the credit rating of the 2 largest reinsurers by one credit quality step

Composition of Counterparty Default Risk Type 2 Exposures

The breakdown of the exposure of the Company to counterparty default risk type 2 is shown in the below table.

Counterparty Default Risk 2 Exposures	**2018**		**2017**	
	€000	%	€000	%
Policyholders	4.398	62%	3.047	43,1%
Intermediaries past due less than 3 months	83	1%	1.628	23,0%
Intermediaries past due over than 3 months	550	8%	258	3,6%
Amounts due from subsidiaries	988	14%	1.037	14,7%
Cyprus Hire Risks Pool	538	8%	417	5,9%
Prepayments	114	2%	119	1,7%
Other receivables	404	6%	562	7,9%
	7.075	100%	**7.068**	**100,0%**

The sensitivity of regulatory solvency II capital to counterparty default risk type 2 is shown below:

Risk sensitivities			
Effect on:	**Available capital**	**Required Capital**	**SCR Ratio**
Type of Risk (%)	€'000	€'000	%
Increase of policyholder and intermediaries balances by 10%	-	77	-0,99
Increased bad debts of 3% of policyholder and intermediaries total non-provided balances	-296	-23	-1,59

Managing counterparty default risk

The Company's risk management policy defines maximum tolerance levels for receivables in terms of credit period, maximum receivable amounts and maximum overdue amounts per counterparty category. The risk management function monitors actual risk exposures versus tolerance levels and reports its findings to the management and the Board on a quarterly basis.

As regards policyholders and intermediaries balances the Company has set strict credit control procedures which are monitored on a daily basis by the Credit Control Department. The Company has adopted strict criteria which restrict policy renewals of customers with overdue amounts above the predefined levels. The Company monitors overdue customers' accounts on a regular basis and takes appropriate action.

Banking counterparties are selected from a list of approved financial institutions which sets maximum exposure levels per bank which are determined based on assessment of credit rating, tier-1 capital adequacy ratio, liquidity ratio and profitability of the banks. Maximum exposure levels are reviewed periodically by the RMF and approved by the RMC.

Reinsurance risk is managed by setting minimum credit rating criteria and maximum exposure by reinsurers in order to reduce excessive risk concentration. For excess of loss reinsurance contracts the Company requires that they are placed with various reinsurance companies.

In addition to reinsurance credit ratings the RMF carries out an ongoing monitoring of current developments affecting the reinsurers (e.g. changes in credit ratings, acquisitions, financial results, etc.) through specialized newsletters which it receives on a regular basis. As regards the 4 main reinsurers of the Company the RMF monitors on a regular basis their share price movements, announcements and developments and receives alerts about significant adverse changes in their stock prices and bond yields.

Prudent person principle applied to credit risks

Reinsurance counterparties are selected by taking into account the credit rating and reputation of each reinsurer. Credit ratings are used as a way of properly identifying and managing the risk attached to a counterparty and Atlantic ensures that only approved counterparties with a high enough credit rating are used. In addition, Atlantic uses multiple counterparties to avoid concentration risk.

Risk mitigation techniques used for credit risks

To mitigate the risk of reinsurer counterparty default, reinsurance is split between a number of reinsurance counterparties to reduce single name exposure. Credit ratings of reinsurance counterparties are reviewed at least every three months. A further mitigation of credit risk is that major reinsurance counterparties are large, well established multinational reinsurers with a high credit rating. No derivatives are employed to manage credit risk.

The risk of banking counterparty default is mitigated by selecting only approved financial institutions and setting maximum exposure levels per bank based on credit assessment which ensures a satisfactory diversification of bank deposits.

4.4. Market Risk

Market risk is the risk of potential losses due to adverse movements in financial market variables. Exposure to market risk is measured by the impact of movements in financial variables such as equity prices, interest rates and property prices.

The main types of market risk are:
- interest rate risk
- equity risk
- property risk
- currency risk
- spread risk
- concentration risk

A summary of sensitivities to market risks for the regulatory solvency, total equity and profit for the year is presented in the tables below:

Market risk - €000	2018	2017	% Change
Equity risk	5.288	5.591	-5,41%
Property risk	3.867	4.306	-10,19%
Concentration risk	2.998	3.311	-9,45%
Spread risk	1.581	1.790	-11,69%
Currency risk	1.491	1158	28,75%
Interest rate risk	-	5	
	15.225	**16.161**	**-5,79%**
Diversification effects	-4.550	-4.719	-3,58%
Market risk	**10.675**	**11.442**	**-6,70%**

The main market risks of the Company are equity, property and concentration risk which account for 34,7%, 25,4% and 19,7% of the undiversified market risk respectively.

The diversification effect is an indication of the impact of having a well-diversified investment portfolio. As a result of the high degree of diversification of the Company's portfolio the diversification effect accounts for over 29,5% of the Company's undiversified SCR.

The capital requirement for market risk decreased by 6,7% to €10,67mln (2017: €11,44mln) mainly as a result of the reduction in equity, property and concentration risk.

Equity risk
Equity risk relates to 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.

Composition of equity exposure

The fair value of equities at the end of 2018 increased by 16,4% to €16,19mln (2017:€13,91mln) of which €10,97mln (2017: €8,83mln) relates to type 1 equities. The Company's equity portfolio consists of 30 listed securities and 13 well diversified global equity funds, hedge funds, private equities and gold related funds. This composition secures a high level of sector and country diversification of the Company's overall equity exposure.

Equity risk-€000	2018	2017	% Change
Strategic participations	914	830	10,1%
Global equity bucket	10.972	8.828	24,3%
Other equity bucket	4.309	4.253	1,3%
	16.195	**13.911**	**16,4%**
EIOPA Symmetric Equity Volatility adjustment	-6,34%	1,90%	

	2018	2017	% Change
SCR Equity Risk-Gross	5.288	5.591	-5,41%
SCR Equity Risk-Net Mkt Risk	3.708	3.959	-6,34%

The required capital is determined by calculating the impact on the available capital due to an immediate drop in share prices. Both assets and liabilities are taken into account. Stocks listed in regulated markets in countries in the EEA or OECD are shocked by 39% together with the symmetric adjustment of the equity capital charge (type I). Stocks in countries that are not members of the EEA or OECD, unlisted equities, alternative investments, or investment funds in which the look-through principle is not possible, are shocked by 49% together with the symmetric adjustment of the equity capital charge (type II). The basic shock for strategic participations is 22%.

Despite the increase in equity risk exposures, the Company's overall solvency capital requirement for equity risk decreased by 5,41% to €5,29mln (2017: €5,59mln) as a result of the significant reduction of the EIOPA Symmetric Equity Volatility adjustment to -6,34% from +1,90% in 2017. The equity risk accounts for 34,7% of the undiversified market risk. After the deduction of the diversification effects of the market risk module, the overall net SCR amounts to €3,71mln.

The sensitivity of regulatory solvency II capital to changes in equity prices is shown in the following table.

Risk sensitivities			
Effect on:	**Available capital**	**Required Capital**	**SCR Ratio**
Type of Risk (%)	€'000	€'000	%
Global equity prices drop by 10%	-1.097	-250	-3,83%
Other equity prices drop by 20%	-862	-236	-2,49%
All equities drop by 10%	-1.620	-381	-5,54%

Currency risk

Currency risk stems from the sensitivity of the values of assets, liabilities and financial instruments to changes in the level or in the volatility of currency exchange rates.

The Company has set a list of approved foreign currencies as well as maximum tolerances for each currency.

Composition of currency exposure

The Company's overall net exposure to foreign currencies at 31 December 2018 increased by 28,7% to €5,96mln.The increase is mainly attributable to the reduction of USD hedging instruments as a result of the high cost of hedging.

USD accounts for 48,2% of the exposure, Australian dollars for 22,7%, Canadian dollars for 12,1% and other currencies account for 17,1%.

The required capital for currency risk is determined by calculating the impact on the available capital due to a change in exchange rates. For each currency, the maximum loss due to an upward and a downward shock of 25% is determined, where lower shocks are applied to several currencies.

The gross SCR currency risk of €1,49mln accounts for 9,8% of the undiversified market risk SCR. The net SCR currency risk amounted to €1,04mln (2017: €0,82mln).

Net exposure by foreign currency	**2018**		**2017**	
Currency	**€000**	**%**	**€000**	**%**
USD	2.875	48,21%	1.478	31,90%
HKD	436	7,31%	403	8,70%
GBP	582	9,76%	658	14,20%
CAD	720	12,07%	811	17,50%
AUD	1.351	22,66%	1.284	27,70%
	5.964	**100,00%**	**4.634**	**100,00%**
SCR Currency Risk-Gross	1.491		1.158	
SCR (After Mkt risk Diversification)	**1.045**		**820**	

The sensitivity of the Company’s SCR to currency risk fluctuations is indicated below:

Risk sensitivities			
Effect on:	**Available capital**	**Required Capital**	**SCR Ratio**
Type of Risk (%)	€'000	€'000	%
USD -5%	-144	-21	-0,65
All Currencies -5%	-298	-31	-1,51

Spread risk

Spread risk relates to the sensitivity of the values of assets, liabilities and financial instruments to changes in the level or in the volatility of credit spreads over the risk-free interest rate term structure.

Composition of spread risk exposure

The Company's exposure to spread risk comprises investments in corporate bonds and fixed term bank deposits of an aggregate value of €12,21mln. (2017: €15,36mln)

Assets subject to spread risk	2018	2017
	€000	€000
Corporate bonds	3.499	4.095
Fixed term bank deposits	8.707	11.268
	12.206	**15.363**

The table below shows the breakdown by credit rating and duration of the assets which are subject to spread risk.

