Irish Life

Irish Life
IRISH LIFE CENTRE

Solvency and Financial Condition **Report 2021**

Helping people build better futures

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SUMMARY

Purpose of the solvency and financial condition report

This report will help you better understand our regulatory capital and financial position following the European-wide Solvency II regulations introduced on 1 January 2016. To help with your understanding, the appendices to this report also detail seven specific Quantitative Reporting Templates (QRTs) for the company in the predefined format needed under the regulations. The specifics of these templates are discussed in more detail across various sections of this report including sections A.2 (Underwriting Performance), A.3 (Investment Performance), D (Valuation for Solvency Purposes) and E (Capital Management).

It also covers how we are run, as well as a description of our business and performance, system of governance, risk profile, valuation for Solvency II purposes and our approach to capital management.

About us

Irish Life Assurance plc ('ILA', 'we') is at the heart of the Irish Life Group ('Irish Life'). For more than 80 years Irish Life has helped people to confidently prepare and plan for their future. As one of Ireland's leading financial services brands, Irish Life now takes care of over 1.3 million customers. It provides a range of innovative health and financial solutions, supported by the highest quality customer care.

Irish Life is proud to be a part of the Great-West Lifeco group of companies, one of the world's leading and most secure life assurance organisations. Great-West Lifeco and its subsidiaries - including the Great-West Life Assurance Company which was founded in Winnipeg, Canada, more than a century ago - have around $2.3 trillion Canadian dollars in consolidated assets under administration. They are members of the Power Financial Corporation group of companies.

Irish Life Assurance plc remained both operationally and financially resilient throughout 2021, despite the challenges presented by the COVID-19 pandemic. This can be seen in the overall performance detailed in Section A (Business and Performance) and is a testament to the resilience of our workforce throughout these unusually challenging times.

Our purpose and vision

Irish Life's purpose is to help people build better futures. We do this by helping people take care of their health and financial well-being, so that they feel empowered to look to the future with more certainty and confidence.

Irish Life's vision is to be Ireland's home of Health and Wealth. To achieve this vision we provide our customers with the highest quality advice and guidance, that anticipates their changing needs at each stage of their life. This is backed by market leading product solutions and the highest standards of customer care.

Our ExO Innovation Hub is a key part of the delivery of Irish Life's vision into the future. It represents our commitment to ensuring we continue to use leading edge technology and digital solutions to meet our current and future customers' changing needs.

Our growth and strategy

At Irish Life, we combine the experience and security that comes with our 80 year heritage with a modern and customer focused approach to how we do business. We believe that both the best people and the best technology are needed to give the best levels of financial and customer service.

Since the start of the current strategy cycle, Irish Life has managed to have a good balance between going ahead with the most important strategic initiatives and reacting to the economic challenges associated with COVID-19, by changing our initiatives. In 2021, our business has exceeded target earnings and sales for individual customers are running above both 2019 and 2020 levels. Digital-based advice processes for customers are now firmly embedded as part of the Irish Life way of doing business. Once again, in 2021 we actively reviewed and amended our strategy to accelerate developments that would help our customers and advisers face the challenges presented by the current economic climate.

As Ireland emerges steadily from the pandemic, we are confident that Irish Life will continue to be recognised as Ireland's home of health and wealth. Our Future of Work strategy will present a vision of how we will operate as a community for the foreseeable future. A lot of work has been done on embedding a framework for sustainability and corporate social responsibility (CSR) within the Irish Life group of businesses. We have relaunched the Irish

Life website and expanded our well-being offering with the launch of WorkLife, a corporate wellness platform. Our Mylife app continues to prove popular with nearly 150,000 registered users. The pandemic continues to highlight the importance for us all to manage our mental, physical as well as financial well-being, and supporting our customers as well as our employees and their families is a critical part of our strategic programme.

When it comes to growth, generating key insights into our customers' needs is being supported by our connected data centre of excellence which works together with our customer, digital and business teams. Irish Life acquired a further business for the intermediary business unit with a view to growing into a significant player in the wealth market. Within the insurance business, Irish Life have acquired Ark Life Assurance dac to enhance our share of the life market for individual customers. Our sister company, Irish Life Investment Managers Ltd ('ILIM'), who manages our investment business, continues to be a market leader in providing Environmental, Social and Governance (ESG) responsibly managed investment funds. The investment in these initiatives is being supported by the continued delivery of operational efficiencies across all aspects of our business.

The success of these initiatives can be seen by our increased customer satisfaction measures and the retention of our #1 market share position with ILA now having a 34% market share.

Our values and achievements

Our purpose and vision are supported by our four values - Customer First, Integrity, Professional People and Respect & Reward. This section shows examples of how our values were carried out during 2021.

Customer First

We keep our promises to our customers and always keep their interest in mind.

Integrity

We are committed to the highest standards of good governance and business ethics.

Professional People

We deliver on Customer expectations through continuous development and improvement to maintain the highest standards throughout our organisation.

Respect & Reward

People feel respected, supported and rewarded for positively contributing to our shared success.

Customer first

Helping people build better futures

We are passionate about helping people build better futures. Every day, all over the country, our financial advisers and distribution partners give clear financial advice to individuals, small to medium-sized enterprises (SMEs) and corporates. We are there for people when they need us most. In 2021, we paid out €281 million (2020: €272 million) in claims to our customers and their families affected by injury, illness and death. We paid €163 million (2020: €153 million) in 2,208 (2020: 2,093) life insurance claims, a further €53 million (2020: €50 million) in specified illness cover claims and another €59 million (2020: €64 million) in income protection claims.

At the end of 2021, we had €27.9 billion (2020: €23.7 billion) in funds under management for our pension customers and during 2021, we made payments related to pension products of €1.4 billion (2020: €1.1 billion).

Our key investment funds range is Irish Life Multi Asset Portfolio Solutions (MAPS®), at the end of 2021 funds under management in MAPS® across Pensions and Investment contracts were €13.6 billion (2020 €11.9 billion).

Delivering top class customer service

A key goal and focus for our business is to deliver outstanding levels of service for customers and business partners. We're extremely proud of the way our teams demonstrated our core value of 'customer first' throughout 2021 and really stepped up and continued to support our customers through the unprecedented challenges of COVID-19. While most of our people worked remotely during 2021, we continued to deliver the highest standards of service to our customers and business partners.

During 2021, we continued providing a range of customer focused solutions (introduced during 2020) such as payment breaks and deferral options for customers' plans and we made sure that all claims were handled sensitively and in a suitable way to support customers who were experiencing challenges from COVID-19. We kept up continuous availability of our human and digital service channels throughout this period.

We invested in new technologies to improve service and our new telephony and communications platform has enabled more seamless integration of voice, web chat and digital channels across our different business divisions. This will make it easier for our customers and business partners to connect with us through their channel of choice and support continuous improvement in our customer experience.

We use an external market research company to continuously measure customer satisfaction with our service. Our award-winning customer experience programme, called Intouch, is based on the 'perfect experience' model which focuses on how specific actions and behaviours can deliver a better customer experience and increase customer satisfaction. Despite the challenges of working remotely we achieved an overall customer satisfaction score of 86.6% from our individual customers in 2021. We are very proud of this achievement as it keeps us in the top quartile for customer satisfaction (as measured by The

Leadership Factor Customer Satisfaction Index) and it also shows the importance of continuing to listen and respond to our customers' feedback in these uncertain times.

We use the same external company to measure customer satisfaction every month for our corporate customers, researching our corporate customers across key points of contact between us and the customer. In 2021, we also expanded our 'Voice of the Customer' programme. The 'Voice of the Customer' committee is comprised of colleagues from operations, member engagement and marketing, with the common aim to drive better customer experience and increase satisfaction. Some great initiatives were rolled out by this committee throughout the course of this year, the aim being to create a better customer experience and increase satisfaction in this area. In 2021, we achieved a customer satisfaction score of 81.8% for our corporate customers.

At the 2021 Irish Pension Awards, we were winners of the 'Excellence in Defined Contribution' award.This award was retained from last year, which was an excellent achievement.

Other awards received in 2021:

- Our sister company, ILIM (which provides ILA with asset management services and expertise) were winners of the Risk Management provider of the Year at the 2021 Irish Pension Awards.
- Our parent company, Irish Life Group won the following awards:
    - Digital Media Awards - gold award for social video and silver award for best media strategy (for our Smart Invest product).
    - Advertising Effectiveness award for our brand campaign for 'Embracing Change'.

Focussing on Innovation

Irish Life's ExO Hub innovation centre continues to experiment with next generation technologies and develop solutions for customers.

One area of focus is in Artificial Intelligence (AI) Technologies and how these can support delivering improved business processes and enhanced experiences for our customers when dealing with Irish Life.

The ExO Hub makes the most of our partnership with Plug and Play in the broader Insurtech community, to connect us with Insurtech and Fintech start-ups that we can match with our business to solve real customer needs. Irish Life is also a founding member of InsTech.ie, an Insurtech hub in Ireland established during 2021.

During 2021, Irish Life also launched a new direct to customer investing solution (Smart Invest) to help Irish people get better value from their deposit savings. Smart Invest has been taken up well in the next generation age group (those aged 20-35 years), a key focus area. Over half of all Smart Invest sales to date are from this age group. Smart Invest quickly became our top selling product through our digital channel for individual customer sales (making up 35% of total digital sales to individual customers).

Respect and reward

Since 2018, we have measured our employee engagement using an annual survey. The results across the group show that our employees are highly engaged and 95% have confidence in the future of the company. Our results benchmark very well against the international and European norms for our sector and wider industry. Our confidence in leadership scores place us in the top 75th percentile of companies globally. When this was analysed, our strong engagement score is seen as the result of confidence in leadership, strong communication (both leadership-level and local line of business level), manager effectiveness (managers attention to employees), a values based environment (employees are treated with respect and free from harassment) and competing effectively (meeting customers needs and making changes to compete).

We recognise that diversity makes us stronger and drives our success and growth as individuals and as a business. Our Irish Life Diversity, Equity and Inclusion (DEI) leadership group acts to champion DEI across all our campuses, and to bring together our different perspectives and capabilities.

This year we have developed three new DEI Employee Resource Groups (ERGs) to the two already established groups, which enables employees to come together to support change and connection in an area that impacts them or are passionate about. These groups also provide a direct line for the organisation to all employees to have a voice regarding diversity issues, staff needs policy adjustments and an opportunity to celebrate national and international Diversity and Inclusion days.

Our five DEI ERGs are:

- **Pride in Diversity** - Driving LGBTQI+ representation and inclusion to create an environment of belonging and connecting LGBTQI+ colleagues and allies.
- **Woman@Work** - Supporting, empowering, and connecting women. Ensuring we continue our progress in providing balanced representation across our business.
- **Race, Ethnicity and Multiculturalism** - A space to celebrate our differences in race, ethnicity and culture and help all staff become race conscious, increase confidence in talking about race and ethnicity.
- **Family Life** - The reality of family life is changing, hybrid work is here to stay, and we all have diverse family needs to juggle with work. Our Family Life Group is about creating an inclusive workplace and supporting employees who are family carers, parents, becoming parents, on the journey to parenthood, to ensure you and your family however it is shaped will have the support needed now and into the future.
- **Able Life** - Championing the value of diversity and inclusion and creating an accessible and inclusive employee experience for colleagues of all abilities.

We have a DEI strategy in place for 2021 and 2022 which has been signed off by our senior leadership team and both the ILA and the Irish Life Board. This is an ambitious strategy to focus our goal of being a DEI thought leader in our industry.

Key DEI achievements during 2021 are as follows:

- We have developed an LGBTQ+ Allyship guide which was published across our intranet in January 2021 and in November 2021 launched our 'Transitioning in the Workplace Policy' and worked with our partners BeLonG To, providing training and education for our HR Business Partners, DEI Champions and Pride In Diversity Group.
- Diversity & Inclusion days celebrated across our business including a video celebrating International Men's Day with colleagues from across our campus celebrating positive male role models in their lives and celebrating International Day of Persons with disabilities, with our newly launched Able Life group sharing their reasons for joining the group and what they would like to achieve.
- A series of workshops delivered in partnership with Family Carers Ireland talking about family caring, the journey of a family carer, how it can come upon you unexpectedly and the supports available.
- We continue to run our flagship female leader development programme, running 5 programmes throughout 2021.
- In partnership with Platform 55, we ran a series of family focused workshops throughout the year supporting our employees who are working parents, becoming parents and those on the journey to parenthood. We also ran expert sessions on topics such as 'Setting Boundaries & Managing Guilt', and 'Preparing for Fertility Treatment'.
- Our DEI work has been globally recognised in the Global Role Model Lists for Involve.
- We have setup a DEI Advisory Council for Marketing and product review, to ensure we are inclusive and reflect the diversity of our modern Irish society and the communities in which we serve.

Social and Employee Matters

Helping to build secure futures in the wider community is of huge importance to Irish Life's vision and values. Every January, all employees are asked to nominate two charities to benefit from fundraising initiatives. All funds raised by employees for the charities are matched by the group and given to the two chosen charities - details of funds raised over the past two years are outlined in the table below. During the pandemic, our staff charities, ALONE and Larkin Community College, along with many others faced significant funding drops as they were no longer able to run their normal fundraising events. However, due to a number of virtual fundraising events, we raised more funds in 2021 than pre-pandemic levels for our staff charities.

Year	Charities	Amount raised
2021	ALONE and Larkin Community College	€414,000
2020	Laura Lynn Ireland's Children's Hospice and Barretstown	€370,800

During 2021, alongside our support for the two charities voted by our employees, Irish Life have also supported many other charities and initiatives:

- Sponsored 2,500 vaccines on behalf of Irish Life staff in the UNICEF vaccine support programme;
- Together with our staff donated over €16,000 to local charities the Capuchin Day Centres, St Vincent De Paul and the Salvation Army;
- Donated €15,000 to St Vincent De Paul's Easter campaign;
- Continued to support long standing educational partnerships with Scoil Chaoimhín and the P-Tech programme in Larkin College in our local community;
- Made donations to charities and clubs that our staff are involved with in their local communities through our special donations and club draw initiatives.

Professional People

We are always working hard to attract and retain the most talented people, and to support and develop them throughout their careers. We have annual development programmes and mentoring in place to make sure all employees have an opportunity to develop their careers with us. We look for creative, original thinkers who will challenge us to be the best we can be. As a result, we have built a skilled and enthusiastic workforce with exceptional knowledge and expertise.

Throughout 2021 the majority of our employees have been working from home due to COVID-19 restrictions. The supports and measures introduced in 2020 continued, and were enhanced and adjusted to meet the needs of our employees. Detailed Frequently Asked Questions and supports were given to employees to help them with any queries they had and these were updated regularly as advice from the Government and HSE changed. During 2021 we continued our Health & Safety Home-working Assessments, making sure all employees have the right equipment needed for home workstation set-up and the best possible working from home experience.

Flexible working arrangements which allowed us to maintain our excellent standards of customer service and were agreed between staff and line management in 2020, continued in 2021 for employees with school going children, who were being educated at home, along with those employees fulfilling the role of carers.

Employee engagement and well-being was, and continues to be, a key priority for us to ensure that our staff are well positioned to serve our customers needs. We continue to improve and adapt our communications throughout 2021, including fortnightly online updates from our group CEO. We used numerous inventive ways of engaging within divisions and teams, to make sure we stay connected and informed. We engaged our Employee Assistance Programme provider in 2021 to review and improve offerings and services to all employees in order to help employees deal with issues such as engagement, isolation, anxiety and stress. We continued to give online exercise and yoga classes which were available to all employees, together with webinars on health and well-being, and activities and competitions for employees and their families. As in 2020, the effort and resilience shown by employees in adapting to the new norm was recognised and rewarded throughout the period.

A small number of our employees were required to be physically present due to the nature of their role. During 2021 we ensured the protocols in place throughout our buildings and across relevant processes continued in line with HSE guidelines, and monitored changes needed as public health advice changed. The safety of our employees, customers and suppliers is really important to us.

We maintained our COVID-19 response plan in 2021, which covers the safe return of our employees to the workplace, in line with government protocols. These plans will continue into 2022 and are adapted as government and public health advice changes.

In October 2021 we initiated a Return to Office, commencing with a slow and gradual return of employees as permitted by government advice. These plans were put on hold in mid-November based on revised public health advice and were resumed on 14 February 2022.

During 2021 we started planning on the hybrid work model that we will adopt once we can return to the office in full. These plans will introduce a blended model of work to all staff, whereby employees will split their time between the office and home locations. A Future of Work project group, which is supported by a group of senior Future of Work representatives from across the organisation, was set up during 2021 to develop, drive and implement this model over the coming years. This will be a major change for all employees and we have set up a number of forums, groups and processes through which the change impact is assessed. Engagement with key stakeholders is key to ensure their input and feedback is taken on board as we progress through test and learn.

Integrity

We are committed to best practice Corporate Governance. The Board of Directors is responsible for the governance of ILA and is supported in this regard by an experienced senior management team. In our business, relationships with our customers and stakeholders are based on trust. This is achieved by sticking to our values of Customer First, Integrity, Respect and Reward and Professional People and by ensuring we operate with the highest ethical standards, which are set out in Irish Life's enterprise-wide Code of Conduct which is approved by the Board. The Board oversees compliance with the Code through our Compliance function, who monitor that the code is being adhered to.

We are committed to abiding by the principles of acting honestly, fairly and professionally in the best interests of our customers and stakeholders. An important element of these principles is that we have appropriate arrangements in place designed to prevent potential conflicts of interest from adversely affecting the interests of our customers.

There are Group-wide policies that prohibit any form of bribery, corruption, fraud or money laundering, which all our ILA team must comply with. This is continuously monitored and updated.

We have a Speaking-Up policy as we are committed to the highest standards of openness, integrity and accountability. We believe it is important to have processes that allow all staff, and other people who work with us, to raise any concerns they may have about suspected wrongdoing within ILA in an anonymous way and without fear of any retaliation. This is achieved through a mix of formal group processes which include a confidential anonymous telephone line and through informal local channels.

Executive Sustainability Committee

An Executive Sustainability Committee ("ESC") was established by Irish Life in 2021 to provide leadership on all sustainability aspects within Irish Life. The ESC is comprised of members of the senior leadership team across Irish Life and an independent non-executive director of the ILA and Irish Life Board. It has five work streams that include Diversity and Inclusion, Responsible Investing, Corporate Social Responsibility, Wellness and the Future of Work (including Carbon Neutrality). During the course of 2021, the ESC commissioned a Sustainability Rating from Vigeo Eiris (an independent international provider of environmental, social and governance (ESG) research and services) for Irish Life, receiving an A2 rating. During 2022, the ESC will put in place long term sustainability targets for all aspects of its business.

Sustainable Investments

Our clients trust us with their investments and to meet our core promise to them - to deliver better futures. Over 2021, our sister company ILIM who manages our flagship funds, continued to make further improvements in their leadership in sustainability specifically in the area of climate change. ILIM issued its Climate Action Pledge and published its first progress report on the action it has taken within its investment portfolios. ILIM became one of the first asset managers in Ireland to commit to and report on the actions it is taking in line with the Taskforce for Climate-related Financial Disclosures (TCFD). In addition, with the introduction of the European Union's Sustainable Finance Disclosure Regulations ("SFDR"), ILIM's proprietary solutions all met the new (Article 8) sustainability criteria for sustainable funds including the Irish Life flagship product MAPS which became the only flagship offering in Ireland to meet this new standard.

As at the end of 2021, ILIM has over €35 billion in responsibly managed AUM (which satisfy the SFDR Article 8 criteria), a circa 60% increase from circa €22 billion at the end of 2020 and a 233% increase since the end of 2019.

ILA holds assets of €23.1 billion in ILIM's responsibly managed AUM as at the end of 2021 (2020: €10.7 billion).

Environmental matters

We are fully committed to the management of all aspects of our business to the highest environmental standards throughout all of our corporate buildings. Irish Life has developed an environmental policy which strives to protect the environment from the potential impacts of its activities, products and services and to assist in maintaining and improving the quality of the environment.

The ISO 14001 is the international standard that sets out the need for an effective environmental management system.

In 2018 Irish Life successfully transitioned to ISO14001:2015 which is audited annually, for certain buildings on the Abbey street campus. This certification sets out the criteria and framework that Irish Life follows for an effective environmental management system. Irish Life is required to consider all environmental issues, including power usage, waste management, and the effective use of resources.

As part of the environmental management system we have introduced electric car charging points, LED lighting, colour-coded recycling stations, e-learning ISO training courses, the Government supported bike to work scheme and the Government travel pass scheme.

As part of a drive to reduce the reliance on single use plastic throughout the campus, staff members can now purchase compostable food containers and receive canteen discounts on coffee for using reusable cups, which have been supplied to all staff. We will continue to look for further opportunities in to reduce our reliance on single use plastic on campus.

Our new office in Dundalk is a significant benchmark on how to design an environmentally friendly workplace. Designed from the beginning to be a Near Zero Energy Building, it generates as much energy as it consumes, and in addition to the Leadership in Energy and Environmental Design (LEED) gold standard award, it won the ACEI (Association of Consulting Engineers Ireland) Environmental Sustainability-Built Environment-Large category award for its design. The electricity supply to our main Abbey Street building is through a renewable energy supplier.

We aim to achieve 90% recycling for our corporate buildings, and we exceeded this target in each of the last two years.

Initiatives for Ireland

As Ireland's leading provider of pensions, managing the financial needs of more than 1 million Irish customers, Irish Life is acutely aware of the need to identify opportunities and anticipate challenges of changing demographics. Irish Life is proud of its long standing relationship with The Irish Longitudinal Study on Ageing (TILDA). TILDA's vision is to make Ireland 'the best place in the world to grow old' by studying the health, wealth and quality of life aspects of ageing. TILDA has become a benchmark for longitudinal studies globally. The relevance and importance of its research has increased as awareness of the ageing profile of the Irish population grows. Our purpose in Irish Life is to help people build better futures, and TILDA helps us understand the health, economic and social circumstances of people aged 50 and older in Ireland. Life expectancy in Ireland is now 83 years, we can use the insights from TILDA to make sure people fully enjoy the years approaching and beyond retirement.

Irish Life are CSR (Corporate Social Responsibility) partners with the GAA's Healthy Club Project, which aims to turn GAA clubs into health and wellbeing hubs for communities. During 2021 Irish Life through our 'MyLife' app supported several nationwide steps challenge initiatives which were hugely successful in recognising and rewarding the importance of physical activity and the wellbeing of communities. In the first quarter of 2022 over 28,000 GAA members, from over 600 clubs nationwide, participated in a distance challenge through our app.

During 2021 Irish Life reached agreement to sponsor the Dublin Marathon, as well as the Dublin race series, for the next 3 years up to and including the Dublin marathon in October 2024. Dublin is now the fourth largest marathon in Europe and raises an estimated €9 million annually for charity partners and €26.5 million for the city of Dublin.

Irish Life noted the publication in October of the Report of the Commission on Pensions[1] and its recommendations on the State Pension, Total Contributions Approach, Long Term-Cares and the Retirement Age. Irish Life welcomed the changes made within the Finance Act 2021 to Approved Minimum Retirement Funds and the removal of the 15 year rule for defined contribution schemes transferring into a Personal Retirement Savings Account (PRSA), which are the first steps in the implementation of the recommendations within the Interdepartmental Pensions Reform and Taxation Group[2]. However, it is noted that with the enactment of the IORP II provisions into Irish Law it is now critically important that the other measures set out within the report are implemented as a matter of urgency to provide alternative pensions options to small pension schemes in the market.

As the economy now accelerates as Ireland re-opens, the establishment of the core design blocks and decisions of auto enrolment should be prioritised and the Road Map for Pensions[3] should be progressed. In particular, the quickest and most cost effective structures for implementation should be further explored, while care is taken not to increase the fiscal pensions burden on the State. Rather than incurring cost building an expensive separate IT system, other models that have worked well in other jurisdictions should be examined. In particular, the use of the Revenue Commissioners as the direct link between employers and pensions providers, similar to the New Zealand KiwiSaver, should be investigated. This would reduce costs and simplify administration for all.

Other Information

On February 24th 2022, the Russian President sanctioned an invasion of Ukraine. In the subsequent weeks following the invasion, barriers to trade between Russia and the rest of the world, including EU member states, have been implemented and various Russian financial assets have been frozen. These events have led to general market volatility, with oil and energy prices in particular surging amid supply concerns given Russia's significant share of global commodity and energy supplies. It is expected that this invasion will have an impact on the financial markets, European growth and inflation over the coming weeks. The company will continue to monitor the situation closely as it evolves.

Business and performance

We have detailed our financial performance - which was influenced by market conditions, premium inflow and claims outflows - in section A (Business and Performance).

At the end of 2021, we reported solvency capital, post dividends, that was €694m (2020: €868m) above the €1,179m (2020: €1,142m) Solvency Capital Requirement (SCR).

[1] https://www.gov.ie/en/publication/6cb6d-report-of-the-commission-on-pensions/

[2] https://www.gov.ie/en/publication/98d7f-report-of-the-interdepartmental-pensions-reform-and-taxation-group/

[3] https://www.gov.ie/en/publication/abdb6f-a-roadmap-for-pensions-reform-2018-2023/

Our underwriting performance of €185m in 2021 increased from €69m in 2020. The year-on-year change in this underwriting result was influenced by the impact of stronger equity market performance during 2021 relative to 2020. This is discussed in more detail in sections A.2 (Underwriting Performance) and A.3 (Investment Performance).

After tax, our financial performance generated a profit for the financial year (excluding profits from the participating funds) of €168m (2020: €97m). The profit for the current financial year is driven by favourable morbidity and mortality experience, investment experience and basis changes related to insurance contract liabilities. Our individual and small business customer sales increased in 2021 to €1,888m (2020: €1,336m). Annual Premium Equivalent (APE) sales also increased to €299m (2020: €218m). This increase in sales was due to strong investment sales across all distribution channels.

Our corporate customer sales decreased by 36% to €997m (2020: €1,553m), APE sales decreased to €378m (2020: €433m). This was mainly due to a lower number of defined contribution (DC) sales in 2021.

We calculate our Solvency Capital Requirement (SCR) using the standard formula set by the European Insurance and Occupational Pensions Authority (EIOPA). We control and report solvency capital in line with the capital management and metrics detailed in section E (Capital Management). The table below summarises our year end position.

