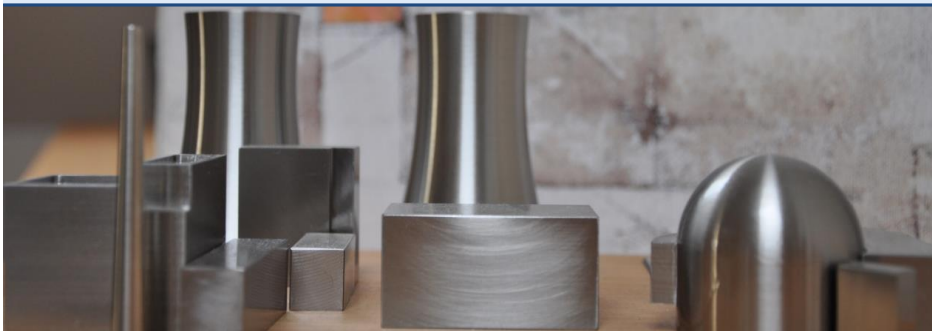


# **BlueRe m.a.**

## **Solvency and Financial Condition Report ("SFCR")**

Version 2022



## **Solvency and Financial Condition Report (“SFCR”)**

The new, harmonised EU-wide regulatory regime, known as Solvency II, came into force with effect from 1 January 2016. The regime requires reporting and public disclosure arrangements to be put in place by insurers and some of them are required to be made public. This document will be made public on the BlueRe website.

The SFCR covers the Business and Performance of BlueRe, its system of Governance, Risk Profile, Valuation for Solvency Purposes and Capital Management. BlueRe is required to hold sufficient assets to match its liabilities at all times while at the same time be committed to high governance standards. A primary responsibility of the Board is to ensure that eligible capital is adequate to cover the required solvency for the nature and scale of the business.

**29/04/2022**

## Contents

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<b>1. MEMBERSHIP STRUCTURE.....</b>	<b>5</b>
Principle: Mission and Vision.....	5
Principle: Acceptance of Members .....	5
Principle: Adequacy of Members.....	6
<b>2. MANAGEMENT STRUCTURE, REMUNERATION .....</b>	<b>8</b>
Principle: Adequate management structure .....	8
<i>General Meeting</i> .....	8
<i>Board of Directors</i> .....	9
<i>Management Committee</i> .....	10
<i>Advisory Board Committees</i> .....	10
Principle: remuneration .....	11
<b>3. FIT &amp; PROPER, EXTERNAL FUNCTIONS AND INTERNAL CONTROL .....</b>	<b>13</b>
Principle: Fit & Proper .....	13
Principle: Qualities required of the Mutual's officers in key functions .....	14
Principle: Independent key functions .....	14
<i>Internal Audit function</i> .....	15
<i>Compliance function</i> .....	15
<i>Risk Management function</i> .....	17
<i>Actuarial function</i> .....	17
<i>Statutory Auditor</i> .....	18
Investments / "Prudent person" principle: policy and implementation process.....	18
Principle: Internal Control System .....	19
<i>Policies and procedures</i> .....	20
<i>Control plans</i> .....	20
<i>Reporting and recommendations</i> .....	20
<b>4. RISK MANAGEMENT SYSTEM, ORSA PROCESS AND RISK MANAGEMENT FUNCTION.....</b>	<b>21</b>
Principle: Risk Management System.....	21

*Specific guidelines for each risk* ..... 22  
*Risk Reporting System* ..... 23  
*Implementation process* ..... 23

**Principle: ORSA process**..... 23  
*Time Horizon* ..... 24  
*Scenario-stress testing* ..... 24  
*Use of the ORSA results* ..... 24  
*Frequency and triggers of ORSA* ..... 25

**5. CAPITAL MANAGEMENT AND SCR-MCR**..... 26  
*Capital requirements* ..... 26  
*Amounts of the undertaking's Solvency Capital Requirement and the Minimum Capital Requirement* ..... 26  
*Balance sheet SII versus LUXGAAP* ..... 26  
*SCR Tree*..... 27  
 ..... 27