Spread Risk	2018		2017	
Bonds	**€000**	**Duration**	**€000**	**Duration**
AAA	-	-	-	-
AA	-	-	-	-
A	502	8,5	997	10,9
BBB	-	-	-	-
BB	175	3,2	1863	1,3
B	5.185	3,2	5.379	3,4
CCC or lower	2.912	1,0	4.021	1
Unrated	3.432	1,0	3.103	1
Total Exposure	**12.206**	**2,3**	**15.363**	**2,5**

The weighted average duration of these holdings as at 31 December 2018 was 2,3 years (2017:2,5 years).

The Company also holds Cyprus Government bonds of €0,82mln (2017: €0,86mln) which are exempted from spread risk calculation under the Standard Model of Solvency II. A breakdown of Government bonds by duration is shown below:

Government Bonds	2018	2017
Duration	€000	€000
<1 year	822	-
1-2 years	-	859
2-5 years	-	-
5-10 years	-	-
	822	**859**

The **required capital for spread risk** is determined by calculating the impact on the available capital due to the volatility of credit spreads over the term structure of the risk-free rate. The required capital for spread risk is equal to the sum of the capital requirements for bonds, structured products and credit derivatives. The capital requirement depends on (i) the market value, (ii) the modified duration and (iii) the credit quality category.

	2018	2017
	€000	€000
SCR Spread risk-Gross	1.581	1.790
SCR Spread risk-Net of Mkt Risk Diversification	1.108	1.267

Atlantic's required solvency capital to cover spread risk amounts to €1,58mln and accounts for 10,4% of the undiversified Market Risk SCR. The overall net solvency capital requirement is €1,11mln.

The sensitivity of the solvency ratio to changes in bond yields is monitored on a quarterly basis. The sensitivity of regulatory solvency II capital to changes in current corporate bond prices is shown in the following table.

Risk sensitivities			
Effect on:	**Available capital**	**Required Capital**	**SCR Ratio**
Type of Risk (%)	€'000	€'000	%
Value of Corporate Bonds falls by 10%	-350	-77	-1,24

Property risk
Property risk arises from 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.

Composition of Property exposure

The Company's property exposure as at 31 December 2018 amounts to €15,47mln (2017:€17,22mln) and consists of assets held for own use, local investment properties and foreign real estate funds as shown below:

	2018	2017
	€000	€000
Assets held for own use	6.220	6.536
Local Investment properties	5.452	5.670
Foreign Real Estate Funds	3.797	5.016
	15.469	**17.222**
SCR property risk	**3.867**	**4.306**

The required capital for property risk is determined by calculating the impact on the available capital due to an immediate drop in property prices by 25%. The Company's SCR property risk decreased by 10,2% to €3,87mln (2017: €4,31mln). Property risk accounts for 25,4% of the undiversified SCR.

The sensitivity of the solvency ratio to changes in property values is monitored on a quarterly basis. The sensitivity of regulatory solvency II capital to changes in property prices is shown in the following table.

Risk sensitivities			
Effect on:	**Available capital**	**Required Capital**	**SCR Ratio**
Type of Risk (%)	€'000	€'000	%
Property prices drop by 10%	-1.547	-234	-6,95%

Interest rate risk
Interest rate risk arises from 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.

The required capital for interest rate risk is determined by calculating the impact on the available capital due to changes in the yield curve. Both assets and liabilities are taken into account. The interest rate risk is the maximum loss of (i) an upward shock or (ii) a downward shock of the yield curve according to the prescribed methodology.

Atlantic's Interest rate risk remained at very low levels due to the **effective matching of financial assets and financial liabilities** as shown in the table below:

€000	**Assets**	**Net Non-life provisions**	**Other liabilities**	
Value	**13.041**	**15.268**	**1.726**	
Modified duration	**1,79**	**1,62**	**0,90**	
Current interest rate	-0,275%	-0,275%	-0,333%	
Undiscounted Value	12.977	15.200	1.721	
up shocked interest rate	0,667%	0,725%	2,284%	
down shocked interest rate	-0,333%	-0,275%	0,453%	

	Assets	**Non-life provisions**	**Other liabilities**	**NAV increase**
Net asset value after upward shock	12.823	15.023	1.686	67
Net asset value after downward shock	13.055	15.268	1.714	26

Prudent Person principle
In accordance with the "Prudent Person" Principle the BoD has set the high level investment principles that should be followed by the Atlantic's Investment Committee:

- All investment activity within the Company is driven by the size, nature and term of its liabilities and by the Company's overall risk appetite and solvency levels
- All investments must qualify under relevant laws and regulations
- Investments should be sufficiently diversified across asset classes and instruments
- The Company does not invest in complex instruments or markets where the risks cannot be sufficiently understood, measured and managed
- Outsourcing of investment to third party assets managers should adhere to the policy for outsourcing.

Management of investment risk
The Board of Directors and the Investment Committee **determine and review the investment strategy** considering the economic environment and macroeconomic conditions, as well as the solvency condition of the Company and of the main risks to which the Company is exposed.

The Company's investments are distributed into five broad asset classes according to their composition and/or investment horizon namely Cash and Cash Equivalents, Equity, Bonds, Property and Other Alternative Investments. The Board has set through the RMC **maximum Risk tolerance limits** for each asset category as a % of the Company's investment portfolio and also aggregate limits per type of risk. Investment limits are set in order to avoid **undesirable concentrations in the Company's portfolio**. Risk limits are reviewed periodically by the RMF and the RMC and revised accordingly.
Atlantic's decision to **invest in specific securities** is taken by the Investment Committee based on the risk appetite of the Company. The risk appetite is expressed in terms of acceptable asset classes for investment, the tolerance level for the risks arising from each investment and the ability to manage and monitor these investments when acquired.

Interest rate risk is managed by proper asset-liability management which aims at aligning fixed-income investments to the profile of the liabilities. The Company does not use any derivatives like interest rate swaps for hedging interest rate risk.

Assessment and risk mitigation techniques used for market risks
The investment committee oversees the investments of the Company. Investment position and risk exposures are reported on a regular basis to the Investment Committee. The committee meets regularly and makes decisions on **tactical asset allocation** always within the constraints of Atlantic's overall investment strategy which is set by the Board and its Risk management committee.

The RMF carries out a **quarterly monitoring** of investment exposure against the acceptable risk limits. Quarterly risk monitoring reports are sent to the senior management and the RMC and appropriate action is taken for any identified breaches of risk exposure limits.

On an annual basis **as part of the ORSA** a formal assessment of investment risks is carried out using stress and scenario testing which is used to assess market risks under stressed conditions.

Derivatives

The Company takes into consideration techniques to mitigate investment risks such as the **use of derivatives**. As part of its hedging policy Atlantic entered into an agreement for the sale of 25 USD futures contracts maturing on September 16, 2019 of an aggregate amount of $3,75mln with the aim of hedging currency risk arising from the USD exposure of the Company's investments and bank balances.

4.5. Concentration Risk

The risk arises from risk exposures (credit, investment, reinsurance) which could lead to a loss of such magnitude which can significantly affect the solvency and financial position of the Company.

Sources of concentration risk
Concentration risk may arise from various sources, including counterparties (e.g. customers, agents) geographical areas, business sectors, reinsurance, investment, property and banking institutions.

Concentration risk decreased by 9,5% to €2,99mln from €3,31mln in 2017. The total amount of assets which are subject to concentration risk decreased by 5,1% to €44,93mln (2017:€47,37mln).

Concentration Risk-€000	2018	2017	2016	% Change
Total amount of assets considered in the market risk concentrations submodule	44.933	47.372	46.456	-5,1%
Threshold for counterparties <A	674	711	697	-5,1%
Threshold for property	4.493	4.737	4.646	-5,1%
Number of counterparties	6	7	8	-14,3%

The number of counterparties or assets having an exposure in excess of the threshold was reduced to 6 from 7 in 2017. The counterparties with exposure above the threshold comprise of 5 local banking institutions and of the value of the Company's head office property.

Management of concentration risk

Concentration risk is managed through the setting of maximum risk levels. The aim of risk levels is the reduction of unnecessary concentration of risk on certain assets and liabilities. The limits pose restrictions on the staff of the risk-taking business units (underwriting, investment management etc.) in order to ensure satisfactory diversification of insurance risks, investments, reinsurance etc.

Maximum exposure limits are set by the RMF in consultation with executive management and are approved by the RMC. The limits are reviewed at least once a year unless changes take place which warrant their immediate review.

4.6. Liquidity risk

Liquidity risk is the risk that the Company may not be able to meet its financial obligations to policyholders and other creditors when they become due and payable, at a reasonable cost and in a timely manner. Liquidity risk is not quantified in the Solvency Capital Requirement of Atlantic.