€m	2021	2020
Tier 1 - unrestricted		
Issued share capital	1	1
Share premium account	340	340
Surplus funds	-	-
Reconciliation reserve	1,562	1,669
Available Own Funds (before foreseeable dividends and adjustments)	**1,903**	**2,010**
Foreseeable dividends, distributions and charges	(30)	-
Ring fenced funds adjustment (Participating Funds)	-	-
Total available Own Funds to meet the SCR	**1,873**	**2,010**
Solvency Capital Requirement (SCR)	1,179	1,142
Solvency ratio	**159%**	**176%**
Minimum Capital Requirement (MCR)	531	514
Eligible Own Funds as a percentage of MCR	**353%**	**391%**

Note: all tables in this document use units of millions and thousands. Because we have rounded the figures, the totals in the tables may not equal the sum of the components exactly.

System of governance

The Board of Directors of ILA is responsible for the governance and oversight of all of ILA's operations and risks. You can find out more about our governance process in section B (System of Governance).

We serve individual customers, small and large corporate customers and other affinity groups. You can find more detail in section A (Business and Performance).

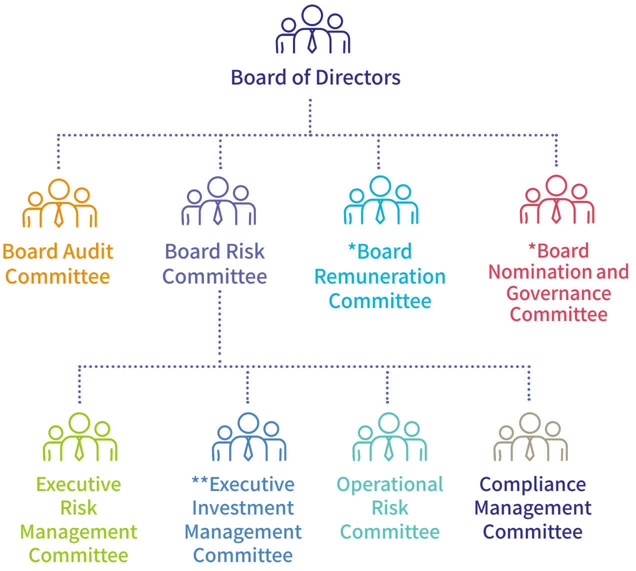
We have two operating divisions: Retail Life and Corporate Life. Retail Life serves individual customers and some small group business. Corporate Life serves larger group business, including corporate customers and affinity groups with a large number of members.

The divisional operations are supported by a number of functions that operate across divisions. These are led by senior executives including the Chief People Officer, Chief Information Officer, Chief Customer Officer and Chief Digital and Innovation Officer. In addition, our control functions work at an ILA level.

Each division has an executive management team, led by a Managing Director who is also the Chief Operating Officer for the division. The Managing Director for each division reports to the Chief Executive Officer of ILA. Each division develops business plans, strategies and annual budgets. There is also an ILA Executive Committee that provides overall leadership for all operational aspects of ILA.

The committees critical to the risk governance structure are set out below.

Governance Structure


Board of Directors
Board Audit Committee
Board Risk Committee
*Board Remuneration Committee
*Board Nomination and Governance Committee
Executive Risk Management Committee
**Executive Investment Management Committee
Operational Risk Committee
Compliance Management Committee

Note: *The Remuneration Committee and Nomination and Governance Committee are constituted at the level of the Irish Life Group, ILA's parent company, and their membership includes some non-ILA directors. ILA relies on these committees, as permitted under the Corporate Governance Code.

**The Executive Investment Management Committee also reports to the Board.

Risk Profile

Our risk profile reflects our main business activities.

We control the way we accept risks, using our expertise to manage them and create shareholder value from them. The Board approves our risk appetite at least once a year, defining a risk preference for all significant risks.

We categorise our risk exposures under major risk headings. The SCR, split by risk category, is as follows:

€m	End 2021	End 2020
Market risk	795	695
Life Underwriting risk	692	717
Health Underwriting risk	228	240
Counterparty risk	42	40
Requirement before diversification	**1,756**	**1,691**
Post diversification	**1,284**	**1,242**
Operational risk	64	62
Loss absorbing capacity of deferred tax	(168)	(163)
Total SCR	**1,179**	**1,142**

Section C (Risk Profile) provides further information.

Risk Management Model

We manage risk using a three lines of defence model.

> **The first line of defence**
This is the business divisions and they are the ultimate owners of the risk. Primarily responsible for day-to-day Enterprise Risk Management (ERM) operations within the established ERM Framework, they identify, measure, manage, monitor and report risk.

> **The second line of defence**
This is the oversight function - including the Risk, Compliance, Actuarial and Finance Functions. The Risk Function oversees the ERM framework, using it to challenge the compliance of the first line of defence.

> **The third line of defence**
This is Internal Audit. This team carries out independent risk assessments of the internal risk control framework and the oversight provided by the second line of defence.

You can find out more in section B.3.2 (Risk management model - three lines of defence).

Valuation for solvency purposes

In section D (Valuation for Solvency Purposes), we explain how we have valued our assets and liabilities under Solvency II regulations. We compare this to our annual audited financial statements, which are prepared under International Financial Reporting Standards (IFRS). The main differences include differences in how various items are valued, including deferred acquisitions costs, intangible assets, deferred front end fees, technical provisions, reinsurance recoverables and deferred tax arising from these.

Section D.2 (Technical Provisions) outlines the way we have calculated the amount we need to meet our contractual obligations under the policies we have written using Solvency II regulations.

Capital management

Our policy is to manage the capital base to a level that enables us to carry out our business plans and meet our growth objectives, within our risk appetite. We actively and regularly review our level of capital and the quality of this capital. We aim to meet all regulatory requirements and maintain customer, investor, creditor and market confidence. Our business planning process, which considers projections over a five year time frame, informs how we manage our capital.

Our ‘Own Funds’ are composed of the excess of our assets over the value of our liabilities. Overall, Available Own Funds have decreased by €137m in 2021 to €1,873m (2020: €2,010m), after taking into account paid dividends during 2021 of €315m (2020: €nil) and planned dividend payments of €30m (2020: €nil) to our parent company.

The SCR increased by €37m during 2021, from €1,142m at 31 December 2020 to €1,179m at 31 December 2021. The solvency ratio reduced from 176% at 31 December 2020 to 159% at 31 December 2021.

Throughout 2021 we were in compliance with the regulatory capital requirements (SCR and MCR).

Further information is provided in section E (Capital Management).

The Board reviewed and approved this report on 1 April 2022.

Denis McLoughlin

Denis McLoughlin,
Chief Executive Officer,
Irish Life Assurance plc

A. BUSINESS AND PERFORMANCE

This section describes our organisational structure and financial performance over the last financial year.

A.1 BUSINESS

Company name

Irish Life Assurance plc

Name and contact details of the supervisory authority who is responsible for financial supervision of the company:

Central Bank of Ireland
New Wapping Street
North Wall Quay
Dublin 1.

We are a wholly owned subsidiary of Canada Life Limited, a U.K. registered company, via our immediate parent, Irish Life Group Limited. The supervisory authority of Canada Life Limited is the Prudential Regulation Authority (PRA).

The contact details for the PRA are:
20 Moorgate
London, EC2R 6DA.

Name and contact details of the external auditor of the company is:

Deloitte Ireland LLP
Chartered Accountants and Statutory Audit Firm
Deloitte & Touche House
Earlsfort Terrace
Dublin 2.

Irish Life Assurance plc (ILA) is a member of the Great-West Lifeco group of companies, one of the world's leading life assurance organisations.

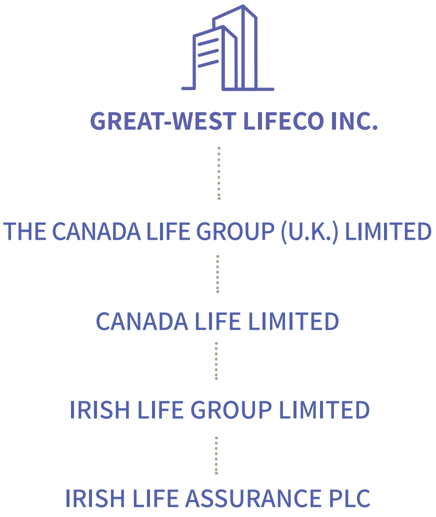
Great-West Lifeco (Lifeco) and its subsidiaries, including The Great-West Life Assurance Company (GWL), have approximately $2.3 trillion Canadian dollars in consolidated assets under administration and at the end of 2021 had approximately 24,500 employees worldwide and are members of the Power Financial Corporation Group of companies. GWL is a wholly owned subsidiary of Lifeco which is incorporated in Canada and listed on the Toronto Stock Exchange.

Lifeco is the indirect parent company of The Canada Life Group (U.K.) Limited (CLG). CLG is the parent company of Canada Life Limited (CLL) which is a U.K. based insurance company.

CLL acquired Irish Life Group Limited in 2013. The Irish Life Group has a number of subsidiaries, and is subject to Solvency II group supervision as the insurance holding company for ILA and Irish Life Health.

Irish Life Investment Managers Limited, Canada Life Asset Management Limited, and Setanta Asset Management Limited are sister companies within CLG. They provide ILA with asset management services and expertise.

Below is a simplified diagram of how our parent company is organised.



GREAT-WEST LIFECO INC.

THE CANADA LIFE GROUP (U.K.) LIMITED

CANADA LIFE LIMITED

IRISH LIFE GROUP LIMITED

IRISH LIFE ASSURANCE PLC

We are the largest life and pensions group in Ireland, serving over 1.3 million customers. The Irish Life brand is one of the most established and recognised financial brands in Ireland. Our strong brand is thanks to our large distribution network, product innovation, flexibility and strong investment performance.

We operate through two main divisions, Irish Life Retail (Retail Life) for our individual and small business customers and Irish Life Corporate Business (Corporate Life) for our corporate customers. Our market share in 2021 was circa 34% (2020: circa 40%).

We provide pensions, life and investment products to individual and small business customers in Ireland. We lead the market with a comprehensive product range spanning protection, pensions, investment and regular savings products. We have the largest and most diverse distribution network of any life assurance company in Ireland, and have the largest direct sales force.

We have a multi-channel distribution strategy. This means that sales are split between:

- independent brokers and independently regulated tied agents
- tied agents in bank branches
- Our employed and self-employed sales force.

We have well established bancassurance arrangements with a number of Ireland's banks which gives us access to the largest network of bank branches in Ireland. There will be significant change in the banking sector during the next two years, with exits from the market and reviews of the distribution strategy. Our total sales for individual and small business customers in 2021 of €1,888 million has increased from last year (2020: €1,336 million) due to strong investment sales across all distribution channels.

We use an external company to help measure customer service every month. At the end of 2021 we achieved a score of 86.6% (2020: 85.9%). This keeps us in the top quartile of companies for customer satisfaction based on a league table of over 700 companies across all business sectors in Ireland and the U.K.

We sell pensions and risk products to our corporate customers, namely employers and affinity groups in Ireland, through direct, pension consultants and brokerage channels.

The key drivers of sales growth for corporate customers are:

- employment and salary growth in the Irish economy.
- the move towards defined contribution pensions, away from defined benefit pensions.
- the de-risking of defined benefit pension liabilities through bulk annuity and bulk personal retirement bond buyouts.

Our corporate customer sales decreased by 36% to €997 million, compared to €1,553 million in 2020, mainly due to a lower number of defined contribution (DC) sales in 2021.

A.2 UNDERWRITING PERFORMANCE

We prepare our financial statements under International Financial Reporting Standards (IFRS), as adopted by the European Union. The information in this section about underwriting performance is provided on an IFRS basis.

Underwriting performance

The tables below show the premiums, claims, expenses, and change in technical provisions, combined with the investment return for each of the Solvency II lines of business. We refer to the total of these items as the "underwriting result" in this report.

	2021				
€m	Health insurance	Insurance with profit participation	Index linked and unit-linked insurance	Other life insurance	Total
Premiums earned (net of reinsurance)	90	1	6,380	289	6,760
Claims (net of reinsurance)	(58)	(7)	(4,753)	(184)	(5,002)
Change in technical provisions (net of reinsurance)	20	(6)	(8,090)	276	(7,800)
Expenses	(30)	-	(253)	(125)	(408)
Investment return	8	11	6,843	(227)	6,635
Underwriting result	**30**	**(2)**	**127**	**29**	**185**

Note: Over 90% of the gross written premiums are undertaken in Ireland.

2020					
€m	Health insurance	Insurance with profit participation	Index linked and unit-linked insurance	Other life insurance	Total
Premiums earned (net of reinsurance)	90	1	5,589	159	5,839
Claims (net of reinsurance)	(67)	(22)	(4,448)	(171)	(4,708)
Change in technical provisions (net of reinsurance)	(40)	3	(2,210)	(25)	(2,273)
Expenses	(28)	-	(263)	(123)	(414)
Investment return	9	(4)	1,332	288	1,625
Underwriting result	**(37)**	**(22)**	**1**	**128**	**69**

Note: Over 90% of the gross written premiums are undertaken in Ireland.

The different lines of business shown in the tables, and the factors which influence their underwriting performance, are explained as follows:

1. Health insurance: This line of business includes group and individual income protection business and group stand-alone serious illness business. The underwriting performance is influenced by:
   - changes in our morbidity experience
   - new business being written in the period.

2. Insurance with profit participation: This line of business includes products that offer policyholders bonuses which reflect the fund's experience on investment returns, mortality rates and expenses. The underwriting performance is influenced by:
   - changes in investment markets
   - mortality rates
   - lapse experience
   - payouts to policyholders.

   Almost all the profits (where applicable) for this line of business are paid out to policyholders, so the profits are offset by an increase in the value of the non-controlling interest in the financial statements.

3. Index-linked and unit-linked insurance: This line of business includes unit-linked products, where the unit-linked policyholders bear all the financial risks associated with the related assets. Examples of these products are defined contribution pensions and savings and investment plans. For a small proportion of these unit-linked products, we offer guarantees that protect policyholders from market falls in the underlying investments. The underwriting performance is mainly influenced by:
   - management charges
   - other fee income from the unit-linked business
   - mortality, morbidity and lapse experience for unit-linked protection contracts.

4. Other life insurance: This line of business includes our life assurance products such as term assurance products and annuities. The underwriting performance is influenced by:
   - changes in mortality, morbidity and lapse experience
   - new business being written in the period.

The material year-on-year variances in the underwriting result by product line are:

- Index linked and unit-linked Insurance: Increase in 2021 largely driven by strong equity market performance during 2021.
- Health insurance: Increase in 2021 is driven by better experience in 2021 relative to 2020 and the re-assessment of a reserve held in aggregate in 2020 which did not re-occur in 2021. This reserve adjustment – in the approach adopted – is notionally fully allocated to the other life insurance line of business.
- Other life insurance: Decrease in 2021 is due to the re-assessment of the same reserve held in aggregate in 2020 and better experience for this line of business in 2020 relative to 2021.

Reconciliation to IFRS profits

The table below shows the reconciliation between the underwriting result and IFRS profits.

€m	2021	2020
Underwriting result	185	69
Other income[4]	13	26
Tax	(25)	(14)
Profit as per IFRS financial statements	**172**	**81**
Attributable to the non-controlling interest[5]	5	(16)
Attributable to the Shareholder	**167**	**97**

We made a profit of €172m after tax for the financial year (2020: €81m). This excludes profits of €5m (2020: losses -€16m), which is attributed to the participating funds. The profit for the current financial year is driven by favourable morbidity and mortality experience, investment experience and basis changes related to insurance contract liabilities .

A.3 INVESTMENT PERFORMANCE

A.3.1
Non-Linked Investments

The make-up of the asset classes in the portfolio remained largely unchanged throughout the year. The tables below show our investment income and investment performance during each year for each class:

2021					
Asset Class €m	Dividends	Interest	Rent	Total Income	Gains and Losses
Equity and Unit Trusts	1	-	-	1	11
Fixed Income	-	62	-	62	(245)
Derivatives	-	(1)	-	(1)	(42)
Mortgages	-	1	-	1	(3)
Property	-	-	4	4	-
Cash and Deposits	-	-	-	-	1
Grand Total	**1**	**62**	**4**	**67**	**(278)**

2020					
Asset Class €m	Dividends	Interest	Rent	Total Income	Gains and Losses
Equity and Unit Trusts	1	-	-	1	(2)
Fixed Income	-	67	-	67	230
Derivatives	-	(1)	-	(1)	(1)
Mortgages	-	2	-	2	1
Property	-	-	4	4	(7)
Cash and Deposits	-	-	-	-	(3)
Grand Total	**1**	**68**	**4**	**73**	**218**

[4] Other income includes return on shareholder assets, management fees and other items.

[5] Profit/(loss) attributable to the non-controlling interest includes the underwriting result of €5m (2020: (€17m)) and a tax impact of €0m (2020: €1m).

Investment Income

Our net investment income from non-linked funds was €67m in 2021 (2020: €73m), which consists mainly of income from bond products of €62m (2020: €68m). This generated more than 93% (2020: 92%) of our overall investment income, with bonds achieving a rate of return of 1%.

Investment expenses

Our non-linked investment managers are Irish Life Investment Managers Limited and Canada Life Asset Management Limited, who charge an arm's length fee based on assets under management.

Investment performance

Eurozone bonds fell through the year with the Eurozone 5yr+ sovereign bond benchmark down -4.7%. Bond yields rose as the Eurozone economy recovered from the double dip recession experienced in the first quarter following renewed lockdowns at the start of the year while increasing concerns around inflation also contributed to higher yields with the German 10 year yield ending the year at -0.18%. The rise in European yields however was more modest than that seen in the US as the ECB increased the size of asset purchases through the middle of the year in an effort to cap the upside in yields while the rise in inflation was smaller than in the US. Peripheral spreads were mixed through the year, initially narrowing as the ECB continued to buy assets in large quantities while sentiment towards Italy improved on the appointment of former ECB President Mario Draghi as Italian Prime Minister. Towards year end however spreads widened, ending above the levels at the start of the year as investors discounted the reduction in ECB asset purchases from March 2022 when the Pandemic Emergency Purchase Programme is scheduled to end. At the end of December Italian 10 year spreads against Germany had risen to 135bps while Spanish spreads had increased to 75bps.

A.3.2
Unit-Linked Investments

The make-up of the asset classes in the portfolio remained largely unchanged throughout the year. The tables below show our investment income and investment performance during each year for each class:

2021					
Asset Class €m	Dividends	Interest	Rent	Total Income	Gains and Losses
Equity and Unit Trusts	486	-	-	486	6,543
Fixed Income	-	172	-	172	(183)
Derivatives	-	-	-	-	(192)
Property	-	-	102	102	(4)
Cash and Deposits	-	(31)	-	(31)	(37)
Grand Total	**486**	**141**	**102**	**729**	**6,127**

2020					
Asset Class €m	Dividends	Interest	Rent	Total Income	Gains and Losses
Equity and Unit Trusts	413	-	-	413	240
Fixed Income	-	170	-	170	403
Derivatives	-	-	-	-	275
Property	-	-	125	125	(199)
Cash and Deposits	-	(27)	-	(27)	(47)
Grand Total	**413**	**143**	**125**	**681**	**672**

Investment income

Our net investment income from unit-linked funds was €729m in 2021 (2020: €681m) which consists mainly of:

- dividend income of €486m (2020: €413m) which generated 67% (2020: 61%) of our overall investment income.
- income from bond products of €172m (2020: €170m) which generated more than 24% (2020: 25%) of our overall investment income.
- rental returns from properties of €102m (2020: €125m) which generated more than 14% (2020: 18%) of our overall investment income, from a portfolio of properties held in Ireland and the U.K.

Unit-linked funds earned management fee income of €309m (2020: €269m).

Investment expenses

Our unit-linked investment managers are Irish Life Investment Managers Limited and Setanta Asset Management Limited, who charge an arm's length fee based on assets under management.

Investment performance

The reflation trade in investment markets which was evident from the lows in March 2020 continued into 2021. The positive fundamental backdrop was further boosted early in the year as additional fiscal stimulus was announced in the US following the unexpected success of the Democrats when winning the two run off Senate seats in Georgia which effectively gave them control of Congress. Increased fiscal spending was also evident in Europe and other parts of the world and when combined with the rollout of vaccination programmes which enabled economies to reopen, global economic and earnings growth forecasts were revised upwards, particularly through the first half of the year. While expectations for global growth began the year at around 5%, it appears the global economy will now have grown by almost 6% in 2021. Alongside this strong recovery has been a significant pick up in inflation over the course of the year with US inflation rising to a 40 year high of 6.8% y/y while Eurozone inflation has risen to an all time high of 4.9% y/y. There has been debate among investors over how permanent or transitory this rise in inflation will prove to be but it has resulted in a tightening of monetary policy by several central banks. In the US, the Fed began to taper asset purchases prior to year end and also suggested interest rates could be raised three times in 2022, while the Bank of England has already started raising interest rates. While medical advancements and the adaptability of consumers and corporates have enabled the recovery to remain robust, the emergence of new Covid variants such as delta and omicron show that the virus is not going away and risks and uncertainties around the growth outlook still remain. However, given initial signs that omicron is less virulent than other variants, that existing vaccines still provide significant protection against it and that the rise in case numbers associated with the strain could be relatively short lived, the negative economic impact from Covid should continue to wane through 2022.

Equity markets generated strong returns in 2021, rising 21.4% in local currency terms and 28.1% in euro terms as the weaker euro boosted returns for euro based investors. Equities were supported by the strong economic environment which resulted in earnings forecasts being significantly upgraded through the year from an expectation for earnings growth of 26% at the beginning of the year to 53% by year end. While the overall trend through the year was up, equities did experience a number of modest corrections during 2021 associated with rising bond yields, concerns over higher inflation, tighter central bank policies, the emergence of new Covid variants, growth concerns linked to China, political uncertainties, and global supply bottle necks. Equities however ultimately recovered from these setbacks and ended the year close to all time highs as the overall medium term growth backdrop remained positive, financial conditions and policy supports remained relatively loose compared to pre Covid levels and equities continued to look attractive compared to other asset classes on a relative valuation basis given the low yield environment.

Eurozone bonds fell through the year with the Eurozone 5yr+ sovereign bond benchmark down -4.7%. Bond yields rose as the Eurozone economy recovered from the double dip recession experienced in the first quarter following renewed lockdowns at the start of the year while increasing concerns around inflation also contributed to higher yields with the German 10 year yield ending the year at -0.18%. The rise in European yields however was more modest than that seen in the US as the ECB increased the size of asset purchases through the middle of the year in an effort to cap the upside in yields while the rise in inflation was smaller than in the US. Peripheral spreads were mixed through the year, initially narrowing as the ECB continued to buy assets in large quantities while sentiment towards Italy improved on the appointment of former ECB President Mario Draghi as Italian Prime Minister. Towards year end however spreads widened, ending above the levels at the start of the year as investors discounted the reduction in ECB asset purchases from March 2022 when the Pandemic Emergency Purchase Programme is scheduled to end. At the end of December Italian 10 year spreads against Germany had risen to 135bps while Spanish spreads had increased to 75bps.

Irish commercial property rose slightly in 2021 as the market began to stabilise following the negative returns experienced in 2020 because of the Covid related recession. The property market remained quite mixed with the retail sector continuing to struggle in a difficult trading environment for retailers, particularly in the first half of the year. The office sector was more resilient with yields and rents stabilising as investor and tenant demand began to recover while the industrial sector remained strong, supported by the continued move to 'online retailing' and a lack of supply in the industrial market.

The Irish economy has performed extremely well during the pandemic as per headline GDP figures. Irish GDP however is distorted by several factors which often overstate the true level of growth in the economy. The performance of the multinational and trade sectors can also contribute to a misleading picture of growth in the underlying economy. Modified domestic demand is seen as providing a truer reflection of growth and having contracted by -4.9% in 2020, is forecast to have grown by 5.5% in 2021. Growth will have been more balanced in 2021 with consumption and investment recovering strongly following contractions in 2020 and contributing to growth alongside trade and the multinational sectors. Domestic parts of the economy were supported by a rapidly improving labour market where adjusted unemployment has fallen from a pandemic peak of 31.5% to 6.9% and numbers employed have risen back above pre Covid levels to 2.47m. Consumer balance sheets are strong with household net worth at a record €883bn and household deposits at a record €136bn with an estimated excess savings of €14bn having been built through the pandemic. Consumer confidence has also recovered strongly from the lows although has recently fallen below pre Covid levels again following new restrictions to combat the rise in Covid cases at year end. Business sentiment readings have also risen sharply and are high in absolute and relative terms compared to global and European peers and are consistent with strong growth in the Irish economy.

A.3.3
Other information

At the end of 2021 we did not hold investments in off balance sheet securitisation vehicles.

A €1m (2020: €(2)m loss) pre-tax loss was recognised in the Statement of Comprehensive Income when we revalued owner occupied property.

A.4 PERFORMANCE OF OTHER ACTIVITIES

There are no items to note.

A.5 ANY OTHER INFORMATION

We recognised a €35m (2020: €20m loss) pre-tax actuarial loss on our defined benefit pension scheme in the Statement of Comprehensive Income. This was primarily due to assumption changes (an increase to both the inflation and the pension increase assumptions) offset by improved asset returns and an increase in the discount rate used to value the future pension liabilities.

We also recognised a €34m (2020: €nil) pre-tax settlement gain in the income statement due to an Enhanced Transfer Value ('ETV') exercise in our defined benefit pension scheme. A number of deferred members of the pension scheme availed of the ETV offer and left the scheme.

B. SYSTEM OF GOVERNANCE

This section describes the structures, systems and processes we have put in place to direct and control our operations and risks so we can balance the interests of our many stakeholders.

B.1 BUSINESS

B.1.1 Governance structure

The Board of Directors of ILA is responsible for the governance and oversight of all of ILA's operations and risks.

