CNP ZOIS S.A.
SOLVENCY AND FINANCIAL CONDITION REPORT
31 DECEMBER 2018

CONTENTS

Independent Auditor's Report

To the Management of the insurance company «CNP ZOIS S.A.»

We have audited the Prudential Reports (prepared in accordance with the Commission Implementing Regulation (EU) 2015/2452) as at 31 December 2018, which comprise the Solvency II Balance Sheet (template S.02.01.02), the Technical Provisions (templates S.12.01.02, S.17.01.02), the Own Funds (template S.23.01.01), as well as the relevant Quantitative Reporting Templates (templates S.19.01.21, S.22.01.21, S.25.01.21, S.28.02.01) (henceforth the Prudential Reports), that are included in the accompanying "Solvency and Financial Conditions Report" of the company "CNP ZOIS S.A." (henceforth the Company) as at 31 December 2018.

The Prudential Reports have been prepared by management in accordance with the regulations and the Company's methodology, as described in Sections D and E of the attached "Solvency and Financial Conditions Report", in accordance with the provisions of Law 4364/2016.

Management's Responsibility for the Prudential Reports

Management is responsible for the preparation and presentation of these prudential reports in accordance with the regulations and the methodology, as described in Sections D and E of the attached "Solvency and Financial Conditions Report" and the requirements of Law 4364/2016, and for such internal control as management determines is necessary to enable the preparation of Prudential Reports that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these Prudential Reports based on our audit. We conducted our audit in accordance with International Standards on Auditing which have been incorporated in the Greek Legislation (Government Gazette/B'/2848/23.10.2012). Those standards require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether the Prudential Reports are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the Prudential Reports. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the Prudential Reports, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and presentation of the Prudential Reports in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. An audit also includes evaluating the appropriateness of the methodology used and the reasonableness of estimates made by management, as well as evaluating the overall presentation of the Prudential Reports.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the Prudential Reports of December 31, 2018, which are included in the accompanying "Solvency and Financial Condition Report" of the Company for the year ended 31 December 2018, are prepared in all material respects, under the applicable regulatory framework and the relevant provisions of Law 4364/2016, as well as under the methodology described in Sections D and E of the accompanying "Solvency and Financial Condition Report".

Emphasis of Matter

Without qualifying our opinion in respect of this matter, we draw your attention to the Section E.2 of the attached "Solvency and Financial Condition Report", which describes that the Bank of Greece, as a Supervisory Authority under Law 4364/2016, may require amendment or reviewing published Company reports or publishing additional information, as well as other actions taken by its management. The preparation of the Prudential Reports and the "Solvency and Financial Condition Report", as well as our audit, has been conducted on the assumption that the necessary approvals have been obtained and that no additional requirements are available from the Supervisory Authority. We do not have any opinion as to whether and whether the relevant approvals or additional requirements will be made by the Supervisory Authority.

Basis for preparation and limitation of use

We draw your attention to the Sections D and E of the accompanying "Solvency and Financial Condition Report", which describe the regulatory provisions and the methodology applied in the Prudential Reports, which have been prepared to assist the Company's management in fulfilling its obligations under Law 4364/2016. As a result, the prudential reports and our report on these may not be suitable for any other purpose. Our report is intended only for use by the Company's management, in order to fulfill its regulatory obligations and should not therefore be used by other parties.

Other matters

Our audit of the prudential reports does not constitute a statutory audit of the Company's financial statements for the year ended December 31, 2018 and therefore we do not express an opinion on these financial statements.

Palaio Faliro, April 17, 2019
The Certified Public Accountant

MAZARS Certified Public Accountants
Business Advisors S.A.
Amfitheas Ave. 14, 175 64, Palaio Faliro
SOEL Reg.No.: 154

Ilias Zafeiropoulos
SOEL Reg.No.: 22811

About this Report

This Solvency and Financial Condition Report (SFCR, Report) is prepared by CNP Zois S.A. (CNP Zois, Company) in accordance with the Solvency II framework.

The Solvency II framework aims to preserve the capital robustness of the insurance companies through modern valuation rules based on stress scenarios limiting the probability of default up to 0.5% for the next 12 months.

This Report is based upon the financial position of CNP Zois as at 31 December 2018 and it was approved by the Company's Board of Directors on 17 April 2019 in accordance with the Company's Reporting and Disclosure Policy.

The SFCR contains both quantitative and qualitative information and its objective is to present the Company's business and performance, the main components of its financial position and system of governance. It also describes the Company's risk profile, the qualitative composition of its own funds and capital requirements as well as its coverage ratios.

The Bank of Greece, under its supervisory assessment, may require the amendment or revision of the Report or the publication of additional information or the undertaking of other actions by the Company.

The Summary accompanying this Report contains key figures and information, highlighting the material changes made from the previous year's SFCR.

The amounts presented in the tables of the Report are in thousands of Euros "€ k" unless otherwise stated in a specific table or section.

The information in this Report was subject to external audit for reasonable assurance according to the Decision 105/12.12.2016 of the Bank of Greece. The Auditors' Report is presented in page 2 and forms an integral part of the SFCR.

About Solvency II Pillar 3

The Solvency II programme is structured around three pillars. The Pillar 1 solvency and capital requirements and the Pillar 2 supervisory review process are complemented by Pillar 3 market discipline. The aim of Pillar 3 is to produce disclosures that allow greater level of transparency for the Supervisor and the public on the capital adequacy, risk exposures as well as risk management and internal control processes.

CNP Zois is committed to maintaining public transparency with regard to its business, financial performance and risks.

CNP Zois publishes comprehensive Pillar 3 Disclosures annually on its website www.cnpzois.com

Summary

A. Activity and Results

CNP Zois is a 100% owned subsidiary of CNP Cyprus Insurance Holdings Ltd (CNP CIH), a private limited company incorporated in Cyprus. The controlling shareholder of CNP CIH with a share capital of 50,1% is CNP Assurances S.A., an insurance company of French interests.

The principal activity of CNP Zois is the underwriting of life and health insurance business. The Company's Gross Written Premiums for the year 2018 was at €4.035k, almost double the corresponding amount at the end of 2017.

During 2018, CNP Zois' Underwriting Profit reached €3.659k with the main contributors being the Savings products (71% of the Underwriting Profit).

With regards to the macroeconomic context, it has been another challenging year as markets were marked by the low level of European interest rates and high volatility.

In 2018, the Company had a negative Investment Income of €266k in comparison to the positive Investment Income of €878k in the previous year.

The Own Funds increased by 7% in comparison to the previous year, reaching €4.816k.

The key figures of the Company are presented herein below.

Solvency II Balance Sheet

In thousands €	31/12/2018	31/12/2017	Difference
Investments	24.340	24.908	-2%
Other Assets	782	757	3%
Total Assets	25.121	25.665	-2%
Technical Provisions	18.209	18.686	-3%
Other Liabilities	2.097	2.460	-15%
Liabilities	20.305	21.147	-4%
Excess of assets over liabilities	4.816	4.518	7%
Eligible Own Funds	4.816	4.518	7%

B. Corporate Governance

The main principles and procedures governing the Company's Corporate Governance System are analysed in Section B of the Report.

During the reporting period, the organizational processes of the Company were adjusted without significant changes in the Company's Governance System. Post the reporting period and since 1 March 2019, the General Manager of the Company is George Georgakopoulos.

CNP Zois for the year 2018 has maintained appropriate for its size, nature of business and complexity of operations organisational arrangements, as well as revised written policies and procedures.

The Company is committed to continuously improve its overall risk management and internal control system.

C. Risk Profile

The risk profile of CNP Zois is predominately driven by life underwriting risk and market risk, since the solvency capital of the two risks represents the 80% of the Basic SCR before diversification. Diversification effects are taken into account when capital requirements are aggregated by using correlation matrices and this is intended to reflect potential dependencies.

The Company is exposed to Pillar 1 risks (market, counterparty default, life underwriting, health underwriting and operational risk) as well as risks not fully covered by Pillar 1 such as strategic, business, liquidity, legal and compliance and reputational. For optimal risk management, the Company has adopted appropriate risk mitigation techniques per type of risk.

The Company uses the standard formula to calculate its Pillar 1 risks and in 2018, it has revisited its normal and stress scenarios. In 2018, CNP Zois successfully submitted to the Bank of Greece the Quantitative Reporting Templates (QRTs).

D. Valuation of Assets and Liabilities

The valuation of the assets and liabilities of the Solvency II Statement of Financial Position is carried out by a Valuation Policy and Reserving Policy endorsed by the Company's Board of Directors.

The Company prepares its Financial Statements in accordance with the International Financial Reporting Standards (IFRSs).

As a principle, the Company's assets and liabilities (particularly financial instruments) are valued on a fair value basis and are then included either directly in the IFRS Statement of Financial Position or disclosed in the notes to the financial statements. For its Solvency II Statement of Financial Position, the Company uses the fair value of assets and liabilities as calculated for IFRS accounting purposes, insofar as this value complies with Solvency II asset and liability valuation principles. This ensures that a reliable Solvency II Statement of Financial Position will be produced as part of an orderly, well-managed process. It also ensures consistency with the IFRS financial statements.

The Company is consistent in applying the valuation techniques unless it considers that an alternative method would result in a more appropriate measurement. Such change in methodology is reported for transparency purposes.

There are instances where, the value of certain items may be estimated using simplified approaches when those items do not represent significant exposure or when the difference with fair value as calculated under IFRS is not material.

The Company applies the volatility adjustment in the calculation of the Best Estimate of its Liabilities.

The Company's Solvency II technical provisions amounted to €18.209k at 31 December 2018.

E. Capital Management

For the year 2018, the Company adequately covered its Solvency II Capital Requirements.

The total Solvency Capital Requirement (SCR) of the Company as at the end of 2018 came up to €2.193k with a total Minimum Capital Requirement (MCR) at €3.700k. These amounts are subject to supervisory assessment.

The Solvency II Capital Requirement (SCR) ratio was at the level of 220% as at 31 December 2018 and the Minimum Capital Requirement (MCR) ratio reached 130%.

The Solvency Capital Requirements of the Company based on the standard formula calculations are presented below.

Total Capital Requirements

In thousands €	31/12/2018	31/12/2017	Difference
Market Risk	1.549	1.573	-2%
Counterparty Default Risk	286	398	-28%
Life underwriting risk	492	714	-31%
Health underwriting risk	215	179	20%
Total	**2.542**	**2.864**	**-11%**
Diversification	-621	-759	-18%
Operational Risk	271	163	66%
Solvency II Capital Requirement	**2.193**	**2.268**	**-3%**

At 31 December 2018, the Own Funds of the Company under IFRS amounted to €6.789k and under the Solvency II (eligible for SCR coverage) amounted to €4.816k. The basis of consolidation for financial accounting purposes differs from that used for Solvency II purposes. All of the Company's Own Funds consist of Tier 1 funds.

In thousands €	31/12/2018	31/12/2017	Difference
Basic Own Funds	4.816	4.518	7%
Tier 1	4.816	4.518	7%
Tier 2	0	0	0%
Tier 3	0	0	0%
Solvency Capital Requirement SCR	2.193	2.268	-3%
Eligible own funds to meet Solvency Capital Requirement	4.816	4.518	7%
Solvency Capital ratio	**220%**	**199%**	**11%**
Minimum Capital Requirement MCR	3.700	3.700	0%
Eligible own funds to meet Minimum Capital Requirement	4.816	4.518	7%
Minimum Capital Requirement Ratio	**130%**	**122%**	**7%**

The Company did not declare dividends for the year 2018.

A. Business and Performance

A.1. Business

The Company was incorporated on 14 February 2002 with the name Laiki Life and has received authorisation from the Private Insurance Supervisory Committee (PISC) to operate as Insurance Company under the licence number AP.M.A.E. 51157/05/B/02/3 offering insurance products for classes I, III, IV, VII.

Following a number of changes in the Company's legal name, as of 31 October 2013, the Company operates under the legal name CNP Zois S.A. and under license number Γ.E.MH 4629401000 (ex. AP.M.A.E. 51157/05/B/02/3).
CNP Zois is a 100% owned subsidiary of CNP Cyprus Insurance Holdings Ltd (CNP CIH), a private limited company incorporated in Cyprus. CNP CIH is the parent company of all the insurance companies of the CNP Cyprus Group in Cyprus and Greece. The fellow insurance subsidiaries of CNP Zois are CNP Cyprialife Ltd and Asfalistiki Ltd incorporated in Cyprus.

CNP Assurances holds 50,1% of the share capital of CNP CIH, with the remaining 49,9% being held by the Bank of Cyprus Public Co (BoC) Limited. CNP Assurances is listed on the Paris Stock Exchange and BoC is listed on the London and Cyprus Stock Exchange.

CNP Assurances Group is France's leading provider of personal insurance, the fourth largest life insurer in Europe and the fifth largest insurance company in Brazil. It was founded 160 years ago and worldwide has 38 million insureds under personal risk and protection policies and 14 million savings and pension policyholders. In 2018, the Group reported premium income of €32.4 billion and its net average technical reserves were €313 billion. 80% of CNP Assurance's financial assets are managed according to environmental, social and corporate governance.

The principal activity of CNP Zois is the underwriting of life and health insurance business. The nature of products in the Company's portfolio is credit life, savings non- linked and unit linked, health (in hospital and out of hospital), term and riders (apart from health) at individual and group base.

During the year the Company changed its offices and the Company's registered office is now located at Andrea Syggrou 162-166 (Building 1), 176 71 Kallithea, Greece.

The Company's related parties for the year 2018 are listed below:

Related Parties
CNP Cyprus Insurance Holdings LTD
CNP Asfalistiki Ltd (Greek Branch)
CNP Cyprialife Ltd
CNP Praktoriaki S.A.
Bank of Cyprus PLC
ΑΝΑΠΤΥΞΕΙΣ ΠΛΑΓΙΑΣ ΑΕ

The Company's appointed auditor for the year ended 31 December 2018 was Mazars Certified Public Accountants Business Advisors S.A (14 Amfitheas Avenue, 175 64 Palaio Faliro, Greece). Mazars S.A in Greece is registered with the Institute of Certified Public Accountants of Greece (SOEL Reg. No. 154).

CNP Zois is directly regulated and supervised on a solo basis by the Bank of Greece (Supervisor), 21 E. Venizelos Avenue GR 102 50 Athens, Greece.

The Company also reports to its ultimate controlling shareholder in France, CNP Assurances, being subject to financial oversight by the Autorité de Contrôle Prudentiel et de Résolution (ACPR) in France at 4 Place de Budapest, 75436 Paris France.

2018 Highlights

Solvency II: The Company is compliant with the Law 4364/2016 with regards to Solvency II. The Company's governance arrangements, policies, procedures, practices and standards are aligned in accordance with the key Solvency II requirements. As at 31 December 2018, the Company's SCR coverage ratio is at 220% and the MCR coverage ratio is at 130%.

Data Privacy Directive (2016/680) and Regulation (2016/679): The Company reviewed the reforms and assessed the impact of the Data privacy Directive and Regulation that came into force on 25 May 2018. The Company has in place a multi-annual project Implementation Plan.

Insurance Distribution Directive 2016/97 (IDD): The Company is introducing new policies and procedures to ensure compliance with the applicable laws and regulations for the IDD which came into force in October 2018, and was transposed into national law in 2019.

Distribution Channels and Customer Service: CNP Zois channelled its products mainly through its network of independent insurance intermediaries. The Company is also committed to high standards of customer service.

Risk Management: The Company via its Risk Management Framework manages its risk profile to reflect the objective enhancing its financial strength.