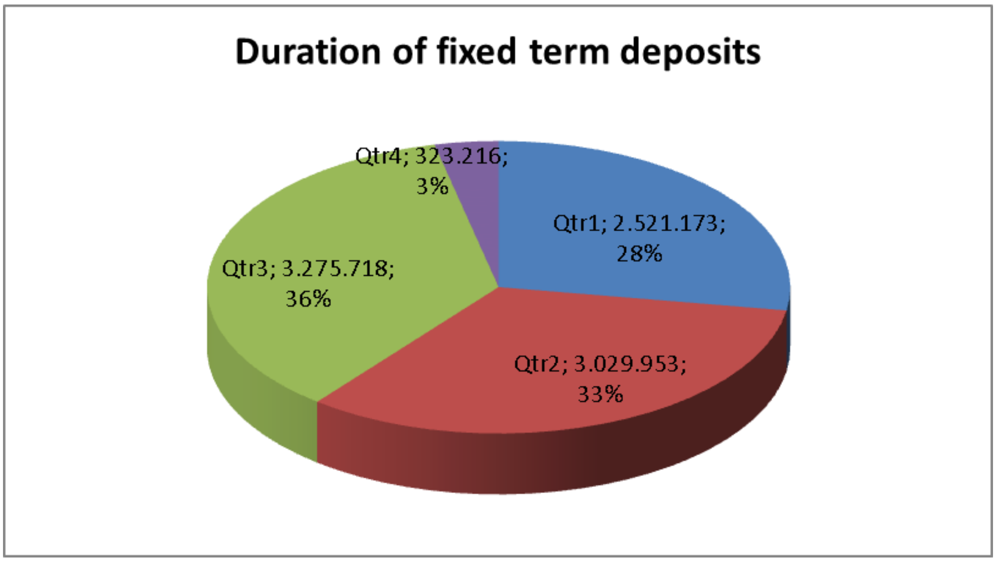
The Company recognizes different levels of liquidity management. Short-term liquidity, or daily cash management, covers the day-to-day cash requirements under normal business conditions and targets funding liquidity risk. Long-term liquidity management considers business conditions under which market liquidity risk materialises.

The Company's liquidity management principle consists of three components. First, a minimum liquidity buffer is kept in cash and cash equivalents and liquid assets. Second, the strategic asset allocation reflects the expected and contingent liquidity needs of liabilities. Finally, an adequate and up-to-date contingency liquidity plan is in place to enable management to act effectively and efficiently in times of crisis.

The Company's minimum liquidity buffer consists only of the following assets:

- Cash, current and instant access bank balances
- Money Market funds
- Fixed term bank deposits that expire within 90 days and provide the right of immediate termination
- Bonds maturing within 90 days

The Company's liquidity risk is assessed as very low since Atlantic holds liquid assets which are well in excess of the Company's minimum liquidity buffer. Additionally the Company holds liquid investments as well as fixed term bank deposits of €9,15mln (2016: 11,18mln). The duration of the Company's fixed term deposits is shown below:



With regard to liquidity risk, 'the expected profit included in future premiums' ("EPIFP") means the expected present value of future cash flows which result from the inclusion in technical provisions of premiums relating to existing insurance and reinsurance contracts that are expected to be received in the future, but that may not be received for any reason, other than because the insured event has occurred, regardless of the legal or contractual rights of the policyholder to discontinue the policy.

4.7. Operational risk

Operational risk is the risk of losses caused by weak or failing internal procedures, weaknesses in the action taken by personnel, system weaknesses or because of external events.

Operational risk can be segmented in the following main sub-categories:

- compliance,
- business process,
- information technology,
- outsourcing,
- business continuity,
- financial reporting.

Examples of key material operational risks that the Company faces include:

- **Legal** - the risk of a defective transaction arising; inadequate contract management or any other event occurring which results in liability for the Company.
- **Cyber/ Data security** - the risk of the inability to protect data from unauthorised access, use, disclosure, disruption, modification or destruction. The increase in cyber-risk activity over recent years has led to significant increase of data security risk.
- **IT Infrastructure** - the risk arising from lack of effectiveness, integrity, reliability, capacity and/or availability of IT infrastructure;

- **Wrong selling** – the risk of deliberate, reckless or negligent sale of products or services in circumstances where the contract is either misrepresented, or the product/service is unsuitable for the customer's needs;
- **Outsourcing** - the risk of failure, non-performance, ineffective management and/or oversight of an outsourcing partner or a binder agreement;
- **People** - the risk of inadequate recruitment practices, development, management or retention of employees and/ or contractors;
- **Execution, Delivery and Process Management** - the risk to a business unit's service provision arising from a failure to carry out operational processes in an accurate, timely and complete manner; and

The required capital for operational risk based on the standard model amounts to €0,87mln as at 31 December 2018:

Operational risk	**Capital requirement €000**
Non-life gross technical provisions (excluding risk margin)	29.131
Capital requirement for operational risk based on technical provisions	**874**
Earned non-life gross premiums (previous 12 months)	23.402
Earned non-life gross premiums (12 months prior to the previous 12 months)	22.312
Capital requirement for operational risk based on earned premiums	**702**
Capital requirement for operational risk charge before capping	**874**
Percentage of Basic Solvency Capital Requirement (30%)	5,58%
Capital requirement for operational risk charge after capping	**874**
Total capital requirement for operational risk	**874**

Risk sensitivity for operational risks
Operational risk makes up 5,6% of the standard formula SCR at 31 December 2018.

Risk sensitivities			
Effect on:	**Available capital**	**Required Capital**	**SCR Ratio**
Type of Risk (%)	€'000	€'000	%
Operational risk +10%	-	76	-0,98

Description	**Scenario**
Operational risks	Measured as the impact of a 10% increase in operational risk

If operational risk was to increase by 10% the increase in the minimum SCR would be €76k and the impact on the SCR ratio would be a reduction by 0,98 basis points.

Measures used to assess operational risks
The following measures are used to assess operational risks:

- Risk assessment by RMF – the Risk management function discusses operational risk issues of each business unit with the staff of the unit to identify risk issues that need to be taken into account. The RMF uses quantitative as well qualitative procedures to assess the impact of the risk which is then subjected to stress testing techniques.
- The Solvency Capital Requirement – the standard formula Solvency Capital Requirement includes an assessment and quantification of the operational risk exposure.

Risk mitigation techniques used for operational risks
All material operational risks which the Company is exposed to, are identified and recorded by the RMF in the risk register. The risks are assessed and once the actions required to manage the risks have been agreed, the risks are reported to senior management, the Risk Management Committee and the Board.

The main actions/techniques used by the Company for mitigating operational risks are:
- Risk reduction – where possible, the Company takes action to reduce the impact of a risk. The required actions vary by risk. During the year Atlantic reduced its IT security risk by investing in new servers and firewall.
- Risk removal – where risks are outside risk appetite and there are no commercially viable means of reducing the risk, the Company may remove the risk if possible.
- Risk transfer – Atlantic outsources a number of activities and in some cases the associated risks with carrying out those activities. Whilst the Company can outsource activities, it can't transfer responsibility and therefore manages its outsourcing relationships accordingly.
- Risk acceptance – where the Company has considered all other mitigation techniques and the risk remains out of appetite, it may proceed to accept the risk with the approval of the Risk Management Committee.

4.8. Other Material Risks

As part of the regular ORSA process, the overall risk profile and associated solvency capital needs are assessed against Atlantic's actual solvency capital position, taking into account identified risks that are not incorporated into the standard formula. The following risks are recognized by the RMF as being potentially material:
- Reputation risk
- Strategic risk
- Legal environment risk
- Model risk
- New and upcoming risk
- Group risk

The Company uses a combined top-down (strategic risk assessment) and bottom-up (control risk self-assessments) approach to identify the material risks to which Atlantic is exposed. The identification process also covers risks which are not incorporated into the standard formula.

Mitigating measures are assessed as well as exposure reducing actions. The risks are then ranked by Level of Concern and are translated to Atlantic's risk priorities and relevant risk scenarios for ORSA.

5. Valuation for solvency purposes

The valuation of assets is based on fair value measurement as described below. Each material asset class is described in paragraph 5.1. Valuation of technical provisions is calculated as the sum of the best estimate and the risk margin as described in paragraph 5.2. Other liabilities are described in paragraph 5.3.

The reconciliation between the IFRS Balance sheet and the Solvency II valuation is shown in the below template:

	Solvency II value	Statutory accounts value	Difference
Assets	€000	€000	€000
Goodwill		0	0
Deferred acquisition costs		496	-496
Intangible assets	0	169	-169
Deferred tax assets	0	0	0
Pension benefit surplus	0	0	0
Property, plant & equipment held for own use	6.632	6.632	0
Investments (other than assets held for index-linked and unit-linked contracts)	38.138	37.930	208
Property (other than for own use)	5.452	5.452	0
Holdings in related undertakings, including participations	914	901	13
Equities	10.295	10.295	0
Equities - listed	9.643	9.643	0
Equities - unlisted	652	652	0
Bonds	4.194	4.056	137
Government Bonds	835	823	13
Corporate Bonds	3.191	3.067	124
Structured notes	167	167	0
Collateralised securities	0	0	0
Collective Investments Undertakings	8.012	8.012	0
Derivatives	0	0	0
Deposits other than cash equivalents	9.271	9.213	58
Other investments	0	0	0
Reinsurance recoverables from:	14.200	14.053	147
Non-life and health similar to non-life	14.200	14.053	147
Non-life excluding health	14.109	13.847	262
Health similar to non-life	91	206	-115
Insurance and intermediaries receivables	5.032	5.032	0
Reinsurance receivables	0	0	0
Receivables (trade, not insurance)	988	988	0
Own shares (held directly)	163	0	163
Cash and cash equivalents	2.469	2.469	0
Any other assets, not elsewhere shown	1.056	1.251	-195
Total assets	68.676	69.018	-342

	Solvency II value	Statutory accounts value	Difference
Liabilities	€000	€000	€000
Technical provisions - non-life	30.064	30.567	-503
Technical provisions - non-life (excluding health)	27.282	27.858	-576
TP calculated as a whole	0		
Best Estimate	26.454		
Risk margin	828		
Technical provisions - health (similar to non-life)	2.782	2.709	73
TP calculated as a whole	0		
Best Estimate	2.677		
Risk margin	105		
Contingent liabilities	0	0	0
Provisions other than technical provisions	200	200	0
Pension benefit obligations	47	47	0
Deposits from reinsurers	0	0	0
Deferred tax liabilities	206	186	20
Derivatives	84	84	0
Debts owed to credit institutions	16	16	0
Debts owed to credit institutions resident domestically	16		
Financial liabilities other than debts owed to credit institutions	0	0	0
Insurance & intermediaries payables	0	0	0
Reinsurance payables	600	600	0
Payables (trade, not insurance)	878	878	0
Subordinated liabilities	0	0	0
Any other liabilities, not elsewhere shown	965	965	0
Total liabilities	33.059	33.542	-483
Excess of assets over liabilities	35.616	35.476	141

5.1. Assets

Fair value measurement

In accordance with the Delegated Regulation, Solvency II figures are based on fair value. In line with the valuation methodology described in article 75 and further of the Solvency II directive and articles 9 and 10, the following three hierarchical levels are used to determine the fair value of financial instruments and non-financial instruments when accounting for assets and liabilities at fair value:

- Fair value based on quoted prices in an active market
- Fair value based on observable market data
- Fair value not based on observable market data

The valuation of each material asset category and an explanation of the differences between the Solvency II value and the IFRS value of each asset category are described below:

Goodwill and Intangible assets

Intangible assets relate to computer software and goodwill arising on the acquisition of agents' portfolios. Goodwill and intangible assets are not recognized in the Solvency II framework and are set to nil. As a result there is a difference between the Solvency II and IFRS value of €169k.