**6. OUTSOURCING**..... 29  
*Policy* ..... 29  
*Staffing and supervision* ..... 29

**7. STATUS OF THE SFCR AND DATE** ..... 30  
 ANNEX..... 31

## 1. Membership structure

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### Principle: Mission and Vision

The object of the Association is to reinsure, excluding all direct insurance operations:

- ELINI in the strict context of third party liability within the scope of and limited to civil liability in the field of nuclear energy, as specified in the national legislations of countries where the Paris Convention signed on July 29th 1960 (as amended from this time) or the Vienna Convention signed on May 21st 1963 (as amended from this time) is applicable or as specified in the national legislation of countries where the Paris or Vienna Convention is not applicable but which apply the same principles in their national legislation;
- any (re)insurance company, including captives, mutual associations and (inter) national nuclear pools, with respect to the insurance policies taken, in the same strict context as referred to in the previous indent, by one or several members of the Association with such;
- captives, associations or pools, provided that such members are also at least partially insured in said context with ELINI;
- The reinsurance provided referred to by this article is to be understood in excess of ELINI's capacity and on an excess and / or quota share reinsurance towards the net underwriting capacity provided by the other non-voting members, where appropriate on a Difference in Conditions and / or Difference in Limits basis.

### Principle: Acceptance of Members

Acceptance of a new member shall be subject to the following conditions which all have to be fulfilled:

According to article 7 of the Articles of Association:

- a) Only companies or other entities in the private or public sector of operating / controlling / owning / (re)insuring nuclear energy installations and having an insurable interest, in the strict context as referred to by Article 3 § 1 first indent of the Articles of Association, under ELINI or their representatives can be accepted as member of the Association.
- b) Approval of the new member by the Board of Directors applying such criteria as may be set by the General Meeting from time to time.

- c) Acceptance of the new member by the General Meeting with the majority as foreseen by Article 14 § 3 of the Articles of Association.
- d) Payment by the prospective member of a contribution to the initial fund of which the amount will be fixed by the Board of Directors and which will be at least equal to the amount paid by the signatory members increased by accumulated Euribor 3 months.
- e) The new member's unreserved acceptance in writing of these Articles of Association.

#### Principle: Adequacy of Members

Each of BlueRe's voting Members is an important player on the international energy market and is therefore submitted to intensive surveillance by national and international authorities. Due to their size and (self)-control, BlueRe considers its voting Members as being reliable and financially sound. The assessment of a candidate voting Member, effectuated by the Engineers of the ceding companies, is also used in the BlueRe membership process.

Membership is submitted to the Board of Directors and becomes effective after approval by General Meeting. New voting Members have to contribute to a sound and prudent management in BlueRe as well as to the stability of the financial institution and its development on a going concern basis. Payment by the prospective member of a contribution to the initial fund of which the amount is fixed by the Board of Directors and which is at least equal to the amount paid by the signatory members increased by accumulated Euribor 3 months.

Each Member having taken part in the constitution of the initial fund, or of the guarantee fund shall have one vote. Each Member using the reinsurance capacity of the Association by means of ELINI shall have a second vote increased with an additional vote (rounded off upwards as of 0,75) for each € 500.000 of gross premium paid at ELINI for the most recent past insurance year; provided, however, that no Member will be allowed votes which represent more than 20 % of the total voting power. Non-voting Members have no voting rights. Because every Member is treated equally, there are no controlling Members even though each Member has got different participations in the funds. A complete list of the Members is published yearly in the annual report and the C.A.A. is informed on a regular basis.