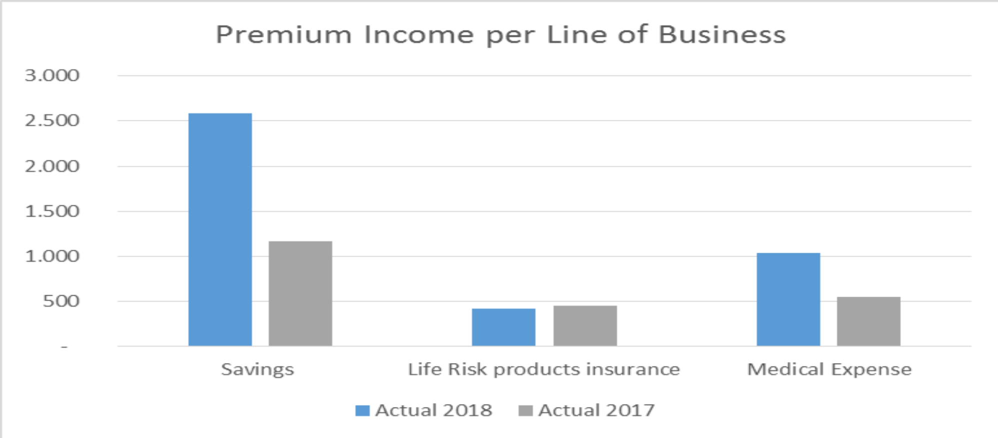
New Products: CNP Zois offers a wide range of products covering the insurance needs of its customers. During the course of the year the Company launched new health products, enriched the personal risk and protection products which are expected to increase the Company's sales volume in 2019. CNP Zois plans to continue with successful product launches, in both categories savings and risk.

Going forward: CNP Zois continues focusing on the development and growth of its business while:

- Providing an excellent service to its customers
- Maximising shareholders' return and strengthening its capital position
- Remaining a responsible company and a responsible employer
- Complying with all relevant laws and regulations

A.2. Underwriting Performance

The premium income figures in this Section present the Gross Written premium of the Company for the years 2018 and 2017. The Underwriting portfolio of the Company has increased due to new business generated during 2018.



In 2018, CNP Zois reached an Underwriting Profit of €3.659k with the main drive being the Savings business (70% of the Underwriting profit).

UNDERWRITING PERFORMANCE

Actual 2018 *In Thousands €*	**Total**	**Savings**	**Life Risk Products insurance**	**Medical Expense**
Gross Written Premiums	4.035	2.586	417	1.032
Net Earned Premiums	3.948	2.586	521	841
Outgoes	-289	-6	215	-498
Underwriting result	**3.659**	**2.580**	**736**	**343**

Actual 2017 *In Thousands €*	**Total**	**Savings**	**Life Risk Products insurance**	**Medical Expense**
Gross Written Premiums	2.149	1.161	445	544
Net Earned Premiums	2.238	1.161	623	454
Outgoes	-427	3	-234	-196
Underwriting result	**1.811**	**1.164**	**389**	**258**

A.3. Investment Performance

The Company's assets, bond and equities, are managed directly or through mutual funds.

The Company does not hold investments in securitization.

The Company's information of income and expenses arising from total Investible assets is shown in the table below by asset class for the year ended 31 December 2018. The unrealized loss in the cash category relates to reversal made for gains/losses from previous years.

Performance per Asset class				
Asset Class In Thousands €	Unrealised Gain / Loss	Realised Gain / Loss	Dividend / Interest / Rent	Total
In-house Equity	16	0	0	**16**
In-house Bonds	-288	205	95	**11**
Bond Funds	-319	-144	163	**-300**
Money Market Funds	-45	0	0	**-45**
Cash	-91	133	9	**51**
Total	**-727**	**193**	**267**	**-266**

The table below shows a comparison of the Company's income arising from investments by asset class for the years ended 31 December 2018 and 31 December 2017.

Performance per Asset class		
In Thousands €	**31/12/2018**	**31/12/2017**
In-house Equity	16	19
In-house Bonds	11	77
Bond Funds	-300	471
Money Market Funds	-45	-16
Cash	51	327
Total	**-266**	**878**

Gains and losses recognized directly in equity

The loss that was recognised by the Company directly in equity was €639k (2017: €290k profit) mainly derived from Mutual Fund Bonds.

Risk Mitigation

The Company follows its approved by the Board of Directors Tactical Asset Allocation (TAA) determining the optimum asset allocation. The Company's aim is Solvency II optimisation and reduction of concentration risk; while at the same time maintaining the required liquidity in order to fulfil its operational requirements.

The Company's Investment policies include prohibitions for assets to minimise its market risk as well as policies for the credit standing of financial institutions in order to minimise the counterparty default risk.

The Company continuously monitors the performance of investments against set benchmarks as well as associated to investments risks.

Prohibited investments

The Company does not allow, under any circumstances, investment in high-risks instruments or complex financial instruments, the risks of which cannot be fully understood, measured and managed. In particular, the following investments have been assessed as high risk and/ or complex and are therefore, not permissible:

- Repackaged loans investment, asset backed securities or other securitisation position
- Collateralised debt obligations / Collateralised loan obligations
- Investment in Conduits or SIVs, SPVs and ISPVs
- Investment in Commodities
- Any other investment or instrument that is not allowed by local law and regulation

B. System of Governance

B.1. General Information on the System of Governance

CNP Zois has in place a clear organisational structure, while ensuring the continuity and regularity of its operations. Well-defined and consistent lines of responsibility and oversight are maintained. The Company uses the three lines of defence model. The First Line of Defence owns the risk and is responsible for identifying, recording, reporting, managing the risks and ensuring that the right controls and assessments are in place to mitigate these risks. The Second Line of Defence sets the policy and guidelines for managing the risks and provides advice, guidance and challenge to the First Line of Defence on effective risk management. The Third Line of Defence is Internal Audit which independently ensures the effectiveness of risk management.

The Company's BoD and its Audit & Risk Committee are kept informed on all material risk-related matters and exposures. The Remuneration Committee is also kept informed on all material risk related matters under its mandate.

Board of Directors and BoD Committees

The Board of Directors (BoD) is the ultimate authority for the management of the Company and it maintains responsibility for prudent management. The role of the BoD is to define the strategic plan, organise and direct the affairs of CNP Zois in a manner that seeks to protect its policyholders' interests and maximise the value of the Company for the benefit of its shareholders, while complying with regulatory requirements and relevant governance standards.

The BoD bears the ultimate responsibility for the compliance of the Company with its legal and regulatory obligations at a national or EU level.

BoD meetings are taking place when needed but at least four times per annum and a quorum must be achieved to form decisions. In 2018, the BoD convened five times.

The Company has an experienced and diverse BoD. The members of the BoD remained fit and proper according to the Solvency II requirements. In 2018, the Company welcomed to its BoD as well as to its Audit and Risk Committee Nicolas Legrand in the role of Non-Executive Director and farewelled Jean Christophe Merer thanking him for his valuable role during his tenure.

Board of Directors		
Chairperson	Non-Executive	Xavier Larnaudie - Eiffel
Vice-Chairperson	Independent Non-Executive	Andreas Paralikis
Managing Director / CEO	Executive	Takis Phidia
Member	Independent Non-Executive	Constantinos Costa
Member	Independent Non-Executive	Stelios Stephanou
Member	Non-Executive	Nicolas Legrand (appointed on 12/06/2018) Jean-Christophe Merer (resigned on 17/02/2018)
Member	Non-Executive	Brigitte Molkhou
Secretary		Polys Michaelides

Audit and Risk Committee

The Audit and Risk Committee assists the BoD in meeting its responsibilities in ensuring an effective system of internal control and compliance for the Company. The Committee also assists the BoD in meeting its external financial reporting obligations, including its obligations under applicable laws, and regulations and is directly responsible on behalf of the BoD for the selection, oversight and remuneration of the external auditor.

The Committee consists of 5 members all being Non-Executive Directors and is presided by an Independent Non-Executive Director.

The Committee convenes with such frequency as it may consider appropriate but in any event not less than two times a year. In 2018, the Audit and Risk Committee convened 5 times.

Remuneration Committee

The Remuneration Committee has primary responsibility to review and approve or make recommendations to the BoD of the Company regarding remuneration of executives and ensure compliance of the Company's remuneration policy and practices with applicable laws and governance regulations.

The Committee consists of 3 members all being Non-Executive Directors and is presided by an Independent Non-Executive Director.

The Committee convenes with such frequency as circumstances dictate, but in any event not less than once a year. In 2018, the Remuneration Committee convened two times.

The Remuneration Committee arrangements were revised in the year.

Remuneration Disclosure

The Company's Remuneration Policy applies to the Company as a whole and is reviewed and maintained by the CNP Zois Remuneration Committee and is approved by the BoD.

The Remuneration Committee of the Company is responsible for the implementation of the Remuneration Policy. The remuneration of the Directors is approved by the shareholders at the Annual General Meeting.

The collective remuneration of the Company's Board of Directors for the year 2018 was at €5k.

Management

The Company's Management has the responsibility for the consistent implementation of the BoD approved strategy through setting appropriate policies for all functions and the development and embedding of the mechanisms and procedures for internal control.

The Company's Management consists of the individuals in positions that effectively run the Company.

The Managing Director of the Company is Takis Phidia and the General Manager is George Georgakopoulos (appointed on 1st March 2019). During 2018, the General Manager of the Company was George Mavrelis. The BoD farewelled George Mavrelis in February 2019 thanking him for his valuable administration.

B.2. Fit and Proper Requirements

The Company has set standards and a Policy for the fitness and propriety. The purpose of the Fit & Proper Policy is to set out the corporate governance and oversight arrangements to ensure the sound and prudent management of the business as well as to ensure that the persons who effectively run the Company or hold key functions fulfil at all times the following requirements:

- Their professional qualifications, knowledge and experience are adequate to enable sound and prudent Management (fit)
- They are of good repute and integrity (proper)

The covered individuals are required to comply with the requirements and behaviours set by the Supervisory Authority and our Code of Ethics defined by the Company Standards under the Fit and Proper Policy.

The Company also ensures that the collective knowledge, competence and experience of our BoD members, includes:

- Market knowledge
- Business strategy and business model
- System of governance
- Financial and actuarial analysis
- Regulatory framework and requirements

B.3. Risk Management System including ORSA

Risk Management

CNP Zois has established an effective Risk Management Function.

The appointed Chief Risk Officer from its holding company CNP CIH is Athena Shipilli-Tsingi and the responsible person for overseeing the outsourced RMF activities in the reporting period was Panayiotis Kylilis.

The RMF is in charge of developing and implementing the policies and risk aware culture within the Company, as well as providing important insights in relation to current and future risks.

The RMF remained independent of risk taking functions and reported to the Company's Managing Director. The CRO also had a direct reporting line to the BoD via the Audit and Risk Committee of the BoD to escalate important issues.

The Risk Management framework of the Company is presented herewith below. CNP Zois has enhanced its Risk Management Framework ensuring that all risks are effectively managed and measured against a set level of risk tolerance.

The Company's policies for the key areas of risk were revised and approved by the BoD in the year.

The Company adopts the following guiding principles as a formal Policy for the management of risk:

- The Company's governance structure and risk management framework aim to create and promote a strong risk culture that is embedded in all aspects of its activities.
- The BoD is responsible for overseeing senior management, for establishing sound business practices and strategic planning as well as for setting the risk appetite and risk tolerance at a level which is commensurate with its sound operation and the strategic goals. In setting the Company's risk appetite and risk tolerance level, all relevant risks are taken into account. The BoD has the ultimate responsibility for the effective management of risk.
- The level of risks that the Company is willing to take is constrained by regulation and supervision. Risk appetite and risk tolerance depend not only on intrinsic risk aversion, but also on the current financial situation and the Company's strategic direction.

CNP Zois implements a consistent risk culture and establishes sound risk governance supported by an appropriate communication policy, all of which are adapted to its size, complexity and risk profile.

- The Company is aware of its responsibilities relating to the identification and reporting of relevant risks.
- The Company has an established, and independent from risk taking activities Risk Management Function in order to ensure effective risk management.
- The Company ensures that the responsibilities for the measurement, monitoring and control of risks are clearly defined and sufficiently independent from any risk-taking activity.
- In consideration of the Company's current and future needs, it develops risk measurement systems and tools with the purpose of capturing all expected and unexpected losses, for each type of risk, under both normal and stressed market conditions.
- The Company applies high standards of transparency for the performance of its operations and communicate all the information it considers necessary and in line with its Reporting & Disclosure Policy to the interested and affected parties.
- The Company analyses new products, markets, and businesses carefully and makes sure that it possesses adequate internal tools and expertise to understand and monitor the risks associated with them.
- The governance of risk is documented and updated as appropriate.
- All outsourcing activities are in accordance with the Company's Outsourcing Policy and the risks arising from such activities are managed in accordance with its defined risk appetite and policies.

Risk Management Framework

Risk is inherent in CNP Zois' business activities. CNP Zois aims through appropriate risk management, to achieve its business and financial strategy by considering internal as well as external constraints without exceeding set risk tolerances. The Company uses an enterprise-wide risk management framework across all risk types which is underpinned by the Company's risk culture.

The Risk Management Framework of CNP Zois is an embedded part of its business interacting with the strategic planning and the capital management process and is the guiding framework for the implementation of the ORSA process.

The Company's Risk Management Framework is based on four key elements:

- Governance
- Risk Quantification and Aggregation
- Risk Control and Optimization
- Risk Monitoring and Reporting

The Audit and Risk Committee of the Board of Directors and the Risk & Reserving Management Committee play a fundamental role in the management of risk. The Committees assist with the formulation of the overall risk strategies and policies for managing significant business risks, and are responsible for designing and implementing a Risk Management Framework. In addition, the Audit & Risk Committee ensures that the overall system of internal control operates effectively, it monitors and reviews risk exposures, it reviews and challenges actuarial reserves and it advises the BoD on the approval of reserves.

Risk Appetite

Risk Appetite is a key component for the management of risk. It describes the aggregate level and risk types that the Company is able and willing to accept in pursuing its medium to long term business objectives. Risk appetite is managed and articulated through the Risk Appetite Statement, which is approved by the Board of Directors on the advice of the Audit and Risk Committee.

The risk appetite is integrated within other risk management tools such as the ORSA and stress testing to ensure consistency in risk management.

CNP Zois faces a range of risks reflecting its responsibilities as Insurance Company in the Greek market. These risks include those resulting from the Company's responsibilities in the area of offering credit life, savings non- linked and unit linked, health, term and group (life, health and pension) insurance to the public as well as its day-to-day operational activities. The risks arising from the Company's responsibilities can be significant. These risks are prudently managed through processes that emphasise the importance of integrity, intelligent inquiry, maintaining high quality staff, and public accountability.

In terms of operational issues, CNP Zois has a moderate appetite for risk. The Company makes resources available either in-house or from the fellow insurance companies of CNP CIH Group, to control operational risks to acceptable levels. The Company recognises that it is not possible or necessarily desirable to eliminate some of the risks inherent in its activities and the acceptance of some risk is often necessary to foster innovation within business practices.

The Company identifies and manages the risks it incurs on an ongoing basis. As part of this, CNP Zois follows a risk strategy that is designed to ensure the continuity as a going concern, protecting earnings, maintaining sound Statement of Financial Position and solvency ratios as well as protecting its identity and reputation.

The Company's objectives when managing capital are:

- The compliance with capital requirements imposed by the Bank of Greece
- To safeguard the Company's ability as a going concern so that is provides returns for shareholders and benefits to other stakeholders
- To provide an adequate return to shareholders by pricing insurance and investment contracts commensurately with the level of risk

Risk exposures

The risk measurement framework and reporting systems are designed to help ensure that risks are comprehensively captured with all the attributes necessary to support well-founded decisions and that information is delivered in a timely manner for those risks to be successfully managed and mitigated.

The Company invests resources in IT systems and processes in order to maintain and improve its risk management capabilities. Risk measurement and reporting systems are designed to help ensure that risks are comprehensively captured and decisions are taken in a timely manner for the risks to be mitigated.