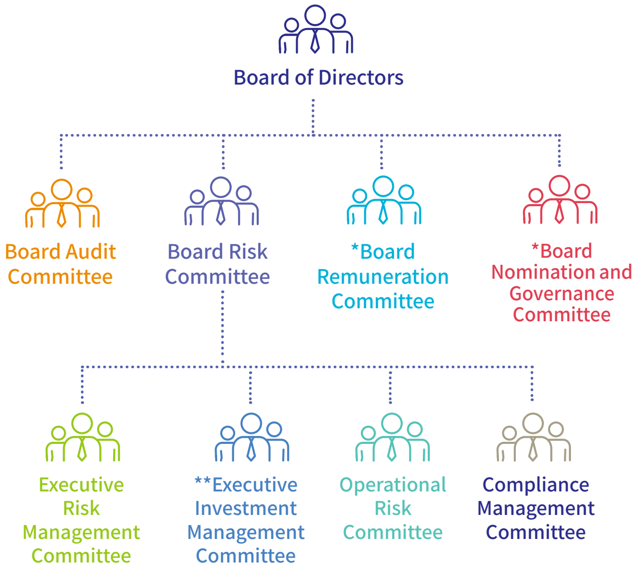
The company has two operating divisions: Retail Life and Corporate Life. Retail Life serves individual customers and some small group business. Corporate Life serves larger group business, including corporate customers and affinity groups with a large number of members. You can find more detail in section A (Business and Performance).

The divisional operations are supported by a number of functions that operate across divisions. These are led by senior executives including the Chief People Officer, Chief Information Officer, Chief Customer Officer and Chief Digital and Innovation Officer. In addition, the control functions work at an ILA level. More detail on the control functions are included in section B.1.4. (Key Functions) below.

Each division has an executive management team, led by a Managing Director who is also the Chief Operating Officer for the division. The Managing Director for each division reports to the Chief Executive Officer of ILA. Each division develops business plans, strategies and annual budgets. There is also an ILA Executive Committee that provides overall leadership for all operational aspects of ILA.

Business and risk issues can be reported and escalated from the bottom up. Communication and guidance on policy and decisions happens from the top down.

The committees critical to the governance structure are set out below. A number of the committees are Board level committees, and their members are Directors of ILA. The other committees are executive level, and are made up of senior managers. The executive committees help the Board committees meet their objectives. Control functions support the executive committees and the Board Risk and Audit Committees. These are discussed in section B.1.4 (Key Functions).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Compliance Management Committee

Notes: *The Remuneration Committee and Nomination and Governance Committee are constituted at the level of the Irish Life Group, ILA's parent company, and their membership includes some non-ILA directors. ILA relies on these committees, as permitted under the Corporate Governance Code.

**The Executive Investment Management Committee also reports to the Board.

	Main function	Main responsibilities
Board of Directors	Lead and control ILA.	> Makes all material strategic decisions. > Establishes an organisational structure with clearly defined authority levels and reporting responsibilities. > Agrees the rules on management authority levels and what the Board should be notified of.
Board Risk Committee	Responsible for ILA's risk governance and oversight of current risk exposures and current and future risk strategy.	> Reviews compliance within the Enterprise Risk Management (ERM) framework and advises the Board on risk oversight. > Reviews the company's Risk Appetite Framework and Risk Strategy. > Approves the operation of the Risk and Compliance functions, making sure they have the resources, authority and independence to meet their responsibilities. > Recommends changes to the risk and compliance management frameworks and policies. > Promotes a company culture that supports risk management. > Develops and approves responses when a risk exposure exceeds appetite.
Board Audit Committee	Act as an independent link between the Board and ILA's external auditors.	> Recommends and monitors the choice of external auditors. > Reviews the scope of the external audit and reviews the independence of the external auditors. > Reviews the company's annual report and financial statements, other public reports and reports we send to the regulatory authorities. > Reviews the effectiveness of internal control systems. > Manages the risks of financial reporting by reviewing significant financial reports. > Reviews financial statements for ILA and Solvency II Pillar I and Pillar III requirements. > Reports to the Board on financial statements it needs to approve. > Monitors the Actuarial, Internal Audit and Finance functions. Ensures they have the resources, authority and independence to meet their responsibilities.
Board Remuneration Committee	Develop ILA's remuneration policy.	> Decides, implements and operates our remuneration policies.
Board Nomination and Governance Committee	Recommend Board and Board Committee appointments to ILA's Board. Keep the governance arrangements for ILA under review.	> Succession plans for the Board. > Makes sure the Board and sub-committees have the right skills and resources. > Arranges training for new directors and ongoing training for all directors. > Oversee ILA's Corporate Governance.
Executive Risk Management Committee (ERMC)	Manage all ILA's material risks, apart from operational and legal/regulatory compliance risks.	> Oversees risk exposures and recommends suitable risk policy (including insurance risks, market risk, credit risks and liquidity risk). > Monitors capital and how assets and liabilities are matched. > Reviews new product developments. > Approves significant transactions. > Monitors and reviews risk experience. > Reviews and recommends material risk management matters, including risk mitigations.

	Main function	Main responsibilities
Executive Investment Management Committee (EIC)	Manage and oversee all investments undertaken by ILA.	> Reviews and recommends the ILA Investment Policy and monitors its implementation. > Monitors and oversees the use of derivatives and stock lending activities. > Oversees the performance of, and recommends the appointment or removal of investment managers and custodians. > Monitors the operation of unit-linked funds, including the range of investment options available to policyholders. > Ensures the management of the non-linked portfolio is aligned to ILA's risk appetite.
Operational Risk Committee (ORC)	Oversee and monitor ILA's operational risk including conduct risk.	> Acts as a forum for prioritising and reviewing existing and emerging material operational risks. > Designs and monitors key risk indicators attached to these risks. > Is supported by two Operational Risk Committees - one for each of ILA's operating divisions.
Compliance Management Committee (CMC)	Establish and oversee regulatory and compliance policies and standards. Monitor compliance within ILA.	> Recommends appropriate regulatory and compliance policies and standards. > Promote a risk culture that stresses integrity and effective compliance risk management throughout ILA. > Monitors compliance across ILA. > Monitors ILA's regulatory relationships. > Keeps under review ILA's consumer protection (conduct risk) compliance frameworks.

The following table shows the members of our Board and Board Committees at 31 December 2021:

Members	Position	Board	Board Audit Committee	Board Risk Committee	Board Remuneration Committee	Board Nomination and Governance Committee
Mr Stefan Kristjanson	Chair of the Board and non-executive director	Y				
Mr Kilian Colleran	Independent non-executive director	Y	Y	Y		
Ms Brenda Dunne	Independent non-executive director and chair of the risk committee	Y	Y	Y	Y	Y
Mr Cecil Hayes	Independent non-executive director and chair of the audit committee	Y	Y	Y	Y	Y
Ms Helen A. Keelan	Independent non-executive director	Y	Y	Y		
Ms Rose McHugh	Independent non-executive director	Y	Y	Y	Y	Y
Ms Deborah Mintern	Independent non-executive director	Y	Y	Y		
Mr Denis McLoughlin	Chief Executive Officer and executive director	Y				
Mr Declan Bolger	Non-executive director	Y				
Mr David Killeen	Non-executive director	Y				
Ms Deirdre Moore	Chief Financial Officer and executive director	Y				
Company secretary is **Ms Maria-Teresa Kelly**						

Mr Denis McLoughlin was appointed Chief Executive Officer on 6th May 2021 and was appointed to the Board on the same date. Ms Helen A. Keelan was appointed to the Board on 12 October 2021, Ms Deborah Mintern was appointed to the Board on 22 October 2021. Ms Deirdre Moore was appointed Chief Financial Officer on 15 November 2021 and was appointed to the Board on the same date. Mr Brian Forrester resigned as Director on 19 May 2021.

B.1.2 Adequacy of and review of systems of governance

We are committed to best practice corporate governance. We are a high-impact rated entity under the Central Bank of Ireland's risk-based framework for the supervision of regulated firms. This is known as PRISM or Probability Risk and Impact System. Central Bank of Ireland's risk-based framework for the supervision of regulated firms. This is known as PRISM or Probability Risk and Impact System.

We must comply with the Central Bank's Corporate Governance Requirements for Insurance Undertakings 2015 (the Requirements). These include requirements in relation to the composition of the Board and its Committees. We also submit a compliance statement to the Central Bank each year.

We review our systems of governance each year. We also annually review the performance of the governance committees listed in section B.1.1 (Governance structure). This includes assessing their responsibilities and updating charters if appropriate.

We commission independent reviews of governance periodically, and there is an independent evaluation of the overall performance of the Board and individual directors every three years.

B.1.3 Remuneration practices

Our Remuneration Policy is designed to attract, retain and reward qualified and experienced employees who will contribute to our success. We use our Remuneration Policy to:

- help generate long-term value for shareholders and customers
- motivate employees to meet annual corporate, divisional and individual performance goals
- encourage employees to achieve goals in line with our Code of Conduct
- align with sound risk management practices and regulatory requirements.

We support the Remuneration Policy with our performance management process. This helps to develop a risk-aware performance culture that reflects our Vision and Values. The process is based on three core principles:

- quality feedback and open conversations
- shared responsibility for the process
- treating staff fairly and recognising their positive contribution.

The umbrella policy for operational risk and the Great-West Lifeco 'Code of Conduct' set out the principles behind our approach to managing the risks associated with our Remuneration Policy.

The principles state that remuneration programmes should:

- promote sound and effective risk management and align with the risk strategy and preferences approved by the Board
- be consistent with business and risk strategy and shareholders' long-term interests
- be consistent with the companies approach to the integration of sustainability risks in the investment decision making and investment advice process
- be communicated to all staff
- be competitive and fair
- attract, reward and motivate staff to deliver on objectives and achieve success
- be underpinned by clear, effective and transparent remuneration governance.

The Remuneration Policy is also designed to meet our regulatory requirements. We identified and assessed the applicable Solvency II principles around remuneration. Then we set up and documented the following compliance arrangements:

- establishing a Board Remuneration Committee to help the Board carry out its remuneration-related roles and responsibilities; the Remuneration Committee, based on data provided, makes sure we comply with the Remuneration Policy each year
- making sure there are specific remuneration arrangements (programmes) for the Board, senior leaders and the key control functions
- benchmarking base salaries against market rate for the role as defined in independent salary surveys
- assessing all bonus schemes against both personal and financial targets (the financial targets for senior oversight roles are not significantly linked to company performance)
- auditing and risk assessing the Remuneration Policy
- publishing our Remuneration Policy on our employee intranet site.

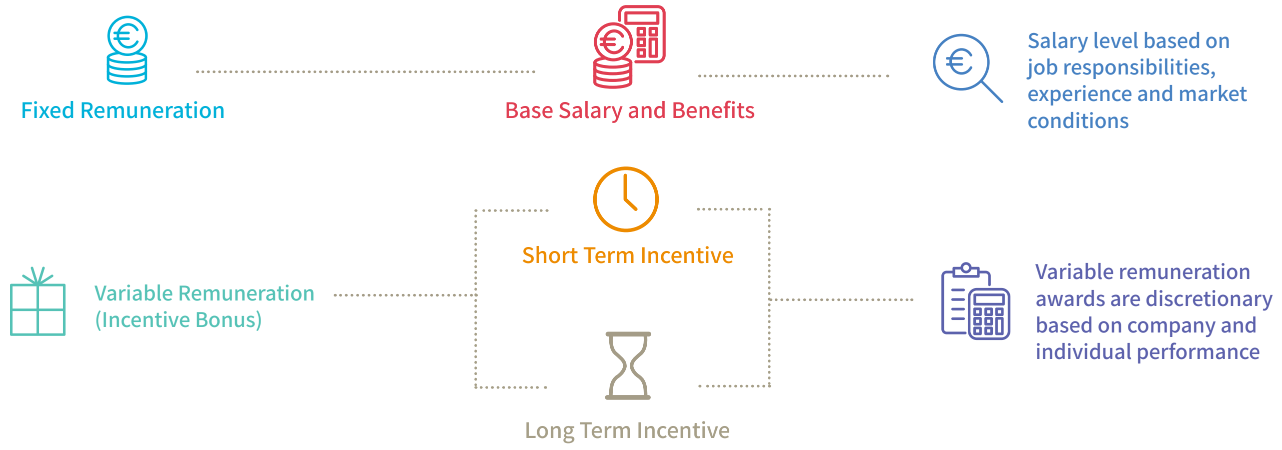
B.1.3.1 Share options, shares or variable components of remuneration

All remuneration packages consist of:

- a base salary
- annual incentive bonus
- retirement benefits
- benefits during employment.

Senior positions may also include a long-term incentive.

The proportion of each element in the overall package will vary based on the role.



Fixed Remuneration

Base Salary and Benefits

Salary level based on job responsibilities, experience and market conditions

Variable Remuneration (Incentive Bonus)

Short Term Incentive

Long Term Incentive

Variable remuneration awards are discretionary based on company and individual performance

The base salary reflects the skills, competencies, experience and performance level of the individual. Base salaries are based on market rate for the role as defined by independent salary surveys.

We also have an annual incentive bonus scheme that links an individual's overall remuneration to the performance of the company and the performance of the individual. The bonus depends on key business units meeting objectives that are high impact and closely aligned to our critical priorities. However, this does not apply to those in senior oversight roles. Their bonuses are not significantly linked to company performance.

In addition, we have a number of incentive schemes linked to the level of the role (each level attracts different payments for hitting specific targets, and has its own maximum bonus) and, where appropriate, the type of role (for example sales and investment roles). Each staff member has a number of operational and bonus objectives for the year, including an accountability heading of Risk and Management Control. We make our base salaries high enough to prevent employees being overly dependent on their bonuses.

Long Term Incentives are made up of stock options, issued by our parent company, and performance share units.

B.1.3.2
Supplementary pension or early retirement schemes for the members of the management body and other key functions

Our Remuneration Policy does not include any supplementary pension or early retirement schemes for Board members or other key function holders. We offer enhanced early retirement pensions to all members of our Irish Life Group defined benefit scheme who are aged over 60 and have completed 40 years' service.

The company has closed its defined benefit pension scheme to future accrual from 30 June 2018 and existing members have joined a company defined contribution plan for future service pension provision beyond this date. Members have retained the benefits they have accrued up to the date of closure of the scheme and these benefits are still linked to final salary.

B.1.3.3
Material transactions during the reporting period

There were no material transactions with senior ILA managers in the period, apart from transactions linked to their remuneration and transactions relating to insurance policies conducted on normal commercial terms.

B.1.4
Key functions

In line with the European Regulator's Guidelines on System of Governance, (EIOPA-BoS-14/253), we consider key functions to be Risk Management, Compliance, Actuarial and Internal Audit. We also view Finance as a key function. Collectively, we refer to these five functions as 'control functions'.

Control functions help the Board to manage ILA effectively. Each one reports to either the Board Audit or Risk Committee.

The Board Committee approves the mandate, resources and plans for the control functions annually. The control functions report to each meeting of the Board Committees and the head of each control function has a direct line of communication with the relevant committee Chair.

Each control function is staffed by professionals with appropriate skills and experience, plus a deep knowledge of our business. During the past year, some new appointments were made to the position of head of a number of the ILA control functions. Those roles were previously held by the equivalent role holder in Irish Life Group, ILA's parent company.

Risk

Overview
This independent second-line function is separate from business operations and looks at them objectively. It has authority across all operating divisions, and access to all ILA records, information and personnel needed to carry out its responsibilities and follow up on issues. In addition, the Chief Risk Officer (CRO) has the right to access, and to attend meetings of, the Board Risk Committee.

The CRO reports to the Board Risk Committee and the Irish Life Group CRO on oversight matters and to the CEO on operational matters and day-to-day management.

The CRO updates each meeting of the Board Risk Committee, including producing a quarterly CRO Report.

The Risk Function's operational risk responsibilities are supported by operational risk resources within each business unit.

Main responsibilities
These are outlined in the Risk Function Mandate, which is set by the Board Risk Committee. Encompassing independent oversight of all forms of risk across all our business divisions, the Risk Function's responsibilities include:

- management and oversight of the Risk Appetite Framework
- maintaining risk policies
- risk governance and culture
- carrying out risk processes including
  - risk identification, assessment and prioritisation
  - risk measurement and limit setting
  - risk management, responses and mitigation strategies
  - risk monitoring and reporting
  - escalation, compliance, independent assurance and oversight at an aggregate and disaggregate level
- ensuring that risk infrastructure is effective
- Own Risk and Solvency Assessment (ORSA) process
- providing risk opinions to the Board
- taking part in management committees.

Governance
The Board Risk Committee reviews the Risk Function Mandate annually, and makes sure the Risk Function complies with it. The Committee also assesses the Risk Function's performance each year.

Actuarial

Overview
This independent second-line function is led by the ILA Head of Actuarial Function (HoAF), who reports directly to the Board Audit Committee and to the Irish Life Group Chief Actuary for oversight matters. The HoAF is responsible to the CEO for operational and day-to-day management.

The Actuarial Function is made up of:

- the actuarial reporting teams in each of our two business divisions - these teams carry out most of the actuarial calculations
- the Group valuation and reporting team which reviews, oversees and consolidates the results
- the actuarial development team which develops the actuarial models, processes and mechanisms behind the actuarial calculations.
- the IFRS17 team which is developing reporting capability for 2023.

Main responsibilities
These are outlined in the mandate for the Actuarial Function, which is set by the Board Audit Committee. They include:

- calculating the value of our liabilities in relation to our insurance policies and reporting on this to the Board in line with regulatory requirements
- contributing to the effective implementation of our risk management system
- providing oversight of product development, pricing and reinsurance activities
- reviewing Policyholders' Reasonable Expectations (PRE) on an ongoing basis and reporting to the Board on the Head of Actuarial Function's interpretation of PRE
- calculating the value of our liabilities in relation to our life insurance business for inclusion in our financial statements
- providing an opinion to the Board on our underwriting and reinsurance arrangements and on the ORSA process.

Governance
The Board Audit Committee reviews the mandate for the Actuarial Function annually, and makes sure the Actuarial Function complies with it. The Committee also assesses the Actuarial Function's performance each year.

Compliance

Overview
This independent second-line function is separate from business operations and looks at them objectively. It ensures that mechanisms are in place to comply with regulations by assessing, monitoring and testing the effectiveness of our regulatory compliance management controls across the company. It is made up of compliance units embedded in Retail Life and Corporate Life plus a Group compliance unit.

It is led by the Head of Compliance, who is the statutory compliance officer for the company. The Head of Compliance reports directly to the Board Risk Committee on the oversight of compliance and has a dual reporting line to the Chief Compliance Officer Ireland and to the ILA Chief Risk Officer.

Main responsibilities
These are outlined in the Head of Compliance Mandate which is reviewed and approved annually by the Board Risk Committee. They include:

- establishing and maintaining a sound compliance framework for the independent oversight and management of our regulatory compliance risks including those relating to conduct risk and the fair treatment of customers
- providing advice and guidance to the business units and group functions on regulatory developments and other compliance matters, including advice and oversight on new and changing regulatory requirements
- promoting a risk culture that stresses integrity and effective compliance risk management throughout the company

- carrying out risk-based monitoring to assess our compliance requirements and procedures and how well we follow them
- making sure all directors, officers and employees acknowledge our Code of Conduct each year
- preparing the compliance plan and putting it into action
- co-ordinating our relationships with regulators
- reporting each quarter to the Board Risk Committee and each month to senior management on key regulatory matters
- training our staff and directors on relevant compliance matters.

Governance
The Board Risk Committee reviews the Head of Compliance Mandate annually and makes sure the Compliance Function complies with it. The Committee also assesses the Compliance Function's performance each year.

Finance

Overview
The ILA Chief Financial Officer (CFO) is responsible to the CEO for all financial matters pertaining to the Company and reports directly to the Board Audit Committee and to the Irish Life Group Finance Director on oversight matters. The Finance Function supports the CFO in operational and day-to-day management.

The Finance Function consists of two divisional finance teams and a central Group Financial control (GF) team. The divisional finance teams are our first line of defence in the finance function. They manage the financial control and reporting needs of their business lines, giving the GF team defined data through a centrally controlled general ledger and reporting platform.

GF, led by the Group Financial Controller, provides finance activities through a shared service model to the company. The GF team are our second line of defence in the Finance Function. They review and oversee this data before adopting it for financial and regulatory reporting and performance management. The GF team, through the CFO, give the Board and Board Audit Committee periodic financial and performance updates along with detail that helps the Board assess and approve the annual statutory financial statements and regulatory returns.

Main responsibilities
These include:

- financial control and governance
- reporting statutory and regulatory financial information, including preparing the financial statements
- budgetary, cost and financial management.

Governance
The Board Audit Committee reviews the CFO's Mandate annually and makes sure the CFO is complying with it. The Committee also assesses the CFO's performance each year.

Internal Audit

Overview
The Internal Audit function is provided by Group Internal Audit and is independent of our business management activities. Internal auditors have no operational responsibility or authority over any of the activities audited.

The Head of Internal Audit (HIA) reports functionally to the Chair of the Board Audit Committee and the Head of Internal Audit for Great-West Lifeco. The HIA reports administratively to the CEO of Irish Life Group.

Main responsibilities
The HIA is required to:

- Submit, at least annually, a risk-based internal audit plan to the Board Audit Committee for review and approval;
- Ensure all internal audit engagements are appropriately executed and results (with applicable conclusions and recommendations) are communicated to appropriate parties;
- Follow up on audit findings and corrective actions, and report periodically to senior management and the Board Audit Committee on progress; and,
- Provide an overall opinion on Governance, Risk Management and Control to the Board Audit Committee on a regular basis.

Governance
The Board Audit Committee:

- Reviews and approves the mandate of the HIA;
- Reviews and recommends the appointment/removal of the HIA to the Board;
- Annually assesses the performance of the HIA and the effectiveness of the Internal Audit function; and,
- Annually reviews and approves the function's organisational and reporting structure, budget and resources.

The HIA maintains direct and unrestricted access to the Board Audit Committee, and meets regularly with the Chair of the Board Audit Committee, without other managers present.

The HIA maintains a quality assurance programme to drive continuous improvement and ensure conformance with the Institute of Internal Auditor's (IIA) Standards and Code of Ethics. The HIA reports the results of this work to the Board Audit Committee every year.

B.2 FIT AND PROPER REQUIREMENTS

B.2.1

Policies and processes in place to meet fit and proper requirements

We are committed to meeting all our fit and proper obligations. We ensure that everyone involved in this has the necessary qualifications, knowledge, skills and experience to carry out their role (fitness assessment); and is honest, ethical, financially sound and acts with integrity (probity assessment).

There is a job profile for all such roles. Typically, the job profile sets out the accountabilities for the job, the level of knowledge, skills and experience needed to do it, and the essential behavioural competencies.

We have documented HR processes for recruiting into roles that must meet fitness and probity requirements. If we become aware of any concerns about fitness and probity of someone in a role subject to the Fit and Proper Policy, we will investigate and take appropriate action as outlined in the Employee Relations Escalation Process.

We also have a Fit and Proper Policy which the ILA Board reviews and approves annually.

The Fit and Proper Policy sets out the process for the fit and proper assessments that determine a person's fitness, probity and financial soundness.

Before we appoint anyone who effectively runs ILA or has another key function, we carry out due diligence to make sure that person is fit and proper for the role. The due diligence checks for assessing whether a person is fit and proper and is financially sound are set out in the Policy. These checks align to the Central Bank of Ireland's Guidance on Fitness and Probity Standards as follows:

- evidence of compliance with Minimum Competency Code (where applicable)
- evidence of professional qualifications where relevant
- evidence of Continued Professional Development (CPD) where relevant
- record of interview and application
- reference checks
- record of previous experience
- record of experience gained outside of Ireland
- confirmation of directorships held and
- record of other employments.

The due diligence around probity and financial soundness checks takes the form of self-certification. We ask potential employees and directors to complete a questionnaire on their probity and financial soundness. We then carry out independent directorship, judgements, negative news and regulatory sanction searches.

Most of the applicable roles are Pre-Approval Controlled Functions (PCFs) as defined in the Central Bank Reform Act 2010 (sections 20 and 22) Regulations. In addition to our internal due diligence, before making appointments into these functions, they are pre-approved by the Central Bank.

All those in a fit and proper role must reconfirm their adherence to the Fit and Proper standards and requirements every year. For those in PCF roles we carry out independent checks to validate the individuals' responses. If we become aware of any concerns about the fitness and probity of someone in a role subject to the Fit and Proper Policy, we will investigate and take appropriate action, without delay. We will also notify the Central Bank of any actions taken, where a negative conclusion to an investigation has been reached.

B.3 RISK MANAGEMENT SYSTEM INCLUDING THE OWN RISK AND SOLVENCY ASSESSMENT

The Board manages all risks across the organisation, and has put in place a comprehensive risk management framework.

The framework includes a documented Enterprise Risk Management Policy. This establishes responsibilities for all key components of the risk management system, including the Board and Executive Risk Committees (see section B.1.1 (Governance Structure)). It also details the three lines of defence model we use, and establishes responsibilities and requirements for the first, second and third lines of defence.

The Board has also generated a Risk Appetite Statement and Risk Strategy document, which outline our appetite for each type of risk and our strategy for accepting, managing and mitigating risks. A further suite of risk policies details the management strategies, objectives, processes, and reporting procedures and requirements for all of the risks we accept.

The Chief Risk Officer (CRO) has primary responsibility for implementing the risk management system. The Risk Function, under the leadership of the CRO, has created processes to make sure we comply with risk policies. It confirms this compliance each year to the Board Risk Committee as part of the annual review of all risk policies. The Risk Function also monitors and reports on all risks. This includes reporting risk exposures and compliance with risk limits to the Board and executive risk committees every quarter.

There are more details of the key components of the risk management framework below. You can find greater detail on our risk profile and risk management strategies, objectives, processes and reporting procedures in section C (Risk Profile).

B.3.1
Enterprise Risk Management framework

Our Enterprise Risk Management (ERM) framework makes sure we can identify and manage all of our material risks, and that we can implement business strategy across the company while fully understanding the risks involved.

There are three broad ways in which each risk type can be treated: capitalisation (hold capital in respect of the risk), management and mitigation. We review the characteristics of each risk so we can identify the appropriate treatment. These reviews weigh up the:

- current and prospective size and complexity of each risk
- potential impact of the risk
- transferability of the risk
- market standard treatment of the risk.

The Irish Life Risk Appetite Framework and Risk Strategy documents set out our overall strategy for each type and level of risk we will assume. Our risk appetite may change as our resources and strategic objectives evolve.

We embed the risk appetite and tolerance for specific risks in the business through risk policies. These set out operational procedures, controls and limit structures that establish a risk management framework for each risk type. Together, our risk policies comprise our Risk Policy Framework.

B.3.2
Risk management model - three lines of defence

Risk taking is fundamental to a financial institution's business profile. Prudent risk management, limitation and mitigation are therefore integral to our governance structure.