Deferred tax assets

Deferred tax assets are recognized in relation to temporary timing differences between accounting and tax values of assets and liabilities only to the extent that they can be utilized in the foreseeable future. Solvency II valuation principles also include a deferred tax asset or liability which is calculated using the applicable effective tax rate of the Company of 12,5% on the relevant Solvency II assets and liabilities valuation adjustments. In accordance with the Delegated Regulation the deferred tax assets and liabilities position resulting from Solvency II valuation adjustments is netted off in the balance sheet. As at 31 December 2018 both the SII value and the IFRS valuation of deferred tax assets was nil.

Deferred acquisition costs

Deferred acquisition costs relate to the unexpired period of risks of contracts in force at the balance sheet date. In accordance with Article 12 of the Solvency II Delegated Act deferred acquisition costs are valued at nil since the related cash outflows that will be incurred in servicing all recognized insurance obligations are considered in determining the Best Estimate technical provisions. As a result there is a difference between the Solvency II and the IFRS value of deferred acquisition costs of €496k.

Property, plant, and equipment held for own use

Property is recognized at fair value as determined at the end of the year by professional independent property valuers. Plant and equipment is valued at cost minus accumulated depreciation which provides a close approximation of fair value.

Investments - Property (other than for own use)

Investment properties are valued at fair value as determined at the end of the year by professional independent property valuers.

Investments - Holdings in related undertakings, including participations

Valuation of holdings in related undertakings is based on fair value or, if not applicable, based on the net equity method. Under IFRS these assets are valued at cost minus provision for diminution in value of the related undertaking. As a result of the different valuation methods there is a small difference of €13k between the SII value and the value based on IFRS.

Investments – Equity, collective investment funds

Listed equities and collective investment funds are valued using the fair value based on quoted prices in an active market. Private equity funds and unlisted property funds are valued based on the level 3 method of the fair value hierarchy using non-observable inputs obtained from the third party custodian. The main non-observable market input for these assets is the net asset value of the investment which is provided quarterly by the custodian of the funds.

As at 31 December 2018 all of the Company's investments in equities were listed with the exception of two property development funds of €652k. These investments were valued at cost because they are still at a very early stage of completion.

As regards collective investment funds, all funds were listed with the exception of a private equity fund of €572k and of a global real estate fund of €166k, both managed by Morgan Stanley and a private equity fund of €278k which is under custody with EFG AG.

Investments –Bonds

All of the Company's investments in bonds are listed in regulated stock exchanges and hence they are valued using the fair value based on quoted prices in an active market. Accrued interest is added to the value of the bonds.

The difference in the Solvency II value of listed bonds of €137k relates to accrued interest on bonds of €13k on government bonds and of €124k which under the IFRS financial statements is included in other debtors.

Derivatives

The Company uses futures and forward contracts to hedge the currency risk arising from its investments denominated in foreign currencies. Derivative assets are valued using the fair value method as the difference between the spot rate at the reporting date and the forward contract rate.

Deposits other than cash and cash equivalents

Deposits other than cash and cash equivalents are valued at fair value. Accrued interest is included as part of the value of the deposits.

The difference in the Solvency II value of deposits relates to the accrued interest on bank deposits of €58k which under the IFRS financial statements is included in other debtors.

Reinsurance receivables

Contracts that transfer a significant insurance risk from the Company to third parties are accounted for as reinsurance contracts, and are classified as outgoing reinsurance. Assets arising from reinsurance contracts are recognized under reinsurance contracts, except for current receivables from reinsurers, which are included under reinsurance receivables. The management assesses at each reporting date whether any objective evidence of impairment of receivables exists. If a reinsurance asset is impaired, its carrying amount is reduced to its recoverable amount. Therefore, current receivables from reinsurers are valued comparable with IFRS.

Insurance and intermediaries receivables

Insurance and intermediaries receivable balances represent premiums owed from policyholders and intermediaries. Outstanding premiums are valued at fair value and due to the short-term nature of the receivable no adjustments to valuation are required. The management assesses whether any objective evidence of impairment of insurance receivables exists. In that case receivables are regarded as doubtful and are adequately provided for. Objective evidence includes payment delays, overdue amounts, indication of significant weakness in repayment of debts, legal procedures and bankruptcy. The value of insurance and intermediaries receivables in the Company's financial statements is the same as for Solvency II.

Own shares

Own shares are valued at fair value based on quoted prices in an active market and are included as part of assets in the balance sheet. In its IFRS financial statements the Company deducts own shares from reserves. As a result there is a difference of €163k between the SII and IFRS asset values.

Cash and cash equivalents

Cash and cash equivalents include cash in hand, deposits held at call with banks, cash collateral and other short-term highly liquid investments with original maturities of three months or less.

Other assets

Other assets include accrued interest, commission receivable, prepayments, other debtors and the Company's share in the assets of the Cyprus Hire Risks Pool. The difference of €195k between the Solvency II and the IFRS value relates to accrued interest which under Solvency II is shown as part of the relevant bonds and bank deposits.

5.2. Technical provisions

Methods

The technical provision is the sum of the best estimate and the risk margin.

Best Estimate

The best estimate is the net present value of projected cash flows from insurance contracts, i.e. benefits and claims, and costs less premiums. These cash flows are estimated using best estimate assumptions with respect to recovery, claims experience, expense and inflation.

The cash flows are discounted using the term structure of risk-free interest rates as prescribed under Solvency II for the valuation of underwriting liabilities.

Risk margin

The risk margin is determined using the Cost of Capital (CoC) method, with a Cost-of-Capital rate of 6%, in line with the Delegated Regulation. The risk margin is based on the Solvency Capital Requirement (SCR) of all insurance risks, operational risk and counterparty default risk for reinsurance arrangements and other material exposures which are closely related to insurance liabilities.

The SCR calculation is making allowance for the correlations between risks using correlation factors as defined in the standard model. In determining the risk margin, allowance is also made for diversification between risk groups within the entity, but not between legal entities.

Risk-free yield curve

The basis for the reference rate of the best estimate is the swap rate at the date of valuation. The below RFR curve with no volatility adjustment was used for discounting technical provisions.

Year	1	2	3	4	5	6	7	8	9	10
Discount	-0,33%	-0,28%	-0,18%	-0,05%	0,10%	0,24%	0,37%	0,50%	0,62%	0,73%
Year	11	12	13	14	15	16	17	18	19	20
Discount	0,82%	0,91%	0,99%	1,05%	1,11%	1,14%	1,17%	1,20%	1,24%	1,28%
Year	21	22	23	24	25	26	27	28	29	30
Discount	1,32%	1,38%	1,43%	1,49%	1,56%	1,62%	1,68%	1,74%	1,80%	1,85%

Level of uncertainty

Atlantic distinguishes between two sources of uncertainty with regard to the level of the technical provisions. These sources are model risk and process risk. The uncertainty associated with these risks has been mitigated as described below:

Process risk

The process risk is mitigated by creating a reasonable degree of assurance as to the reliability of financial reports and information. Key controls for the calculation of technical provisions process have been identified and implemented. The effectiveness of the process controls is strengthened by the periodic independent verification of the calculation of technical provisions by an external professional actuary.

Model risk

The models used by the Company for the calculation of technical provisions were reviewed and validated by external professional advisors. The Company incorporated in its calculation models all recommendations raised by the external advisors. The Company employs regular procedures and validation checks to provide adequate assurance that the reported figures do not contain any material misstatements or that no key facts have been omitted. The actuarial function performs an independent internal review of the technical provisions calculation on a periodic basis.

Despite the above mitigation factors, the Company has added an additional amount of €470k in the value of its technical provisions to cover process and model error risk. The additional provision is in line with the Company's conservative approach to the Solvency II capital calculations.

Technical provisions by line of business

Line of Business -€000	Gross	Net
Accident and health	2.677	2.586
Motor Vehicle Liability	9.238	8.199
Motor -Other	1.662	1.604
Marine	280	120
Property	13.449	1.131
Liability	1.477	1.099
Credit	17	8
Assistance	326	185
Miscellaneous	5	1
Total	**29.131**	**14.932**

The Solvency II value of technical provisions amounted to €30,06mln and consists of the **Best Estimate** of €29,13mln and of the **Risk Margin** of €0,93mln which accounts for 3,2% of the Best Estimate. The risk margin is calculated based on the gross earned premiums and gross technical reserves.

The gross best estimate consists of premium provisions of €10,00mln and claim provisions of €19,13mln. Claims provisions include a gross outstanding claim of €10mln regarding the damages on EAC Vasilico station in 2016. Claim provisions also include a provision for model error risk of €0,47mln.