The Board of Directors has the overall responsibility for the assumption, monitoring and management of risks. The below risks form part of the Company's Risk Register Inventory and are identified, assessed and managed:

- Investment (Market) Risk
- Counterparty Default (Credit) Risk
- Life Underwriting Risk
- Health Underwriting Risk
- Operational Risk
- Business (Strategic) Risk
- Liquidity Risk
- Asset – Liability Risk
- Reputational Risk
- Any other Risk the Company identifies to be exposed to

The Company's risk categories are further broken into sub-categories of risks that are precise, specific and mutually exclusive. These sub-categories are used for identifying and assessing existing and emerging risk exposures as part of the risk management process and are registered in the risk register. The aggregation of risk exposures into the above categories creates the risk profile of the Company.

ORSA Process

The Own Risk and Solvency Assessment (ORSA) forms a core component of the Company's risk management system and comprises of all the procedures and measures adopted with the purpose of ensuring the following:

- Appropriate identification and measurement of risks
- An appropriate level of internal capital (the capital that is considered adequate for the coverage of the risks inherent in the business model and actives of a company, for Pillar 1 and 2 purposes. This level of capital is determined by the Company by the application of internal risk assessment methodologies) in relation to the Company's risk profile
- The application and further development of suitable risk management and internal control systems

In December 2018, the Company has submitted its ORSA Report to the Bank of Greece. The ORSA Report explained in detail how the Company has implemented and embedded the ORSA within its business, describing its risk profile and the degree of risk appetite that the Company is willing to endure as well as the capital that it considers as adequate to be held against the risks that it is exposed to.

B.4. Internal Control System

For CNP Zois the Internal Control System is the aggregate of control mechanisms and procedures which covers every single activity and contributes towards the efficient and sound operation. The Internal Control System comprises of every preventative or corrective control and more specifically aims at achieving the following objectives:

- The consistent application of the operational strategy, through the efficient utilization of all available resources
- The identification and management of every possible risk which is assumed and the safeguarding of the Company's assets
- Ensuring the completeness and reliability of data and information which are necessary for the correct and up-to-date determination of the financial position and the production of reliable financial statements
- Compliance with the legal framework which governs the Company's operations, including internal rules and codes of ethics
- Prevention and avoidance of any operations which could endanger the reputation and interests of the Company, its shareholders and its counterparties.

Internal Control System is effected in multiple levels within the Company across its three lines of defence organisational arrangements. The following processes were established and form an integral part of CNP Zois' Internal Control System:

- Strategic objectives and corporate values which are disseminated throughout the Company
- Clear hierarchy and lines of responsibility, accountability and segregation of duties to the extent possible due to its size via its organizational arrangements
- Composition of the Board and Committees
- The three lines of defence philosophy is embedded in the organizational structure
- Documented Policies and Procedures for the key activities
- Terms of Reference for the established Committees
- Fit and Proper Requirements for key persons charged with governance
- Code of Conduct and Code of Ethics for all members of staff
- Risk Management embedded in the processes
- Information Technology Systems (including accounting) to monitor transactions
- Reporting Mechanisms to the Board of Directors and to the Authorities

- Utilisation of the work conducted by internal and external auditors as well as other control functions such as compliance, actuarial, risk
- Contingency / Business Continuity and Disaster Recovery Arrangements

The processes are under continuous review for improvement opportunities and apply for the below business areas:

- Reserving
- Actuarial Valuations
- Underwriting
- Reinsurance
- Investment Management
- Claims Handling
- Sales & Customer Service
- Accounting
- IT
- Information Security
- Risk Management
- Human Resources
- Legal & Compliance
- Audit

At CNP Zois, the Board of Directors has the final responsibility for the design, implementation / application and maintenance of the Internal Control System.

The CNP CIH Group Internal Control department, under the responsibility of the CRO, designed its methodology in the year 2018 to provide reasonable assurance regarding the achievement of objectives for the effectiveness and efficiency of CNP Zois' operations and compliance with applicable laws and regulations.

The Internal Audit Function assessed the appropriateness, efficiency and effectiveness of the Company's internal control environment and reported its observations and recommendations to the Audit and Risk Committee.

Compliance

CNP Zois has a Compliance Function and a dedicated Chief Compliance Officer from its holding company CNP CIH.

The appointed Chief Compliance Officer from its holding company CNP CIH is Polys Michaelides and the responsible person for overseeing the outsourced Compliance activities in the year 2018 was George Georgakopoulos (under his role in the year as Manager of Operations Department).

The Compliance Function decodes new and proposed (financial services / insurance) compliance-related rules from legislative or regulatory bodies, which are relevant to business, into internal standards, procedures, and guidelines.

The Compliance Function remained independent of risk taking functions and reported to the Company's Managing Director. The Chief Compliance Officer also had a direct reporting line to the BoD via the Audit and Risk Committee of the BoD to escalate important issues.

The main responsibility 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 activities and responsibilities of the Function are governed by the Compliance Charter and Manual, which are approved by the BoD and reviewed annually.

The key role of the Compliance Function is to proactively:

- Identify, assess and monitor the compliance risks faced by the Company
- Assist, support and advise line management in fulfilling its compliance responsibilities

In performing its above role, the Compliance Function has the objective to enable the Company to demonstrate to the regulatory authorities' compliance with applicable regulations and thus to:

- Protect the good reputation of the Company
- Avoid disciplinary action by the regulators
- Avoid criminal sanctions

Compliance risk areas within the scope of the Compliance Function are recognised by the Company as:

- Anti-Money Laundering/ Customer Acceptance/ Sanctions
- Privacy and Data Protection
- New Products and Services
- Customer Complaints and all complaints against the Company, employees and associates
- Marketing and Sales Practices
- Conflicts of Interest
- Confidentiality
- Outsourcing Services
- On-line presence and corporate communication
- Internal and External Codes of Conduct
- Regulatory Relationships
- Protection of Competition
- Insurance Legislation
- Corporate Governance
- Anti-bribery and Corruption
- Regulatory framework
- Internal and external Fraud
- Whistleblowing
- Any other risk deemed applicable

The Company's policies for the key areas of compliance (Anti-Money Laundering, Code of Conduct, Conflict of Interest, Confidentiality, On-line Presence, Outsourcing Compliance, New Products and Marketing, Fit and Proper, Whistleblowing, anti-Bribery and Corruption) were revised and approved by the BoD in the year.

The approved by the Audit and Risk Committee risk-based Compliance Plan was implemented with results being reported to the Audit and Risk Committee of the BoD. The implementation of the Plan did not reveal significant findings.

B.5. Internal Audit

The Internal Audit Function (IAF) is currently outsourced to Deloitte Cyprus. The appointed Internal Auditor is Panicos Papamichael, Partner at Deloitte Cyprus. The responsible person for overseeing the outsourced Internal Audit activities is Panayiotis Kylilis (Head Financial Department).

The IAF remained independent and autonomous and provided an independent assessment of the risk framework and internal control processes.

To ensure the organisational independence of the IAF, the Internal Auditor reports significant findings and any other matters to the Audit and Risk Committee of the Board of Directors. The Audit and Risk Committee is responsible for Internal Audit as part of its internal control structure, and was ultimately responsible for the direction and approval of the scope of work performed by the internal audit team in 2018.

The Company's Internal Audit policy and principles are outlined in the Internal Audit Charter and the Internal Audit Manual which are approved by the Audit and Risk Committee of the BoD and reviewed at least annually for their adequacy. The Company's Charter and Manual were approved by the BoD in the year.

The Internal Audit Function takes a risk-based approach in deciding its priorities. The steps in the Internal Audit Methodology are the below:

- Understand the Company's business, industry, processes, locations, and specific business objectives
- Implement the approved by the Company's Audit and Risk Committee risk-based audit plan
- Have a close collaborative relationship with the risk, actuarial, compliance and internal control departments
- Evaluate the reasonableness of management response on actions as well as quality and timeliness of management responses
- Report to the Management and the Audit and Risk Committee on identified deficiencies in control measures and of recommendations for improvement
- Submit to the Audit and Risk Committee an annual / periodic report regarding the audit activity and the (progress of) implementation of internal and external audit recommendations
- Inform the Audit and Risk Committee periodically about the latest developments and best practices in the field of internal auditing

B.6. Actuarial Function

The Actuarial Function of the Company is responsible for coordinating all actuarial activities.

The appointed by the BoD Actuarial Function Holder is Eftstathia Yiannopoulou.

The Actuarial Function in the reporting year was responsible for all actuarial activities. More specifically:

- Coordinated the calculation of technical provisions
- Ensured the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of technical provisions
- Assessed the sufficiency and quality of the data used in the calculation of technical provisions
- Compared best estimates against experience
- Informed the BoD of the reliability and adequacy of the calculation of technical provisions
- Expressed an opinion on the overall underwriting policy
- Expressed an opinion on the adequacy of reinsurance arrangements
- Contributed to the effective implementation of the risk-management system, in particular with respect to the risk modelling underlying the calculation of the capital requirements and to the Own Risk and Solvency Assessment
- Contributed and monitored the preparation of QRTs under Pillar III
- Contributed to the effective implementation of the risk-management system, in particular with respect to the risk modelling underlying the calculation of the capital requirements and to the ORSA
- Informed the senior management on each quarter's Solvency II results, assumptions, and any other topics as agreed through the relevant Company's policies

The Board of Directors was kept informed on all actuarial matters and exposures. The Company's actuarial policy and Report where approved by the BoD.

B.7. Outsourcing

The Company has in place an Outsourcing Manual setting out the Outsourcing Policy and procedures ensuring the on-going compliance with the requirements of the Solvency II Directive with respect to the effective control and management of risks associated with the outsourced services.

The main objectives of the Manual are:

- To ensure that a consistent approach is taken to all decisions regarding the possibility of outsourcing any activities or functions
- To give adequate consideration to the risks involved
- To establish a framework for the management of outsourced services, ensuring that appropriate controls are exercised

The BoD approves any amendments to the Policy Manual and all critical or important outsourcing activities or functions. The key determinant to define a critical or important outsourcing arrangement is whether a function or activity is fundamental to the Company's ability to carry out its core business and the impact it has on the Company.

The Company outsourced externally the key functions / activities of Internal Audit, Information Security, IT Infrastructure, Claims Handling, Health & Safety, Storage Services and the "Data Protection Officer" (DPO) services.
The Company also received support from its parent company CNP CIH in the areas of Risk Management, Compliance, Legal, Investments, Business Continuity Management, Human Resources, Health & Safety, Information Security and Marketing.

CNP Zois remains fully responsible for all outsourced functions and activities. The Company has included in its risk management systems and controls a process for monitoring and reviewing the quality of the service provided.

C. Risk Profile

The Company conducts an annual ORSA to determine a forward looking assessment of the Company's capital requirements given the Company's business strategy, risk profile, risk appetite and capital plan. As part of the CNP Zois ORSA, a range of stress tests are applied to the Company's base capital plan. The ORSA is approved by the Board of Directors, which has the ultimate responsibility for the effective management of risk and approval of the Company's risk appetite.

The ORSA is reviewed by the Bank of Greece as part of its supervisory review and evaluation process which occurs periodically.

Pillar 2 considers, in addition to the minimum regulatory capital requirements for Pillar 1 risks, any supplementary requirements for those risks as well as any requirements for risk categories not captured by Pillar 1. The risk categories to be covered under Pillar 2 depend on the specific circumstances of an insurance company and the nature and scale of its business.

CNP Zois is exposed to Pillar 1 risks which are explicitly assessed through Pillar 1; market, counterparty default, life underwriting, health underwriting and operational risk calculated by the standard formula as well as risks not fully covered by Pillar 1 such as strategic, business, liquidity, legal and compliance and reputational. The type of risks which the Company is exposed to, have not changed significantly over the course of the year.

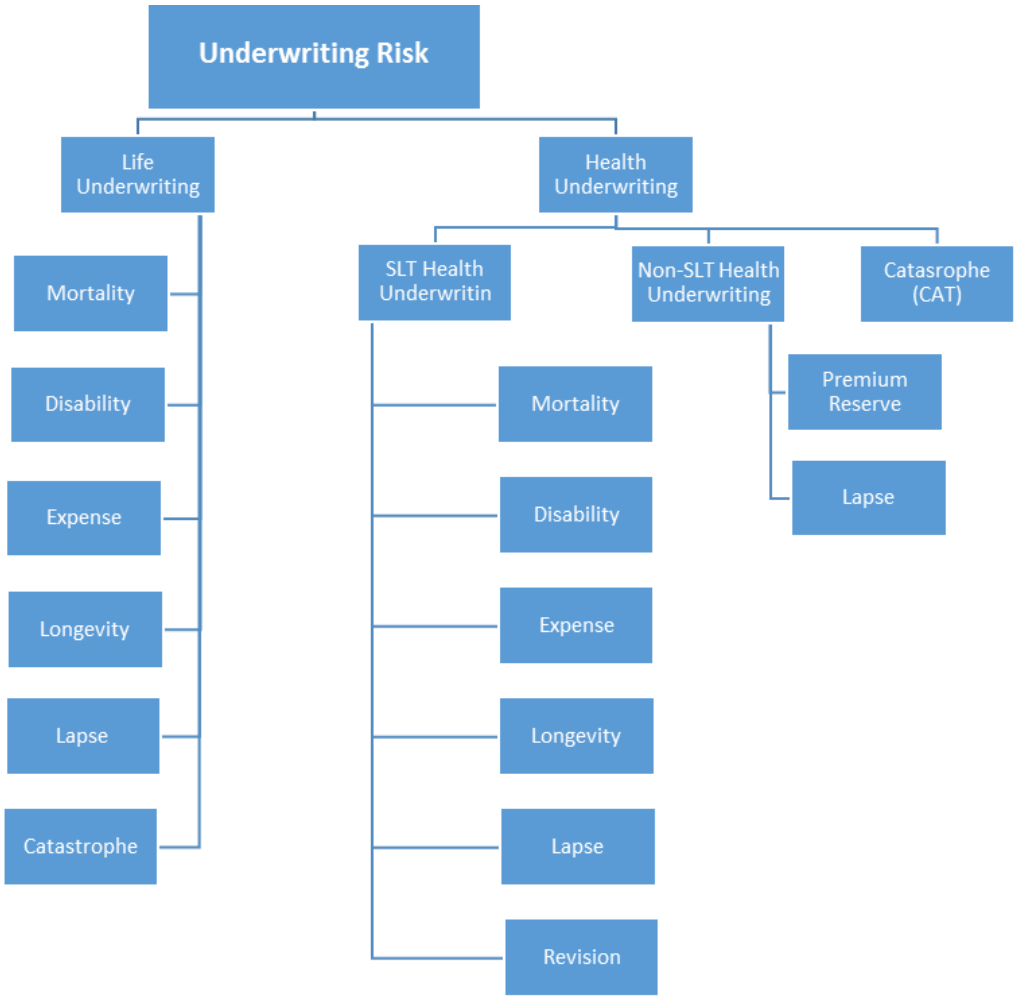
The Risk Management Function has an ongoing project in place to identify at all times the Company wide risks. All the risks that the Company is exposed to or could be exposed to in the future are documented, categorised and assessed based on the severity of adverse impact that they could have on the Company if they were to be crystallized. The result of this assessment is the profiling of risks in different categories of severity.

In Thousands €	**EOY 2018**
SCR Coverage Ratio	**220%**
MCR Coverage Ratio	**130%**
Own Funds	**4.816**
MCR	**3.700**
SCR	**2.193**
BSCR	**1.922**
SCR Operational	271
SCR Market	1.549
SCR Life	492
SCR Health	215
SCR Counterparty	286

The Solvency II capital position of CNP Zois under normal and stressed scenarios (excluding extreme risks that did not materialise) was adequate to support its capital and business goals in the reporting year 2018.

The Company's Board of Directors approves the Solvency II coverage ratio and examines the Company's profile both from regulatory and economic capital viewpoints.