We operate the 'three lines of defence' risk model shown in the diagram below

The first line of defence

This is the business divisions and our investment managers. As the ultimate owners of the risk, they are primarily responsible for day-to-day ERM operations within the established ERM Framework. They identify, measure, manage, monitor and report risk.

Business divisions are accountable for the risks they assume in their operations from inception throughout the risk lifecycle. They must make sure their business strategies align with the ERM Policy including the Risk Appetite Framework.

First-line responsibilities include:

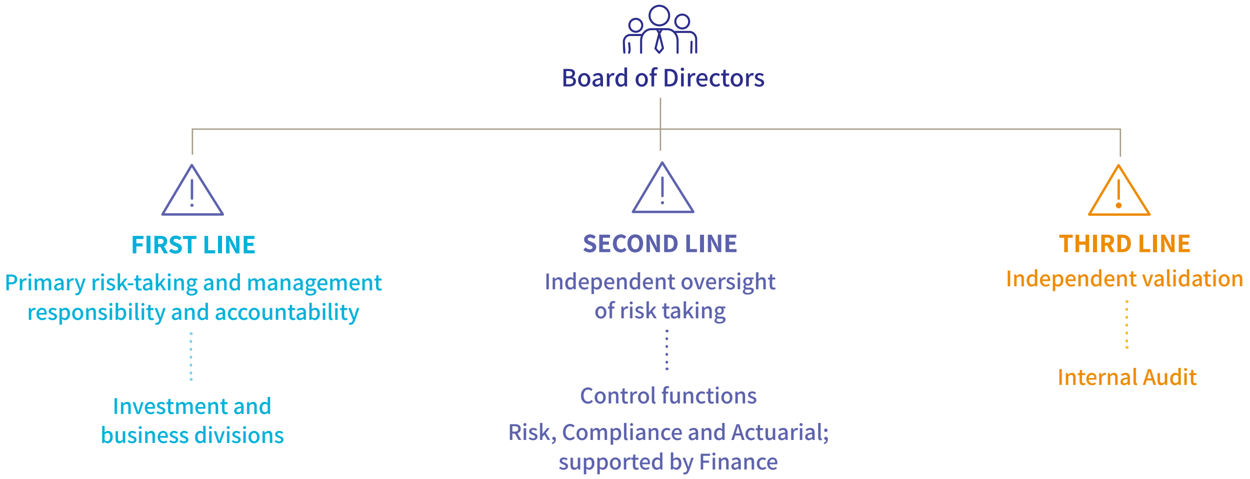
- diversifying products and services, customers and distribution channels
- developing prudent investment underwriting processes and diversifying by asset type, issuer, sector and geography
- following a disciplined application of pricing standards and underwriting, and conducting extensive testing of the risks involved in new products and offerings
- thoroughly managing the business by regularly reviewing, assessing and implementing relevant changes
- conducting business to safeguard our reputation through delivering fair customer outcomes by maintaining high standards of integrity based on our Code of Conduct and sound sales and marketing practices
- generating returns for shareholders through profitable and growing operations, whilst maintaining a strong capital position and accepting appropriate levels of risk in accordance with our risk appetite.

The second line of defence

This is the oversight functions - including the Risk, Compliance, Actuarial and Finance Functions.

The Risk Function oversees the ERM framework, using it to challenge the compliance of the first line of defence with it. The Function's specific responsibilities and accountabilities include independently reviewing risk identification, measurement, management, monitoring and reporting.

The Risk Function looks at the work of the Actuarial, Compliance and Finance Functions when assessing compliance with the ERM Framework. It makes sure there are no conflicts of interest and reinforces independence and objectivity.



Board of Directors

FIRST LINE

Primary risk-taking and management responsibility and accountability

Investment and business divisions

SECOND LINE

Independent oversight of risk taking

Control functions

Risk, Compliance and Actuarial; supported by Finance

THIRD LINE

Independent validation

Internal Audit

The third line of defence

This is Internal Audit. It carries out independent risk-based assessments of the internal risk control framework and the oversight provided by the second line of defence.

Internal Audit independently assures and validates the operational effectiveness and design of the ERM Framework. This includes periodic audits of first- and second-line control processes to help promote effective and efficient operations, integrity of financial reporting, appropriate information technology processes and compliance with law, regulations and internal policies.

B.3.3
Risk appetite and strategy

We employ a prudent approach to taking and managing risks, with emphasis on the resilience of business operations and sustainable growth. We recognise that negative externalities, such as environmental degradation, social risk issues and climate change, may impact the long-term sustainability of the business. We also recognise an expectation of customers that the firm will act in a responsible and sustainable manner. We aim to align business goals with our corporate social responsibility strategy, and other 'green' objectives.

The Board approved Risk Appetite Statement and Risk Strategy document sets out our appetite for each type of risk, our rationale for accepting risks, and our strategy for the type and level of risk we will assume. Our risk appetite will change as our resources and strategic objectives evolve.

The key objectives in the Risk Appetite Statement are below.

> **Treating our customers fairly and maintaining the Company's reputation:** we seek to maintain a high standing and positive reputation with our customers, counterparties, creditors and other stakeholders. This includes building and maintaining trust, delivering fair customer outcomes, full consideration of corporate social responsibility, and effective management of sustainability and reputational risks. Meeting customer needs and expectations is a core principle in the design, distribution and administration of our products and services.

> **Strong capital position:** we maintain a strong balance sheet and do not take risks that would jeopardise our solvency.

> **Strong liquidity:** we maintain a high quality, diversified investment portfolio with enough liquidity to meet our policyholder and financing obligations under normal and stressed conditions.

> **Mitigated earnings volatility:** we aim to avoid substantial earnings volatility by managing risk concentration, limiting exposure to more volatile lines of business and diversifying our exposure to risk.

These objectives support both shareholder and policyholder interests since both are best served if we continue to be financially strong and profitable. Equally, we can only remain profitable if customers, financial advisors and other interested parties are satisfied that we are a secure company.

Risk appetite statements establish the core risk strategy across the business. We develop these statements through an iterative reviewing, monitoring and updating process that involves our key functions. The Board then approves these statements. Our strategic and business plans are aligned with the risk parameters within the risk appetite statement.

We achieve our Risk Strategy goals by embedding a risk awareness culture across all our business activities, and being prudent when taking and managing risks. We focus on:

> diversifying products and services, customers and distribution channels

> prudent investment management and diversifying by asset type, issuer, sector and geography

> disciplined application of pricing standards and underwriting, and extensively testing the risks involved in new products and offerings

> thoroughly managing the business through regular reviews

> safeguarding our reputation by operating a highly ethical business, based on the employee Code of Conduct, and sound sales and marketing practices

> increasing returns to shareholders through profitable and growing operations, while maintaining a strong financial position.

The Irish Life Risk Appetite Framework sets out limits and thresholds for risks. The Risk Function then monitors these risks and reports on them each quarter to the executive and Board Risk Committee.

The Board sets risk policies that stipulate the type and level of risk the company is allowed to take on, along with the related risk management and reporting procedures. We establish risk processes and controls for each business division to enforce the specific risk policies approved by the Board.

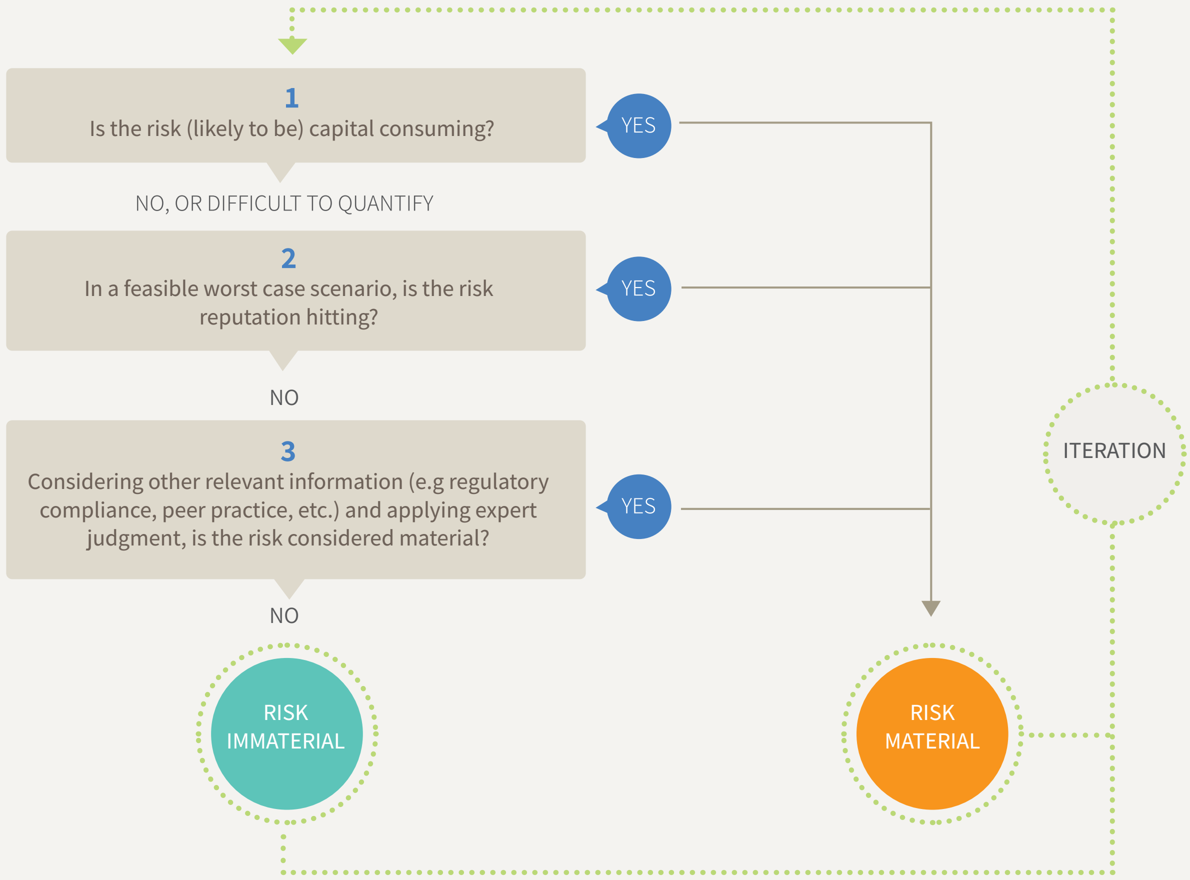
B.3.4
Risk management processes: identification, assessment and treatment

The Risk Function oversees the identification of both existing and emerging risks within the company. Risks are identified from the bottom up as well as the top down. Our business divisions, senior managers, risk specialists and specific risk committees all have significant input to this. We also use our stress-testing framework, which draws on scenario analysis to spot emerging and previously unidentified risks.

We use individual risk assessment frameworks at the divisional level, overlaid with our risk materiality framework, to assess identified risks. Senior managers across the company ratify any risks considered material. The Board Risk Committee then monitors these regularly.

Our risk materiality framework follows the iterative approach in the chart below.

Risk Materiality Framework: a decision tree


1
Is the risk (likely to be) capital consuming?
YES
NO, OR DIFFICULT TO QUANTIFY
2
In a feasible worst case scenario, is the risk reputation hitting?
YES
NO
3
Considering other relevant information (e.g regulatory compliance, peer practice, etc.) and applying expert judgment, is the risk considered material?
YES
NO
RISK IMMATERIAL
RISK MATERIAL
ITERATION

We have three different treatments for the risks we identify, and combine these treatments as appropriate. These treatments are the basis of our risk policies.

1. We may hold capital so we remain solvent if the risk impact becomes severe.
2. We may manage the risk through controls.
3. We may mitigate the risk by choosing not to take it on or transferring it to a third party.

Every year we evaluate the way we categorise risk as part of our Risk Appetite Framework review.

We also run an emerging-risk identification process. This involves the risk teams in the operating divisions, divisional Operational Risk Steering Committees, central risk teams, senior executives and the Board.

B.3.5
Risk management processes: monitoring, measurement and reporting

We monitor risk appetite limits, risk policy limits and key risk indicators (KRIs) against selected measures of risk. We measure our exposure to risk in a variety of different ways, including monitoring sums assured, nominal or market value of exposures, the level of actual deviation from expected outcomes and the range of potential deviations from expected outcomes.

Our risk limits and KRIs framework is multi-layered to make monitoring, evaluating and limiting risk-taking more effective. We monitor and review exposures regularly, and report to Board and Executive Risk Committees each quarter or more often if required.

The framework includes:

> limits linked to individual risks

> aggregate risk exposures for different risk categories, measured by how much they contribute to the capital we need.

The table below summarises how we measure different risks. In addition, we use our annual ORSA process to analyse the impact of different risks on company solvency under stress scenarios.

Risk category	The main ways we measure risk
Mortality risk	We measure mortality risk using the sum assured, both gross and net of reinsurance.
Longevity risk	We measure longevity risk by assessing the value of those liabilities that are exposed to it. We consider our exposure both gross and net of reinsurance.
Morbidity risk	We measure morbidity risk using the sum assured, both gross and net of reinsurance.
Expense risk	We measure expense risk using actual, budgeted and projected expense levels.
Lapse risk	We measure and monitor lapse risk by considering the number of policyholders who surrender their policies early compared to the number we expected to do so.
Credit risk - fixed interest/ cash assets	We measure credit risk by referring to the value of the assets we have invested with different counterparties. Our risk policy limits depend on the financial strength of counterparties.
Credit risk - reinsurance counterparties	We measure our exposure to reinsurance counterparties both gross and net of mitigations such as any collateral we hold. We set a minimum rating for the financial strength of counterparties, depending on the type of reinsurance we're looking for.
Equity/property risk	We measure market risks, such as equity/property risk, by referring to the most recent market/fund value of investments, and the value of the management charges we collect from unit-linked funds that invest in equity and property assets.
Interest rate risk	We measure interest rate risk by analysing how the values of our assets and liabilities change when interest rates move.
Liquidity risk	We measure liquidity risk by comparing the quantity of our cash and assets we can readily convert into cash to the potential demand we might face for cash.
Currency risk	We measure currency risk by analysing how the values of our assets and liabilities change when exchange rates move.
Operational risk	We measure operational risk, including information technology risk, retrospectively by analysing operational risk losses and near misses; and prospectively by monitoring relevant Key Risk Indicators.
Strategic risk	We do not measure strategic risk directly. Instead, we evaluate the existing and proposed key strategic initiatives that have been approved by the Board.
Legal and regulatory risk	We analyse legal and regulatory risks as part of our compliance framework, and mainly measure them qualitatively through risk reporting.
Customer advice risk	Customer advice is a core process that contributes to operational risk, and as such we monitor and measure it in the same way we do for all other aspects of operational risk as set out above. We also report on consumer protection and conduct risk using our compliance framework.

B.3.6
Investments

Prudent Person Principle

Our Board approved Investment Policy sets out the criteria we use when we invest our assets.

The Policy makes sure that our approach to investment management follows the Prudent Person Principle defined in Solvency II regulations. The Policy covers the investment of all our assets, including unit-linked assets.

The controls and processes set out in the policy make sure we invest in assets and instruments only when we can properly identify, measure, monitor, manage, control and report on their associated risks; and only when we can take these risks into account when we assess our solvency needs. The investment restrictions and requirements in the policy ensure the security, quality, liquidity and profitability of the investment portfolio, and that the assets are available when we need them.

The value of our liabilities change due to changing market conditions - for example when interest rates change or equity prices move. We invest in assets whose values move in a similar way to the liabilities.

Our Investment Policy also establishes principles and controls to manage potential conflicts of interest.

Other controls in the Policy include:

> using derivative instruments only if they help reduce risks or improve portfolio management

> limiting the amount of assets we can hold which are not publicly traded - apart from property assets, we have minimal exposure to such assets

> diversifying our assets through strategic asset allocation limits, specified by asset type and individual counterparty exposure limits

> placing strict rules around who we can lend assets to, and what security we need them to provide, whenever we lend assets to other investors in order to increase returns

> how we report and monitor investment positions, and our oversight responsibilities

> the approval process for investment operations.

Equity Investment Strategy

We offer a very broad range of unit-linked funds to our customers. These funds invest in a range of asset types, including a significant portion in equities. The investment returns for each fund accrue to our customers who have chosen to invest in the fund.

Our range of funds are categorised by how volatile future investment returns are expected to be. Funds with higher levels of expected volatility are categorised as higher risk and only recommended to customers with a high risk appetite. Whilst being more volatile, these funds also have a higher level of expected returns based on how different asset types have performed in the past. Our higher volatility funds will often invest a large portion of their assets in equities. We recommend less volatile funds, with a lower portion of assets in equities, for customers who have a lower risk appetite.

We also manage two with-profits funds, which are no longer available to new customers. Similar to our unit-linked funds, the investment returns on these funds accrue to the customers who are currently invested in the funds. These funds hold a portion of their assets in equities and this allocation is kept under active review. One of the factors we consider is the term to go until maturity of the policies in the fund.

We do not have any other material direct equity investments.

Our Asset Managers

We have appointed Irish Life Investment Managers Ltd. (ILIM) and Setanta Asset Management Ltd. (Setanta) to manage the large majority of our unit-linked and with-profits funds. ILIM and Setanta are related companies within the same group as ILA. We also offer our customers access, at their discretion, to a range of funds managed by external asset managers.

Our asset managers have a range of criteria they use to make investment decisions. This includes how they engage with investee companies and factors taken into consideration when assessing investee companies including Environmental, Social and Governance factors. In the case of our group asset managers (ILIM and Setanta) we have regular engagement to ensure their investment approach continues to meet our needs.

We set a mandate for our group asset managers that outlines how each fund should be managed. This outlines the portion of assets that should be invested in equities and other asset types and what types of equities or other assets can be held by each fund. The mandate aligns with our customers' expectations for each fund. We assess the performance of the asset managers against this mandate.

We monitor the performance of our funds against funds offered by other firms, which have a similar risk level. Performance is assessed net of all investment costs including transaction costs. We consider the performance over a range of time horizons.

Our arrangements with asset managers are open ended, but can be terminated subject to a notice period.

B.3.7
Credit assessments

We do not rely solely on external credit assessments when we assess the credit quality of counterparties.

We decide on the credit ratings for all fixed interest investments we take on - including bonds, cash and commercial mortgages, and investments - through an internal credit review by the appointed investment manager. We supplement this with any ratings available from external credit rating agencies. We make sure the internal rating is not higher than the highest published rating from a major external credit rating agency. We refer to the regulatory guidelines for performing credit assessments and our Risk Function oversees the process.

The processes reflect the significance of the counterparty. We complete the rating process in advance of any investment with a new counterparty, and review it at least once each year.

Our Risk Function monitors the credit quality of the investment portfolio, along with our compliance with our investment limits, and reports these to the Executive Risk Management Committee and the Board Risk Committee each quarter.

The Risk Function also monitors and reports the credit quality of reinsurance counterparties to these committees each quarter.

B.3.8
ORSA

We see the Own Risk and Solvency Assessment (ORSA) process as key to our risk management system.

The ORSA evaluates our risk profile and solvency position in relation to business operations, strategy and plan.

Own: Reflects our business model and corporate structure and is integrated with business plans and strategy.

Risk: Evaluates risks, including emerging risks, relative to appetite, and outlines our risk management techniques and risk governance structures.

Solvency: Reviews potential solvency needs under normal and stress conditions and evaluates capital and liquidity available compared to requirements.

Assessment: Assesses current and projected risk position and solvency needs.

The ORSA is a year-round collection of processes, integrating our Enterprise Risk Management (ERM) Framework with capital management and business planning.

The ILA Board has put in place an ORSA Policy that sets out the roles and responsibilities for completing the ORSA. A regular ORSA is carried out each year. A non-regular ORSA may be performed following the occurrence of a material event at an interim date between annual ORSA reports or following a significant change in the Company's risk profile or appetite.

The Board, with significant support from the Board Risk Committee, owns and directs the ORSA, and reviews and approves the ORSA Policy annually. The CRO conducts the ORSA process, producing the ORSA report and maintaining the ORSA record. The Board and Board Risk Committee steer this process, and review and approve the key aspects of the process at various points throughout the year. The annual ORSA process culminates in the ORSA report, which the Board reviews and approves.

The Actuarial Function helps the Risk Function to produce various aspects of the ORSA - capital projections and stress testing in particular. The Head of Actuarial Function also gives an Opinion on the ORSA to the Board.

The ORSA is the main link between the risk management system and capital management activities. We have listed the key steps in the ORSA process below. They include an assessment of our solvency capital requirements in light of our risk exposures. We carry out this assessment using the Standard Formula under Solvency II to evaluate our capital requirements, and by developing our own view of the appropriate level of capital. As part of this exercise we consider all the risks we are exposed to over the life-time of the insurance obligations, whether or not these risks are included in the Standard Formula calculation of capital requirements. A key output from the ORSA is an assessment of the level of capital we need to hold, which stems from our current and prospective risk profile.

We evaluate planned business strategies and proposed capital management activities as part of the ORSA process, capturing and reporting on their impact on the ORSA. The annual ORSA report projects our solvency resources for the following five years, under a base case and range of stress scenarios. The base case scenario reflects the approved business strategy and plans, updated to reflect changes to the operating environment and with certain adjustments where appropriate for the purpose of the ORSA.

We also look at how material developments to the strategy or to the capital position outside of the annual cycle would affect the ORSA.

Key steps in the orsa process

> **Consider the business strategy**
The first-line business divisions present the business strategy to the Board to be challenged and approved. The business plans are informed by the findings of the ORSA. This presentation includes a review of the key assumptions underlying the plan, including projected sales, expenses and new business margins. The Board considers the risks associated with the business strategy. Where the proposals include changes that may materially impact the risk profile of the business, those will be reviewed and analysed through an ORSA lens.

> **Assess the appropriateness of the Standard Form**ula
We use the Standard Formula to calculate how much capital we must hold under the regulations. As part of the annual ORSA process the Board evaluates the risk profile of the business based on the assumptions underlying the Standard Formula. This tests whether the use of the Standard Formula is appropriate for our business.

> **Complete an Own Solvency Needs Assessment (OSNA):**

- We assess our own view of the capital required for the business, as distinct from the capital which the regulations say we must hold.
- We assess the appropriate additional layer of capital to hold above the regulatory requirements, to make sure we will still have sufficient capital even after adverse events.

> **Select stress tests**
The Board, supported by the Risk Function, sets the stress and scenario tests we consider as part of the ORSA. The stress tests are forward looking while also taking past experience into account. We weigh up the impact of the stress tests on our business strategy.

> **Produce the ORSA report**
The Risk Function produces an ORSA report each year under the direction of the Board. The CRO presents it to the Board Risk Committee, who review and recommend the report to the Board for approval. The report includes a solvency projection under the base assumptions as well as the result of the stress tests and an analysis of the results. The base assumptions are consistent with the Board-approved business plans, but with adjustments where appropriate to reflect developments since the plans were approved. The report notes any material changes in the company's risk profile since the previous ORSA and analyses the projected changes in the company's risk profile in the future. The Board reviews and challenges the report. We submit the final report, once approved by the Board, to the Central Bank of Ireland.

> **Review the level of capital held**
After considering the insights on our risk profile gained from each of the key steps above, along with other relevant matters, the Board reviews what level of capital we should hold.

> **Addressing ORSA findings**
The ORSA may generate recommendations such as risk mitigation initiatives or adjustments to business plans. We assign these actions as appropriate to the relevant area, and the Risk Function reports to the Board regularly on our progress in addressing them.

> **Communicating ORSA results**
The Risk Function communicates the results from the ORSA to the business divisions and other key functions as appropriate.

> **Embedding the ORSA within decision making**
Throughout the year we bring significant new initiatives, such as product development and acquisitions, to the Board for approval. The Risk Function analyses the impact of these on the ORSA and present their findings to the Board for consideration.

> **Reviewing risk policies**
The Board reviews and approves all risk policies each year. We update our risk policies to reflect the outcome from the ORSA process.

B.4 INTERNAL CONTROL SYSTEM

B.4.1
Internal control framework

We maintain an internal control framework, a set of processes created by the company's board of directors, management and other personnel, which gives reasonable assurance that the following objectives will be achieved:

> effective and efficient operations

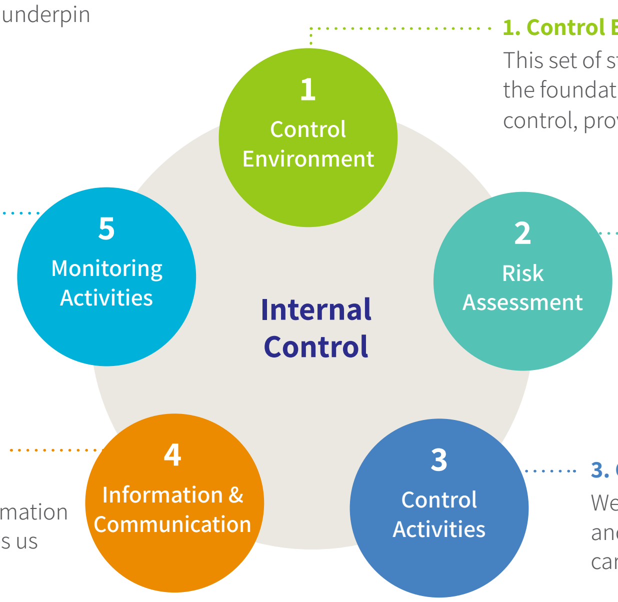
> reliable financial and management reporting

> compliance with applicable laws and regulations.

Our internal controls are key to managing significant risks to fulfilling our business objectives.

The Board determines our Internal Controls and Financial Management policy, and each year approves the policy following recommendation from the Board Audit Committee.

Five components of internal control underpin our internal control system.



1. Control Environment
This set of standards, processes and structures is the foundation for all other components of internal control, providing discipline and structure.

2. Risk Assessment
This is the process for identifying and assessing relevant risks to achieving our objectives, and the basis for deciding how to manage those risks

3. Control Activities
We establish these actions through policies and procedures that help make sure we all carry out management's objectives.

4. Information & Communication
This helps us identify, capture and exchange internal and external information in a form and timeframe that enables us all fulfill our responsibilities.

5. Monitoring Activities
Ongoing evaluation enables us find out whether all components of the internal control system are present and functioning.

Our internal control system demands we have a combination of preventive, detective, directive and corrective control processes in place.