The net best estimate of technical provisions was €14,93mln and comprised of premium provisions of €6,88mln and claim provisions of €8,05mln as shown in the table below.

Comparison between the Solvency II and the IFRS valuation

A comparison between the Solvency II and the IFRS valuation of technical provisions is shown in the below table:

Technical provisions-€000	SII	IFRS	% Diff
Best estimate-Gross	**29.131**	**30.567**	**-4,7%**
Premium Provisions-Gross	10.002	10.864	-7,9%
Claim Provisions-Gross	19.129	19.702	-2,9%
Best estimate-Net	**14.932**	**16.514**	**-9,6%**
Premium Provisions-Net	6.877	8.168	-15,8%
Claim Provisions-Net	8.054	8.346	-3,5%
BE Net and Risk Margin			
Best Estimate -Net	14.932		
Risk margin (SII) SF	933		
Technical provisions-Net	**15.864**	**16.514**	**-3,9%**

The net Solvency II technical provisions amounted to €15,86mln and were lower than the IFRS technical provisions by 3,9%.

Under Solvency II, the technical provisions are calculated using a different method compared to IFRS. The main differences between the two valuation methods relate to:

- A different curve used to calculate the best estimate
- Different methods for the risk margin
- In IFRS expected profit is not taken into account
- Different methods for determining best estimate premium liabilities
- Investment costs are taken into account under Solvency II

5.3. Other liabilities

Valuation of other liabilities

In line with the valuation of assets, the accounting principles for other liabilities used in the Pillar III reports are generally also based on the IFRS as adopted by the EU. Any differences between the methods for IFRS and Solvency II purposes are addressed in detail per liability category.

Deferred tax liabilities

Deferred tax liabilities are recognized in relation to temporary timing differences between accounting and tax values of assets and liabilities. The amount of deferred tax is calculated using the applicable effective tax rates. Solvency II valuation principles also include a deferred tax asset or liability which is calculated using the applicable effective tax rate of the Company of 12,5% on the relevant Solvency II assets and liabilities valuation adjustments. In accordance with the Delegated Regulation the deferred tax assets and liabilities position resulting from Solvency II valuation adjustments is netted off in the balance sheet. The amount of deferred tax liability on the Solvency II valuation adjustments was €20k.

Derivatives

The Company uses futures and forward contracts to hedge the currency risk arising from its investments denominated in foreign currencies. Derivative liabilities are valued using the fair value method as the difference between the spot rate at the reporting date and the forward contract rate.

Reinsurance payables

Reinsurance payables relate to amounts due under reinsurance contracts which were in force at the reporting date. The amounts payable are calculated in accordance with reinsurance agreements and contract notes. No estimation methods, adjustments for future value or valuation judgements are required for these balances. The timing of expected economic outflows to settle the liability with each reinsurer is contractually based.

Trade payables (non-insurance)

The balances relate to amounts due to suppliers of consumables, equipment and services. These liabilities are valued using the fair value method based on the actual contractual amounts. Due to their short term duration, no future value adjustments are normally necessary.

Any other liabilities

Other liabilities include amounts payable for taxation, dividends and amounts due to subsidiary undertakings and related persons.

Contingent liabilities

Contingent liabilities are defined as:

- a possible obligation depending on whether some uncertain future event occurs, or
- a present obligation but payment is not probable or the amount cannot be measured reliably.

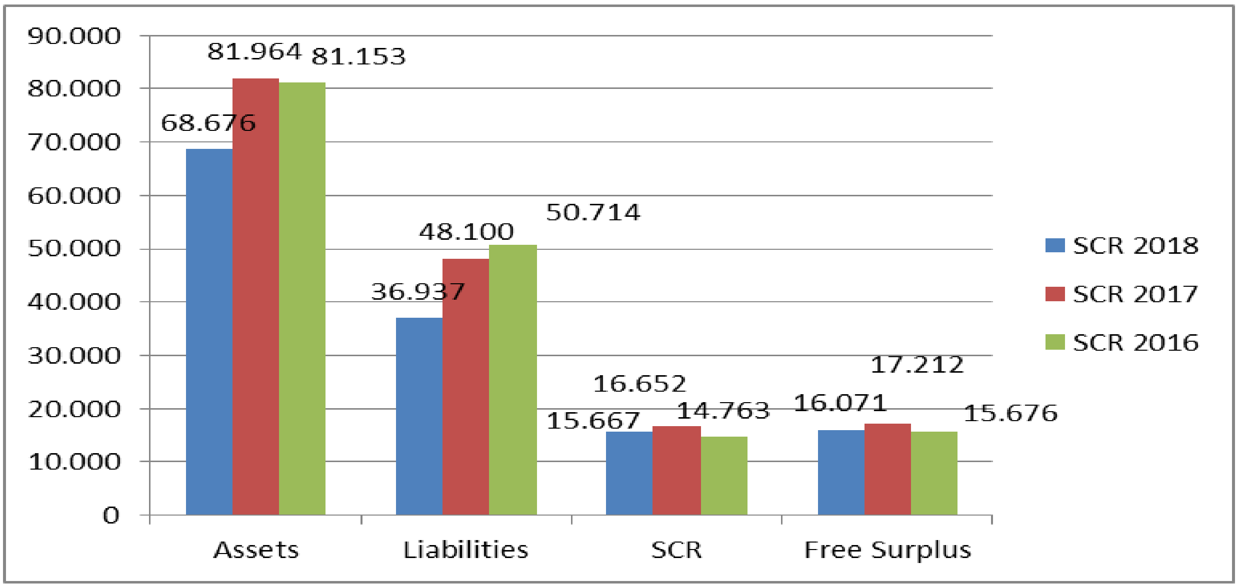
Solvency II prescribes that all contingent liabilities be recognized on the Solvency II balance sheet. The Company carries a regular review at each reporting date to assess whether any contingent liabilities should be recognized on the Solvency II balance sheet. As at 31 December 2018 there were no significant contingent liabilities.

6. Capital management

6.1. Key figures

Solvency ratio comparison-€000	2018	2017	2016	2015	% Change
Value of assets	68.676	81.964	81.153	58.666	-16,2%
Value of technical provisions and other liabilities	36.937	48.100	50.714	28.645	-23,2%
Available eligible capital	31.739	33.864	30.439	30.021	**-6,3%**
Required capital (SCR, required solvency margin)	15.667	16.652	14.763	13.963	**-5,9%**
'Free surplus'	16.071	17.212	15.676	16.058	**-6,6%**
Solvency Ratio	**202,6%**	**203,4%**	**206,2%**	**215,0%**	**-0,8%**

The **Solvency Ratio** fell to 202,6% in 2018 from 203,4% in 2017. The small decrease is due to the fact that available eligible capital decreased by 6,3% whilst the Solvency Capital Required (SCR) decreased by 5,9%.



6.2. Objectives, policies and processes

Objectives, policies and processes

The Company is committed to maintain a strong capital position in order to be a robust insurer for its policyholders and other stakeholders. The objective is to maintain a solvency level that is within the limits defined in the risk appetite statements and the solvency targets.

Sensitivities are periodically performed for principal risks and annual stress tests are performed to test Atlantic's ability to withstand moderate to severe adverse scenarios.

The SCR is reported on a quarterly basis and the internal minimum solvency ratio for Atlantic as formulated in the risk appetite statement is 150%. The solvency ratio stood at 202,6% at 31 December 2018, which was comfortably higher than both the internal limit of 150% and the minimum regulatory limit of 100%.

The Company uses a 3-year business planning horizon as part of the ORSA process. On an annual basis, and having regard to the results of stress tests applied to the projections over the three year planning period, the Management will consider whether further action is required in accordance with the Company's approved contingency plan.

Capital generated by operating units and future capital releases will be allocated to profitable growth of new business or distributed to shareholders. The objective of the Company's active capital management is to improve its capital generation capacity through business improvement and balance sheet restructuring.

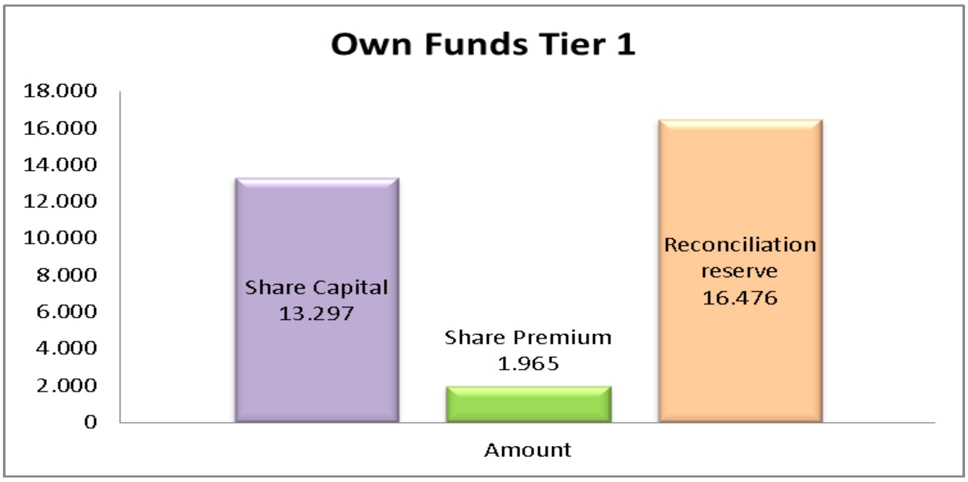
The Board's decision on the payment of dividend takes into consideration the current and projected SCR levels of the Company.