C.1. Underwriting Risk



Underwriting risk is the risk of loss or unfavourable change of the value of the liabilities of insurances resulting from an increase of the claim rate not anticipated during the pricing or during the acceptance of the risks.

The underwriting risks quantified under Pillar 1 are Life and Health underwriting risks, which are the risks arising from the life and health insurance obligations, in relation to the perils covered as well as the processes used in the conduct of business. They include the risk resulting from uncertainty included in assumptions about exercise of policyholder options like termination options.

The Life and Health underwriting risk modules take account of the uncertainty in the results of undertakings related to existing insurance and reinsurance obligations as well as to the new business expected to be written over the following 12 months.

A standardised approach in line with the EIOPA specifications was followed by the Company for calculating the solvency capital requirement for life and health underwriting risks looking at the sub-modules shown below.

Mortality Risk

Mortality risk is the risk of loss resulting from a change in value caused by the actual mortality rate being higher than the one expected.

Disability Risk

Disability risk is the risk of loss resulting from a change of value caused by a deviation of the actual randomness in the rate of insured persons that are incapable to perform one or more duties of their occupation due to a physical or mental condition, compared to the expected randomness.

Expense Risk

Expense risk is the risk of loss resulting from a change in value caused by the fact that the timing and/or the amount of expenses incurred differs from those expected.

Longevity Risk

Longevity risk is the risk of loss resulting from a change in value caused by the actual mortality rate being lower than the one expected.

Lapse Risk

Lapse risk is the risk of loss resulting from fluctuations in the frequency of policy lapses.

Premium Risk

Premium risk is the risk of loss resulting from fluctuations in the timing, frequency and severity of insured events. It relates to policies to be written (including renewals) during the period and to unexpired risks on existing contracts. Premium risk includes the risk that premium provisions turn out to be insufficient to compensate or need to be increased. It also included the risk resulting from the volatility of expense payments. Expense risk is implicitly included as part of the premium risk.

Reserve Risk

Reserve risk is the risk of loss resulting from fluctuations in the timing and amount of claims settlements.

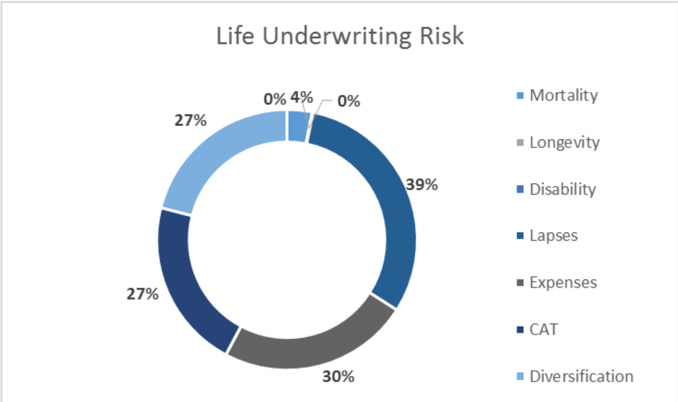
Catastrophe Risk

Catastrophe risk is the risk that a single event or series of events, of major magnitude, usually over a short period, leads to a significant deviation in actual claims from the total expected claims.

Life Underwriting Risk

The capital requirement for Life Underwriting risk is the sum of the life underwriting risk components plus the diversification effect between the components. The life underwriting risk components are the mortality risk, longevity risk, disability risk, lapse risk, expenses risk and catastrophe risk.

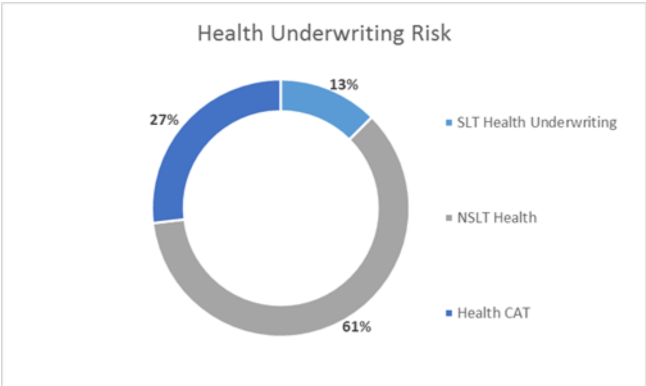
Lapse Risk contributed the greatest to the Life Underwriting risk of the Company with 39%. The impact of diversification was around 27%.



Health Underwriting Risk

The capital requirement for Health Underwriting risk is the sum of the Health Underwriting risk components plus the diversification effects. The Health Underwriting risk components are the similar to life technique underwriting risk, the non-similar to life technique health risk and the health catastrophe risk.

Health Non-Similar to Life contributed the greatest to the Health Underwriting risk with 61%. The impact of diversification is around 21%.



Changes over the reporting period

The Company's portfolio of insurance products has improved over the reporting period. The Gross Written Premiums of the Company have increased by 97% coming from Savings business (123% increase) and Medical Expense business (90% increase).

The Solvency Capital Requirement per risk as described above for the years ended 2018 and 2017 are shown below:

	SCR Life	
In Thousands €	**31/12/2018**	**31/12/2017**
Mortality	27	37
Longevity	0	0
Disability	1	0
Lapse	262	331
Expenses	202	278
CAT	180	339
Diversification	*-179*	*-271*
SCR Life Underwriting	**492**	**714**

The SCR Life has decreased by 31% with CAT risk being the greatest contributor to this decrease in the year with 47% (€159k) decrease.

This decrease was mainly due to new data incorporated in the calculations. Life Risk Products Insurance business was the greatest contributor to this decrease.

Mortality Risk and Expenses Risk have decreased by 28% and 27% respectively, mainly due to new data.

	SCR Health	
In Thousands €	**31/12/2018**	**31/12/2017**
SLT Health Underwriting	34	60
NSLT Health	164	88
Health CAT	73	93
Diversification	*-56*	*-62*
SCR Health Underwriting	**215**	**179**

The SCR Health has increased by 20% mainly due to an increase of 85% (€76k) in NSLT Health Underwriting Risk. The increase in NSLT Health Underwriting risk was due to new data incorporated in the calculations.

SCR Health similar to Life has decreased by 44% (€26k), mainly due to new data, whereas Health CAT risk has decreased by 22%.

Risk Mitigation

Underwriting risk (including life and health risks) is taken on in line with the Company's underwriting and pricing expertise, to provide an appropriate level of return for an acceptable level of risk. The Company has a preference for those risks which are more understandable.

The Company's underwriting objective is to maximize earning levels and minimize volatility of earnings, while ensuring that the Company is appropriately compensated for the risks it assumes. This objective is constrained by the Company's target solvency position and the material risks that the Company is exposed to.

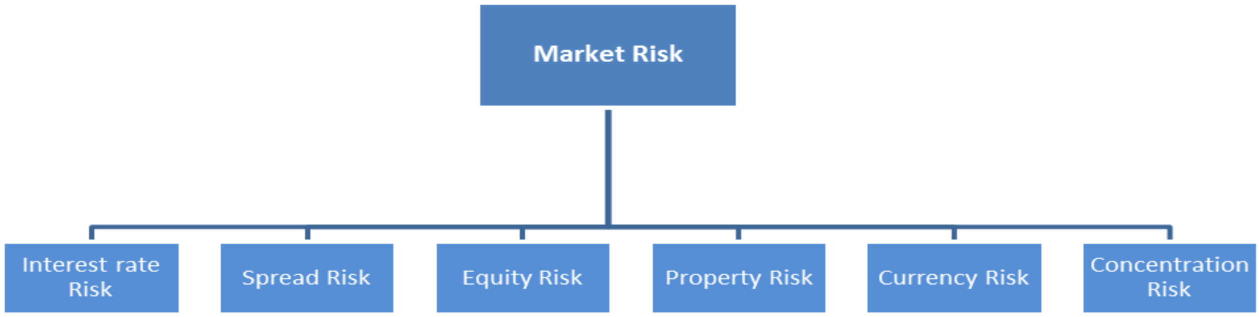
Underwriting discipline and a robust governance process is at the core of the Company's underwriting strategy. The risks arising from underwriting are managed, monitored, reported and controlled in accordance with the Company's overall governance arrangements, which follow the management and oversight of the Company's exposure to underwriting risk.

In the course of the year, CNP Zois has maintained adequate reinsurance arrangements. The reinsurance covers of the Company are both proportional and non-proportional as outlined below.

Reinsurance Treaty	Type of Reinsurance arrangement	Insurance Covers
Individual Life	Proportional - Surplus	Life, TPD, AD&D, WoP
New Individual Life	Proportional – Surplus	Life, TPD, AD&D, WoP
Credit Life	Proportional - Surplus	Life, TPD, AD&D, WoP
Group Life	Proportional - Surplus	Life, TPD, AD&D, WoP, LoI, HDA, MedEx
Medical Expenses	Proportional - Quota share	Secondary Health Insurance
Critical Illness	Proportional Surplus	Critical Illness benefits
Cat XL	Non Proportional	Life, TPD, AD&D,
Per Risk XL	Non Proportional	Secondary Health Insurance

During the course of its ORSA process, the Company in addition to the Central scenario performed the ORSA Upward scenario and the ORSA Downward scenario and no further action was decided to be required at the end of the year 2018. Earlier in the year, the Company completed an increase in share capital by €800k.

C.2. Market Risk



Market risk is defined as the risk of loss or of adverse change in the financial situation resulting, directly or indirectly, from fluctuations in the level and in the volatility of market prices of assets, liabilities and financial instruments.

The market risks quantified under Pillar 1 refer to fluctuations that may arise in interest rates, equities, foreign exchange rates (currency) and property as well as spread and concentration risks. Concentration risk relates to all risk exposures with a loss potential which is large enough to threaten the solvency or the financial position of a Company.

These market risk factors may affect a Company's income and the value of its holdings in financial instruments.

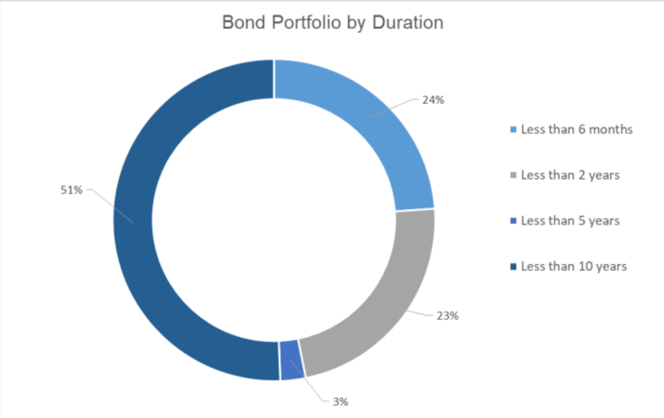
CNP Zois has followed a standardised approach in line with the EIOPA specifications for calculating the solvency capital requirement for market risk looking at the sub-modules shown below.

Interest Rate Risk

Interest Rate risk is the risk of a change in value caused by a deviation of the actual interest rates from the expected interest rates.

On the asset point of view, to calculate the Interest Rate risk the Company estimates the value for each security held separately before and after the shock as described in the standard formula. For individual securities the Company adds the implied yield increase or decrease (depending on the shock) to the actual yield of the asset in order to estimate the market value of the specific asset after the shock.

The figure below shows the mutual funds bond portfolio of the Company by duration:

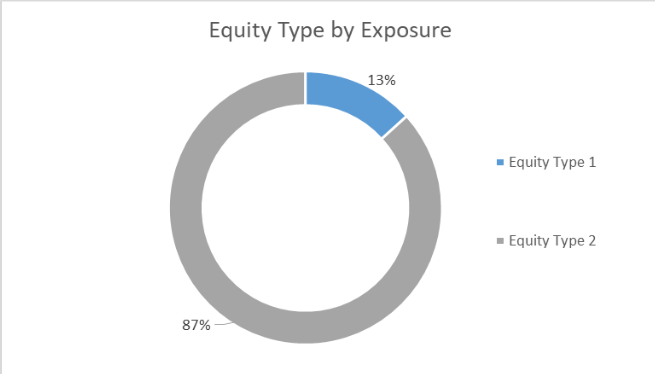


Equity Risk

Equity risk is the risk of a change in value caused by deviations of the actual market values of equities and/or income from equities from their expected values.

For the Equity risk, the Company uses the standard formula which applies a 39% shock for Type 1 equities and 49% shock for Type 2 equities plus the systematic adjustment. Type 1 equities are the equities listed in regulated markets in countries which are members of the European Economic Area (EEA) or the Organisation for Economic Cooperation and Development (OECD). Type 2 equities are equities listed in stock exchanges in countries which are not member of the EEA or the OECD, equities which are not listed, commodities and other alternative investments.

The Company has exposures to Type 1 and Type 2 Equity risk through its mutual fund holdings.



Property Risk

Property risk is the risk of financial loss occurring as the result of owning a real estate investment.

The Company has no exposure to Property Risk as at the end of year 2018.

Spread Risk

Spread risk is the risk of a change in value due to a deviation of the actual market price of credit risk from the expected price of credit risk.

For the Spread Risk calculation, the Company uses for its Funds the value for each underlying bond before and after the shock as described in the standard formula.

The table below illustrates the credit rating of the bond portfolio of the Company.

Credit Rating	AA+ - AA-	A+ - A-	BBB+ - BBB-	B or lower / unrated	Total
Direct Exposure €k	504	585	4.579	510	**6.177**
Indirect Exposure €k	0	1.965	11.806	-	**13.771**
%	3%	13%	82%	3%	**100%**

Currency Risk

Currency risk is the risk of a change in value caused by the fact that actual foreign currency exchange rates differ from those expected.

The Company is exposed to currency risk through its investment in mutual funds,

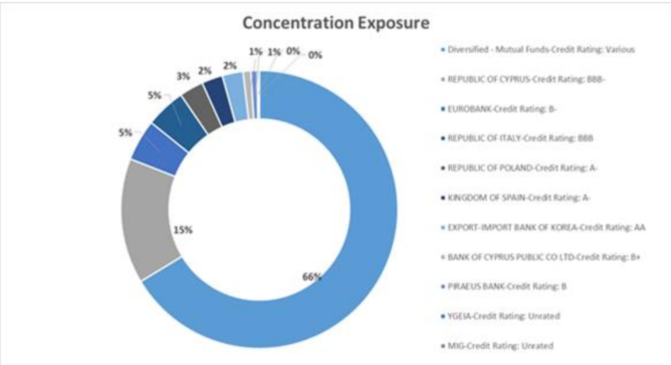
Concentration Risk

Concentration risk is the risk of exposure to increased losses associated with inadequately diversified portfolios of assets and/or obligations.

For the Concentration risk the Company uses the standard formula to calculate the risk that arises from concentrated exposure to a single issuer.

In the reporting period the Company's investment decisions have diverted the emphasis towards yield and capital protection. As a consequence, there was a high increase in concentration risk for a few months.

The figure below illustrates the highest exposures to a single issuer where their risk is borne by the Company:



As shown above there is no material concentration risk in the reporting period due to the Company keeping its portfolio diversified and the majority in mutual funds in order to avoid high concertation to a single issuer.

Changes over the reporting period

The Company is inherently exposed to be adversely impacted by the historically low interest rate environment which is anticipated to continue for an extended period of time. The Company anticipates that financial markets may continue to have periods of high volatility in the short term.

The Company continuously monitors its investment risks through the revision of its TAA and takes action as necessary. The risks from investments affect the ability of the Company to keep the returns promised to its customers as well as pay a return to its shareholders.

Unexpected risks exposures are currently covered by own funds.