The Canadian Securities Administrators (CSA) requires the CEO and CFO of a company whose securities are publicly traded to verify that they evaluate the design of their Internal Controls Over Financial Reporting (ICOFR) every quarter and that they review the effectiveness of their ICOFR every year. We must comply with this regulation because we are a subsidiary of a Canadian company.

Internal Audit, on behalf of management, tests the design and effectiveness of the key ICOFR controls to make sure we meet the requirements. Each year we review the relevance of these key controls and edit them accordingly, so they continue to reflect the existing control environment.

The CFO must review and approve the Internal Controls and Financial Management Policy before it goes forward for Board approval. Each year our Board assesses whether any new internal controls are required and validates the effectiveness of these (if any) and all existing controls.

B.4.2 Compliance Function

You can find out more about the Compliance Function in section B.1.4 Key Functions above.

B.5 INTERNAL AUDIT FUNCTION

You can find out more about the Internal Audit Function in section B.1.4 Key Functions above.

B.6 ACTUARIAL FUNCTION

You can find out more about the Actuarial Function in section B.1.4 Key Functions above.

B.7 OUTSOURCING

Description of our outsourcing policy

When appropriate, we outsource specific business functions to reduce or control costs, to free internal resources and capital, and to harness skills, expertise and resources not otherwise available to us. However, outsourcing specific business functions may also expose the company to additional risks - risks that we must identify and manage. Our Outsourcing Policy is a Board-approved policy that sets out the principles and requirements for managing outsourcing arrangements.

The Board and senior management retain ultimate responsibility for any functions and activities we outsource. They have the necessary expertise to manage outsourcing risks and oversee outsourcing arrangements.

Our Outsourcing Policy sets out the following general principles for identifying and managing outsourcing risks:

- outsourcing arrangements must be identified and assessed based on their materiality
- outsourcing arrangements must be appropriately approved
- the capability of proposed service providers for material outsourcing must be thoroughly evaluated
- outsourcing contracts for material outsourcing must contain certain mandatory terms and conditions
- material outsourcing arrangements must be effectively monitored and controlled by senior management and the executive Operational Risk Committee, with oversight from the Board Risk Committee
- material outsourcing arrangements must have documented exit plans in place, which are regularly reviewed.

We take a prudent and conservative approach to outsourcing.

Details of outsourced critical or important operational functions and activities

Internal Provider	Services provided	Jurisdiction
Irish Life Financial Services Ltd (ILFS)	Administration and distribution services for ILA.	Ireland
Irish Life Investment Managers Ltd (ILIM)	Investment Management Services	Ireland
Setanta Asset Management Ltd	Investment Management Services	Ireland
Canada Life Asset Management Ltd (CLAM)	Investment Management Services	UK
Canada Life Group Services Ltd and Irish Life Group Services Ltd	These are shared services companies, which provide ILA and sister companies with services including Information Technology, Internal Audit, Finance, Corporate Resources and other.	Ireland
Canada Life Group Services Ltd	Administration of a small number of policies	Ireland
Invesco	Administration and actuarial services to a small number of insurance policies	Ireland
External Provider	**Services provided**	**Jurisdiction**
Investment manager (2 firms)	Investment management services for a small portfolio of assets	Ireland
External consultancy firm	Certain Actuarial services	Ireland
External firm	Administration of a small portfolio of policies	UK
External printing firm	Certain printing and document management services	Ireland
Call centre communication services	Telephony and related communication services	Ireland

Outsourced key function

Our key functions are supported by services provided by shared services companies, as shown on the table above.

B.8 ANY OTHER INFORMATION

No other items to note.

C. RISK PROFILE

Irish Life
IRISH LIFE CENTRE

This section categorises and explains our risk exposures under major risk headings.

Our risk profile reflects our main business activities, particularly those activities that are to do with creating and selling life insurance products and unit-linked investment and saving products.

We control the way we accept risks, using our expertise to manage them and create shareholder value from them. The ILA Board approves our risk appetite at least once a year.

We outline the main points about our risk profile and management strategy below.

Risk Appetite

The ILA Board sets our risk appetite, defining a risk preference level for all significant risks. The risk preferences range from 'no appetite' to 'readily accepts'. We have the highest appetite for risks related to core business activities, particularly those related to insurance products and unit-linked investment management services.

Risk Strategy: Solvency and Capital

The main objective of our risk strategy is to keep our commitments while growing shareholder value. This risk strategy involves generating returns to sustainably grow shareholder value through profitable and growing operations, while maintaining a strong balance sheet and taking a conservative approach to risk management.

Risk Strategy: Capital Usage and Growth

We aim to maximise how efficiently we use capital and how well we control the risk to this capital. We achieve this through product design and setting target returns on the capital we invest.

We believe that controlled organic growth is essential to our continued profitability.

Risk Strategy: Funding

We aim to self-finance our sales plan and the payment of equity dividends. We do not currently plan to raise any new sources of capital.

Risk Exposures

In this section we describe our main risk exposures and how we assess and mitigate them.

The table below shows our Solvency Capital Requirement (SCR) split by risk type. This is the capital needed to cover the '1 in 200 year' adverse outcome, as set out in the Solvency II regulations. This capital can therefore be viewed as a measure of the total risk exposure to each risk type, net of risk mitigations.

€m	End 2021		End 2020	
Market risk	795		695	
Life Underwriting risk	692		717	
Health Underwriting risk	228		240	
Counterparty risk	42		40	
Requirement before diversification		**1,756**		**1,691**
Post diversification		**1,284**		**1,242**
Operational risk		64		62
Loss absorbing capacity of deferred tax		(168)		(163)
Total SCR		**1,179**		**1,142**

Note: There are some technical differences in how we view the split of the total SCR by risk category, as shown in the table above, from the presentation in Appendix 6 that follows a methodology prescribed by the regulatory authorities.

The market risk SCR mainly relates to interest, equity, currency and property risks (see section C.2 (Market Risk) for more details) and credit risk (see section C.3 (Credit Risk) for more details). The life and health underwriting risk SCR relates to lapse, expense, mortality, morbidity and longevity risks (see section C.1 (Underwriting Risk) for more details).

C.1 UNDERWRITING RISK

Insurance (underwriting) risk is linked to contractual promises and obligations made under insurance contracts. Exposure to this risk results from adverse events that occur under specified perils and conditions covered by the terms of an insurance policy.

Insurance risk includes uncertainties around:

> the ultimate amount of net cash-flows (premiums, commissions, claims, pay-outs and related settlement expenses)

> when these cash-flows are received in and paid out

> how the policyholder will behave (e.g. if and when policyholders decide to stop paying into their policies).

Risk Description

Insurance risks comprise mortality, longevity, morbidity, lapse, expense, and catastrophe risks. These risks could cause losses from the changing level, trend or volatility of claims as well as by a single catastrophic event.

Mortality risk

This relates to the risk of loss from higher than expected mortality rates. We are exposed to mortality risks through individual and group insurance policies, which pay benefits to insured policyholders upon death.

Longevity risk

This relates to the risk of loss from lower than expected mortality rates. We are exposed to longevity risk primarily through annuity contracts, where regular payments are made to policyholders while the policyholder is alive.

Morbidity risk

This relates to the risk of loss from higher than expected levels of illness or injury, or lower than expected rates of recovery from illness or injury. We are exposed to morbidity risk when we sell income-replacement contracts (which pay a replacement income to policyholders who are unable to work due to illness or injury) and through specified-illness cover policies (which pay a lump sum on diagnosis of one of a number of specified illnesses).

Lapse risk

This is the risk of losses due to policy-holders ending their contracts early.

Expense risk

This is the risk of losses due to higher than expected expenses that we incur when administering our business. This includes the impact of inflation rates on expenses.

Catastrophe risk

This relates to losses caused by catastrophic events, for example a pandemic affecting the population or an industrial accident at a single location. We are exposed to catastrophe risk on our insured business, particularly where we provide group insurance coverage for the lives of many people who routinely work at the same location.

Throughout 2021 we were exposed to each of these insurance risks.

Risk Assessment and Mitigation

We use a series of techniques to assess, manage and mitigate underwriting risks.

Own Risk and Solvency Assessment (ORSA)

We assess all material risks, both qualitatively and quantitatively, as part of the annual ORSA process.

Risk limits

We have a series of risk limits that measure risk exposure from different sources of underwriting risk. Our Risk Function monitors these limits and reports on them each quarter to the Executive Risk Management Committee and the Board Risk Committee. By monitoring exposures, we can see trends in the risk profile over time and identify material deviations from business plans or from our appetite for each risk.

Stress testing

We use stress testing as part of the ORSA process to assess risk exposures and their potential impact. Stress testing can also be useful in helping us decide how to mitigate our exposure to risk.

Reinsurance

We set retention limits to restrict the insurance risks we retain that relate to an individual policy or a group of exposures. We reinsure amounts that are more than the limits.

During the year, we entered a new reinsurance arrangement that transferred some of the risks associated with certain group pension policies to a reinsurer. This resulted in a reduction in our retained insurance and market risks relating to that business line.

Assumption/experience monitoring

When writing an insurance policy, we make a series of assumptions around the insurance experience that will unfold over the term of the contract. If the actual experience is worse than we assumed, the result will be lower profits or even losses.

Our Actuarial Function investigates insurance risk experience for our main exposures every year. This allows the Chief Actuary and the Board to assess the suitability of the assumptions made when pricing business, setting reserves and calculating the value of our liabilities for inclusion in our financial statements. Each year, after considering recommendations from the Chief Actuary, the Board approves the assumptions used to determine the value of our liabilities in relation to our insurance policies upon recommendation from the Board Audit Committee. The Executive Risk Management Committee and the Board Risk Committee also review the insurance risk experience each year.

We monitor risk experience against assumed/expected experience regularly through monthly business division management information, budget tracking and quarterly profit reporting. If this regular monitoring identifies a potential deviation in experience, the Actuarial Function investigates and feeds back into the pricing and reserving processes, as appropriate.

Underwriting

Our underwriting process includes an assessment of insurance risks before we issue policies. This assessment includes a medical underwriting assessment and a financial assessment for certain product lines. We also carry out underwriting assessments when a claim is made.

Risk pricing

We control the development of new products and the pricing of new and existing products to minimise the risk of underwriting risks at a loss. The profitability of new and existing products depends on the applicable experience assumptions used to price the product (e.g. expense, claim and investment experience assumptions).

We monitor the profitability of new business against targets set through our annual budget process. Our operating divisions regularly monitor and report on sales volumes and profitability levels. We report results to the Board each quarter.

Risk Concentration

Our insurance concentration risks take a number of forms:

- We operate within Ireland, and a significant portion of the Irish population lives in the greater Dublin area, so our insurance risk exposure is relatively concentrated to a specific place. This is an on-strategy risk for us and we do not seek to reduce it.
- Individual policyholders with large sums assured can lead to some concentration risk. We actively manage this risk by using reinsurance. We reinsure large policies so that the retained sum assured is limited to the maximum amount we have set.
- We actively write group business and can face site concentration risk as a result. We use reinsurance to manage this risk.
- The sale of annuities to pension schemes can lead to longevity risk exposures concentrated in certain industries. Our portfolio is large and diverse, which reduces this concentration risk. We further reduce this risk with tailored pricing and by using reinsurance.

Sensitivities / stress testing

You can find out more about the stress testing and sensitivity analysis we carry out in section C.7.1 (Risk Sensitivities).

C.2 MARKET RISK

Risk Description

Market risks comprise equity/property risk, currency risk, interest rate risk, inflation risk and liquidity risk (see section C.4 (Liquidity Risk)). We are willing to accept market risk in certain circumstances as a consequence of our business model and seek to mitigate the risk wherever practical by matching our assets and liabilities.

Equity risk

This relates to losses due to falls in equity prices. We have no significant direct shareholder investments in equity markets. We do give policyholders access to equity markets through unit-linked products. Any gains or losses from those investments are incurred by policyholders. However, we are indirectly exposed to market levels as our charges depend on the value of the unit-linked funds. So if fund values fall due to falls in equity markets, our charges will fall as well. We also have some products, which are now closed, that provide investment guarantees.

Property risk

This relates to losses due to falls in property prices. It is similar to equity risk in that we also have indirect exposure to property market levels through charges collected from unit-linked funds. In addition, we have some direct property holdings, mainly owner-occupied premises.

Currency risk

This relates to losses due to changes in currency exchange rates. We have no significant direct exposure to currency market levels, as we hedge exposures that arise. It is similar to our equity risk exposure, in that we have indirect exposure to currency markets. If a change in currency exchange rates affects the value of unit-linked funds, it will also affect the value of the charges we collect.

Interest rate risk

This relates to losses due to changes in interest rates. The values of our liabilities linked to insurance policies are sensitive to prevailing long-term interest rates. However, we largely mitigate this exposure by holding assets whose values also move when interest rates change, offsetting the change in the values of our liabilities.

Inflation risk

This relates to losses due to changes in inflation rates. Some of our policies pay benefits to policyholders that increase in line with prevailing inflation rates, so higher than expected inflation rates may lead to losses. We partly mitigate this risk by holding assets that have a higher return when inflation rates are higher.

Defined benefit pension schemes

An indirect source of our market risks relates to the risk of economic loss caused by uncertainty around required contributions to our defined benefit pension schemes.

We consider this risk to be a part of expense risk as a deterioration in the pension scheme position could lead to the need for greater contributions from the employer, which would increase expenses. Deterioration in the pension scheme position could stem from adverse market movements affecting the value of the pension scheme's assets or liabilities.

During the year, a number of deferred members of the pension scheme availed of an Enhanced Transfer Value offer. This resulted in a modest reduction in the size of the scheme and associated risk profile.

Risk Assessment and Mitigation

We use a series of techniques to assess, manage and mitigate market risks.

ORSA

We assess all material risks, both qualitatively and quantitatively, as part of our annual ORSA process.

Risk limits

We have a series of risk limits that measure market risk exposure from different sources. Our Risk Function monitors these limits and reports on them each quarter to the Executive Risk Management Committee and the Board Risk Committee. By monitoring exposures we can see trends in the risk profile over time and identify material deviations from business plans or from our appetite for each risk.

Stress testing

We use stress testing as part of the ORSA process to assess risk exposures. Stress testing can also be useful in helping us decide how to mitigate our exposure to risk.

Asset Liability Matching (ALM)

We invest in matching assets to mitigate the market risks linked to policy liabilities.

- We invest in unit-linked assets to match the surrender value of unit-linked policies.
- We mitigate the interest rate and inflation rate exposure of non-linked products by matching liabilities with appropriate assets. That means the value of the liabilities and assets move by similar levels when interest and inflation rates change.
- We mitigate currency risk by holding assets of the same currency as liabilities or by hedging currency risks that arise.

Equity hedge

We operate an equity hedge to partially mitigate certain residual exposure to equity risk.

Reinsurance

We reinsure some market risks linked to certain legacy unit-linked products that gave investment guarantees to policyholders.

As noted above under section C.1, a new reinsurance arrangement entered into during the year reduced the retained market risks on a portfolio of group pension policies.

Prudent investment strategy

We invest our assets prudently, including assets that back policy liabilities and other shareholder assets. This is in line with the Prudent Person Principle, as required by Solvency II regulations. You can find out more in section B.3.6 Prudent Person Principle about how we apply this. Our investment principles include:

- establishing strategic asset limits to make sure our investments are appropriately diversified
- maintaining a high level of liquidity, above the level we foresee we will need
- restricting the use of derivatives to make sure we only hold these instruments to manage investments efficiently or reduce investment risk
- keeping shareholder investments in equity/property assets low.

The Executive Investment Management Committee also oversees our market risks through its oversight of the company's investments.

Risk Concentration

Our shareholder assets include owner-occupied properties in a single campus in central Dublin. Other than these assets, we do not have any significant concentrated holdings of individual equity or property assets.

You can find out more about concentration risks linked to our fixed interest assets holdings in section C.3 (Credit Risk).

Sensitivities / Stress testing

You can find out more about the stress testing and sensitivity analysis we carry out in section C.7.1 (Risk Sensitivities).

C.3 CREDIT RISK

Risk Description

Credit risk relates to risks from a counterparty's potential inability or unwillingness to meet its obligations. Our counterparties include sovereign governments and corporate entities who issue fixed interest assets, reinsurers, insurance intermediaries, policyholders and derivative counterparties.

Our main source of credit risk is investments in fixed interest assets issued by borrowers, including sovereign governments and corporate entities. These assets are highly liquid and traded on various market exchanges. Credit risk also stems from deposits and other assets we place with banks.

We cede insurance risk to reinsurance companies to mitigate our insurance risk, and are willing to accept the resulting reinsurance counterparty risk within the limits we have set. Similarly, we are willing to accept derivative counterparty risk because we use derivatives to mitigate other risks, but have set limits in relation to this.

We are also willing to accept credit risk that results from our business model, e.g. through our dealings with group clients, brokers, intermediaries, policyholders, suppliers, service providers etc.

Risk Assessment and Mitigation

We use a series of techniques to assess, manage and mitigate credit risk.

ORSA

We assess all material risks, both qualitatively and quantitatively, as part of the annual ORSA process.

Risk limits

We have a series of risk limits that measure credit risk exposure from different sources. Our Risk Function monitors these limits and reports on them each quarter to the Executive Risk Management Committee and the Board Risk Committee. By monitoring exposures we can see trends in the risk profile over time and identify material deviations from business plans or from our appetite for each risk.

Stress testing

We use stress testing as part of the ORSA process to assess risk exposures. Stress testing can also be useful in helping us decide how to mitigate our exposure to risk.

Prudent investment strategy

Our overarching investment strategy involves targeting a diversified portfolio of assets from counterparties that are in the upper tier for credit quality. We establish limits by referring to aggregate portfolio and individual counterparty limits, as applicable. We then link these to credit ratings that assess the financial strength/creditworthiness of counterparties. Implementation of this investment strategy is overseen by the Executive Investment Management Committee, Executive Risk Management Committee, and the Board.

Reinsurance

In relation to our reinsurers, we deal only with counterparties that meet our specific creditworthiness requirements. We actively monitor the financial strength of our reinsurers. We also seek contractual protection such as collateral and offset rights where appropriate.

Risk Concentration

We have set fixed interest and cash counterparty credit risk limits to manage credit concentration risk. Our largest counterparty is the German sovereign.

Our operations also lead to some concentration risk exposure linked to reinsurance counterparties. We diversify across reinsurers to reduce this risk. We also look for collateral, where appropriate, to reduce the risk.

Sensitivities / Stress testing

You can find out more about the stress testing and sensitivity analysis we carry out in section C.7.1 (Risk Sensitivities).

C.4 LIQUIDITY RISK

Risk Description

Liquidity risk stems from a company's inability to generate the necessary funds to meet its obligations as they fall due.

Our business model does not lead to significant liquidity risk as we hold assets that are greater than the value of our liabilities. Our business model is also cash-generating.

Risk Assessment and Mitigation

We monitor and assess potential liquidity risk regularly.

Day-to-day/expected liquidity strains

For day-to-day liquidity needs, we maintain adequate funds in instant-access bank accounts. Our Finance Function monitors and maintains balances daily.

The need to pay policyholders is the main generator of ongoing liquidity needs. For unit-linked policies, we fund claims by selling the unit-linked assets. For non-linked policies, we make sure liquid resources are available when we need them by investing in assets that generate cash when we need it to pay benefits to our policyholders.

Unexpected liquidity strains

Unexpected liquidity strains can stem from a number of sources. These include higher-than-expected insurance claims and collateral calls linked to derivatives or reinsurance arrangements. Liquidity strains could also arise from higher than expected policyholder encashment requests, if the assets held by ILA prove to be difficult to liquidate - for example, high levels of surrender requests from unit-linked property funds may cause a liquidity strain if the underlying properties held by the funds are difficult to sell in a timely manner.

We invest our assets to make sure we have ample liquidity to meet unexpected liquidity needs. We have established minimum and maximum strategic investment limits for different liquid and illiquid asset categories.

We hold significant assets to provide solvency capital cover for the company. These also act as a buffer for unexpected liquidity strains.

Sensitivities / Stress testing

The Risk Function carries out regular stress testing to make sure we have sufficient liquidity to meet conceivable needs, even during times of severe strain. We report the results of stress testing each quarter to the Executive Risk Management Committee and the Board Risk Committee.

The stress testing considers the potential liquidity strains we face. We compare these liquidity strains to the available liquid assets to make sure the available assets exceed our requirements.

Risk Concentration

As noted earlier, most of our insurance risks are located in Ireland. The associated concentration risk could lead to material liquidity strains from higher-than-expected insurance claims, as described above. And as explained above, high levels of surrender requests from unit-linked property funds could cause some liquidity strain. Most of the properties held by these funds are located in Ireland.

Our stress testing of liquidity risk captures these factors, and we hold ample liquidity to address the risk

C.4.1
Expected profit included in future premiums

The regulations require us to state in this report the amount of 'expected profit included in future premiums'. This is the amount by which our liabilities are reduced due to the premiums expected from our policyholders in the future. When calculating our liability values we only include future premiums for certain policy types, in line with the requirements of the regulations.

At the end of 2021, expected profit included in future premiums was €291m (2020: €290m). This figure includes the impact of reinsurance but does not include any impact on tax provisions.

The value of our liabilities is reduced by this amount, which leads to a higher net asset position - i.e. a higher level of capital available. However, the amount of capital we have to hold also increases as a result of recognising these future premiums and so the higher capital available must be kept within the company to meet the higher requirement.

When we assess whether our liquid resources are adequate, as described above, we do not count the expected profit included in future premiums as it is not a liquid asset.

C.5 OPERATIONAL RISK

Risk Description

Operational risk is the risk linked to inadequate or failed internal processes, people and systems or from external events. Operational risks relate to all business processes.

We accept limited operational and other risks as part of our business model. We have controls in place to mitigate them through integrated and complementary policies, procedures, processes and practices, keeping in mind the cost/benefit trade-off.

We advise customers about their financial needs, and this causes operational risks. We use best management practices to mitigate and manage this risk.

Operational risks also include the risk of failing to identify and comply with new or emerging legal and regulatory requirements. To mitigate such risks and factor them in to new business decisions, we monitor regulatory developments closely, keep in regular contact with relevant regulators and capitalise on our internal communication processes.

Strategic risk stems from the potential inability to implement appropriate business plans and strategies, make decisions, allocate resources or anticipate business change. We instigate strategic risk management at the individual business division level and consolidate it upwards. Our senior leadership team makes decisions at the ILA level for subsequent review and approval by the Board.

Risk Assessment and Mitigation

The Risk Function co-ordinates operational risk management activities. In addition, the Internal Audit Function is key to auditing the processes and associated controls that manage operational risks.

We record operational risks, their associated controls and associated loss events for each of our business divisions. We identify our top operational risks and assess them for specific monitoring. We maintain Key Risk Indicators (KRIs) for each top operational risk, and report on these each quarter as part of a risk dashboard to the Operational Risk Committee (ILA ORC). This committee escalates operational risk issues as appropriate to the Board Risk Committee. The ILA ORC also receives quarterly reports on actual loss events and additional reporting on significant losses. We also monitor a series of risk limits and report on them each quarter to the ILA ORC. In addition, the Risk Function reports risk limits and operational risk KRIs each quarter, with commentary, to the Board Risk Committee.

As part of the annual ORSA process, we assess our operational risks both qualitatively and quantitatively.

Business Continuity Planning (BCP) is an important part of mitigating operational risks. It helps ensure continuity of business in a crisis situation. Our Board has approved a BCP framework that applies across our business units.

Stress testing is another tool in assessing operational risks. We carry out a range of operational risk stress tests each year. These help us develop our approaches to mitigation and management of operational risk.

We will not take on opportunities if we think they pose a risk to our reputation. When we design products and advice processes for customers, we consider any potential impact on our reputation.

As part of a large insurance group, we have a number of relationships with other group companies and rely on them for certain services. Our oversight and management of operational risks includes these shared service arrangements.

We have formal outsourcing agreements in place to manage external and inter-group outsourcing arrangements. These agreements set out the responsibilities of both parties and we monitor and review them regularly. This level of formality ensures we manage the associated risks with appropriate rigour.

Risk Concentration

Our business operations and policy administration are based mainly in a single campus in Dublin, with a second administration centre in Dundalk. We have centred most of the servicing of policies in these locations. We have partially mitigated the associated concentration risks through business continuity planning, which includes potential to carry out operations from alternative locations and an ability to widely deploy remote working capability. In case of an incident at the Dublin campus, we use off-site centres for data backup and restoration.

We have noted other concentration risks, such as providing insurance products within Ireland, in sections C.1 to C.4 above.

C.6 OTHER MATERIAL RISKS

No other items to note.

C.7 ANY OTHER INFORMATION

C.7.1
Risk sensitivities

We use a number of sensitivity tests to understand the volatility of our capital position. We regularly produce sensitivity tests on our key risk exposures to help inform our decision-making and planning processes, and as part of the framework we use to identify and quantify our risks.

Like every long-term business, we make a number of assumptions when we compile our financial results. These assumptions relate to future expense, mortality and other insurance experience rates, and policyholder lapse rates. Our assumptions are informed by an analysis of historic and expected experience.

We have set out the results of key risk sensitivity tests below. We produce these results from our financial reporting models. For each sensitivity test, we have shown the impact of a change in a single factor, and left other assumptions unchanged. You can see the change in our Solvency Capital Requirements (SCR) coverage ratio that would result from the sensitivities shown.

Interest rates

The impact of a 0.5% increase or decrease in market interest rates. The test considers the impact on the value of our liabilities, net of reinsurance, offset by changes to the value of the assets we hold.

Credit spreads

The impact of a 0.5% increase in credit spreads on corporate bonds and our other non-sovereign assets. The test considers the impact on the value of our liabilities, net of reinsurance, offset by changes to the value of the assets we hold.

Equity/property market values

The impact of a 10% fall in the market value of equity and property assets.

Expenses

The impact of a permanent 10% increase in maintenance expenses.

Lapses

The impact of a permanent 10% increase or decrease in policyholder lapse rates.

Mortality

The impact of a permanent 5% increase in mortality rates, excluding the mortality rate of the people we pay annuities to.

Annuitant mortality

The impact of a permanent 5% decrease in the mortality rate of the people we pay annuities to.

Morbidity

The impact of a permanent 5% deterioration in morbidity. We assume a 5% increase in incidence rates and a 5% reduction in recovery rates for those products where these assumptions are relevant.