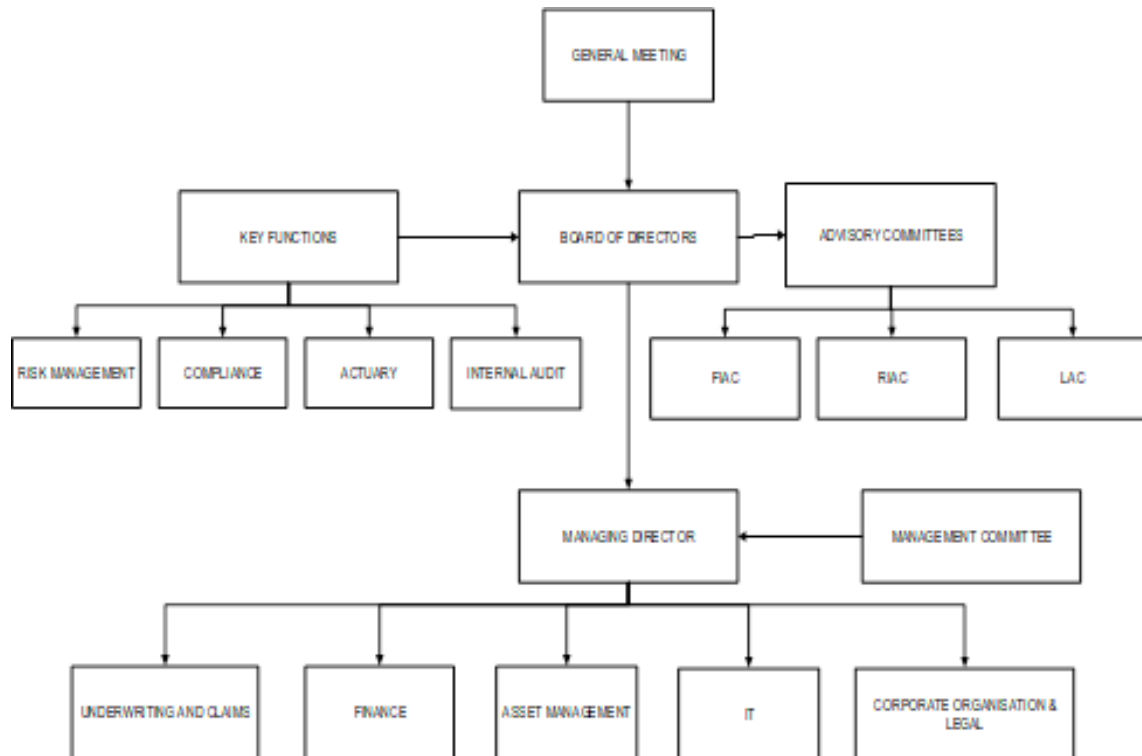
This transparent membership structure and the fact that membership contracts are signed on an individual basis, helps to protect the Mutual against agreements between Members to act jointly or to meet separately and unofficially. To BlueRe's knowledge, no arrangements between Members, relating to the relation between Members on the one side and the Mutual on the other side, exist.

BlueRe encourages its voting Members to participate at the Members Meetings. In order to facilitate this, agendas and all other relevant information are sent in advance of the Members Meetings. During the meeting, the Board of Directors presents a management report and financial

overview of the latest financial figures. The General Meeting acts by simple majority of votes if quorum is reached unless for those cases stated in the Articles of Association where the approval is needed of three-quarters of the Members.

The Annual General Meeting, according to Article 10 of the Articles of Association, must meet on the last Thursday of April at the registered office in Luxembourg or at any other place fixed by the Board of Directors. Written minutes of the AGM are drafted and adopted during the meeting itself.

## 2. Management structure, remuneration



### Principle: Adequate management structure

In line with the best practice on sound governance; BlueRe maintains independency between the supervision of management and the management itself. The supreme management body of the Association is the General Meeting that has delegated its powers to the Board of Directors, who in his turn has entrusted the day-to-day management of the Mutual to the Management Committee.