The total exposure per risk as described above for the years ended in 2018 and 2017 is shown below:

	Exposure	
	31/12/2018	**31/12/2017**
Interest Risk	22.682	22.578
Spread Risk	22.682	22.578
Equity Risk Type 1	55	39
Equity Risk Type 2	362	949
Property Risk	0	0
Currency Risk	281	524
Concentration Risk	21.337	20.228

The Solvency Capital Requirement per risk as described above for the years ended in 2018 and 2017 is shown below:

	SCR Market	
In Thousands €	**31/12/2018**	**31/12/2017**
Interest Rate	575	21
Equity	187	511
Property	0	0
Spread	1.091	996
Concentration	684	584
Currency	70	131
Diversification	-1.058	-669
SCR Market (After Diversification)	**1.549**	**1.573**

The SCR Market Risk has decreased by 2%. The significant increase observed in interest rate risk this year and the reduction in equity risk arises due to the different composition of the Company's investment portfolio.

The impact of diversification is around 41%.

Risk Mitigation

Risks arising from investments are monitored and controlled through the use of risk limits and via robust governance.

The Company uses its Tactical Asset Allocation to match assets and liabilities in the best possible way allowing for the different objectives (return vs risk) and controlling the market SCRs.

Monitoring Investment risk exposures is a joint responsibility between the three lines of defence in the Investment risk management framework, consisting of prudent and regular review of risk metrics and exposures. All risk monitoring is undertaken in the context of the overarching limit structure, and any limit breaches are quickly and promptly escalated to the required parties.

The BoD bears ultimate responsibility for setting the investment risk strategy and appetite and for the management of the investment risk. The Investment Committee is the BoD's delegated authority to develop and oversee the implementation of the Company's investment strategy, policies and procedures as well as for ensuring the investment decisions are made in a prudent manner and are within the BoD's risk appetite. The Committee provides challenge on investment decisions and on the risks associated with them.

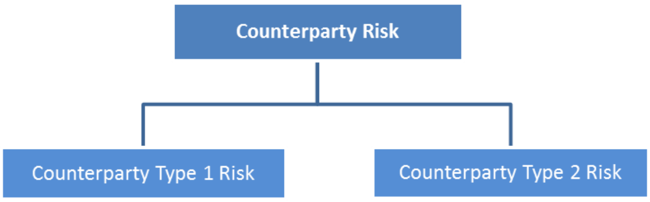
During the course of its ORSA process, the Company in addition to the Central scenario performed the ORSA Upward scenario, the ORSA Downward scenario and Company specific scenarios and no further action was decided to be required at the end of the year 2018.

C.3. Counterparty Default Risk/Credit Risk

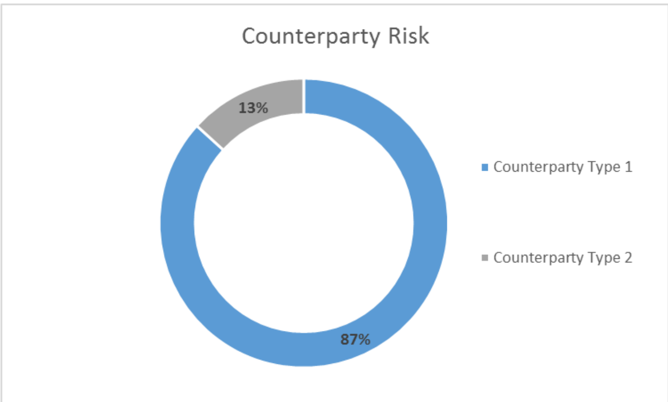
The Counterparty Default Risk is the risk to incur a possible loss due to unexpected default or deterioration in the credit standing of the counterparties and debtors of insurance and reinsurance undertakings over the following 12 months.

This type of risk can reduce the amount of future cash inflows from financial assets on hand at the reporting date.

The Company follows a standardised approach in line with the EIOPA specifications for calculating the solvency capital requirement for counterparty default risk.



The figure below shows the split of SCR Counterparty between the 2 types:



Type 1 exposures consist of the following:

- Risk-mitigation contracts
- Cash at bank

Type 2 exposures consist of all credit exposures which are not covered in the spread risk sub-module and which are not type 1 exposures. The Company's type 2 exposures are its receivables from intermediaries.

The Company is inherently unable to predict all developments which could have impact on this risk; albeit it takes the necessary measures to contain the risk at acceptable levels.

The total exposure per risk as described above for the years ended in 2018 and 2017 is shown below:

Counterparty Risk		
In Thousands €	**31/12/2018**	**31/12/2017**
Counterparty Type 1	255	384
Counterparty Type 2	39	19
Diversification	*-5*	*-5*
SCR Counterparty	**286**	**398**

Counterparty Risk has decreased by 28% (€112k) over the reporting period due to a reduction in assets that fall under the Counterparty risk and specifically cash at bank.

Risk Mitigation

The Company has policies to limit the counterparty default risk by reviewing the credit standing of its reinsurers as well as the level of deposits in reputable financial institutions with good credit standing.

In the reporting period the Company's investment decisions have diverted the emphasis towards yield and capital protection.

Cash exposures are diversified in order to ensure that the counterparty risk remains at acceptable low levels.

Receivables are individually assessed on an ongoing basis for impairment and where deemed necessary a provision is recognised in the Company's financial statements.

The Company's Board of Directors is being informed on counterparty exposures and specific actions are followed up. In addition to the Central scenario, the Company performed scenarios and sensitivity analysis stressing the Company's capital adequacy.

During the course of its ORSA process, the Company in addition to the Central scenario performed the ORSA Upward scenario and the ORSA Downward scenario and no further action was decided to be required at the end of the year 2018.

C.4. Liquidity Risk

Liquidity Risk is the risk of not being able to make payments as they become due because there are insufficient assets in cash form or that can easily be turned into cash at no excessive cost.

This risk may arise when the Company is unable to realise investments and other assets in due time to meet its obligations as well as from significant asset / liability mismatches in relation to duration, currency, nature and timing.

Liquidity Policy and Monitoring Procedures

CNP Zois ensures that we maintain sufficient liquid financial resources to meet its obligations as they fall due through. There is a liquidity risk appetite which requires that sufficient resources be maintained for the Company to manage its day to day operations in the short, medium and long term as well as sufficient buffer of liquid assets for covering sudden liquidity demands that may arise.

Asset Liability Matching is performed to monitor this risk and specific thresholds and stresses are also executed. The duration of the Company's liabilities is considered in the Investment decisions.

An ALM dashboard for normal and stressed market conditions is prepared in line with the Company's Asset Liability Matching (ALM) Policy and presented to the Risk & Reserving Committee.

In the unlikely event of liquidation, 75% of the Company's portfolio may be fully liquidated within one week.

On the asset side the Company's liquidity risk remained low as the Company's portfolio included high traded equities as well as mutual funds with fund managers offering daily liquidity and cash.

C.5. Operational Risk

Operational risk is the risk of loss arising from inadequate or failed internal processes, or from people and systems, or from external events.

It includes legal and compliance risk, which can be defined as the risk of loss arising from non-compliance with laws and regulations, contracts, established practices or codes of conduct, but excludes strategic and reputational risks.

The Company continuously operates, validates and enhances its key operational controls arising from inadequate or ineffective internal processes, people and systems or from external events.

The regulatory environment is fast changing and imposes significant demands on the resources of the Company.

In terms of operational issues, the Company has a moderate appetite for risk. Resources are available to control operational risks to acceptable levels and maintain an operational policy. Other risk mitigants include internal controls, insurance and business continuity plan arrangements.

Internal Fraud

CNP Zois takes all allegations of suspected fraud or corruption perpetrated by its employees very seriously and such are considered and responded fully and fairly as set out in the Code of Conduct. The Company has implemented an electronic tool for Whistleblowing.

External Fraud

CNP Zois takes all allegations of suspected fraud or corruption perpetrated by people outside the Company very seriously and such are considered and responded fully and fairly.

Security of Property and Persons

The Company strives to provide a highly-secure environment for its people and assets by ensuring its physical security measures meet high standards.

Work Health & Safety – The Company aims to create a safe working environment for all its employees.

Legal & Compliance

The Company is committed to a high level of compliance with relevant legislation, regulation, industry codes and standards as well as internal policies and sound corporate governance principles. Identified breaches of compliance will be remedied as soon as practicable.

All legal subjects and court proceedings are handled diligently in the normal course of the business.

Products, Contracts and Customer Relationship

The Company takes very seriously those incidents arising from an unintentional or negligent failure to meet a professional obligation to clients (including fiduciary and suitability requirements); as well as low appetite for losses linked to the nature or design of a product.

Project Management

The Company carefully examines losses arising from failed management of projects either performed by internal resources or from external vendors and service providers.

IT Dysfunctions

Information Technology (IT) risks cover both daily operations and on-going enhancements to the Company's IT systems. These include:

- Processing – Prolonged outage of core systems: The Company ensures the availability of systems which support its critical business functions thus maximum recovery times have been identified and agreed with each business area.
- Security – external or internal attacks on core systems or networks: The Company aims for strong internal control processes and the development of robust technology solutions. The Company has enhanced its information security organizational arrangements.
- On-going Development: The implementation of new technologies creates new opportunities, but also new risks. The Company carefully reviews IT system-related incidents which are generated by poor change management practices.

Execution, Delivery and process management

The Company is committed to ensuring that its information is authentic, appropriately classified, properly conserved and managed in accordance with legislative and business requirements.

Human Resources management

Calibre of People: The Company relies and high quality employees to perform its functions. It aims to create an environment where employees are empowered to the full extent of their abilities.

Conduct of People: The Company expects employees to conduct themselves with a high degree of integrity, to strive for excellence in the work they perform and the outcomes they achieve, and to promote the clients interest. The Company takes very seriously any breaches of its Code of Conduct.

Changes over the reporting period

A standardised approach in line with the EIOPA specifications for calculating the solvency capital requirement for operational risk as presented in the below table. This approach takes into consideration the earned premiums as well as the technical provisions of the Company which does not necessarily capture the full definition of the operational risk as stated above.

	SCR Operational	
In Thousands €	**31/12/2018**	**31/12/2017**
SCR Operational	271	163

The Company takes appropriate and timely steps to prevent and mitigate undue operational risk and financial loss due to weaknesses in processes, people and systems.

It continuously aims to improve further the operational risk framework and all loss events are promptly captured for appropriate action to be taken and promote internal learning.

During the course of its ORSA process, the Company in addition to the Central scenario performed Company specific scenarios and no further action was decided to be required at the end of the year 2018.

C.6. Other Material Risks

Business Risk

Business risk arises because capital is risk sensitive and may vary as business cycles and conditions fluctuate over time.

CNP Zois continuously examines market conditions to which the business is exposed to, and continuously identifies the key sources of risks. Due to the troublesome financial period of the last few years, the entire financial industry globally and in Greece has been affected. As expected, this results to an unstable financial environment. Furthermore, the Country's creditor reviews and the reforms bring additional economic and political instability.

Reputational Risk

Reputational risk could arise from an adverse perception of the image of a company on the part of customers, counterparties, shareholders, media speculation and negative publicity, supervisory authorities and any other stakeholders.

This risk is not ignored by the Company and at an early stage we seek to identify prevent, manage and constraint any threat to its brand or reputation.

Strategic Risk

The strategic risk could occur as a result of adverse business decisions, improper implementation of decisions or lack of responsiveness to changes in the business environment. This risk could impose material threats on the Company's current and prospective earnings.

The BoD is promptly informed on all risk exposures that may arise and where needed action is taken.

During the course of its ORSA process, the Company in addition to the Central scenario performed Company specific scenarios and no further action was decided to be required at the end of the year 2018.

D. Valuation for Solvency Purposes

Valuation Principles

The Company prepares its financial statements under the IFRSs. Accordingly, fair value is already calculated for many of its assets and liabilities (particularly financial instruments) and is then included either directly in the IFRS Statement of Financial Position or disclosed in the notes to the financial statements.

For its Solvency II Statement of Financial Position, the Company uses the fair value of assets and liabilities as calculated for IFRS accounting purposes, insofar as this value complies with Solvency II asset and liability valuation principles.

This ensures that a reliable Solvency II Statement of Financial Position is produced as part of an orderly, well-managed process. It also ensures consistency with the IFRS financial statements.

There are instances where, the value of certain items may be estimated using simplified approaches (e.g. cost price or cost) when those items do not represent significant exposure or when the difference with fair value as calculated under IFRS is not material. The Company is consistent in applying alternative valuation techniques unless the change in method would result in a more appropriate measurement.

Criteria for Active market Identification

Solvency II requires entities to use values obtained from transactions carried out on active markets wherever possible.

If no active market transactions are available, a significant element of judgement will need to be used in the valuation as regards the choice of valuation methods as well as the assumptions, inputs and data to be used. Such an approach must be part of a well-managed process in order to achieve unbiased valuations.

To assess whether a market is active for Solvency II asset and liability valuation purposes, the Company uses the same criteria as in its IFRS accounting process.

For valuations and fair value measurements under IFRS 13-Fair Value Measurement, prices obtained from transactions carried out on an active market should be used where possible. For financial instruments in particular, the Company uses the fair value hierarchy set out in IFRS 13. Instruments classified in Level 1 in the notes to the IFRS financial statements are considered as having been obtained on an active market when preparing the Solvency II Statement of Financial Position.

General principles and rules for classifying items according to the IFRS 13 fair value hierarchy are summarised in the notes to the IFRS financial statements.

The Assets and Liabilities are presented below:

Assets	Statutory Accounts value	Solvency II value	Difference
Deferred acquisition costs	147	0	-147
Deferred tax assets	180	0	-180
Property, plant & equipment held for own use	18	0	-18
Investible Assets	22.396	22.734	338
Loans & mortgages	110	0	-110
Reinsurance recoverables	408	395	-13
Insurance & intermediaries receivables	209	209	0
Receivables (trade, not insurance)	178	178	0
Cash and cash equivalents	1.944	1.606	-338
Total assets	**25.589**	**25.121**	**-468**

Liabilities	Statutory accounts value	Solvency II value	Difference
Technical provisions	16.703	18.209	1.506
Provisions other than technical provisions	66	66	0
Pension benefit obligations	46	46	0
Insurance & intermediaries payables	123	123	0
Reinsurance payables	153	153	0
Payables (trade, not insurance)	1.709	1709	0
Total liabilities	**18.800**	**20.305**	**1.505**

D.1. Assets

Specific Rules for asset valuation and gap between Financial Statements

Deferred Acquisition Costs

The IFRS value was €147k (2017: €189k), whereas in the Solvency II Statement of Financial Position they were valued at nil, based on the SII valuation principles in the EIOPA Guidelines.

Property, Plant and equipment

The IFRS value was €18k (2017: €25k), whereas in the Solvency II Statement of Financial Position there was a nil value. The €18k related to building improvements.

Deferred Tax Assets

The Company had recognised Deferred Tax Asset of €180k (2017: €133k) under IFRS principles mainly related to the damage resulting from the exchange of Greek government bonds (PSI). For Solvency II purposes the Company reduced this asset to nil. Furthermore no Deferred Tax is recognised on Solvency II adjustments.

Loans & mortgages

The IFRS value was €110k (2017: €117k) whereas the value in Solvency II Statement of Financial Position was nil.

Insurance & intermediaries receivables

Insurance & intermediaries receivables are amounts due from customers (i.e. from policyholders) and are recognised initially at fair value and subsequently measured at amortised cost, using the effective interest rate method, less provision for impairment.

The IFRS value was €209k (2017: €61k) being the same value as in the Solvency II Statement of Financial Position.

A provision for impairment of trade receivables is established when there is objective evidence that the Company will not be able to collect all amounts due according to the original terms of receivables. Significant financial difficulties of the debtor, probability that the debtor will enter bankruptcy or delinquency in payments are considered indicators that the trade receivable is impaired. The amount of the provision is the difference between the carrying amount and the recoverable amount. The carrying amount of the asset is reduced through the use of a provision account, and the amount of the loss is recognised in Statement of Comprehensive Income. When an amount is uncollectible, it is written off against the allowance account for insurance receivables. Subsequent recoveries of amounts previously written off are credited in Statement of Comprehensive Income.

The value of the Insurance & intermediaries receivables under SII does not differ from IFRS one.