The table below shows the sensitivity test results as they impact the SCR coverage ratio. These sensitivities have been selected on the basis of our key risk exposures. We accept these risks in line with the Company's business strategy and risk appetite.

Sensitivity Test	Impact on SCR Coverage Ratio
0.5% increase in interest rates	+3%
0.5% decrease in interest rates	-2%
0.5% increase in credit spreads	+1%
10% fall in equity and property values	-4%
10% increase in maintenance expenses	-7%
10% increase in policy lapse rates	+6%
10% decrease in policy lapse rates	-5%
5% increase in mortality rates (assured lives)	0%
5% decrease in annuity mortality rates	-2%
5% deterioration in morbidity rates	-3%

C.7.2
Use of Special Purpose Vehicles

The regulations require us to include details of any Special Purpose Vehicles (SPVs) we use to transfer risks off our balance sheet, within this report.

We do not have any SPVs.

D. VALUATION FOR SOLVENCY PURPOSES

D.1 ASSETS

This section is about our valuation of each kind of asset for Solvency II basis. This includes explanations of:

1. how the value of each asset for Solvency II is different from valuing it for statutory financial reporting purposes that meets the EU's International Financial Reporting Standards (IFRS).
2. the valuation bases, methods and main assumptions used for Solvency II and those used for statutory IFRS financial statements for the financial year ended 31 December 2021.

The Solvency II Balance Sheet is in Appendix 1.

1. Valuation differences - Solvency II v IFRS

Balance Sheet Extract - Assets

The IFRS values in the following tables are as recorded in our annual report and financial statements. The Asset Type categorisation here is per the Solvency II balance sheet and not directly comparable to categorisation applied in the IFRS Statement of Financial Position.

2021				
Asset Type (€m)	Note	IFRS	Valuation Adjustments	Solvency II
Deferred acquisition costs	1	327	(327)	—
Intangible assets	2	1	(1)	—
Property, plant & equipment held for own use	3	111	—	111
Property (other than for own use)	4	32	—	32
Equities	5	46	—	46
Government bonds	6	2,510	—	2,510
Corporate bonds	6	2,328	—	2,328
Collateralised securities	6	29	—	29
Investment funds	7	35	—	35
Derivatives	8	4	—	4
Deposits other than cash equivalents	9	30	—	30
Unit linked assets	10	57,256	—	57,256
Loans and mortgages	11	130	—	130
Reinsurance recoverables	Section D.2	1,868	(461)	1,408
Insurance & intermediaries receivables	12	24	—	24
Reinsurance receivables	13	122	—	122
Receivables (trade, not insurance)	14	8	—	8
Cash and cash equivalents	9	82	—	82
Any other assets, not elsewhere shown	15	394	—	394

2020				
Asset Type (€m)	Note	IFRS	Valuation Adjustments	Solvency II
Deferred acquisition costs	1	308	(308)	—
Intangible assets	2	1	(1)	—
Property, plant & equipment held for own use	3	111	—	111
Property (other than for own use)	4	32	—	32
Equities	5	40	—	40
Government bonds	6	2,982	—	2,982
Corporate bonds	6	2,291	—	2,291
Collateralised securities	6	27	—	27
Investment funds	7	43	—	43
Derivatives	8	8	—	8
Deposits other than cash equivalents	9	96	—	96
Unit linked assets	10	48,916	—	48,916
Loans and mortgages	11	114	—	114
Reinsurance recoverables	Section D.2	2,134	(537)	1,597
Insurance & intermediaries receivables	12	28	—	28
Reinsurance receivables	13	109	—	109
Receivables (trade, not insurance)	14	1	—	1
Cash and cash equivalents	9	80	—	80
Any other assets, not elsewhere shown	15	670	—	670

2. Valuation Bases, Methods and Main Assumptions - Solvency II v IFRS

Solvency II sometimes uses a different set of valuation bases, methods and main assumptions than companies use for IFRS statutory financial statements. In this section we show where there are differences, and what those differences are, across various asset types as they apply for the financial year ended 31 December 2021.

Note 1: Deferred Acquisition Costs

Solvency II purposes:	IFRS reporting purposes:
As per Article 12 of the Delegated Act, deferred acquisition costs are valued at nil for Solvency II purposes.	Acquisition costs for investment contracts represent those costs directly associated with acquiring new investment management service contracts. The company defers these costs to the extent that they are expected to be recoverable out of future revenues to which they relate.

Note 2: Intangible Assets

Solvency II purposes:	IFRS reporting purposes:
As per Article 12 of the Delegated Act, intangible assets are valued at nil for Solvency II purposes, unless the intangible asset can be sold separately, and the company can demonstrate that there is a value for the same or similar assets derived in accordance with Article 10 of the Delegated Act.	**Computer Software** Computer software is carried at cost, less amortisation (over a period of three to fifteen years) less provision for impairment, if any. The external costs and identifiable internal costs of acquiring and developing software are capitalised where it is probable that future economic benefits that exceed its cost will flow from its use over more than one year.

Note 3: Property, plant and equipment held for own use

Solvency II purposes:	IFRS reporting purposes:
Property Owner Occupied Properties (OOP) are carried at fair value with changes in fair value included in the income statement within investment return. External chartered surveyors value OOP at least once a year at open market value. This is in accordance with the Appraisal and Valuation Standards published by the Royal Institution of Chartered Surveyors (RICS) in the U.K. and Ireland and follows the guidelines on the most appropriate way to value OOP. The company revalues OOP at least once a quarter, using a commercial property price index as a guide. The revalued premises, excluding the land element, are depreciated to their residual values over their estimated useful lives (50 years), which the directors assess once a year.	**Property** External chartered surveyors value OOP at least once a year at open market value. This is in line with IAS 40 Investment Property and IFRS 13 Fair Value Measurement and with guidance set down by their relevant professional bodies (RICS). An increase in the fair value is included within the statement of other comprehensive income ("OCI"). In the event of a decrease in the fair value, the amount is included in the OCI where a revaluation surplus exists. Where no surplus exists, the amount is recognised in the income statement as an impairment. For Solvency II, all fair value movements are recorded in the income statement. While the presentation of the fair value gain or loss is different, there is no valuation difference between Solvency II and IFRS basis.
Plant and Equipment Plant and equipment are stated at cost, less accumulated depreciation and impairment losses. This valuation is assumed to materially approximate the fair value of these assets. The company calculates depreciation to write off the costs of such assets to their residual value over their estimated useful lives, which the directors assess once a year. The estimated useful lives are as follows: Office equipment 5 - 15 years Fixtures and fittings 5 - 15 years Computer hardware 3 - 10 years Motor vehicles 5 years	**Plant and Equipment** There is no valuation difference between Solvency II and IFRS basis.
Lease assets On initial application of IFRS16 the company calculated right-of-use assets on a lease by lease basis by calculating the lease liabilities of all outstanding leases (see section D.3). Right-of-use assets were equal to lease liabilities at initial application; Right-of-use assets were subsequently adjusted for onerous lease provisions. The company measured its right-of-use assets at cost less accumulated depreciation and impairment losses. The company also adjusted its right-of-use assets for any re-measurement of lease liabilities where applicable. The company depreciates its right-of-use assets from the commencement date to the earlier of the end of useful life or end of lease term. Right-of-use assets shall also be adjusted by the amount of re-measurement of the lease liabilities. If the carrying amount of the right-of-use asset is reduced to nil any further reductions shall be recognised in the income statement. Minor leases held by the company have been identified and assessed. These low value items are treated as an expense through the income statement.	**Lease assets** There is no valuation difference between Solvency II and IFRS basis.

Note 4: Property (other than for own use)

‘Property (other than for own use)’ means property we are holding for long-term rental yields and capital growth. It can be land or buildings.

Solvency II purposes:	IFRS reporting purposes:
Investment properties are carried at fair value with changes in fair value included in the income statement within investment return. External chartered surveyors value property at least once a year at open market value. This is in line with the Appraisal and Valuation Standards published by the Royal Institution of Chartered Surveyors (RICS) in the UK and Ireland and follows the guidelines on the most appropriate way to value property. Fair values take into account the highest and best use of the property and are based on yields which are applied to arrive at the property valuation. Investment properties are revalued at least once a quarter using a commercial property price index as a guide.	External chartered surveyors value property at least once a year at open market value. This is in line with IAS 40 Investment Property and IFRS 13 Fair Value Measurement and with guidance set down by their relevant professional bodies (RICS). There is no valuation difference between Solvency II and IFRS basis.

Note 5: Equities

Equities principally include common shares.

Solvency II purposes:	IFRS reporting purposes:
The company values quoted equities based on the fair value determined by the closing bid price from the exchange where they are principally traded. Management value unquoted equities in line with principles set down by the European Venture Capital Association. An unquoted equity valuation report is presented to the board at least once a year for review and approval.	There is no valuation difference between Solvency II and IFRS basis.

Note 6: Government Bonds, Corporate Bonds and Collateralised Securities

Equities principally include common shares.

Solvency II purposes:	IFRS reporting purposes:
The company values bonds based on the fair value determined by referring to quoted market bid prices. These are primarily from third-party independent pricing sources. If there are price movements above specified tolerances, the company makes sure those movements are correct by checking a second pricing source. Where prices are not quoted in an active market, the company determines fair values by valuation models. The company maximises the use of observable inputs and minimises the use of unobservable inputs when measuring the fair value. The company uses a ‘mark to model’ valuation basis to determine a value appropriate to the industry sector. The model uses public bond spread data as a proxy for current spreads on fixed-interest assets. The company then uses this to develop a yield curve to discount the cash flows underlying the private placement to obtain its value. For a limited number of small exposures or short duration bonds, the company uses amortised cost as a proxy for the mark to model valuation basis.	There is no valuation difference between Solvency II and IFRS basis.

Note 7: Investment Funds

Investment funds principally include Money Market Funds (MMFs).

Solvency II purposes:	IFRS reporting purposes:
The company values MMFs at fair value based on a quoted market price where the asset is traded.	There is no valuation difference between Solvency II and IFRS basis.

Note 8: Derivatives

Derivatives principally include currency forward rate contracts, currency swaps and futures contracts.

Solvency II purposes:	IFRS reporting purposes:
The company values derivatives based on a counterparty valuation which is verified by an independent third-party valuation service.	There is no valuation difference between Solvency II and IFRS basis.

Note 9: Deposits other than cash equivalents; Cash and cash equivalents

'Deposits other than cash equivalents' means deposits we hold for investment purposes. 'Cash and cash equivalents' means cash we have in a bank or deposit account we hold ready to use for business operations.

Solvency II purposes:	IFRS reporting purposes:
The company values cash and deposits at their face value.	There is no valuation difference between Solvency II and IFRS basis.

Note 10: Unit-Linked Assets

We hold unit-linked assets for the benefit of policyholders. They are made up of several kinds of investment assets, primarily:

1. property
2. equities
3. bonds
4. derivatives
5. deposits.

Both the Solvency II balance sheet and the IFRS statutory balance sheet present unit-linked assets as one line.

Note 10.1: Property (other than for own use)

This means property we are holding for long-term rental yields and capital growth. It can be land or buildings.

Solvency II purposes:	IFRS reporting purposes:
The company carries investment properties at fair value, with changes in fair value included in the income statement within investment return. External chartered surveyors value property at least once a year at fair value in accordance with IAS 40 Investment Property and IFRS 13 Fair Value Measurement. This is in line with the RICS Valuation - Professional Standards 2020 published by the Royal Institution of Chartered Surveyors (RICS) in the U.K. and Ireland and follows the guidelines on the most appropriate way to value property. Fair value is based on the highest and best use of the property, taking into account all of its particular attributes, including occupational tenancies, and prevailing market conditions.	There is no valuation difference between Solvency II and IFRS basis.

Note 10.2: Equities

Equities include common shares, preferred shares and investments in collective investment schemes.

Solvency II purposes:	IFRS reporting purposes:
The company values quoted equities based on the fair value determined by the final traded price from the exchange where they are principally traded. Management value unquoted equities in accordance with principles set down by the European Venture Capital Association. An unquoted valuation report is presented to the board at least once a year for review and approval. The external manager values unlisted unit trusts using the latest published Net Asset Value (NAV).	There is no valuation difference between Solvency II and IFRS basis.

Note 10.3: Bonds

Bonds include government bonds, corporate bonds and collateralised securities.

Solvency II purposes:	IFRS reporting purposes:
The company values bonds based on the fair value determined by referring to quoted market bid prices, except in a minority of instances where bonds are valued on a mid-basis in line with market convention. These are primarily from third-party independent pricing sources. If there are price movements above specified tolerances, the company makes sure those movements are correct by checking a second pricing source. Where prices are not quoted in an active market, the company determines fair values by valuation models. The company maximises the use of observable inputs and minimises the use of unobservable inputs when measuring the fair value. The company uses a 'mark to model' valuation basis to determine a value appropriate to the industry sector. The model uses public bond spread data as a proxy for current spreads on fixed-interest assets. The company then uses this to develop a yield curve to discount the cash flows underlying the private placement to obtain its value.	There is no valuation difference between Solvency II and IFRS basis.

Note 10.4: Derivatives

Derivatives include Over-The-Counter derivatives (OTC), exchange traded derivatives, foreign exchange traded derivatives, currency forward rate contracts, futures contracts, forward rate agreements and options.

Solvency II purposes:	IFRS reporting purposes:
The company uses the bid value supplied by the counterparty to value OTC Derivatives. The company values exchange traded derivatives by using the closing price from the exchange in which they are traded. The company values foreign exchange traded derivatives using a market feed of forward points and corresponding interest rates.	There is no valuation difference between Solvency II and IFRS basis.

Note 10.5: Deposits

Solvency II purposes:	IFRS reporting purposes:
The company values deposits at their face value.	There is no valuation difference between Solvency II and IFRS basis.

Note 11: Loans and Mortgages

Solvency II purposes:	IFRS reporting purposes:
The company records loans and mortgages at fair value, determined by discounting expected future cash-flows using current market rates. Valuation inputs typically include benchmark yields and risk-adjusted spreads based on current lending activities and market activities.	There is no valuation difference between Solvency II and IFRS basis.

Note 12: Insurance & intermediaries receivables

‘Insurance & intermediaries receivables’ includes outstanding premiums that policyholders are due to pay us.

Solvency II purposes:	IFRS reporting purposes:
The company records receivables at their fair value, net of any amounts deemed as doubtful debts.	There is no valuation difference between Solvency II and IFRS basis.

Note 13: Reinsurance receivables

Reinsurance receivables include the money that reinsurers are still due to pay us and the money we’re due to receive from multinational pooling (MNP) arrangements.

Solvency II purposes:	IFRS reporting purposes:
The company estimates amounts receivable from reinsurers in a manner consistent with the claim liability associated with the reinsured policy. The company records MNP receivables on an accruals basis to account for premiums and claims activity that has not yet been agreed with the MNP	There is no valuation difference between Solvency II and IFRS basis.

Note 14: Receivables (trade, not insurance)

Receivables (trade, not insurance) relates to current tax owed to the company.

Solvency II purposes:	IFRS reporting purposes:
The company records corporation tax assets at current tax rates	There is no valuation difference between Solvency II and IFRS basis.

Note 15: Any other assets, not elsewhere shown

'Any other assets, not elsewhere shown' includes other unit-linked assets not shown anywhere else on the balance sheet, for example, broker outstanding balances. This section also includes other non-linked assets not shown anywhere else on the balance sheet, for example, intercompany debtors, accrued external fees and management charges due.

Solvency II purposes:	IFRS reporting purposes:
The company records receivables at their fair value, net of any amounts deemed as doubtful debts.	There is no valuation difference between Solvency II and IFRS basis.

There have been no changes to the recognition and valuation basis during the year for the assets noted above.

There are no classes of assets subject to operating or finance lease arrangements.

For estimation uncertainty, please refer to section D.4 (Alternative Methods for Valuation).

D.2 TECHNICAL PROVISIONS

Technical provisions represent the value of our liabilities under policies we have written.

Solvency II technical provisions include:

- account values (unit liabilities)
- best estimate technical provisions (BETPs)
- risk margin.

D.2.1
Solvency II Technical Provisions and Reinsurance Recoverables: Overview

The tables below show the value of technical provisions and reinsurance recoverables split by line of business:

2021					
€m	Technical Provisions			Reinsurance Recoverables	
Line of business	Calculated as a whole	Best estimate technical provisions	Risk Margin	Calculated as a whole	Other
Contracts with profit participation		86	—		
Other Life Insurance		4,093	161		1,332
Health		593	43		64
Unit-linked	57,299	(764)	179	22	(10)
Total	**57,299**	**4,008**	**385**	**22**	**1,386**

2020					
€m	Technical Provisions			Reinsurance Recoverables	
Line of business	Calculated as a whole	Best estimate technical provisions	Risk Margin	Calculated as a whole	Other
Contracts with profit participation		83	—		
Other Life Insurance		4,438	150		1,502
Health		617	92		74
Unit-linked	49,201	(553)	155	21	1
Total	**49,201**	**4,585**	**398**	**21**	**1,576**

The increase in technical provisions calculated as a whole (€8,098m) is due to investment returns on assets backing unit-linked funds and net inflows into the funds.

The decrease in best estimate technical provisions (-€577m) is due to a decrease in provisions arising from market performance, in force movements and the impact of assumption changes.

The decrease in risk margin (-€14m) is driven by the impact of a new reinsurance treaty, movements on the in force book of business and market performance partially offset by the impact of new business growth.

D.2.1.1 Technical provisions calculated as a whole

Under Solvency II rules, certain technical provisions can be calculated "as a whole" which means that separate calculation of the best estimate and risk margin is not required. For ILA, unit liabilities representing the current account value of unit-linked contracts are classified as technical provisions as a whole. The value is based on the value of the underlying assets to which the contracts are linked. Other technical provisions are calculated as a best estimate plus a risk margin, as discussed in the sections below.

D.2.1.2 Best estimate technical provisions

Best estimate technical provisions (BETPs) represent the best estimate of the value of our obligations under the policies we have written.

The BETPs represent the probability-weighted average of future cash-flows, taking into account the time value of money. To allow for the time value of money we use the relevant risk-free interest rate term structure.

D.2.1.3 Reinsurance recoverables

We have a number of reinsurance arrangements in place which reduce our exposure to risks such as mortality risk, morbidity risk and longevity risk.

We work out the value of reinsurance recoverables in the following manner:

The present value of the payments we expect to receive from reinsurers (under existing reinsurance arrangements) minus

The present value of the payments we expect to make to reinsurers (under existing reinsurance arrangements)

In general, the way we work out the value of reinsurance recoverables is the same as the way we work out the BETPs and in general, we use the same assumptions.

We do not have any reinsurance arrangements with special purpose vehicles.

D.2.1.4 Risk margin

The risk margin is meant to represent the extra premium that another insurer would require for taking on our insurance portfolio. It reflects the cost of holding the policy-related capital - the Solvency Capital Requirement (SCR) - for all our policies.

We work out the risk margin in the following manner:

The present value of the projected capital on our existing business

multiplied by a cost-of-capital rate

where the future capital in any given year is equal to the projected SCR arising on our existing business in that year.

EIOPA has prescribed a cost-of-capital rate of 6%.

We work out our aggregate risk margin and then split it between the lines of business, as in the table above.

D.2.2 Solvency II Technical Provisions and Reinsurance Recoverables: bases, methodology and assumptions

We work out the value of our BETPs and our reinsurance recoverables in line with Solvency II regulations. For most of our business, we use a projection of future cash-flows based on central assumptions. We make an adjustment to reflect a best estimate of catastrophe costs. In some cases we use different methods, which we discuss in the sections below covering the individual lines of business.

These are the three main categories of assumptions we use to work out the BETPs and reinsurance recoverables:

- demographic assumptions
- expense assumptions
- economic assumptions.

Demographic assumptions: include assumptions about how long policyholders will live, the rate at which they will die or get ill, and how many of them will let their policies lapse. We discuss these assumptions in the sections below that cover the demographic assumptions on each of the individual lines of business.

Expense assumptions: include assumptions about maintenance and investment expenses. We have set the expense assumptions based on the most recent expense investigation. We have taken into account the level of expenses we expect from different types of products and the amount of business in force.

The main **economic assumptions** are:

- the discount rate
- the rate of investment return on unit-linked funds
- the rate of increase of future benefits which are linked to inflation
- expense inflation.

We project future investment returns on unit-linked funds using the risk free yield curve specified by the EIOPA. We use the same risk free yields to discount the value of future cash-flows. We use the yield curve with the volatility adjustment for calculating BETPs (We discuss the volatility adjustment further in section D.2.5 Long Term Guarantee Measures). In line with the Solvency II requirements, we do not use the volatility adjustment when we work out the risk margin.

Our assumption about the inflation of future benefits is set considering the results of stochastic modelling. This considers a large number of possible future inflation scenarios. Our assumption about the inflation of expenses is based on long term assumptions about how we expect prices to go up, plus how we expect salaries to go up in excess of prices.

Our approach for working out expense and economic assumptions is similar across all lines of business.

Other than the difference in the yield curve noted above, the projected capital requirements we use to calculate the risk margin are based on the same assumptions we use to calculate the BETPs.

D.2.2.1 Demographic assumptions: Contracts with profit participation

This line of business includes participating endowment and whole life policies, as well as a small number of participating deferred annuity contracts.

The main demographic assumptions for this line of business are assumptions about the rate at which policyholders die or let their policies lapse. We generally make these assumptions based on our experience investigations. We apply expert judgement to make sure there is enough allowance for relevant trends or factors we expect to change.

D.2.2.2 Demographic assumptions: Other Life Insurance

This line of business includes annuity business, individual and group non-linked protection business.

The main demographic assumptions for this line of business are assumptions about the rate at which policyholders will die or get ill, and how many of them will let their policies lapse. We generally make these assumptions based on our experience investigations. We apply expert judgement to make sure there is enough allowance for relevant trends or factors we expect to change.

D.2.2.3 Demographic assumptions: Health

This line of business includes group and individual income protection business, and group serious illness business.

The main demographic assumptions for this line of business are assumptions about when policyholders will get ill, and when policyholders who are receiving income protection benefits will recover or die. We generally make these assumptions based on our experience investigations. We apply expert judgement to make sure there is enough allowance for relevant trends or factors we expect to change.

D.2.2.4 Demographic assumptions: Unit-Linked

This line of business includes unit-linked investment policies.

For most unit-linked business we use a projection of future cash-flows based on central assumptions to work out the BETPs and reinsurance recoverables. This is based on our best estimate assumptions. For material investment guarantees, we work out the BETPs using stochastic models. This means we use a large number of possible economic scenarios to work out the cost of the guarantees. The BETP is the average cost under all those scenarios.

The main demographic assumptions for this line of business are assumptions about the rate at which policyholders will die or get ill, and how many of them will surrender their policies early or let them lapse. We generally make these assumptions based on our experience investigations. We apply expert judgement to make sure there is enough allowance for relevant trends or factors we expect to change.

D.2.2.5 Significant simplifications used in the calculation of technical provisions

We use some simplifications when we work out the risk margin.

The actuarial valuation system produces an accurate projection of most of the SCR components used to work out the risk margin. Where this is not possible due to system constraints, we use a simplified method, which Solvency II regulations allow. Where we have adopted a simplified approach for projecting a component of the SCR, we use the risks that drive that component to project that component.

We do not use any other significant simplifications in the way we work out our technical provisions.

D.2.3

Level of uncertainty associated with the value of technical provisions

The value of the BETPs is based on expected future cash-flows. We work these out based on a number of assumptions. We explain the main assumptions in section D.2.1 Solvency II Technical Provisions and Reinsurance Recoverables: Overview above.

There is inherent uncertainty. Actual experience may differ from our assumptions over time, and this may result in us changing our assumptions in the future.

Some of the key sources of uncertainty within the BETPs are the rate at which policyholders will die or get ill, how long they live, how many of them will let their policies lapse, and expenses.

- If the rate at which life insurance policyholders die - the mortality rate - or the rate at which they get ill - the morbidity rate - goes up, so will our BETPs. We partly mitigate against this uncertainty with our reinsurance arrangements.
- If people with annuities from us live longer, our BETPs go up. Again we partly mitigate against this uncertainty with reinsurance arrangements on some annuity blocks.
- Generally, if more policyholders let their policies lapse - a higher lapse rate - our BETPs go up. This is because the BETPs allow for the expected value of future profits, which will go down if more policyholders let their policies lapse.
- If expenses go up, so will our BETPs.

Our BETPs also vary depending on market movements, in particular movements in interest rates and the equity and property markets.

When interest rates change, the impact on our BETPs is usually offset, to a broad extent, by changes in the value of the assets backing our BETPs.

Equity and property values have an impact on future profits on unit-linked business. So they have an impact on our BETPs. If equity or property values fall, this will reduce our future profits on unit-linked business and increase our BETPs.

This table shows how our main assumptions affect our BETPs, net of reinsurance (excluding participating business):

Sensitivity Test	Impact on BETPs (€m)
10% fall in equity and property values	+98
10% increase in maintenance expenses	+87
10% increase in policy lapse rates	+29
10% decrease in policy lapse rates	-31
5% increase in mortality rates (assured lives)	+20
5% deterioration in morbidity rates	+35
5% decrease in annuity mortality rates	+24

D.2.4

Differences between Solvency II technical provisions and insurance contract liabilities and investment contract liabilities included in the financial statements

We prepare financial statements under International Financial Reporting Standards (IFRS). The basis of how we value our liabilities for IFRS is different from the basis Solvency II requires. The main differences are:

Investment contracts

IFRS allow for some recognition of future profits, through the recognition of Deferred Acquisition Costs (DAC) asset, net of the Deferred Front End Fees (DFEF). Solvency II gives a greater allowance for the present value of future profits on investment contracts within the BETPs, subject to some restrictions.

Insurance contracts

There are three main differences in the approach to valuing insurance contracts:

1. Under IFRS, we value insurance contracts using best estimate assumptions, but we allow for margins for adverse deviation. These margins allow for the possibility of mis-estimation and for our best estimate assumptions deteriorating in the future. The margins also provide reasonable assurance that insurance contract liabilities cover a range of possible outcomes.

   Under Solvency II, we value all contracts (both investment and insurance contracts) using best estimate assumptions and a prescribed yield curve. We also allow for the risk associated with the business (quantified as the cost of capital) through the risk margin.

2. Under IFRS, the liability on any policy which is allowed to surrender is subject to a floor of zero.

   Under Solvency II, there is no similar restriction on liability valuations.