6.3. Eligible Own funds

Atlantic's eligible own funds amount to €31,74mln. The Company's own funds are all tier 1 unrestricted and available to cover the SCR and MCR.

Basic Own Fund Items-€000	Current accounting bases	SII Valuation Principles	Tier 1	Tier 2	Tier 3
Ordinary share capital (net of own shares)	**13.297**	**13.297**	**13.297**	**0**	**0**
Paid up	13.297	13.297	13.297		
Share premium account	**1.966**	**1.966**	**1.966**	**0**	**0**
Reconciliation reserve		**16.476**		**0**	**0**
Retained earnings including profits from the year	17.157	17.157	17.157	0	0
Other reserves from accounting balance sheet	3.218	3.218	3.218	0	0
Reconciliation adjustments	**0**	**-3.900**	**-3.900**	**0**	**0**
Adjustments to assets	0	-505	-505	0	0
Adjustments to technical provisions	0	503	503	0	0
Foreseeable Dividends	0	-3.715	-3.715	0	0
Adjustments to other liabilities	0	-20	-20	0	0
Own Shares included in Assets	0	-163	0	0	0
Surplus funds	0	0	0	0	0
Expected profit in future premiums	0	0	0	0	0
Other paid in capital instruments	**0**	**0**	**0**	**0**	**0**
Preference shares	0	0	0	0	0
Subordinated liabilities	0	0	0	0	0
Other items not specified above	-163	0	0	0	0
Total Basic own funds before adjustments	**35.476**	**31.739**	**31.739**	0	0
Total Ancillary own funds	0	0	0	0	0
Total available own funds to meet SCR	**35.476**	**31.739**	**31.739**	**0**	**0**

With respect to the capital position, Solvency II requires the insurers to categorize own funds into 3 tiers of capital with differing qualifications as eligible available regulatory capital. The rules impose limits on the amount of each tier that can be held to cover capital requirements with the aim of ensuring that the items will be available if needed to absorb any losses that might arise.



The Company's ordinary share capital, share premium arising on ordinary share capital and reconciliation reserve are all available as tier 1 unrestricted own funds as per Article 69 (a)(i) of the Delegated Regulation.

The Company has no tier 1 restricted own funds (per Article 80 of the Delegated Regulations), no tier 2 own funds (per Article 72 of the Delegated Regulations) no tier 3 own funds (per Article 76 of the Delegated Regulations) and no ancillary own funds. There is no item of basic own funds which is subject to the transitional arrangements referred to in articles 308 b(9) and 308 b(10).

6.4. Reconciliation of Own Funds

The reconciliation between the Company's own funds shown in its IFRS financial statements and the excess of assets over liabilities as calculated for solvency purposes is shown below:

Basic Own Fund Items-€000	**2018**
IFRS Own funds	**35.476**
Own shares added back	163
	35.638
Reconciliation Differences	**-3.900**
Adjustment to Assets	**-505**
Intangible Assets	-169
Deferred acquisition costs	-496
Participations	13
Reinsurers share of TP	147
Adjustment to liabilities	**483**
TP Best Estimate	503
Deferred taxes	-20
Foreseeable Dividends	**-3.715**
Other items not specified above	**-163**
Own Shares	-163
Total available own funds to meet SCR, before eligibility assesment	**31.739**

The total adjustments in own funds calculated based on IFRS amount to €3,90mln and comprise of assets adjustments of -€505k, adjustments to liabilities of €483k and foreseeable dividends of €3,71mln.

The adjustments to assets relate to the increase in reinsurers share of Technical provisions of €147k, the exclusion of deferred acquisition costs of €496k and of intangible assets of €169k and valuation differences of participations of €13k.

The adjustments to liabilities relate to the increase in the value of technical provisions by €503k based on Solvency II valuation principles and deferred taxes calculated on the Solvency II valuation adjustments of €20k.

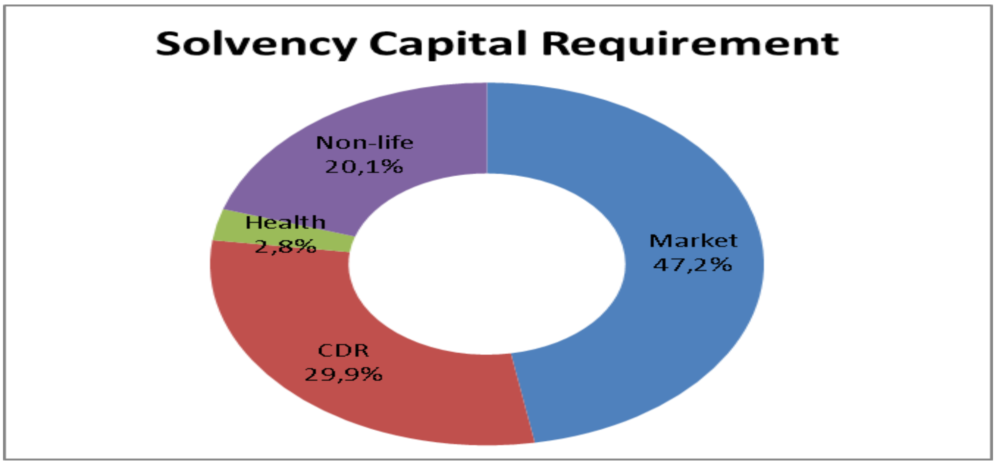
6.5. Solvency Capital Requirement

The Solvency capital requirement ("SCR") which is calculated based on the Standard Formula of Pillar 1 amounts to €15,67mln. SCR decreased by 5,9% as compared to the previous year. The decrease mainly relates to the reduction of market risk by 6,7%.

€000	2018	2017	% Change
Solvency Capital Requirement	**15.667**	**16.652**	**-5,9%**
SCR operational risk	874	1.211	-27,8%
Adjustment for the LAE of TP and deferred taxes	-1.848	-1.961	-5,8%
Basic Solvency Capital Requirement	**16.642**	**17.402**	**-4,4%**
Diversified risk	16.642	17.402	-4,4%
Diversification effects	-5.957	-6.152	-3,2%
Sum of risk components	**22.598**	**23.554**	**-4,1%**
Market risk	10.675	11.442	-6,7%
Counterparty default risk	6.747	6.842	-1,4%
Health underwriting risk	634	631	0,5%
Non-Life underwriting risk	4.542	4.639	-2,1%

The adjustment for the loss absorbing effect of technical provisions and deferred taxes amounted to €1,85mln (2017: €1,96mln). In recognizing the above amount the Company considered whether the full amount is expected to be utilized by future taxable profits over the next 5 years both under normal operating conditions as well as under stressed economic conditions.

The main components of the Company's SCR are the market risk 47,2%, counterparty default risk 29,9% and underwriting risk 22,9%. A breakdown of the undiversified SCR by risk modules is shown below:



Market risk is analysed in the following risk modules:

€000	**2018**	**2017**	**% Change**
Market risk	**10.675**	**11.442**	**-6,7%**
Diversification effects	-4.550	-4.720	-3,6%
Sum of risk components	**15.225**	**16.162**	**-5,8%**
Interest rate risk	0	5	-99,8%
Equity risk	5.288	5.591	-5,4%
Property risk	3.867	4.306	-10,2%
Spread risk	1.581	1.790	-11,7%
Currency risk	1.491	1.158	28,7%
Concentration risk	2.998	3.311	-9,5%

The total Solvency II value of the Company's assets was reduced by 16,2% to €68,68mln (2017: €81,96mln) mainly as a result of the reduction of the reinsurers share of the EAC claim by €10mln.

Total assets subject to concentration risk comprised 65,4% of total assets and amounted to €44,9mln whilst assets subject to counterparty default risk amounted to €23,7mln and accounted for 34,5% of total assets.

Assets Risk Analysis-€000	**2018**	**2017**	**% Change**
Concentration Risk	44.933	47.372	-5,1%
Counterparty Risk	23.713	34.312	-30,9%
None (Cash /Deferred Tax/Other)	30	280	-89,2%
	68.676	**81.964**	**-16,2%**

Undertaking specific parameters

In the calculation of the SCR the Company did not make any use of undertaking specific parameters.

Capital Add-on

The Insurance Companies Control Service has made use of the option provided in article 51(2) of the Solvency II Directive 2009/138/EC. The Company was not required to use any capital add-on nor Company specific parameters in the calculation of the SCR.

6.6. Minimum Capital Requirement ("MCR")

The Company's MCR as at 31 December 2018 amounts to €3,92mln.

The linear minimum capital requirement amounts to €2,64mln as compared to the absolute floor level of €3,7mln.

Inputs used to calculate the Minimum Capital Requirement

The table below shows the inputs into the MCR calculation as at 31 December 2018. The absolute floor of the Minimum Capital Requirement is prescribed by EIOPA and stated in €000 below.

Overall MCR calculation	**€000**
Linear MCR	2.643
SCR	15.667
MCR cap	7.050
MCR floor	3.917
Combined MCR	3.917
Absolute floor of the MCR	3.700
Minimum Capital Requirement	**3.917**

Material changes of MCR and SCR

There were no other material changes in the MCR and SCR over the reporting period other than the ones described above.

Non-compliance with the MCR and SCR

Atlantic has not faced any form of non-compliance with the Minimum Capital Requirement or the Solvency Capital Requirement during the reporting period or at the reporting date.

Any other information

Dividend policy and capital actions

The Company has formulated its dividend policy in line with its current strategy. The objective of its policy is to pay an annual dividend that creates sustainable long-term value for its shareholders. The Company aims to operate at a solvency ratio, calculated according to the standard formula, above the management threshold level of at least 150% of the Solvency Capital Requirement (''SCR'').