No provision for impairment was considered necessary as at 31 December 2018.

Reinsurance recoverable

The IFRS value was €408k (2017: €324k) whereas the value in the Solvency II Statement of Financial Position was €395k (2017: €303k).

Amounts recoverable from reinsurers were replaced by the Solvency II reinsurance recoverable amount

Receivables (trade, not insurance)

The IFRS value of Receivables was €178k (2017: €393k) same value as in the Solvency II Statement of Financial Position relating to a receivable from the Greek Tax Authorities.

The Company considers that the IFRS value is not significantly different from the fair value.

Fair value may be determined on a case-by-case basis if the IFRS value is likely to differ significantly from fair value, for example due to the impact of discounting.

Investment Assets

Investment assets were valued at Fair Value for IFRS purposes. The IFRS value of the Company's total Investible Assets was €24.340k (2017: €24.908k) and is detailed below.

The value of the Investment Assets under Solvency II does not differ from IFRS.

Assets Under Management by Asset Category		
In Thousands €	**Market Value 31/12/2018**	**Market Value 31/12/2017**
Equity – In-house	52	35
In-house Bonds	6.177	3.265
Bond Funds	9.011	11.481
Money Market Funds	4.760	4.805
Cash	4.340	5.322
Total Company	**24.340**	**24.908**

The valuation method for each security depends on several factors.

Equities

The very low exposure in equities held by the Company are listed in regulated markets in countries which are members of the European Economic Area (EEA) or the Organization for Economic Cooperation and Development (OECD), therefore the closing price in those markets is used for valuation purposes.

Bonds

The same valuation method applies for government bonds and corporate bonds if the asset is considered liquid. For bonds which are illiquid, the Company uses yields derived from similar securities (from the same issuer) in active markets and with the use of linear interpolation the Company estimated the price of the illiquid securities.

All funds the Company invests in, offer daily liquidity and the price is received by the fund manager or via Bloomberg.

D.2. Technical Provisions

Methods and Assumptions

The Company's portfolio has been analysed and classified after a segmentation process into various homogeneous risk groups for the calculation of Technical Provisions, having regard to the minimum Solvency II Directive groupings.

The following risk classification has been performed:

- Index-linked and unit-linked life insurance
- Life Insurance With Profit Participation
- Other Life Insurance
- Health Similar to Life (HSLT)
- Health Non Similar to Life (HNSLT)

Technical Provisions

Solvency II requires undertakings to set up technical provisions which correspond to the current amount undertakings would have to pay if they were to transfer their (re)insurance obligations immediately to another undertaking. The value of technical provisions is equal to the sum of a best estimate (BE) and a risk margin.

Undertakings should segment their (re)insurance obligations into homogeneous risk groups, and as a minimum by line of business, when calculating technical provisions.

The actuarial and statistical methods to calculate technical provisions are proportionate to the nature, scale and complexity of the risks supported by the undertaking.

The Company does not make use of any transitional measures apart from the volatility adjustment.

Best Estimate of Technical Provisions

The Gross Best Estimate for Life business technical provisions is the result of the present value of gross cash outflows less gross cash inflows. More specifically, cash outflows include claims, maturity payments, surrender payments, expenses, premium tax and commissions.

For the Health NSLT business, Non-life techniques are used. The Best Estimate for Non-Life consists of:

- Premium provisions (cash flow projections related to claim events occurring after the valuation date and during the remaining in-force period of the policies)
- Claim provisions (cash flow projections related to claim events having occurred before or at the valuations date-whether the claims arising from these events have been reported or not).

Premium Provisions

For premium provisions the method used is based on an estimate of the combined ratio of the line of business in question.

Claims Provisions

This is the sum of the total undiscounted indicated claims reserves. The Company has allocated the total expenses in the inforce portfolio and for this reason Claims Handling Expense reserve isn´t included, since it is already included in the premium reserve.

The Best Estimate for Life business is mainly calculated through a dedicated software where all variables are checked. In this software, actuarial models were appropriately set up. For Health NSLT, Best Estimate calculation models were set up in spreadsheets.

Best Estimate of Reinsurance Recoverable

Reinsurance recoverable is calculated through appropriate modelling of the reinsurance arrangements.

Description of Model

Deterministic models are used for all business with the exception of Life with profit participation with interest rate guarantee. For these exceptions the Company uses a stochastic model.

Models are built in the Company's Actuarial software used for the SII projections.

For all Life policies, a contract-by-contract approach has been used and cash flows have been projected until the end of the portfolio (with no residual cash flow).

For the Health business classified as Health NSLT, non-life deterministic models have been used. The actual 2017-2018 data have been used to determine the respective loss ratios gross and net of reinsurance.

Product mapping was performed in the past and must be updated/adjusted to allow for new products or changes to existing products.

The projection models are used for all the activities performed by the Actuarial Function with appropriate adjustments in parameters or run settings.

The Actuarial Function ensures the appropriateness of the methodologies and underlying models used.

Based on the description of the different products, actuarial knowledge and specifications (such as technical specifications of Solvency II and CNP Assurances guidance), appropriate models are set up and variables are created.

Any changes in product description or creation of new product must be taken into account in modelling.

Assumptions

The assumptions used in the models are determined by the Actuarial Function using past experience studies and expert judgement. Assumptions are reviewed and challenged by the Risk and Reserving and Audit and Risk Committees

Economic Assumptions

Yield Curves

Yield curves with volatility adjustment for Greece used are obtained from EIOPA website upon publication while the stochastic scenarios are internal. More specific the modelling of the macroeconomic and financial environment is based on a set of risk factors the evolution of which is foreseen on one or more trajectories. These data are generated using Barrie & Hibbert's economic scenarios generator.

The table below shows the impact of a change to zero of the volatility adjustment on the technical provisions, SCR, MCR and on the Own Funds. Although the Own Funds are reduced if yield curves with no volatility adjustment are used, the impact is small (2,85% reduction in Own Funds).

In Thousands €	With VA	No VA	Results with VA vs No VA
Best Estimate (Net of Reinsurance)	17.641	17.769	99,28%
Risk Margin	173	178	97,03%
Technical Provisions	17.814	17.947	99,26%
SCR	2.193	2.201	99,62%
MCR	3.700	3.700	100,00%
Eligible OF to meet MCR	4.816	4.682	102,85%
Eligible OF to meet SCR	4.816	4.682	102,85%
Own Funds	4.816	4.682	102,85%

Income tax assumptions

The existing tax rate of 29% is used as per the current legislation.

Guaranteed Interest rate

The Company has products with guaranteed interest rates. For the products which the Company has the right to change the level of guarantee, this is done taking into account the current economic conditions, the product loadings and Company´s Tactical Asset Allocation.

Deterministic and stochastic approach

For the technical provisions calculation the Company uses deterministic approach except from the products with profit participation in which the Company does not have the right to change the level of the guaranteed interest rate.

Operational Assumptions

Mortality

The mortality assumption is set based on the 2012 Hellenic Actuarial Association mortality table (EAE2012A).

Disability

The disability assumption was set based on the reinsurance experience in the Greek Insurance Market.

Lapses/surrenders

A study is performed at the end of each year. Data since 2011 are used since previous behaviour is not indicative to project the future experience. The study is performed on a per product level.

Reinsurance premium ratios

For the Life and riders the reinsurance tables of the Company's existing treaties have been used.

Health NSTL business

The loss ratio over the last two years is used for the determination of the premium provision. For claims provisions data over the last 5 years are used as there is no previous business experience.

Expense Assumptions

Expense assumptions were determined using the Company's 2018 experience. This cost was allocated to all inforce policies and benefits. Different weights according to the category of the main benefit and the number of the benefits under the same policy have been used. Expense figures were increased by the inflation rate.

Risk Margin Calculation

The risk margin is a part of technical provisions in order to ensure that the value of technical provisions is equivalent to the amount that insurance and reinsurance undertakings would be expected to require in order to take over and meet the insurance and reinsurance obligations.

The risk margin should be calculated by determining the cost of providing an amount of eligible own funds equal to the SCR necessary to support the insurance and reinsurance obligations over the lifetime thereof.

The rate used in the determination of the cost of providing that amount of eligible own funds is called Cost-of-Capital rate.

In order to calculate the Risk Margin, the calculations of the projected Solvency Capital requirement of the Company in each point in time is required. Due to the complexity of the Risk Margin definition and calculation, a simplified method is used based on European Insurance and Occupational Pensions Authority' s (EIOPA) technical specifications. A simplification using the overall Solvency Capital Requirement for each future year (level 3 of the hierarchy as defined in the relevant technical specifications) is used.

Simplifications

Premium Provisions for Health Non Similar to Life (HNSLT)

Due to the size of the annual renewable in-hospital products (compared to the total portfolio) and the limited risk exposure of the primary care products, simplified models have been used for the calculations of Health Non Similar to Life portfolio based on an estimate of the combined ratio of the line of business in question.

Risk Margin

Due to the complexity of the Risk Margin definition and calculation, a simplified method is used. The Risk Margin is calculated on the basis of the 3rd simplification method, as explained above, which uses the SCR related to Risk Margin at time zero, the Best Estimate of technical provisions at time zero and forecasts of Best Estimate for each future time period.

Gap with Financial Statements

The differences between the Solvency II Technical Provisions (gross of reinsurance) and the financial statements reserves of 2018 and 2017 (gross of reinsurance) for each line of business is presented below:

Technical Provisions In Thousands €	SII EOY 2018	FS 2018	Difference SII EOY 2018 vs FS 2018	SII EOY 2017	FS 2017	Difference SII EOY 2017 vs FS 2017
Unit-linked & index-linked	1.713	1.397	316	2.945	2.385	560
Life - Other life insurance	1.856	1.483	373	2.445	2.129	316
Life insurance with profit participation	13.573	12.722	851	12.121	11.276	845
Health (similar to life)	508	589	-81	785	848	-62
Health (similar to non-life)	559	513	47	389	373	16
Total	**18.209**	**16.703**	**1.506**	**18.686**	**17.011**	**1.675**

Material differences between Solvency II Technical provisions and IFRS Reserves are recorded to the first three lines of business, mainly due to the yield rates constructed by EIOPA and due to the annual rate of return under the stochastic approach.

Main Results

Technical Provisions

Technical provisions of liabilities are defined as the sum of Best Estimate of Liabilities (BE) and Risk margin.

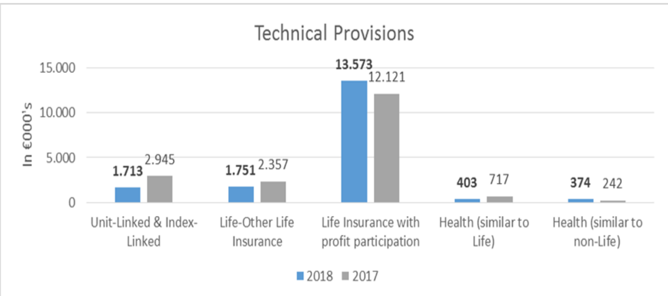
The values of the Technical Provisions of liabilities (Net of Reinsurance) as at the end of year 2018 are presented below based on Solvency II lines of business.

In Thousands €	Technical Provision (Net of Reinsurance)
Unit-linked & index-linked	1.713
Life - Other life insurance	1.751
Life insurance with profit participation	13.573
Health (similar to life)	403
Health (similar to non-life)	374
Total	**17.814**

Life insurance with profit participation is the largest source of business for the Company hence formed 76% of the total Technical Provisions.

Unit Linked and Index Linked as well as Other Life insurance had a 10% contribution each to the Total Technical Provisions.

The figure below illustrates the movement of Net Technical Provisions between 2017 and 2018.



The net technical provisions (total best estimate and risk margin) have been decreased by €569k since EOY 2017.

The decrease is mainly due to one year of less projection and due to the development of new data. It should be noted here, that for unit-linked contracts, net best estimate of technical provisions decreased by €1.232k due to maturities.

Net Best Estimate

The values of the Best Estimate (Net of Reinsurance) as at the end of year 2018 are presented below based on Solvency II lines of business.

In Thousands €	Best Estimate (Net of Reinsurance)
Unit-linked & index-linked	1.696
Life - Other life insurance	1.734
Life insurance with profit participation	13.441
Health (similar to life)	399
Health (similar to non-life)	371
Total	**17.641**

Risk Margin

For the Risk Margin calculation the SCR of the year and the projected best estimates of liabilities for each future year are being used.

The values of the Risk Margin as at the end of year 2018 are presented below based on Solvency II lines of business.

In Thousands €	Risk Margin
Unit-linked & index-linked	17
Life - Other life insurance	17
Life insurance with profit participation	132
Health (similar to life)	4
Health (similar to non-life)	4
Total	**173**

Life Insurance with Profit participation had the largest contribution to Risk Margin being 76% of the total Risk Margin.

Unit Linked and Indexed Linked as well as Other Life Insurance followed with 10% contribution to the total Risk Margin.

Reinsurance Recoverable

Reinsurance Recoverable is defined as the difference of the Gross and Net Best Estimate.

The values of the Reinsurance Recoverable as at the end of year 2018 are presented below based on Solvency II lines of business.

In Thousands €	Reinsurance Recoverable
Unit-linked & index-linked	0
Life - Other life insurance	105
Life insurance with profit participation	0
Health (similar to life)	105
Health (similar to non-life)	185
Total	**395**

D.3. Other Liabilities

Specific Rules for liabilities valuation and gap between Financial Statements

Payables (Trade Not insurance)

The IFRS value of Payables was €1.709k (2017: €2.207k) and under Solvency II does not differ from IFRS. The decrease in the value of payables from last year was due to payments related to Unit Linked products which were outstanding during 2017.

The value of Payables under Solvency II does not significantly differ from IFRS. The Company considers that this IFRS value does not differ significantly from the economic value of the liabilities, since amounts payable are due in the short term (less than one year).

Provisions other than technical

The carrying amount of other provisions, payables and accrued expenses is deemed to be a reasonable approximation to fair value. The IFRS value was €66k (2017: €60k) and under Solvency II the value does not differ from IFRS.

Pension benefit obligations

Pension benefit obligations include the benefits payable to the Company's employees after they retire (retirement compensation, additional pension benefit). The IFRS value was €46k (2017: €42k) and under Solvency II the value does not differ from IFRS.

Insurance & intermediaries payables

The carrying amount of Insurance and intermediary payables is deemed to be a reasonable approximation of fair value. Balances payable include actual account balances due, mainly to the company's distribution network. The IFRS value was €123k (2017: €106k the difference is mainly due to time differences of payments) and under Solvency II the value does not differ from IFRS.

Reinsurance payables

The carrying amount of Reinsurance payables is deemed to be a reasonable approximation of fair value. Balances payable include actual account balances due. The IFRS value was €153k (2017: €46k) and under Solvency II the value does not differ from IFRS.

E.Capital Management

E.1. Own Funds

CNP Zois has a simple share capital structure. It is a wholly owned subsidiary of CNP Cyprus Insurance Holdings Ltd which is owned 50,1% by CNP Assurance S.A. and 49,9% by Bank of Cyprus.

The excess of Capital over Liabilities (Own funds) of the Company under IFRS amounts to €6.789k and consist of:

- Share capital comprised of issued and fully paid ordinary shares.
- Retained earnings which is the cumulative net income not distributed to its shareholder as dividend and
- Other Reserves, not distributable as dividends (AFS reserve).

The Excess of assets over liabilities under Solvency II amounts to €4.816k. The difference compared to IFRS figure is mainly due to the differences in the calculation of Technical Reserves which is calculated based on Solvency II principles.

The capital management plan (management of Own Funds) is defined as a result of the strategic planning exercise, and is part of the overall framework set by this exercise, in terms of dividend payments, capital increase, etc. It takes into account the Solvency projections from the work carried out as part of the strategic planning.

It can be adjusted upon the occurrence of a major event on markets (stress situation in equities, bonds), or affecting CNP Zois (acquisition, business disposal, other event). If the situation requires the full or partial review of the strategic planning exercise, this is revised accordingly.