3. Under IFRS, for participating business, the value of liabilities in the financial statements does not allow for future terminal dividends. The excess of assets over liabilities is reflected in the non-controlling interest line of the financial statements.

   Under Solvency II, the technical provisions reflect the best estimate of future terminal dividends.

For each line of business, these tables show the differences between the Solvency II technical provisions and the technical provisions included in the financial statements (including insurance contract liabilities, investment contract liabilities and unit-linked liabilities):

€m	2021				
	Participating contracts	Other Life	Health	Unit-Linked	Total
Solvency II technical provisions (net of reinsurance recoverables)	**86**	**2,922**	**573**	**56,702**	**60,284**
Valuation methodology differences for investment contracts	—	—	—	850	**850**
Valuation methodology differences for insurance contracts (margins for adverse deviation, zeroisation of negative liabilities, allowance for terminal dividends for participating business)	(50)	725	42	73	**789**
Risk margin not held under IFRS	—	(161)	(43)	(179)	**(385)**
Value of insurance contract liabilities, investment contract liabilities and unit-linked liabilities per IFRS financial statements (net of reinsurance asset)	**35**	**3,486**	**571**	**57,445**	**61,538**

€m	2020				
	Participating contracts	Other Life	Health	Unit-Linked	Total
Solvency II technical provisions (net of reinsurance recoverables)	**84**	**3,086**	**635**	**48,781**	**52,586**
Valuation methodology differences for investment contracts	—	—	—	662	**662**
Valuation methodology differences for insurance contracts (margins for adverse deviation, zeroisation of negative liabilities, allowance for terminal dividends for participating business)	(45)	825	47	68	**895**
Risk margin not held under IFRS	—	(150)	(92)	(155)	**(398)**
Value of insurance contract liabilities, investment contract liabilities and unit-linked liabilities per IFRS financial statements (net of reinsurance asset)	**38**	**3,761**	**590**	**49,356**	**53,744**

In summary, at the end of 2021 our liabilities under Solvency II are €1,254m (2020: €1,158m) lower than under our local financial statements.

However, under Solvency II, future profits recognised within the calculation of liabilities must be stressed within the calculation of the Solvency Capital Requirement (SCR). This is to allow for market shocks and severe adverse changes in rates of mortality, morbidity, longevity, and lapses.

So, the SCR allows for the impact of severe adverse stresses on the future profits. The SCR was €1,179m at 31 December 2021 (2020: €1,142m). In section E.2 Solvency Capital Requirement Split by Risk Module we outline the calculation of the SCR in more detail.

During 2021, the difference between our liabilities under Solvency II and our local financial statements grew by €96m mainly due to the impact of investment market performance.

D.2.5
Long Term Guarantee Measures

Long Term Guarantee measures are optional measures available to companies under the Solvency II regime. Long Term Guarantee measures can help to reduce the impact of credit spread changes on a company's solvency position.

The Long Term Guarantee measures available to us include the matching adjustment and the volatility adjustment:

- The matching adjustment allows a company to adjust the Solvency II yield curve when they value policy liabilities. The company can adjust it by an amount that is linked to the yield on the backing assets it holds.
- The volatility adjustment allows a company to adjust the Solvency II yield curve by an amount which varies based on credit spreads on a specified asset portfolio.

We do not apply the matching adjustment.

We use the volatility adjustment for calculating technical provisions. At the end of 2021, the volatility adjustment represented an increase in the Solvency II forward rate yield curve of 3 basis points for the first 20 years.

These tables show the impact of reducing the volatility adjustment to zero on technical provisions (net of reinsurance recoverables), eligible Own Funds, the SCR and the MCR.

€m	2021		
	WITH volatility adjustment	**WITHOUT** volatility adjustment	Impact of volatility adjustment reducing to zero
Technical Provisions (net of reinsurance recoverables)[6]	60,284	60,298	14
Basic Own Funds	1,873	1,861	(12)
Eligible Own Funds	1,873	1,861	(12)
Solvency Capital Requirement (SCR)	1,179	1,180	1
Minimum Capital Requirement (MCR)	531	531	—
Solvency Margin Ratio	**159%**	**158%**	**(1)%**

€m	2020		
	WITH volatility adjustment	**WITHOUT** volatility adjustment	Impact of volatility adjustment reducing to zero
Technical Provisions (net of reinsurance recoverables)[6]	52,586	52,622	36
Basic Own Funds	2,010	1,979	(31)
Eligible Own Funds	2,010	1,979	(31)
Solvency Capital Requirement (SCR)	1,142	1,144	3
Minimum Capital Requirement (MCR)	514	515	1
Solvency Margin Ratio	**176%**	**173%**	**(3)%**

The year on year impact of reducing the volatility adjustment to zero is consistent with the magnitude of the adjustment to the yield curve arising from the volatility adjustment during 2021.

[6] The impact on technical provisions net of reinsurance recoverables is comprised of an increase in gross of reinsurance technical provisions of €19m (2020: €48m) and an increase in reinsurance recoverables of €5m (2020: €12m).

D.2.6
Transitional Measures

We do not apply the transitional risk-free interest rate-term structure. Nor do we apply the transitional deduction to technical provisions.

D.2.7
Changes to assumptions compared to previous reporting period

The main changes to our assumptions since 31 December 2020 calculations are:

> we updated our assumptions about mortality, morbidity and lapse rates, based on the results of our most recent experience investigations

> we updated assumptions about expenses, based on the results of our most recent expense investigations

> we updated the discount rate and the assumed rate of future investment returns on unit-linked funds based on changes in the risk free yield curve specified by EIOPA.

D.3 OTHER LIABILITIES

This section is about our valuation of each kind of 'other liability' for Solvency II purposes. This includes explanations of:

1. how the value of each other liability for Solvency II is different from valuing it for statutory financial reporting that meets the EU's International Financial Reporting Standards (IFRS).
2. the valuation bases, methods and main assumptions used for Solvency II and those used for statutory IFRS financial statements for the financial year ended 31 December 2021.

The Solvency II balance sheet is in Appendix 1.

1. Valuation Differences - Solvency II v IFRS

Balance Sheet Extract - Other Liabilities

The IFRS values in the following tables are as recorded in our annual report and financial statements. The Liability Type categorisation here is per the Solvency II balance sheet and not directly comparable to categorisation applied in the IFRS Statement of Financial Position.

	2021			
Liability Type (€m)	Note	IFRS	Valuation Adjustments	Solvency II
Other provisions	1	(101)	99	(2)
Pension benefit obligations	2	(1)	—	(1)
Deposits from reinsurers	3	(109)	—	(109)
Deferred tax liabilities	4	(51)	(135)	(186)
Derivative liabilities	See Section D.1.2	(6)	—	(6)
Debts owed to credit institutions	5	(13)	—	(13)
Financial Liabilities other than debts owed to credit institutions	6	(15)	—	(15)
Insurance & intermediaries payables	7	(419)	—	(419)
Reinsurance payables	8	(27)	—	(27)
Payables (trade, not insurance)	9	(2)	—	(2)
Other liabilities	10	(173)	—	(173)

	2020			
Liability Type (€m)	Note	IFRS	Valuation Adjustments	Solvency II
Other provisions	1	(101)	100	(1)
Pension benefit obligations	2	(1)	—	(1)
Deposits from reinsurers	3	(122)	—	(122)
Deferred tax liabilities	4	(50)	(125)	(175)
Derivative liabilities	See Section D.1.2	(4)	—	(4)
Debts owed to credit institutions	5	(20)	—	(20)
Financial Liabilities other than debts owed to credit institutions	6	(17)	—	(17)
Insurance & intermediaries payables	7	(370)	—	(370)
Reinsurance payables	8	(25)	—	(25)
Payables (trade, not insurance)	9	—	—	—
Other liabilities	10	(216)	—	(216)

2. Valuation Bases, Methods and Main Assumptions - Solvency II v IFRS

In this section you'll find the valuation basis for Solvency II purposes for each class of liability in the table above. We also explain the differences between Solvency II and the IFRS statutory financial statements when it comes to valuation bases, methods and main assumptions used for the financial year ended 31 December 2021.

Note 1: Other provisions

'Other provisions' include a property related provision for dilapidation, customer complaints provisions and legal provisions.

The valuation adjustment to other provisions is in relation to Deferred Front End Fees (DFEF).

Solvency II purposes:	IFRS reporting purposes:
The company derives the value of each provision by management reviewing and evaluating the expected outflow required to settle the liability to which the provision applies. These reviews are presented to the Board Audit Committee for approval and inclusion in the Qualitative Reporting Templates (QRTs). Similar to DAC, as per Article 12 of the Delegated Act, DFEF are valued at nil for Solvency II purposes.	Initial fees earned and incremental costs (mainly commission) paid on sale of an investment contract are deferred and recognised over the expected life of the contract. The company estimates the expected life of the contracts based on current experience and the term of the contracts. The company reviews this at least once a year. The maximum amortisation period for DFEF is 20 years.

Note 2: Pension benefit obligations

We operate a defined benefit pension scheme and a hybrid scheme with a defined benefit element. Some staff participate in a defined benefit pension scheme - an Irish scheme sponsored by Canada Life Irish Holding Company Limited (CLIH), a member of the Canada Life Group. These schemes are closed to new members and from 30 June 2018, were closed to future accrual. Existing members have joined our defined contribution plan for future service pension provision beyond this date. Members have retained the benefits they accrued up to the date of closure of the schemes and these benefits are still linked to final salary.

These schemes are funded by contributions into separately administered trust funds. The benefits paid from the defined benefit schemes are based on percentages of the employees' final pensionable pay for each year of credited service. Under the rules of each of the Irish Life schemes, pension increases are wholly at the discretion of the schemes' principal employer.

Solvency II purposes:	IFRS reporting purposes:
The net obligation of the company's defined benefit schemes represent the present value of the obligation to employees in respect of services to date, less the fair value of the plan assets. It is based on the IAS19 accounting standard. The external scheme actuary calculates the present value of the obligation once a year. The present value of the obligation is determined by discounting the estimated future cash flows. The discount rate is based on the market yield of high quality corporate bonds that have maturity dates approximating to the terms of the pension liability. The estimated future cash-flows are based on the accrued past service benefits, future salary inflation, future price inflation and assumptions made about mortality.	There is no valuation difference between Solvency II and IFRS basis.

This table shows the annual movement in our Benefit Obligation liabilities:

Benefit obligation	2021 (€m)	2020 (€m)
Benefit obligation as at 1 January	(1,464)	(1,376)
Current service cost	(1)	(1)
Net interest cost	(20)	(22)
Actuarial loss (experience adjustments, financial and demographic assumption changes)	(174)	(95)
Contributions by plan participants	—	—
Curtailment gain	1	7
Settlement gain	34	—
Liabilities extinguished on settlement	81	—
Benefits paid	26	23
Benefit obligation as at 31 December	**(1,517)**	**(1,464)**

This table shows the nature and composition of our plan assets:

Asset Type	2021 Fair Value	2021 Plan assets (%)	2020 Fair Value (€m)	2020 Plan assets (%)
Equities	527	35	554	38
Bonds	874	58	783	54
Property	112	7	110	7
Cash and cash equivalents	3	—	16	1
Fair value of plan assets at 31 December	**1,516**	**100**	**1,463**	**100**

Note 3: Deposits from reinsurers

Deposits from reinsurers are funds held by the company under reinsurance contracts. Premiums and claims due in the period are paid to or withdrawn from the funds withheld account.

Solvency II purposes:	IFRS reporting purposes:
The company estimates amounts payable to reinsurers in a manner consistent with the claim liability associated with the reinsured policy.	There is no valuation difference between Solvency II and IFRS basis.

Note 4: Deferred tax liabilities

Deferred tax is recognised in respect of all timing differences that have originated, but not yet reversed, at the balance sheet date. This means where transactions or events have occurred at that date it will result in an obligation to pay more tax or a right to pay less tax.

When calculating a net deferred tax liability, deferred tax assets are offset only to the extent that it is more likely than not that there will be suitable taxable profits from which the future reversal of the underlying timing differences can be deducted. The tax rate used to calculate the deferred tax balance is the rate that's expected to be in-force at the time the tax becomes payable. There is no expiry date of taxable temporary differences.

Solvency II purposes:	IFRS reporting purposes:
Article 15 of the Delegated Act dictates how the company accounts for deferred tax. It says that the company should: > Recognise and value deferred taxes in relation to all assets and liabilities, including technical provisions. > Value deferred taxes on the basis of the difference between the values ascribed to assets and liabilities recognised and valued in accordance with Article 82 of SI 485 of the European Union (Insurance and Reinsurance) Regulations 2015 and in the case of technical provisions in accordance with Articles 83 to 98 and the values ascribed to assets and liabilities as recognised and valued for tax purposes. > Only ascribe a positive value to deferred tax assets where it is probable that future taxable profit will be available against which the deferred tax asset can be used, taking into account any legal or regulatory requirements on the time limits relating to the carry forward of unused tax losses or the carry forward of unused tax credits.	There are no valuation differences between Solvency II and IFRS basis. However there is a deferred tax effect, resulting from the various accounting differences between Solvency II and Financial Statements as discussed throughout this document.

Note 5: Debts owed to credit institutions

'Debts owed to credit institutions' means bank overdrafts held with credit institutions.

Solvency II purposes:	IFRS reporting purposes:
The company values bank overdrafts at their face value.	There is no valuation difference between Solvency II and IFRS basis.

Note 6: Financial Liabilities other than debts owed to credit institutions

'Financial liabilities other than debts owed to credit institutions refers to liabilities under lease commitments.

Solvency II purposes:	IFRS reporting purposes:
Lease liabilities On initial application of IFRS16 lease liabilities were measured as the present value of lease payments that were not paid at the date of commencement. These payments were discounted using an incremental borrowing rate ("IBR") based on a group borrowing rate. The company will increase its lease liabilities to reflect the interest charge and will reduce the liabilities for any lease payments made. The company will remeasure lease liabilities if there are any lease modifications or if there is a change in the lease payments. The lease liability shall also be re-measured by the company if there is a change in either the lease term or a change in the assessment of an option to purchase the underlying asset. These remeasurements may also lead to a change in the discount rate used. Minor leases held by the Company have been identified and assessed. These low value items are treated as an expense through the income statement.	There is no valuation difference between Solvency II and IFRS basis.

Note 7: Insurance and intermediaries payable

'Insurance and intermediaries payables' refers to the balance of outstanding claims payable to policyholders, commissions payable and premiums on deposit.

Solvency II purposes:	IFRS reporting purposes:
The company records payables on an accruals basis.	There are no valuation differences between Solvency II and IFRS basis.

Note 8: Reinsurance payables

'Reinsurance payables' represent the balance due to reinsurers for outstanding reinsurance premiums and experience rating refunds for monies due to multinational pooling (MNP) arrangements.

Solvency II purposes:	IFRS reporting purposes:
The company records payables on an accruals basis. The company records MNP payables on an accruals basis to account for premiums and claims activity that has not yet been agreed with the MNP.	There are no valuation differences between Solvency II and IFRS basis.

Note 9: Payables (trade, not insurance)

'Payables (trade, not insurance)' represent the current tax liability of the company.

Solvency II purposes:	IFRS reporting purposes:
The company provides corporation tax payable on taxable profits at current tax rates.	There are no valuation differences between Solvency II and IFRS basis.

Note 10: Other liabilities

'Other liabilities' includes other unit-linked liabilities not shown anywhere else on the balance sheet, for example outstanding balances with brokers. This section also includes other non-linked liabilities not shown anywhere else on the balance sheet, for example intercompany liabilities, other taxation balances (PAYE, Exit Tax) and accruals.

Solvency II purposes:	IFRS reporting purposes:
The company records payables on an accruals basis.	There are no valuation differences between Solvency II and IFRS basis.

During the year there have been no changes to the recognition and valuation basis of the liabilities noted above.

During 2017 we granted a legal charge over a block of assets to support liabilities to a specific policyholder. The value of these assets at the end of 2021 was €258m (2020: €287m). We have substantially retained the benefit of all the risks and rewards associated with these assets and continue to recognise them as available to meet the liability to the policyholder. In certain circumstances, the policyholder could enforce the charge and obtain control of the assets to offset our obligation to them under the policy, the likelihood of which is remote.

For estimation uncertainty, please refer to section D.4 (Alternative Methods for Valuation).

D.4 ALTERNATIVE METHODS FOR VALUATION

Overview of methodology for valuing invested assets

The Technical Specification (EIOPA 14/209) outlines the Solvency II rules on how to value assets and liabilities, other than technical provisions. It says that, unless otherwise stated, the default reference framework should be the international accounting standards, as adopted by the European Commission in line with Regulation (EC) No 1606/2002.

In most cases those international accounting standards (IFRS) and Solvency II give consistent valuations.

For our annual statutory financial statements we recognise assets and liabilities in line with IFRS. For our regulatory reporting we follow Central Bank guidelines.

As required under IFRS 13 (Fair Value Measurement), our annual audited statutory financial statements disclose how we value assets and liabilities across level 1, 2 and 3. This is the fair value hierarchy.

- **Level 1:** fair value measurements based on quoted market prices (unadjusted) in active markets for identical assets or liabilities that the entity can access at the measurement date.
- **Level 2:** fair value measurements based on inputs other than quoted prices included within level 1 that are observable for the asset or liability either directly (i.e. as prices) or indirectly (i.e. derived from prices).
- **Level 3:** fair value measurements based on valuation techniques that include inputs for the asset and liability that are based on unobservable market data.

Level 1 and 2 show what's known as a 'mark to market' approach. This means values are based on readily available prices in orderly transactions that are sourced externally.

Level 3 shows a 'marked to model' approach. This means values are based on assumptions or financial models.

Where assets are 'marked to model' the relevant primary investment manager must maintain supporting documentation addressing:

- a description of the process followed (model design) and the data/assumptions used by the approach (including assessment of data quality)
- the reason why a 'mark to market' approach is not possible
- the sign-off process applied in reviewing the valuation and other applicable controls (such as any applicable benchmarking of valuation output to other comparable methods)
- the level of uncertainty inherent in the valuation approach and an assessment of the model's performance in this case, which should include any particular circumstances where the approach would be expected to be ineffective
- the results of any independent check performed in relation to model outputs
- possible alternative valuation models where primary models are complex.

At least once a year, the relevant primary investment manager presents a report to our Board Audit Committee for review and approval. The report outlines how the manager priced the asset, what management considered appropriate and the resulting valuation of unquoted securities we hold. These unquoted securities primarily consist of bonds, venture capital and unit trusts.

The Group Reporting Committee (GRC) is made up of the Irish Life Chief Financial Officer (Chairman), Irish Life Chief Actuary, ILA Chief Financial Officer, ILA Head of Actuarial Function, Executive Manager ILA Group Valuation and Reporting, Head of Group Finance and Executive Financial Reporting Manager. The GRC is responsible for monitoring and reviewing the Irish Life Group Financial Reporting and Disclosure Policy, including making recommendations to the Board Audit Committee and assessing the application of the policy.

Among other responsibilities, the GRC is required to assess the relevance and adequacy of the policies associated with the valuation of assets and liabilities at least once a year. This has to include taking into consideration changes in accounting rules and policies as governed by the international accounting standards.

For invested assets, we expect that our primary investment managers maintain:

- sufficient independence in valuing assets
- sufficient documentation of applicable standards and guidelines
- sufficient control over valuation models
- sufficient management information
- consistent governance between internally and externally managed funds.

This is set out in our investment management agreements.

Where the unit-linked and non-linked investment managers hold units in the same fund, both investment managers will ensure they use the same fund price at the end of each quarter. Where this is not practical, the investment managers will contact the group financial reporting and control team to assess options. If the investment managers propose to use different prices for the same assets at the end of the financial year, this will be brought to the attention of the Board Audit Committee and set out the reasoning behind their proposal. The Board Audit Committee will review and, if appropriate, ratify the proposal.

We base estimates and associated assumptions on experience and various other factors that we believe to be reasonable under the circumstances. These factors are reflected in our judgements about the carrying amounts of assets and liabilities that are not objectively verifiable. We review estimates and underlying assumptions on an on-going basis. Where necessary, we revise them to reflect current conditions. This applies to uncertainties that arise on estimations we use when we value assets and liabilities.

ILA-invested assets are managed by two separate entities, both of which are part of the GWL group. ILA's unit-linked invested assets are primarily managed by Irish Life Investment Managers Limited (ILIM). A small percentage of ILA's unit-linked invested assets comprise the third-party Self Directed Funds (SDFs). These are managed in-house. ILA's non-linked invested assets are managed by Canada Life Asset Management Limited (CLAM).

D.5 ANY OTHER INFORMATION

No other items to note.

E. CAPITAL MANAGEMENT

This section describes the components of our Own Funds as at 31 December 2021, as well as the policies and processes we use to make sure we meet all regulatory capital requirements when we manage Own Funds.

E.1 Own Funds

'Own Funds' refers to the excess of the value of our assets over the value of our liabilities, where the value of our liabilities includes technical provisions and other liabilities.

Own Funds are divided into three tiers based on their permanence, and how well they can absorb losses. Tier 1 funds are of the highest quality.

We manage our Own Funds so that the solvency position stays within a targeted range although management may choose to operate outside this targeted range from time to time in order to provide financial flexibility.

E.1.1 Management of Own Funds

Our policy is to manage the capital base so that we meet all regulatory requirements. We also aim to maintain investor, creditor and market confidence, and to make sure there is enough capital to support our future growth. Our business planning process, which considers projections over a five year time frame, informs our capital management.

We manage our Own Funds so that we maintain high quality capital, mainly equity. The assets backing our Own Funds are mainly made up of:

- relatively secure assets such as fixed interest assets, as well as some owner occupied property holdings
- the expected value of future profits from our existing business, which we include when we calculate technical provisions (as discussed in section D.2 Technical Provisions). A large part of this value is offset by capital requirements in the Solvency Capital Requirement (SCR).

E.1.2
Components of Own Funds

This table sets out and assesses the way we value and calculate our Own Funds:

Solvency II Own Fund Item	How we value Own Funds (according to Solvency II rules)	Assessment
Ordinary share capital	Valued in accordance with Article 75 of Directive 2009/138.	This is the share capital and share premium, based on the company's statutory accounts.
Share premium account related to ordinary share capital		All of the company's share capital and share premium is classed as Tier 1 unrestricted.
Surplus funds	Article 91 of Directive 2009/138 (Article 106 of SI 485) defines surplus funds: "1. Surplus funds shall be deemed to be accumulated profits which have not been made available for distribution to policy holders and beneficiaries" Tiering is in line with Article 69 of the Delegated Act.	The definition is understood to mean surplus available to With Profit fund holders.
Reconciliation reserve	Valued in accordance with Article 70 of the Delegated Act.	The reconciliation reserve equals the excess of assets over liabilities from the company Solvency II balance sheet. It is reduced by the following amounts:
		i) Own shares - n/a
		ii) Foreseeable dividends
		iii) The basic own fund items listed above - ordinary share capital, share premium and surplus fund
		iv) Restrictions relating to the company's ring-fenced funds - see below
		In line with Article 69, all reconciliation reserve is classed as Tier 1 unrestricted.
Restrictions in respect of the company's ring-fenced funds	Valued in accordance with Article 81 of the Delegated Act.	Restrictions apply in respect of the assets in the company's ring-fenced funds. The amount which must be deducted from Own Funds is calculated separately for each ring-fenced fund as: the value of assets held within the ring-fenced fund minus the value of the liabilities of the ring-fenced fund minus the SCR for the ring-fenced fund. The deduction in respect of each ring-fenced fund is subject to a minimum of zero.
Expected profits included in the future premiums	Valued in accordance with Article 70 of the Delegated Act.	Expected profit in future premiums contributes to the company's Own Funds, as discussed in section C.4.1 Expected Profit Included in Future Premium. This is classed as Tier 1 unrestricted and is already included in the reconciliation reserve amount.

We do not hold any hybrid instruments.

This table shows the breakdown of our Own Funds:

€m	31 December 2021	31 December 2020
Tier 1 - unrestricted		
Issued share capital	1	1
Share premium account	340	340
Surplus funds	—	—
Reconciliation reserve	1,562	1,669
Available Own Funds (before foreseeable dividends and adjustments)	**1,903**	**2,010**
Foreseeable dividends, distributions and charges	(30)	—
Ring-fenced funds adjustment (Participating Funds)	—	—
Total available Own Funds to meet the SCR and MCR	**1,873**	**2,010**

Reconciliation reserve

The reconciliation reserve will vary over time based on the experience of the company, including lapse and claims, expense levels and the impact of writing future new business.

Changes in own funds in 2021

Overall, Own Funds have decreased by €137m in 2021.

The €137m decrease is mostly due to:

- margins which emerged from our existing business
- experience gains and the impact of assumption changes
- the impact of investment market returns during 2021 on the insurance business
- partly offset by dividend payments to our parent company during 2021.

Movements in the company's Own Funds in the future will depend on the company's experience and dividend payments. We intend to manage our Own Funds so that the solvency position stays within a targeted range, as noted at the beginning of Section E.1 Own Funds.

Deferred taxes

The company's Own Funds include a deferred tax liability of €186m at 31 December 2021. This reflects tax that is expected to be paid in the future, if the future profits reflected in Own Funds arise as expected, and on undeclared surplus on net life business (as described in Section D.3.2, Note 4).

No deferred tax asset is held under Solvency II at year end 2021.

Ring-fenced funds

We have three ring-fenced funds relating to our pension schemes, and two ring-fenced funds relating to our Participating Business.

In the table above, there is a €nil deduction for ring-fenced funds on 31 December 2021 (2020: €nil). This relates to the excess of the surplus over the SCR in our ring-fenced Participating Funds.

For our pension schemes, the excess of liabilities over assets is €1.0m (2020: €1.0m). We show this on the balance sheet as a liability, and so it does not result in any additional available assets. As a result, we do not need to make any deductions to Own Funds relating to these pension schemes.

Deductions to own funds and restrictions on transferability

There are no other deductions to Own Funds. There are also no significant restrictions on how we can transfer our Own Funds.

Limits on eligibility of capital

The limits on eligible Tier 2 capital, Tier 3 capital and restricted Tier 1 capital have no impact on our eligible Own Funds to cover the SCR.

ILA has no restricted Tier 1, Tier 2 or Tier 3 capital as at 31 December 2021.