On April 19, 2019 the Board of Directors has decided to propose for approval at the Annual General Meeting of the Company which will take place on June 5, 2019, the payment of a dividend of 9,5 cents per share (2018: 9,50 cents).

Validations

Atlantic Insurance Company Public Limited

Approval by the Board of Directors of the Solvency and Financial Condition Report

Financial period ended 31 December 2018

We certify that:
1 the Solvency and Financial Condition Report ("SFCR") has been properly prepared in all material respects in accordance with the Solvency II Regulations; and
2 we are satisfied that:
(a) throughout the financial year in question, the Company has complied in all material respects with the requirements of the Solvency II Regulations as applicable to the insurer; and
(b) it is reasonable to believe that, at the date of the publication of the SFCR, the Company has continued to comply, and will continue to comply in future.

Approval by the Administrative, Management or Supervisory Body of the SFCR and reporting templates

Emilios Pyrishis	Loukis Ioannou
Chief Executive Officer	C.F.O, Head of Risk Management Function

Appendix: Templates

General information

Undertaking name	ATLANTIC INSURANCE COMPANY PUBLIC LTD
Undertaking identification code	213800ZUWYFW5BADU685
Type of code of undertaking	LEI
Type of undertaking	Non-life undertakings
Country of authorisation	CY
Language of reporting	en
Reporting reference date	31 December 2018
Currency used for reporting	EUR
Accounting standards	IFRS
Method of Calculation of the SCR	Standard formula
Matching adjustment	No use of matching adjustment
Volatility adjustment	No use of volatility adjustment
Transitional measure on the risk-free interest rate	No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	No use of transitional measure on technical provisions

List of reported templates

S.02.01.02 - Balance sheet
S.05.01.02 - Premiums, claims and expenses by line of business
S.05.02.01 - Premiums, claims and expenses by country
S.17.01.02 - Non-Life Technical Provisions
S.19.01.21 - Non-Life insurance claims
S.23.01.01 - Own Funds
S.25.01.21 - Solvency Capital Requirement - for undertakings on Standard Formula
S.28.01.01 - Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

S.02.01.02
Balance sheet

		Solvency II value
	Assets	C0010
R0030	Intangible assets	0
R0040	Deferred tax assets	0
R0050	Pension benefit surplus	0
R0060	Property, plant & equipment held for own use	6.632
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	38.138
R0080	*Property (other than for own use)*	5.452
R0090	*Holdings in related undertakings, including participations*	914
R0100	*Equities*	10.295
R0110	*Equities - listed*	9.643
R0120	*Equities - unlisted*	652
R0130	*Bonds*	4.194
R0140	*Government Bonds*	835
R0150	*Corporate Bonds*	3.191
R0160	*Structured notes*	167
R0170	*Collateralised securities*	0
R0180	*Collective Investments Undertakings*	8.012
R0190	*Derivatives*	0
R0200	*Deposits other than cash equivalents*	9.271
R0210	*Other investments*	0
R0220	Assets held for index-linked and unit-linked contracts	0
R0230	Loans and mortgages	0
R0240	*Loans on policies*	0
R0250	*Loans and mortgages to individuals*	0
R0260	*Other loans and mortgages*	0
R0270	Reinsurance recoverables from:	14.200
R0280	*Non-life and health similar to non-life*	14.200
R0290	*Non-life excluding health*	14.109
R0300	*Health similar to non-life*	91
R0310	*Life and health similar to life, excluding index-linked and unit-linked*	0
R0320	*Health similar to life*	0
R0330	*Life excluding health and index-linked and unit-linked*	0
R0340	*Life index-linked and unit-linked*	0
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	5.032
R0370	Reinsurance receivables	0
R0380	Receivables (trade, not insurance)	988
R0390	Own shares (held directly)	163
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	2.469
R0420	Any other assets, not elsewhere shown	1.056
R0500	**Total assets**	68.676

		Solvency II value
	Liabilities	C0010
R0510	Technical provisions - non-life	30.064
R0520	*Technical provisions - non-life (excluding health)*	27.282
R0530	*TP calculated as a whole*	0
R0540	*Best Estimate*	26.454
R0550	*Risk margin*	828
R0560	*Technical provisions - health (similar to non-life)*	2.782
R0570	*TP calculated as a whole*	0
R0580	*Best Estimate*	2.677
R0590	*Risk margin*	105
R0600	Technical provisions - life (excluding index-linked and unit-linked)	0
R0610	*Technical provisions - health (similar to life)*	0
R0620	*TP calculated as a whole*	0
R0630	*Best Estimate*	0
R0640	*Risk margin*	0
R0650	*Technical provisions - life (excluding health and index-linked and unit-linked)*	0
R0660	*TP calculated as a whole*	0
R0670	*Best Estimate*	0
R0680	*Risk margin*	0
R0690	Technical provisions - index-linked and unit-linked	0
R0700	*TP calculated as a whole*	0
R0710	*Best Estimate*	0
R0720	*Risk margin*	0
R0740	Contingent liabilities	0
R0750	Provisions other than technical provisions	200
R0760	Pension benefit obligations	47
R0770	Deposits from reinsurers	0
R0780	Deferred tax liabilities	206
R0790	Derivatives	84
R0800	Debts owed to credit institutions	16
R0810	Financial liabilities other than debts owed to credit institutions	0
R0820	Insurance & intermediaries payables	0
R0830	Reinsurance payables	600
R0840	Payables (trade, not insurance)	878
R0850	Subordinated liabilities	0
R0860	*Subordinated liabilities not in BOF*	0
R0870	*Subordinated liabilities in BOF*	0
R0880	Any other liabilities, not elsewhere shown	965
R0900	**Total liabilities**	33.059
R1000	**Excess of assets over liabilities**	35.616

S.05.01.02
Premiums, claims and expenses by line of business
Non-life

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)									Total
		Medical expense 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	Assistance	Misc. financial loss	
		C0010	C0040	C0050	C0060	C0070	C0080	C0090	C0110	C0120	C0200
	Premiums written										
R0110	Gross - Direct Business	3.566	8.596	2.832	245	6.588	1.126	14	591	12	23.570
R0120	Gross - Proportional reinsurance accepted	0	71	23	3	97	66	0	0	0	260
R0130	Gross - Non-proportional reinsurance accepted										0
R0140	Reinsurers' share	109	306	122	150	5.229	172	0	297	8	6.393
R0200	Net	3.457	8.361	2.733	98	1.456	1.021	14	294	4	17.437
	Premiums earned										
R0210	Gross - Direct Business	3.514	8.522	2.820	245	6.318	1.100	4	604	14	23.142
R0220	Gross - Proportional reinsurance accepted	0	71	23	3	97	66	0	0	0	260
R0230	Gross - Non-proportional reinsurance accepted										0
R0240	Reinsurers' share	93	303	121	142	4.968	183	-9	321	10	6.132
R0300	Net	3.421	8.290	2.723	105	1.447	983	14	283	4	17.270
	Claims incurred										
R0310	Gross - Direct Business	2.725	3.518	1.791	11	-3.655	167	0	1	0	4.557
R0320	Gross - Proportional reinsurance accepted	0	0	0	0	0	0	0	0	0	0
R0330	Gross - Non-proportional reinsurance accepted										0
R0340	Reinsurers' share	25	-307	0	9	-3.838	277	0	0	0	-3.834
R0400	Net	2.700	3.825	1.791	2	182	-110	0	1	0	8.391
	Changes in other technical provisions										
R0410	Gross - Direct Business	-287	-825	-17	0	-9.991	33	0	0	0	-11.088
R0420	Gross - Proportional reinsurance accepted	0	0	0	0	0	0	0	0	0	0
R0430	Gross - Non-proportional reinsurance accepted										0
R0440	Reinsurers' share	18	-307	0	0	-10.043	277	0	0	0	-10.056
R0500	Net	-306	-518	-17	0	52	-244	0	0	0	-1.032
R0550	**Expenses incurred**	549	2.513	922	65	792	299	3	92	1	5.237
R1200	**Other expenses**										0
R1300	**Total expenses**										5.237

S.05.02.01
Premiums, claims and expenses by country

Non-life

		C0010	C0020	C0030	C0040	C0050	C0060	C0070
		Home Country	Top 5 countries (by amount of gross premiums written) - non-life obligations			Top 5 countries (by amount of gross premiums written) - non-life obligations		Total Top 5 and home country
R0010								
		C0080	C0090	C0100	C0110	C0120	C0130	C0140
	Premiums written							
R0110	Gross - Direct Business	23.570						23.570
R0120	Gross - Proportional reinsurance accepted	260						260
R0130	Gross - Non-proportional reinsurance accepted	0						0
R0140	Reinsurers' share	6.393						6.393
R0200	Net	17.437	0	0	0	0	0	17.437
	Premiums earned							
R0210	Gross - Direct Business	23.142						23.142
R0220	Gross - Proportional reinsurance accepted	260						260
R0230	Gross - Non-proportional reinsurance accepted	0						0
R0240	Reinsurers' share	6.132						6.132
R0300	Net	17.270	0	0	0	0	0	17.270
	Claims incurred							
R0310	Gross - Direct Business	4.557						4.557
R0320	Gross - Proportional reinsurance accepted	0						0
R0330	Gross - Non-proportional reinsurance accepted	0						0
R0340	Reinsurers' share	-3.834						-3.834
R0400	Net	8.391	0	0	0	0	0	8.391
	Changes in other technical provisions							
R0410	Gross - Direct Business	-11.088						-11.088
R0420	Gross - Proportional reinsurance accepted	0						0
R0430	Gross - Non-proportional reinsurance accepted	0						0
R0440	Reinsurers' share	-10.056						-10.056
R0500	Net	-1.032	0	0	0	0	0	-1.032
R0550	**Expenses incurred**	5.237						5.237
R1200	**Other expenses**							
R1300	**Total expenses**							5.237