Based on Company's financial projections as stated in the approved Business Plan, the Actuarial Function Holder performs the Solvency II calculations to ascertain whether the capital levels are adequate to enable the Company to continue as a going concern.

The Finance Function is responsible for preparing the Company's Business Plan, which is then approved by the Board of Directors. The financial projections of the Company are based on the strategic plan and targets set by the Company for the planning horizon, in conjunction and taking into consideration, the external and internal environment that the Company operates in.

The budget is used as an input to the capital planning. Capital planning includes projections of internal capital requirements (Pillar 1 and 2) and Own Funds over the planning period. These projections are calculated based on the projected Statement of Financial Position structure of the Company, reasonable assumptions, parameters, correlations or levels of confidence decided by the Managing Director, General Manager, Actuarial, Finance and Risk Management Functions.

Projected capital requirements are compared with Own Funds so that the Company is able to observe whether the forecasted available Own funds of the Company will be adequate to cover any future strategic actions that the Management intends to take.

Prospective changes in the Company's risk profile and how they affect its current and projected level of solvency requirements are taken into account during the capital planning process. The quality and profile of the Company's own funds over the planning period is also taken into consideration.

The Company monitors the procedure described above and is regularly informed about the outcome of the various calculations performed at each step of the procedure.

Information is also provided to the Risk Management Function to quantify and assess the risks that the Company faces.

Structure, Amount and Quality of Own Funds

Basic Own Funds

The Own Funds of the Company under IFRS amount to €6.789k and under the Solvency II amount to €4.816k.

The table below illustrates the split of Basic Own Funds under IFRS and Solvency II as at the end of the year ended 31 December 2018 compared to the year ended 31 December 2017.

In Thousands €	2018 SII Statement of Financial Position Value	2018 IFRS Statement of Financial Position Value	2017 SII Statement of Financial Position Value	2017 IFRS Statement of Financial Position Value
Ordinary Share Capital (gross of own shares)	9.050	9.050	8.250	8.250
Reconciliation reserve	-4.234	-2.440	-3.732	-1.705
An amount equal to the value of net deferred tax assets	0	180	0	133
Total Basic Own Funds	**4.816**	**6.789**	**4.518**	**6.678**

Solvency II Own Funds as at 31/12/2018 and 31/12/2017

The table below illustrates separate for each tier information about the Own Funds at the end of the year-ended 31 December 2018 compared to the year-ended 31 December 2017 together with the eligible amounts of Own Funds to cover SCR and MCR.

The Company's Own Funds consists of Tier 1 funds.

	2018				2017			
In Thousands €	**Total**	**Tier 1 - unrestricted**	**Tier 2**	**Tier 3**	**Total**	**Tier 1 - unrestricted**	**Tier 2**	**Tier 3**
Ordinary share capital (gross of own shares)	9.050	9.050	0	0	8.250	8.250	0	0
Reconciliation reserve	-4.234	-4.2348	0	0	-3.732	-3.732	0	0
An amount equal to the value of net deferred tax assets	0	0	0	-0	0	0	0	0
Total basic own funds after deductions	**4.816**	**4.816**	**0**	**0**	**4.518**	**4.518**	0	0
Total available own funds to meet the SCR	**4.816**	**4.816**	**0**	**0**	**4.518**	**4.518**	0	0
Total available own funds to meet the MCR	**4.816**	**4.816**	**0**	**0**	**4.518**	**4.518**	0	0
Total eligible own funds to meet the SCR	**4.816**	**4.816**	**0**	**0**	**4.518**	**4.518**	0	0
Total eligible own funds to meet the MCR	**4.816**	**4.816**	**0**	**0**	**4.518**	**4.518**	0	0

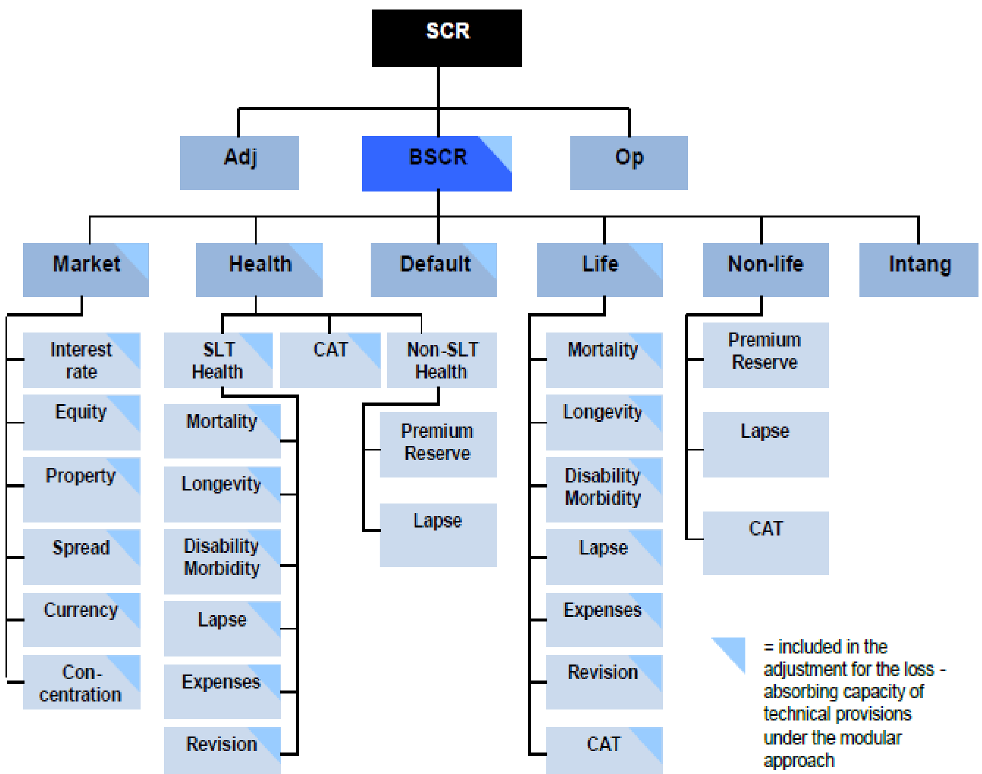
E.2. Solvency Capital Requirement and Minimum Capital Requirement

Solvency Capital Requirement valuation method

The overall Solvency II Capital Requirement is calculated using the standard formula as described in the technical specifications.

The Company's Solvency Capital Requirement (SCR) is composed by:

- The Basic Solvency Capital requirement (BSCR).
- The Operational SCR and
- Allowing for any adjustment for the risk absorbing effect of technical provisions and deferred taxes.



Each SCR module is calculated based on the technical specifications of EIOPA.

The basic idea for the SCR calculation is to look at the values of assets and liabilities using the SII calculation methods before and after each shock. The SCR is defined as below:

$$\text{SCR=max}\left\{\begin{bmatrix}(Market\ Value\ of\ Assets\ Central - Market\ Value\ of\ Assets\ Shock) - \\ (Best\ Estimate\ of\ Liabilities\ Central - Best\ Estimate\ of\ Liabilities\ Shock)\end{bmatrix}, 0\right\}$$

Solvency Capital Valuation Principles

SCR and MCR as at 31/12/2018

Bank of Greece, as the Supervisory Authority pursuant to Article 41 of Law 4364/2016, may require the modification or revision of published Company reports or the publication of additional information, as well as other actions taken by its management.

The total Solvency Capital Requirement (SCR) of CNP Zois as at the end of 2018 was €2.193k with a total Minimum Capital Requirement (MCR) of €3.700k. These amounts are subject to supervisory assessment.

In Thousands €	EOY 2018
MCR	**3.700**
SCR	**2.193**
BSCR	**1.922**
SCR Operational	**271**
SCR Market	**1.549**
Interest Rate	575
Equity	187
Property	0
Spread	1.091
Concentration	684
Currency	70
SCR Life	**492**
Mortality	27
Longevity	0
Disability	1
Lapse	262
Expenses	202
CAT	180
SCR Health	**215**
SLT Health Underwriting	34
Mortality	0
Longevity	0
Disability	31
Lapse	1
Expenses	5
NSLT Health	164
SCR Health NSLT premium and reserve	164
SCR Health NSLT lapse	0
Health CAT	73
SCR Counterparty	**286**
Type 1 Counterparty	255
Type 2 Counterparty	39

SCR as at 31/12/2018

The SCR of the Company is calculated based on the standard formula provided by the Solvency II Guidelines. The analysis of the 2018 by risk module is indicated below.

The SCR of the Company consists of the Basic Solvency Capital Requirement (BSCR) of €1.922k and the Operational SCR of €271k.

The Basic Solvency Capital Requirement is due to the combination of market risk, life and health underwriting risk and counterparty risk after allowing for diversification between and within those risk modules.

The main risk drivers are the market of €1.549k and life risk of €492k given the underlying business of the Company.

The greatest components of market risk is spread risk of €1.091k.

The greater components of life underwriting risk arises from the lapse shock of €262k and expenses of €202k.

SCR has been decreased by 3% during the reporting period compared to the previous reporting period. This decrease is mainly due to decrease in Life and Counterparty Risks.

MCR as at 31/12/2018

The Minimum Capital Requirement calculation is derived as the maximum value between the absolute value MCR and the combined MCR. The absolute MCR based on SII regulation comes up to €3.700k for the life business.

As the combined MCR is lower than the absolute value, the MCR of the Company equals the absolute MCR of €3.700k.

The combined MCR is derived as the lower of MCR cap (45% of SCR) and of the highest of MCR floor (25% of SCR) and MCR linear. The MCR linear is derived in terms of the life and health non-similar to life business. The main inputs used for the calculation of the combined Minimum Capital Requirement are the SCR, best estimates of technical provisions net of reinsurance recoverable, the capital at risk for life business and the written premium over the last 12 months for the health non-similar to life business. The capital at risk is the value the Company will pay in the event of death or disability less the amount of best estimate of liabilities (both net of reinsurance).

In the year 2018, the Company completed an increase in share capital by €800k.

In Thousands €	**31/12/2018**
Linear MCR	883
SCR	2.193
MCR cap	987
MCR floor	548
Combined MCR	883
Absolute floor of the MCR	3.700
Minimum Capital Requirement	**3.700**

In Thousands €	**EOY 2018**	**EOY 2017**	**Percentage Change**
SCR	**2.193**	**2.268**	**-3%**
MCR	**3.700**	**3.700**	**0%**
SCR Operational	271	163	66%
SCR Market	1.549	1573	-2%
SCR Life	492	714	-31%
SCR Health	215	179	20%
SCR Counterparty	286	398	-28%

Appendix I - Abbreviations

The following abbreviated terms are used throughout this Report.

A	
ACPR	Autorité de Contrôle Prudentiel et de Résolution
AD&D	Accidental Death & Death
AFS	Available for Sale
B	
BOC	Bank of Cyprus Public Company Ltd
BoD / Board	Board of Directors of CNP Cyprialife Ltd
BSCR	Basic Solvency Capital Requirement
C	
CAT	Catastrophe
CNP CIH	CNP Cyprus Insurance Holdings Ltd and its subsidiaries
CNP Zois	CNP Zois S.A.
CRO	Chief Risk Officer
D	
Directive	Solvency II Directive
E	
EIOPA	European Insurance and Occupational Pensions Authority
EU	European Union
H	
HDA	Hospital Daily Allowance
I	
IAF	Internal Audit Function
IFRS	International Financial Reporting Standards
IT	Information Technology
L	
LoI	Loss of Income
M	
MCR	Minimum Capital Requirement
MedEx	Medical Expenses
N	
NSLT	Non-Similar to Life Techniques
O	
OF	Own Funds
ORSA	Own Risk Solvency Assessment
Q	
QRTs	Quantitative Reporting Templates
R	
RMF	Risk Management Function
S	
SCR	Solvency Capital Requirement
SFCR	Solvency and Financial Condition Report
SII	Solvency II
Supervisor	Bank of Greece
T	
TAA	Tactical Asset Allocation

TPD	Total Permanent Disability
W	
WoP	Waiver of Premium

Appendix II - QRTs

S.02.01.02
Balance sheet

		Solvency II value
		C0010
Assets		
Intangible assets	R0030	-
Deferred tax assets	R0040	-
Pension benefit surplus	R0050	-
Property, plant & equipment held for own use	R0060	-
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	21.337.162
Property (other than for own use)	R0080	-
Holdings in related undertakings, including participations	R0090	-
Equities	R0100	51.689
Equities - listed	R0110	51.689
Equities - unlisted	R0120	-
Bonds	R0130	6.176.999
Government Bonds	R0140	6.176.999
Corporate Bonds	R0150	-
Structured notes	R0160	-
Collateralised securities	R0170	-
Collective Investments Undertakings	R0180	13.770.469
Derivatives	R0190	-
Deposits other than cash equivalents	R0200	1.338.005
Other investments	R0210	-
Assets held for index-linked and unit-linked contracts	R0220	1.396.563
Loans and mortgages	R0230	-
Loans on policies	R0240	-
Loans and mortgages to individuals	R0250	-
Other loans and mortgages	R0260	-
Reinsurance recoverables from:	R0270	394.694
Non-life and health similar to non-life	R0280	185.058
Non-life excluding health	R0290	-
Health similar to non-life	R0300	185.058
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	209.637
Health similar to life	R0320	104.761
Life excluding health and index-linked and unit-linked	R0330	104.875
Life index-linked and unit-linked	R0340	-
Deposits to cedants	R0350	-
Insurance and intermediaries receivables	R0360	209.315
Reinsurance receivables	R0370	-
Receivables (trade, not insurance)	R0380	177.548
Own shares (held directly)	R0390	-
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	-
Cash and cash equivalents	R0410	1.605.892
Any other assets, not elsewhere shown	R0420	-
Total assets	R0500	25.121.174

Liabilities		
Technical provisions – non-life	R0510	559.443
Technical provisions – non-life (excluding health)	R0520	-
Technical provisions calculated as a whole	R0530	-
Best Estimate	R0540	-
Risk margin	R0550	-
Technical provisions - health (similar to non-life)	R0560	559.443
Technical provisions calculated as a whole	R0570	-
Best Estimate	R0580	555.807
Risk margin	R0590	3.637
Technical provisions - life (excluding index-linked and unit-linked)	R0600	15.936.393
Technical provisions - health (similar to life)	R0610	507.753
Technical provisions calculated as a whole	R0620	-
Best Estimate	R0630	503.838
Risk margin	R0640	3.915
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	15.428.640
Technical provisions calculated as a whole	R0660	-
Best Estimate	R0670	15.279.787
Risk margin	R0680	148.853
Technical provisions – index-linked and unit-linked	R0690	1.712.693
Technical provisions calculated as a whole	R0700	-
Best Estimate	R0710	1.696.056
Risk margin	R0720	16.637
Other technical provisions	R0730	-
Contingent liabilities	R0740	-
Provisions other than technical provisions	R0750	65.734
Pension benefit obligations	R0760	45.771
Deposits from reinsurers	R0770	-
Deferred tax liabilities	R0780	-
Derivatives	R0790	-
Debts owed to credit institutions	R0800	-
Financial liabilities other than debts owed to credit institutions	R0810	-
Insurance & intermediaries payables	R0820	123.255
Reinsurance payables	R0830	152.986
Payables (trade, not insurance)	R0840	1.708.895
Subordinated liabilities	R0850	-
Subordinated liabilities not in Basic Own Funds	R0860	-
Subordinated liabilities in Basic Own Funds	R0870	-
Any other liabilities, not elsewhere shown	R0880	-
Total liabilities	R0900	20.305.171
Excess of assets over liabilities	R1000	4.816.003

S.05.01.01 Non-Life (direct business/accepted proportional reinsurance and accepted non-proportional reinsurance)