E.1.3
Eligible Own Funds to cover Solvency Capital Requirement (SCR) and Minimum Capital Requirement (MCR)

This table sets out our eligible Own Funds to cover the SCR and MCR:

€m	31 December 2021	31 December 2020
Tier 1 - unrestricted	1,873	2,010
Tier 1 - restricted	—	—
Eligible Own Funds to meet SCR and MCR	**1,873**	**2,010**
Solvency Capital Requirement (SCR)	1,179	1,142
Solvency ratio	**159%**	**176%**
Minimum Capital Requirement (MCR)	531	514
Eligible Own Funds as a percentage of MCR	**353%**	**391%**

E.1.4
Equity in financial statements compared to Solvency II Own Funds

We prepare our financial statements under International Financial Reporting Standards (IFRS) rules.

There are some differences between the equity in our financial statements and the Solvency II Own Funds:

- The way we value insurance contract liabilities (including reinsurance assets) and investment contract liabilities in the financial statements differs from how technical provisions are valued under Solvency II (as discussed in section D.2 Technical Provisions).
- The financial statements allow us to defer incremental acquisition costs and upfront fees through a Deferred Acquisition Costs (DAC) asset and Deferred Front End Fees (DFEF) liability. These are not allowed under Solvency II valuation rules (as discussed in section D.1 Assets and D.3 Other Liabilities above).
- Our intangible assets are valued as nil under Solvency II (as discussed in section D.1 Assets above).
- We adjust deferred tax liabilities to reflect the impact on tax when assets and liabilities are valued differently (as discussed above).

€m	31 December 2021	31 December 2020
Solvency II Own Funds	**1,873**	**2,010**
Differences in technical provisions	(1,254)	(1,158)
Investment contracts DAC and DFEF	229	209
Differences in valuation of intangible assets	1	1
Deferred tax	134	124
Proposed dividends	30	—
Financial statements: shareholder equity plus non-controlling interest	**1,013**	**1,186**

The difference between Solvency II Own Funds and shareholder equity plus non-controlling interest in the financial statements has increased from €824m at 31 December 2020 to €860m at 31 December 2021. This is mainly due to the larger increase in policy liabilities in the financial statements relative to the technical provisions under Solvency II, primarily due to investment market performance.

E.1.5
Transitional arrangements

We do not use any Solvency II transitional arrangements.

E.1.6
Ancillary Own Funds

We do not have any ancillary own fund items.

E.2 SOLVENCY CAPITAL REQUIREMENT SPLIT BY RISK MODULE

We calculate the SCR using the standard formula. The SCR includes:

- the Basic Solvency Capital Requirement (BSCR)
- the SCR for operational risk
- any adjustments for the loss-absorbing capacity of deferred taxes and technical provisions.

We calculate the BSCR using these six risk modules:

- market
- counterparty (default)
- life underwriting
- non-life underwriting
- health underwriting
- intangible assets.

We combine the results from each of these risk modules using correlation factors.

€m	31 December 2021	31 December 2020
Market risk	795	695
Counterparty risk	42	40
Life Underwriting risk	692	717
Health Underwriting risk	228	240
Operational risk	64	62
Diversification impacts	(473)	(449)
Loss absorbing capacity of deferred tax	(168)	(163)
SCR	**1,179**	**1,142**

Note: In the table above, we have shown the SCR for each risk category after allowing for the impact of the loss absorbing capacity of technical provisions. This mainly impacts the market risk category. In Appendix 6, the SCR for each risk category is shown before allowing for the loss absorbing capacity of technical provisions, and the loss absorbing capacity of technical provisions is shown separately. Another reason for a difference in the SCRs in comparison to Appendix 6 is how the adjustment for diversification due to ring fenced funds is allocated to the individual SCRs. The presentation of the QRT in Appendix 6 is in line with the EIOPA SFCR guidelines.

The SCR increased by €37m during 2021, from €1,142m at 31 December 2020 to €1,179m at 31 December 2021. The increase is mainly due to:

- a €100m increase in the Market Risk, primarily due to strong market performance during 2021
- a €25m decrease in the Life Underwriting Risk, mainly due to the impact of a new reinsurance treaty
- a €12m decrease in the Health Underwriting Risk primarily due to movements in the existing book of business, net of new business growth
- a €24m increase in diversification benefits.

E.2.1 Use of simplified methods

Every stress or shock impact we used to calculate our overall SCR was produced separately on a full calculation basis. This means that we do not use any of the simplifications allowed in the Delegated Acts when we calculate the SCR except for the ones mentioned below.

We did use some simplifications when we worked out the counterparty SCR:

- We used a simple 85% factor to reduce the value of the collateral assets for reinsurance (excluding funds withheld), which allowed for market risk.
- For Retail Life, we split the overall risk mitigating effect from reinsurance by counterparty. We assumed that the risk mitigating effect was split between counterparties in the same proportion as the best estimate reinsurance asset is split between counterparties.

E.2.2 Undertaking specific parameters and capital add-ons

We do not use undertaking specific parameters. No capital add-ons apply to us.

E.2.3 Loss Absorbing Capacity of Deferred Taxes

The SCR has been reduced by €168m for the loss absorbing capacity of deferred taxes. This reflects that if the company incurs losses due to adverse experience there will be a reduction in the tax paid by the company.

The source of the loss absorbing capacity of deferred taxes is the deferred tax liability of €186m at year-end 2021. As noted in Section E.1, Own Funds allow for a deferred tax liability of €186m. The SCR calculation anticipates stress events which reduce the value of future profits. The occurrence of these stress events would also mean that this tax liability would not arise.

No allowance is made for any loss absorbing capacity of deferred taxes from future profits or any carry-back against prior year tax payments. It is not expected that there will be a deferred tax asset after allowing for the loss absorbing capacity of deferred taxes.

E.2.4
Calculation of the Minimum Capital Requirement

The tables below show the inputs to the MCR:

2021			
€m	Amount Factor	Factor	Contribution to MCR
Obligations with profit participation: guaranteed benefits	46	3.7%	2
Obligations with profit participation: future discretionary benefits	40	(5.2)%	(2)
Unit-linked insurance obligations	56,523	0.7%	396
Other life and health obligations	3,291	2.1%	69
Capital at risk	219,259	0.07%	153
Total Linear MCR			**618**
MCR Cap (45% of SCR)			**531**
Minimum Capital Requirement			**531**

2021			
€m	Amount Factor	Factor	Contribution to MCR
Obligations with profit participation: guaranteed benefits	47	3.7%	2
Obligations with profit participation: future discretionary benefits	36	(5.2)%	(2)
Unit-linked insurance obligations	48,626	0.7%	340
Other life and health obligations	3,479	2.1%	73
Capital at risk	223,673	0.07%	157
Total Linear MCR			**570**
MCR Cap (45% of SCR)			**514**
Minimum Capital Requirement			**514**

E.2.5
Changes since the previous reporting period

The SCR increased by €37m over 2021. The increase in the SCR is mainly due to an increase in Market Risk partly offset by a decrease in Life Underwriting Risk, Health Underwriting Risk and an increase in diversification benefits.

The MCR increased by €17m over 2021. This is due to the increase in the SCR.

E.3 USE OF DURATION BASED SUB-MODULE IN THE CALCULATION OF THE SOLVENCY CAPITAL REQUIREMENT

We do not use the duration based equity risk sub-module.

E.4 DIFFERENCES BETWEEN STANDARD FORMULA AND ANY INTERNAL MODEL USED NT

We use the standard formula to calculate the SCR.

E.5 NON-COMPLIANCE WITH THE MINIMUM CAPITAL REQUIREMENT AND NON-COMPLIANCE WITH THE SOLVENCY CAPITAL REQUIREMENT

During 2021 we were in compliance with the SCR and MCR requirements.

E.6 ANY OTHER INFORMATION

No other items to note.

GLOSSARY

Accommodative policy stances

Accommodative monetary policy, also known as loose credit or easy monetary policy, occurs when a central bank attempts to expand the overall money supply to boost the economy when growth is slowing (as measured by Gross Domestic Product (GDP)).

Ancillary own funds

Investment, or capital, that's been promised to a company but not paid. For Solvency II, this counts as capital towards an insurer's Solvency Capital Requirement. However, it only counts as Ancillary Own Funds - and therefore towards Solvency II requirements - if:

- the insurer could call in the capital at any point
- there are no conditions attached to transferring the capital
- the regulator has approved the commitment to transfer the capital

Annualised rate

An annualised rate of return is calculated as the equivalent annual return an investor receives over a given period.

Annual premium equivalent

Annual premium equivalent (APE) is a common sales measure calculation used by insurance companies, where the sales are measured by taking the value of regular premiums, plus 10% of single premiums written during the year.

Arms length fee

Fee charged in a transaction between two related parties should be the same as that in a transaction between two unrelated parties on the open market.

Assets under administration

Assets managed by a financial institution on behalf of a client

Bancassurance

Partnership between a bank and an insurance company to allow a bank to sell insurance products.

Bear market

A bear market is when prices of securities fall sharply, and a sweeping negative view causes the sentiment to further entrench itself. As investors anticipate losses in a bear market and selling continues, pessimism grows.

BPS

Basis points (BPS) refers to a common unit of measure for interest rates and other percentages in finance. One basis point is equal to 1/100th of 1%, or 0.01%, or 0.0001, and is used to denote the percentage change in a financial instrument.

Bulk annuity

A group of policies written by an insurer that pays retirement income to policyholders. We typically sell bulk annuities when a defined benefit pension scheme wants to insure its liabilities. This usually happens when a pension scheme is being wound up.

Capital add-on

An additional amount of capital which the supervisory authority may, in exceptional circumstances, require a company to hold over and above the Solvency Capital Requirement.

Capital at risk

The loss that an insurance company would make if someone with a policy dies. The capital at risk for any policy cannot be less than zero.

It is calculated like this:

- the amount that the company would pay if the person died, minus
- the amount that the company would receive from reinsurers if the person died, under its reinsurance arrangements, minus
- the technical provisions minus reinsurance recoverables that the company holds for that policy.

The total capital at risk is the sum of the capital at risk for all the policies the company has written.

Correlation factors

Factors which reflect the relationships between the risks included in the calculation of the Solvency Capital Requirement.

Defined Contribution

Defined contribution (DC) schemes are occupational pension schemes where a customer's contributions and their employer's contributions are both invested and the proceeds used to buy a pension and/or other benefits at retirement. The value of the ultimate benefits payable from the DC scheme depends on the amount of contributions paid, the investment return achieved less any fees and charges, and the cost of buying the benefits.

Delegated act

One of the tools the EU uses to put a law in place. Generally, they use an 'implementing act' for ruling on procedure and on how to follow legislation that already exists in other acts. They use a 'delegated act' for ruling on the content of legislation. A delegated act might, for example, add or change elements of a piece of legislation that are not fundamental to that legislation's essence.

The Solvency II regime involves both implementing acts and delegated acts.

Derivatives

Financial products made up of assets packaged together. The value of the product depends on - or 'derives' from - the value of the underlying assets. The asset could be, for example, currency or a commodity. Futures and options are examples of derivatives.

Duration based equity risk sub-module

This allows a company to hold a lower SCR in respect of some equity holdings, as long as it meets certain conditions and gets approval from the supervisory authority.

Forward rate agreements

An agreement to buy a particular amount of currency at a fixed price on a fixed date in the future.

Future discretionary benefits

Benefits which ILA may pay in addition to the minimum benefits payable under a policyholders' contract. For example, for participating business (see definition), bonuses may be paid to policyholders based on the profits of the participating fund

Hybrid instruments

An investment product that combines two or more different financial instruments, usually an equity and a debt security.

Irish Life Multi Asset Portfolios (MAPS®)

Irish Life MAPS® are a range of unit linked funds, which are available across pension, investment and savings plans. There are five MAPS funds. Each fund is managed to a specific risk level.

Lapse rate

A measure of how often customers cancel their policies early or stop paying premiums. It is usually calculated as the number of policies which lapsed in a given year out of the total number of policies that were in place in that year.

Loss absorbing capacity of technical provisions

The reduction in the SCR which arises due to reductions in future discretionary benefits (see definition) expected in adverse scenarios.

Off balance sheet

Not on a company's balance sheet. Items that are considered off balance sheet are generally ones the company does not have legal claim to or responsibility for.

Onerous contract provisions

A contract where the unavoidable costs of meeting the obligations under the contract exceed its expected economic benefits.

Own Risk and Solvency Assessment (ORSA)

A set of processes which assess a company's risk profile and the capital it needs to hold in light of these risks. It assesses both the current risk profile, and what it is likely to be in the future. It helps us make decisions, and analyse strategy and risk. In line with standard insurance regulations, we carry out an ORSA each year.

Participating business

Policies where the benefits paid to policyholders include bonuses which vary depending on the profits earned by a fund (the 'participating fund') which the company maintains.

Peripheral Bonds

Spain, Portugal, Italy and Greece are called 'peripheral' because of their higher bond yields and more volatile spreads. The 10-year spread (the market benchmark) reflects the difference between the yield on a country's 10-year bond and the yield on the German benchmark bond.

Reflation trade

This is a bet that certain sectors of the market perform well immediately after a recession or economic crisis.

Ring-fenced fund

A fund where a company cannot use the assets within the fund to meet liabilities outside the fund.

Securitisation

Different types of contractual debt being pooled, and then sold to various investors.

Special purpose vehicle

An entity formed by a company for a particular project or task, usually to hold assets.

Transitional arrangements

Arrangements which allow companies to gradually switch from the Solvency I to Solvency II capital calculation basis.

With profit fund holders

Policyholders whose benefits include bonuses which vary depending on the profits earned by a 'participating fund' (see 'participating business' definition).

Appendices

Amounts in the tables that follow are in €’000s.

APPENDIX 1

S.02.01.02

Balance Sheet

		Solvency II value
	Assets	C0010
R0030	Intangible assets	0
R0040	Deferred tax assets	0
R0050	Pension benefit surplus	0
R0060	Property, plant & equipment held for own use	110,542
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	5,013,842
R0080	*Property (other than for own use)*	32,080
R0090	*Holdings in related undertakings, including participations*	63
R0100	*Equities*	45,539
R0110	*Equities - listed*	45,539
R0120	*Equities - unlisted*	0
R0130	*Bonds*	4,866,994
R0140	*Government Bonds*	2,510,456
R0150	*Corporate Bonds*	2,327,943
R0160	*Structured notes*	0
R0170	*Collateralised securities*	28,595
R0180	*Collective Investments Undertakings*	34,924
R0190	*Derivatives*	3,785
R0200	*Deposits other than cash equivalents*	30,457
R0210	*Other investments*	0
R0220	Assets held for index-linked and unit-linked contracts	57,255,830
R0230	Loans and mortgages	130,378
R0240	*Loans on policies*	1,232
R0250	*Loans and mortgages to individuals*	1
R0260	*Other loans and mortgages*	129,145
R0270	Reinsurance recoverables from:	1,407,544
R0280	*Non-life and health similar to non-life*	0
R0290	*Non-life excluding health*	0
R0300	*Health similar to non-life*	0
R0310	*Life and health similar to life, excluding index-linked and unit-linked*	1,395,729
R0320	*Health similar to life*	63,631
R0330	*Life excluding health and index-linked and unit-linked*	1,332,097
R0340	*Life index-linked and unit-linked*	11,815
R0350	Deposits to cedants	
R0360	Insurance and intermediaries receivables	23,663
R0370	Reinsurance receivables	121,544
R0380	Receivables (trade, not insurance)	8,041
R0390	Own shares (held directly)	0
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	82,153
R0420	Any other assets, not elsewhere shown	393,709
R0500	**Total assets**	64,547,247

APPENDIX 1

S.02.01.02

Balance Sheet (continued)

		Solvency II value
	Liabilities	C0010
R0510	Technical provisions - non-life	0
R0520	*Technical provisions - non-life (excluding health)*	0
R0530	*TP calculated as a whole*	0
R0540	*Best Estimate*	0
R0550	*Risk margin*	0
R0560	*Technical provisions - health (similar to non-life)*	0
R0570	*TP calculated as a whole*	0
R0580	*Best Estimate*	0
R0590	*Risk margin*	0
R0600	Technical provisions - life (excluding index-linked and unit-linked)	4,977,104
R0610	*Technical provisions - health (similar to life)*	636,662
R0620	*TP calculated as a whole*	0
R0630	*Best Estimate*	593,168
R0640	*Risk margin*	43,494
R0650	*Technical provisions - life (excluding health and index-linked and unit-linked)*	4,340,442
R0660	*TP calculated as a whole*	0
R0670	*Best Estimate*	4,178,772
R0680	*Risk margin*	161,671
R0690	Technical provisions - index-linked and unit-linked	56,714,113
R0700	*TP calculated as a whole*	57,299,065
R0710	*Best Estimate*	-764,375
R0720	*Risk margin*	179,423
R0740	Contingent liabilities	0
R0750	Provisions other than technical provisions	1,949
R0760	Pension benefit obligations	1,050
R0770	Deposits from reinsurers	108,967
R0780	Deferred tax liabilities	185,662
R0790	Derivatives	6,467
R0800	Debts owed to credit institutions	12,544
R0810	Financial liabilities other than debts owed to credit institutions	15,052
R0820	Insurance & intermediaries payables	418,880
R0830	Reinsurance payables	27,413
R0840	Payables (trade, not insurance)	2,067
R0850	Subordinated liabilities	0
R0860	*Subordinated liabilities not in BOF*	0
R0870	*Subordinated liabilities in BOF*	0
R0880	Any other liabilities, not elsewhere shown	172,885
R0900	**Total liabilities**	62,644,154
R1000	**Excess of assets over liabilities**	1,903,093

APPENDIX 2

S.05.01.02

Premiums, claims and expenses by line of business

		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									
R1410	Gross	98,510	824	6,396,550	508,952					7,004,836
R1420	Reinsurers' share	6,949	0	16,670	218,503					242,122
R1500	Net	91,561	824	6,379,881	290,449					6,762,714
	Premiums earned									
R1510	Gross	97,120	824	6,396,550	507,518					7,002,012
R1520	Reinsurers' share	6,949	0	16,670	218,503					242,122
R1600	Net	90,171	824	6,379,881	289,015					6,759,890
	Claims incurred									
R1610	Gross	61,824	7,280	4,766,388	466,519					5,302,012
R1620	Reinsurers' share	3,843	0	13,396	282,875					300,113
R1700	Net	57,982	7,280	4,752,992	183,644					5,001,898
	Changes in other technical provisions									
R1710	Gross	-29,501	6,183	8,081,872	-524,430					7,534,124
R1720	Reinsurers' share	-9,818	0	-7,675	-248,810					-266,303
R1800	Net	-19,684	6,183	8,089,548	-275,619					7,800,428
R1900	**Expenses incurred**	29,602	221	252,779	124,704					407,305
R2500	**Other expenses**									180
R2600	**Total expenses**									407,485

APPENDIX 3

S.12.01.02

Life and Health SLT Technical Provisions

			Index-linked and unit-linked insurance			Other life insurance						Health insurance (direct business)					
		Insurance with profit participation		Contracts without options and guarantees	Contracts with options or guarantees		Contracts without options and guarantees	Contracts with options or guarantees	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, including Unit-Linked)		Contracts without options and guarantees	Contracts with options or guarantees	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Health reinsurance (reinsurance accepted)	Total (Health similar to life insurance)
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0150	C0160	C0170	C0180	C0190	C0200	C0210
R0010	**Technical provisions calculated as a whole**	0	57,299,065			0					57,299,065	0					0
R0020	Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	0	21,751			0					21,751	0					0
	Technical provisions calculated as a sum of BE and RM																
	Best estimate																
R0030	**Gross Best Estimate**	85,688		-804,786	40,412		3,890,090	202,994			3,414,397		593,325	-157			593,168
R0080	Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	0		-6,943	-2,992		1,247,209	84,888			1,322,162		63,562	70			63,631
R0090	Best estimate minus recoverables from reinsurance/SPV and Finite Re	85,688		-797,843	43,404		2,642,880	118,106			2,092,235		529,763	-226			529,537
R0100	**Risk margin**	283	179,423			161,388					341,094	43,494					43,494
	Amount of the transitional on Technical Provisions																
R0110	Technical Provisions calculated as a whole	0	0			0					0	0					0
R0120	Best estimate	0		0	0		0	0			0		0	0			0
R0130	Risk margin	0	0			0					0	0					0
R0200	**Technical provisions - total**	85,971	56,714,113			4,254,472					61,054,555	636,662					636,662

APPENDIX 4

S.22.01.21

Impact of long term guarantees measures and transitionals

		Amount with Long Term Guarantee measures and transitionals	Impact of transitional on technical provisions	Impact of transitional on interest rate	Impact of volatility adjustment set to zero	Impact of matching adjustment set to zero
		C0010	C0030	C0050	C0070	C0090
R0010	Technical provisions	61,691,218	0	0	18,543	0
R0020	Basic own funds	1,873,093	0	0	-12,173	0
R0050	Eligible own funds to meet Solvency Capital Requirement	1,873,093	0	0	-12,173	0
R0090	Solvency Capital Requirement	1,178,916	0	0	707	0
R0100	Eligible own funds to meet Minimum Capital Requirement	1,873,093	0	0	-12,173	0
R0110	Minimum Capital Requirement	530,512	0	0	318	0

APPENDIX 5

S.23.01.01

Own Funds

Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35

		Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
R0010	Ordinary share capital (gross of own shares)	1,127	1,127		0	
R0030	Share premium account related to ordinary share capital	339,873	339,873		0	
R0040	Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings	0	0		0	
R0050	Subordinated mutual member accounts	0		0	0	0
R0070	Surplus funds	14	14			
R0090	Preference shares	0		0	0	0
R0110	Share premium account related to preference shares	0		0	0	0
R0130	Reconciliation reserve	1,532,079	1,532,079			
R0140	Subordinated liabilities	0		0	0	0
R0160	An amount equal to the value of net deferred tax assets	0				0
R0180	Other own fund items approved by the supervisory authority as basic own funds not specified above	0	0	0	0	0
R0220	**Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds**	0				
R0230	**Deductions for participations in financial and credit institutions**	0	0	0	0	
R0290	**Total basic own funds after deductions**	1,873,093	1,873,093	0	0	0
	Ancillary own funds					
R0300	Unpaid and uncalled ordinary share capital callable on demand	0				
R0310	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	0				
R0320	Unpaid and uncalled preference shares callable on demand	0				
R0330	A legally binding commitment to subscribe and pay for subordinated liabilities on demand	0				
R0340	Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	0				
R0350	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	0				
R0360	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0				
R0370	Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0				
R0390	Other ancillary own funds	0				
R0400	**Total ancillary own funds**	0			0	0
	Available and eligible own funds					
R0500	Total available own funds to meet the SCR	1,873,093	1,873,093	0	0	0
R0510	Total available own funds to meet the MCR	1,873,093	1,873,093	0	0	
R0540	Total eligible own funds to meet the SCR	1,873,093	1,873,093	0	0	0
R0550	Total eligible own funds to meet the MCR	1,873,093	1,873,093	0	0	
R0580	**SCR**	1,178,916				
R0600	**MCR**	530,512				
R0620	**Ratio of Eligible own funds to SCR**	158.88%				
R0640	**Ratio of Eligible own funds to MCR**	353.07%				

	Reconcilliation reserve	C0060
R0700	Excess of assets over liabilities	1,903,093
R0710	Own shares (held directly and indirectly)	0
R0720	Foreseeable dividends, distributions and charges	30,000
R0730	Other basic own fund items	341,014
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	
R0760	**Reconciliation reserve**	1,532,079
	Expected profits	
R0770	Expected profits included in future premiums (EPIFP) - Life business	291,310
R0780	Expected profits included in future premiums (EPIFP) - Non- life business	0
R0790	**Total Expected profits included in future premiums (EPIFP)**	291,310

APPENDIX 6

S.25.01.21

Solvency Capital Requirement - for Undertakings on Standard Formula

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
R0010	Market risk	817,992		
R0020	Counterparty default risk	42,674		
R0030	Life underwriting risk	694,973		
R0040	Health underwriting risk	228,794		
R0050	Non-life underwriting risk	0		
R0060	Diversification	-480,305		
R0070	Intangible asset risk	0		
R0100	**Basic Solvency Capital Requirement**	1,304,128		

	Calculation of Solvency Capital Requirement	C0100
R0130	Operational risk	63,720
R0140	Loss-absorbing capacity of technical provisions	-20,516
R0150	Loss-absorbing capacity of deferred taxes	-168,417
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0
R0200	**Solvency Capital Requirement excluding capital add-on**	1,178,916
R0210	Capital add-ons already set	0
R0220	**Solvency capital requirement**	1,178,916
	Other information on SCR	
R0400	Capital requirement for duration-based equity risk sub-module	0
R0410	Total amount of Notional Solvency Capital Requirements for remaining part	1,172,180
R0420	Total amount of Notional Solvency Capital Requirements for ring fenced funds	6,746
R0430	Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	0
R0440	Diversification effects due to RFF nSCR aggregation for article 304	0

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

		LAC DT
	Calculation of loss absorbing capacity of deferred taxes	C0130
R0640	LAC DT	-168,417
R0650	LAC DT justified by reversion of deferred tax liabilities	-168,417
R0660	LAC DT justified by reference to probable future taxable economic profit	0
R0670	LAC DT justified by carry back, current year	0
R0680	LAC DT justified by carry back, future years	0
R0690	Maximum LAC DT	-168,417

USP Key

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

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

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

APPENDIX 7

S.28.01.01

Minimum Capital Requirement - Only Life or only Non-life Insurance or Reinsurance Activity

Linear formula component for non-life insurance and reinsurance obligations

R0010	MCR$_{NL}$ Result	0

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

	Linear formula component for life insurance and reinsurance obligations	C0040
R0200	MCR$_L$ Result	617,838

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0050	C0060
R0210	Obligations with profit participation - guaranteed benefits	45,524	
R0220	Obligations with profit participation - future discretionary benefits	40,163	
R0230	Index-linked and unit-linked insurance obligations	56,522,875	
R0240	Other life (re)insurance and health (re)insurance obligations	3,290,524	
R0250	Total capital at risk for all life (re)insurance obligations		219,259,176

	Overall MCR calculation	C0070
R0300	Linear MCR	617,838
R0310	SCR	1,178,916
R0320	MCR cap	530,512
R0330	MCR floor	294,729
R0340	Combined MCR	530,512
R0350	Absolute floor of the MCR	3,700
R0400	**Minimum Capital Requirement**	530,512

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