S.17.01.02
Non-Life Technical Provisions

		Direct business and accepted proportional reinsurance									
		Medical expense 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	Assistance	Miscellaneous financial loss	Total Non-Life obligation
		C0020	C0050	C0060	C0070	C0080	C0090	C0100	C0120	C0130	C0180
R0010	**Technical provisions calculated as a whole**	0	0	0	0	0	0	0	0	0	0
R0050	Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole										0
	Technical provisions calculated as a sum of BE and RM										
	Best estimate										
	Premium provisions										
R0060	Gross	1.750	3.352	1.239	90	2.934	289	17	325	5	10.002
R0140	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	72	297	58	67	2.381	95	9	141	3	3.124
R0150	**Net Best Estimate of Premium Provisions**	1.678	3.055	1.181	23	553	194	8	184	1	6.877
	Claims provisions										
R0160	Gross	927	5.886	423	190	10.515	1.188	0	1	0	19.129
R0240	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	19	406	0	93	10.274	283	0	0	0	11.075
R0250	**Net Best Estimate of Claims Provisions**	908	5.481	423	97	241	905	0	1	0	8.054
R0260	**Total best estimate - gross**	2.677	9.238	1.662	280	13.449	1.477	17	326	5	29.131
R0270	**Total best estimate - net**	2.586	8.535	1.604	120	794	1.099	8	185	1	14.932
R0280	**Risk margin**	105	499	111	14	95	97	2	10	0	933

S.17.01.02 (Continued)
Non-Life Technical Provisions

		Direct business and accepted proportional reinsurance									
		Medical expense 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	Assistance	Miscellaneous financial loss	Total Non-Life obligation
		C0020	C0050	C0060	C0070	C0080	C0090	C0100	C0120	C0130	C0180
	Amount of the transitional on Technical Provisions										
R0290	Technical Provisions calculated as a whole										0
R0300	Best estimate										0
R0310	Risk margin										0
R0320	**Technical provisions - total**	2.782	9.737	1.773	294	13.544	1.574	19	336	5	30.064
R0330	**Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total**	91	703	58	160	12.655	378	9	141	3	14.200
R0340	**Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total**	2.690	9.034	1.715	134	889	1.196	10	195	2	15.864

S.19.01.21
Non-Life insurance claims

Total Non-life business

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

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

		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110		C0170	C0180
	Year	**Development year**												**In Current year**	**Sum of years (cumulative)**
		0	1	2	3	4	5	6	7	8	9	10 & +			
R0100	Prior											19		19	19
R0160	2009	6.436	1.417	140	629	18	13	162	187	15	101			101	9.117
R0170	2010	6.661	1.457	208	312	703	349	12	114	33				33	9.848
R0180	2011	6.637	1.857	281	77	35	45	28	156					156	9.116
R0190	2012	6.768	1.649	175	58	11	29	817						817	9.507
R0200	2013	5.527	1.443	379	129	131	31							31	7.640
R0210	2014	5.209	1.364	222	1.351	65								65	8.211
R0220	2015	6.217	2.122	357	98									98	8.794
R0230	2016	5.031	2.081	6.352										6.352	13.465
R0240	2017	5.321	1.833											1.833	7.154
R0250	2018	6.141												6.141	6.141
R0260													**Total**	15.645	89.014

S.19.01.21(Continued)

Non-Life insurance claims

Total Non-life business

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

Gross Undiscounted Best Estimate Claims Provisions

(absolute amount)

		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360
	Year	**Development year**											**Year end (discounted data)**
		0	1	2	3	4	5	6	7	8	9	10 & +	
R0100	Prior											180	0
R0160	2009	0	0	0	0	0	0	0	332	318	239		0
R0170	2010	0	0	0	0	0	0	233	83	91			0
R0180	2011	0	0	0	0	0	989	947	676				0
R0190	2012	0	0	0	0	1.214	1.270	228					0
R0200	2013	0	0	0	566	364	277						0
R0210	2014	0	0	2.216	708	527							0
R0220	2015	0	1.115	538	321								0
R0230	2016	24.688	21.293	10.638									0
R0240	2017	4.786	1.288										0
R0250	2018	4.574											0
R0260												**Total**	0

S.23.01.01
Own Funds

	Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35	**Total**	**Tier 1 unrestricted**	**Tier 1 restricted**	**Tier 2**	**Tier 3**
		C0010	C0020	C0030	C0040	C0050
R0010	Ordinary share capital (gross of own shares)	13.297	13.297		0	
R0030	Share premium account related to ordinary share capital	1.966	1.966		0	
R0040	Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings	0	0		0	
R0050	Subordinated mutual member accounts	0		0	0	0
R0070	Surplus funds	0	0			
R0090	Preference shares	0		0	0	0
R0110	Share premium account related to preference shares	0		0	0	0
R0130	Reconciliation reserve	16.476	16.476			
R0140	Subordinated liabilities	0		0	0	0
R0160	An amount equal to the value of net deferred tax assets	0				0
R0180	Other own fund items approved by the supervisory authority as basic own funds not specified above	0	0	0	0	0
R0220	**Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds**	0				
R0230	**Deductions for participations in financial and credit institutions**	0	0	0	0	
R0290	**Total basic own funds after deductions**	31.739	31.739	0	0	0
	Ancillary own funds					
R0300	Unpaid and uncalled ordinary share capital callable on demand	0				
R0310	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	0				
R0320	Unpaid and uncalled preference shares callable on demand	0				
R0330	A legally binding commitment to subscribe and pay for subordinated liabilities on demand	0				
R0340	Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	0				
R0350	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	0				
R0360	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0				
R0370	Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0				
R0390	Other ancillary own funds	0				
R0400	**Total ancillary own funds**	0			0	0
	Available and eligible own funds					
R0500	Total available own funds to meet the SCR	31.739	31.739	0	0	0
R0510	Total available own funds to meet the MCR	31.739	31.739	0	0	
R0540	Total eligible own funds to meet the SCR	31.739	31.739	0	0	0
R0550	Total eligible own funds to meet the MCR	31.739	31.739	0	0	
R0580	**SCR**	15.667				
R0600	**MCR**	3.917				
R0620	**Ratio of Eligible own funds to SCR**	**202,58%**				
R0640	**Ratio of Eligible own funds to MCR**	**810,31%**				

S.23.01.01 (Continued)
Own Funds

		C0060
	Reconcilliation reserve	
R0700	Excess of assets over liabilities	35.616
R0710	Own shares (held directly and indirectly)	163
R0720	Foreseeable dividends, distributions and charges	3.715
R0730	Other basic own fund items	15.263
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	0
R0760	**Reconciliation reserve**	16.476
	Expected profits	
R0770	Expected profits included in future premiums (EPIFP) - Life business	0
R0780	Expected profits included in future premiums (EPIFP) - Non- life business	0
R0790	**Total Expected profits included in future premiums (EPIFP)**	0

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
R0010	Market risk	10.675		
R0020	Counterparty default risk	6.747		
R0030	Life underwriting risk	0		
R0040	Health underwriting risk	634		
R0050	Non-life underwriting risk	4.542		
R0060	Diversification	-5.957		
R0070	Intangible asset risk	0		
R0100	**Basic Solvency Capital Requirement**	16.642		

	Calculation of Solvency Capital Requirement	C0100
R0130	Operational risk	874
R0140	Loss-absorbing capacity of technical provisions	0
R0150	Loss-absorbing capacity of deferred taxes	-1.848
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0
R0200	**Solvency Capital Requirement excluding capital add-on**	15.667
R0210	Capital add-ons already set	0
R0220	**Solvency capital requirement**	15.667
	Other information on SCR	
R0400	Capital requirement for duration-based equity risk sub-module	0
R0410	Total amount of Notional Solvency Capital Requirements for remaining part	0
R0420	Total amount of Notional Solvency Capital Requirements for ring fenced funds	0
R0430	Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	0
R0440	Diversification effects due to RFF nSCR aggregation for article 304	0

USP Key

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

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

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

S.28.01.01

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

	Linear formula component for non-life insurance and reinsurance obligations	C0010
R0010	MCR_{NL} Result	2.640

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	**Net (of reinsurance) written premiums in the last 12 months**
		C0020	C0030
R0020	Medical expense insurance and proportional reinsurance	2.586	3.457
R0030	Income protection insurance and proportional reinsurance	0	0
R0040	Workers' compensation insurance and proportional reinsurance	0	0
R0050	Motor vehicle liability insurance and proportional reinsurance	8.535	8.361
R0060	Other motor insurance and proportional reinsurance	1.604	2.733
R0070	Marine, aviation and transport insurance and proportional reinsurance	120	98
R0080	Fire and other damage to property insurance and proportional reinsurance	794	1.456
R0090	General liability insurance and proportional reinsurance	1.099	1.021
R0100	Credit and suretyship insurance and proportional reinsurance	8	14
R0110	Legal expenses insurance and proportional reinsurance	0	0
R0120	Assistance and proportional reinsurance	185	294
R0130	Miscellaneous financial loss insurance and proportional reinsurance	1	4
R0140	Non-proportional health reinsurance	0	0
R0150	Non-proportional casualty reinsurance	0	0
R0160	Non-proportional marine, aviation and transport reinsurance	0	0
R0170	Non-proportional property reinsurance	0	0

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

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

	Overall MCR calculation	C0070
R0300	Linear MCR	2.640
R0310	SCR	15.667
R0320	MCR cap	7.050
R0330	MCR floor	3.917
R0340	Combined MCR	3.917
R0350	Absolute floor of the MCR	3.700
R0400	**Minimum Capital Requirement**	3.917