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)												Line of Business for: accepted non-proportional reinsurance				Total
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Health	Casualty	Marine, aviation, transport	Property	
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0200
Premiums written																		
Gross - Direct Business	R0110	1.031.660																1.031.660
Gross - Proportional reinsurance accepted	R0120	-																-
Gross - Non-proportional reinsurance accepted	R0130																	-
Reinsurers' share	R0140	119.974																119.974
Net	R0200	911.686																911.686
Premiums earned																		-
Gross - Direct Business	R0210	963.952																963.952
Gross - Proportional reinsurance accepted	R0220	-																-
Gross - Non-proportional reinsurance accepted	R0230																	-
Reinsurers' share	R0240	123.278																123.278
Net	R0300	840.675																840.675
Claims incurred																		-
Gross - Direct Business	R0310	282.011																282.011
Gross - Proportional reinsurance accepted	R0320	-																-
Gross - Non-proportional reinsurance accepted	R0330																	-
Reinsurers' share	R0340	152.784																152.784
Net	R0400	129.227																129.227
Changes in other technical provisions																		-
Gross - Direct Business	R0410	-																-
Gross - Proportional reinsurance accepted	R0420	-																-
Gross - Non- proportional reinsurance accepted	R0430																	-
Reinsurers' share	R0440	-																-
Net	R0500	-																-
Expenses incurred	R0550	598.728																598.728
Other expenses	R1200																	-
Total expenses	R1300																	598.728

S.05.01.01 Life

		Line of Business for: life insurance obligations						Life reinsurance obligations		
		Health insurance	**Insurance with profit participation**	**Index-linked and unit-linked insurance**	**Other life insurance**	**Annuities stemming from non-life insurance contracts and relating to health insurance obligations**	**Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations**	**Health reinsurance**	**Life reinsurance**	**Total**
		C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0300
Premiums written										
Gross	R1410	61.523	2.585.911	-	355.461					3.002.895
Reinsurers' share	R1420	29.849	-	-	105.279					135.128
Net	R1500	31.673	2.585.911	-	250.182					2.867.766
Premiums earned										-
Gross	R1510	210.908	2.585.911	-	448.433					3.245.252
Reinsurers' share	R1520	30.218	-	-	107.792					138.009
Net	R1600	180.690	2.585.911	-	340.641					3.107.242
Claims incurred										-
Gross	R1610	-87.724	4.711	1.307	-92.706					- 174.413
Reinsurers' share	R1620	43.716	-	-	17.902					61.617
Net	R1700	- 131.440	4.711	1.307	- 110.608					- 236.030
Changes in other technical provisions										-
Gross	R1710	-	- 1.442.454	994.460	380.439					- 67.555
Reinsurers' share	R1720	-	-	-	-					-
Net	R1800	-	- 1.442.454	994.460	380.439					- 67.555
Expenses incurred	R1900	207.420	168.171	393.206	683.341					1.452.139
Other expenses	R2500									10.328
Total expenses	R2600									1.462.467

S.12.01.02
Life and Health SLT Technical Provisions

		Insurance with profit participation	Index-linked and unit-linked insurance			Other life insurance			Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Accepted reinsurance	Total (Life other than health insurance, incl. Unit-Linked)	Health insurance (direct business)			Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Health reinsurance (reinsurance accepted)	Total (Health similar to life insurance)
				Contracts without options and guarantees	Contracts with options or guarantees		Contracts without options and guarantees	Contracts with options or guarantees					Contracts without options and guarantees	Contracts with options or guarantees			
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0150	C0160	C0170	C0180	C0190	C0200	C0210
Technical provisions calculated as a whole	R0010	-	-			-			-	-	-	-			-	-	-
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	R0020	-	-			-			-	-	-	-			-	-	-
Technical provisions calculated as a sum of BE and RM																	
Best Estimate																	
Gross Best Estimate	R0030	13.441.129		-	1.696.056		-	1.838.658	-	-	16.975.843		-	503.838	-	-	503.838
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0080	-		-	-		-	104.875	-	-	104.875		-	104.761	-	-	104.761
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	R0090	13.441.129		-	1.696.056		-	1.733.783	-	-	16.870.968		-	399.077	-	-	399.077
Risk Margin	R0100	131.846	16.637			17.007			-	-	165.490	3.915			-	-	3.915
Amount of the transitional on Technical Provisions																	
Technical Provisions calculated as a whole	R0110	-	-			-			-	-	-	-			-	-	-
Best estimate	R0120	-		-	-		-	-	-	-	-		-	-	-	-	-
Risk margin	R0130	-	-			-			-	-	-	-			-	-	-
Technical provisions - total	R0200	13.572.975	1.712.693			1.855.665			-	-	17.141.333	507.753			-	-	507.753

S.17.01.02
Non-Life Technical Provisions

		Direct business and accepted proportional reinsurance												Accepted non-proportional reinsurance				Total Non-Life obligation
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
Technical provisions calculated as a whole	R0010	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	R0050	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Technical provisions calculated as a sum of BE and RM																		
Best estimate																		
Premium provisions																		
Gross	R0060	297.149	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	297.149
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	40.682	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40.682
Net Best Estimate of Premium Provisions	R0150	256.467	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	256.467
Claims provisions																		
Gross	R0160	258.657	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	258.657
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	144.376	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	144.376
Net Best Estimate of Claims Provisions	R0250	114.282	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	114.282
Total Best estimate - gross	R0260	555.807	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	555.807
Total Best estimate - net	R0270	370.749	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	370.749
Risk margin	R0280	3.637	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.637
Amount of the transitional on Technical Provisions																		
Technical Provisions calculated as a whole	R0290	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Best estimate	R0300	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Risk margin	R0310	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Technical provisions - total																		
Technical provisions - total	R0320	559.443	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	559.443
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	185.058	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	185.058
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340	374.385	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	374.385

S.19.01.21

Non-life Insurance Claims Information

Accident year / Underwriting year	Z0020	Accident year [AY] {s2c_AM:x4}

Gross Claims Paid (non-cumulative)

(absolute amount)

Development year

Year		**0**	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10**	**11**	**12**	**13**	**14**	**15 & +**
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160
Prior	R0100																-
N-14	R0110	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
N-13	R0120	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
N-12	R0130	-	-	-	-	-	-	-	-	-	-	-	-	-			
N-11	R0140	-	-	-	-	-	-	-	-	-	-	-	-				
N-10	R0150	-	-	-	-	-	-	-	-	-	-	-					
N-9	R0160	-	-	-	-	-	-	-	-	-	-						
N-8	R0170	-	-	-	-	-	-	-	-	-							
N-7	R0180	6.592	2.128	6	-	-	-	-	-								
N-6	R0190	25.352	5.068	-	-	-	-	-									
N-5	R0200	16.825	23.889	-	-	-	-										
N-4	R0210	67.579	27.571	1.534	-	-											
N-3	R0220	136.342	10.138	-	11.385												
N-2	R0230	92.469	68.078	19.896													
N-1	R0240	101.235	61.174														
N	R0250	93.069															

		In Current year	**Sum of years (cumulative)**
		C0170	C0180
	R0100		-
	R0110	-	-
	R0120	-	-
	R0130	-	-
	R0140	-	-
	R0150	-	-
	R0160	-	-
	R0170	-	-
	R0180	-	8.726
	R0190	-	30.420
	R0200	-	40.715
	R0210	-	96.684
	R0220	11.385	157.865
	R0230	19.896	180.443
	R0240	61.174	162.409
	R0250	93.069	93.069
Total	R0260	185.524	770.331

Gross undiscounted Best Estimate Claims Provisions
(absolute amount)

Development year

Year		**0**	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10**	**11**	**12**	**13**	**14**	**15 & +**
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0310	C0320	C0330	C0340	C0350
Prior	R0100																-
N-14	R0110	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
N-13	R0120	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
N-12	R0130	-	-	-	-	-	-	-	-	-	-	-	-	-			
N-11	R0140	-	-	-	-	-	-	-	-	-	-	-	-				
N-10	R0150	-	-	-	-	-	-	-	-	-	-	-					
N-9	R0160	-	-	-	-	-	-	-	-	-	-						
N-8	R0170	-	-	-	-	-	-	-	-	-							
N-7	R0180	9.586	-	-	-	-	-	-	-								
N-6	R0190	9.810	-	-	-	-	-	-									
N-5	R0200	25.416	10.850	-	-	-	-										
N-4	R0210	38.392	2.942	-	-	-											
N-3	R0220	31.710	20.207	22.207	-												
N-2	R0230	84.185	18.281	27.051													
N-1	R0240	131.023	83.850														
N	R0250	129.725															

		Year end (discounted data)
		C0360
	R0100	
	R0110	-
	R0120	-
	R0130	-
	R0140	-
	R0150	-
	R0160	-
	R0170	-
	R0180	-
	R0190	-
	R0200	-
	R0210	-
	R0220	-
	R0230	27.051
	R0240	83.850
	R0250	129.725
Total	R0260	240.626

S.22.01.21
Impact of long term guarantees measures and transitionals

		Amount with Long Term Guarantee measures and transitionals	Impact of the LTG measures and transitionals (Step-by-step approach)				
			Impact of transitional on technical provisions	Impact of transitional on interest rate	Impact of volatility adjustment set to zero	Without matching adjustment and without all the others	Impact of matching adjustment set to zero
		C0010	C0030	C0050	C0070	C0080	C0090
Technical provisions	R0010	18.208.530	-	-	133.607	18.342.136	-
Basic own funds	R0020	4.816.003	-	-	- 133.585	4.682.418	-
Eligible own funds to meet Solvency Capital Requirement	R0050	4.816.003	-	-	- 133.585	4.682.418	-
Solvency Capital Requirement	R0090	2.192.579	-	-	8.361	2.200.940	-
Eligible own funds to meet Minimum Capital Requirement	R0100	4.816.003	-	-	- 133.585	4.682.418	-
Minimum Capital Requirement	R0110	3.700.000	-	-	-	3.700.000	-

S.23.01.01
Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	9.050.000	9.050.000		-	
Share premium account related to ordinary share capital	R0030	-	-		-	
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	-	-		-	
Subordinated mutual member accounts	R0050	-		-	-	-
Surplus funds	R0070	-	-			
Preference shares	R0090	-		-	-	-
Share premium account related to preference shares	R0110	-		-	-	-
Reconciliation reserve	R0130	- 4.233.997	- 4.233.997			
Subordinated liabilities	R0140	-		-	-	-
An amount equal to the value of net deferred tax assets	R0160	-				-
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	-	-	-	-	-
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220	-				
Deductions						
Deductions for participations in financial and credit institutions	R0230	-	-	-	-	
Total basic own funds after deductions	R0290	4.816.003	4.816.003	-	-	-
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300	-			-	
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310	-			-	
Unpaid and uncalled preference shares callable on demand	R0320	-			-	-
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330	-			-	-
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340	-			-	
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350	-			-	-
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360	-			-	
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370	-			-	-
Other ancillary own funds	R0390	-			-	-
Total ancillary own funds	R0400	-			-	-
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	4.816.003	4.816.003	-	-	-
Total available own funds to meet the MCR	R0510	4.816.003	4.816.003	-	-	
Total eligible own funds to meet the SCR	R0540	4.816.003	4.816.003	-	-	-
Total eligible own funds to meet the MCR	R0550	4.816.003	4.816.003	-	-	
SCR	R0580	2.192.579				
MCR	R0600	3.700.000				
Ratio of Eligible own funds to SCR	R0620	2,20				
Ratio of Eligible own funds to MCR	R0640	1,30				

Reconciliation reserve - S.23.01.01.02

		Total
		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	4.816.003
Own shares (held directly and indirectly)	R0710	-
Foreseeable dividends, distributions and charges	R0720	-
Other basic own fund items	R0730	9.050.000
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	-
Reconciliation reserve	R0760	- 4.233.997
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	-
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	-
Total Expected profits included in future premiums (EPIFP)	R0790	-

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

		Net solvency capital requirement	Gross solvency capital requirement
		C0030	C0040
Market risk	R0010	1.549.195	1.549.195
Counterparty default risk	R0020	286.242	286.242
Life underwriting risk	R0030	492.430	492.430
Health underwriting risk	R0040	214.626	214.626
Non-life underwriting risk	R0050	-	-
Diversification	R0060	- 620.531	- 620.531
Intangible asset risk	R0070	-	-
Basic Solvency Capital Requirement	R0100	1.921.962	1.921.962

Calculation of Solvency Capital Requirement		C0100
Operational risk	R0130	270.617
Loss-absorbing capacity of technical provisions	R0140	-
Loss-absorbing capacity of deferred taxes	R0150	-
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	-
Solvency Capital Requirement excluding capital add-on	R0200	2.192.579
Capital add-on already set	R0210	-
Solvency capital requirement	R0220	2.192.579
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	-
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	-
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	-
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	-
Diversification effects due to RFF nSCR aggregation for article 304	R0440	-

S.28.02.01

MCR components

		MCR components	
		Non-life activities	Life activities
		MCR(NL,NL)Result	MCR(NL,L)Result
		C0010	C0020
Linear formula component for non-life insurance and reinsurance obligations	R0010	60.274	-

Background information

		Background information			
		Non-life activities		Life activities	
		Net (of reinsurance/ SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0030	C0040	C0050	C0060
Medical expense insurance and proportional reinsurance	R0020	370.749	911.686	-	-
Income protection insurance and proportional reinsurance	R0030	-	-	-	-
Workers' compensation insurance and proportional reinsurance	R0040	-	-	-	-
Motor vehicle liability insurance and proportional reinsurance	R0050	-	-	-	-
Other motor insurance and proportional reinsurance	R0060	-	-	-	-
Marine, aviation and transport insurance and proportional reinsurance	R0070	-	-	-	-
Fire and other damage to property insurance and proportional reinsurance	R0080	-	-	-	-
General liability insurance and proportional reinsurance	R0090	-	-	-	-
Credit and suretyship insurance and proportional reinsurance	R0100	-	-	-	-
Legal expenses insurance and proportional reinsurance	R0110	-	-	-	-
Assistance and proportional reinsurance	R0120	-	-	-	-
Miscellaneous financial loss insurance and proportional reinsurance	R0130	-	-	-	-
Non-proportional health reinsurance	R0140	-	-	-	-
Non-proportional casualty reinsurance	R0150	-	-	-	-
Non-proportional marine, aviation and transport reinsurance	R0160	-	-	-	-
Non-proportional property reinsurance	R0170	-	-	-	-

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Linear formula component for life insurance and reinsurance obligations

		Non-life activities	Life activities
		MCR(L,NL)Result	MCR(N,L)Result
		C0070	C0080
Linear formula component for life insurance and reinsurance obligations	R0200	-	822.995

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

		Non-life activities		Life activities	
		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0090	C0100	C0110	C0120
Obligations with profit participation - guaranteed benefits	R0210	-		13.441.129	
Obligations with profit participation - future discretionary benefits	R0220	-		-	
Index-linked and unit-linked insurance obligations	R0230	-		1.696.056	
Other life (re)insurance and health (re)insurance obligations	R0240	-		2.132.860	
Total capital at risk for all life (re)insurance obligations	R0250		-		384.300.670

Overall MCR calculation

		Overall MCR calculation
		C0130
Linear MCR	R0300	883.269
SCR	R0310	2.192.579
MCR cap	R0320	986.660
MCR floor	R0330	548.145
Combined MCR	R0340	883.269
Absolute floor of the MCR	R0350	3.700.000
Minimum Capital Requirement	R0400	3.700.000

Notional non-life and life MCR calculation

		Non-life activities	Life activities
		C0140	C0150
Notional linear MCR	R0500	60.274	822.995
Notional SCR excluding add-on (annual or latest calculation)	R0510	-	2.192.579
Notional MCR cap	R0520	-	986.660
Notional MCR floor	R0530	-	548.145
Notional Combined MCR	R0540	-	822.995
Absolute floor of the notional MCR	R0550	-	3.700.000
Notional MCR	R0560	-	3.700.000

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