To enhance efficiency, the Board has set up Advisory Committees in charge of analyzing specific issues. These Committees have only an advising function as the decision-making and risk appetite remain the responsibility of the Board.

### **General Meeting**

The General Meeting is composed of all the voting Members of the Association. The Annual General Meeting meets annually the last Thursday of April at the registered office in Luxembourg or at any other place fixed by the Board of Directors and designated in the notice convening the meeting.



Additionally, a General Meeting is convened by the Board of Directors when a Members' decision is legally and/or statutory required as described in the Articles of Association.

Members shall be represented directly at General Meetings by a person duly authorized for that purpose.

Any General Meeting shall be chaired over by the Chairman of the Board of Directors, or in his absence, by a Vice-Chairman or, in their absence, by another Director, who is not a member of the Management Committee, selected by his co-Directors. The Chairman of the Meeting shall designate the Secretary and choose two scrutineers from among the members of the meeting.

### ***Board of Directors***

The Annual General Meeting nominates the Board of Directors for a three-year period but can dismiss them at any given time. On completion of their three years period of office, Directors shall be eligible for re-appointment. According to the Articles of Association, the Board of Directors is composed out of at least 5 Directors.

The C.A.A. is informed of any new candidates who get (re)nominated and who resign.

Amongst the non-executive Directors following competences should be present:

- Actuarial / Solvency experience;
- Underwriting market experience;
- Claims handling experience;
- Legal background in relation with (re)insurance legislation and regulations;
- Financial / investment background;
- Corporate governance background;
- Human resources knowledge;
- Compliance & audit.

Every candidate is assessed before (re)election on the following requirements:

- His/her professional qualifications, knowledge and experience are adequate to enable sound and prudent management (fit);
- He/she is of good repute and integrity (proper).

Missing skills should be taken into account in order to maintain a sound composition.

The information required to do so are included in the Internal Procedure Manual under the chapter of the Board of Directors.

Annually the Board of Directors performs a self-assessment according to written principles and actions to be taken in case of a negative evaluation.

Minutes, of the conclusions as well as of the measures taken in order to improve the efficiency of the governance structure, are recorded of every meeting and signed off by the Chairman. Copies and extracts of the minutes shall be signed by the Chairman or by one of the members of the Management Committee.

Directors receive no remuneration for their commitment except the Independent Directors who receive an annual attendance fee. Board members, travelling on BlueRe business will be reimbursed for travel expenses according to the Board expense policy.

Non-Executive Directors may have other mandates in other companies. Executive Directors are only authorized to take on additional Non-Executive mandates or other Executive mandates in companies in the insurance sector.

### *Management Committee*

The Management Committee is entrusted by the Board with the day-to-day management within the framework of the general policy of the Association and in accordance with the laws and regulations in force. The Management Committee is responsible for the execution and management of the outcome of all Board decisions. This structure is set up in line with the limited size of BlueRe however, it still has a desire to improve its functioning by regular and adequate self-assessment.

The Management Committee is a board acting jointly and collegially. It may delegate various tasks amongst its members, although they always remain jointly and collegially responsible.

At least the Managing Director is also member of the Board of Directors. The members of the Management Committee cannot become the majority in the Board of Directors.

Special powers can be determined and granted by the Board of Directors to the members of the Management Committee or to certain members of staff.

In line with the fit and proper requirements applicable by the fit and proper policy, the Management Committee performs annually a self-assessment.

### *Advisory Board Committees*

The Board appoints and dismisses the delegated members of the specialized Board Committees in charge of advising the Board: The Financial Investment & Advisory Committee (FIAC), the Reinsurance Advisory Committee (RIAC) and the Legal Advisory Committee (LAC). The existence of the Committees does not decline the overall responsibility of the Board. Board Committees provide advice and support in their field of expertise by making written recommendations towards the Board of Directors.

All Advisory Board Committees have charters that explain their purpose and their role including the responsibilities of the Committee towards the Board of Directors as advisory body. Each Charter is yearly evaluated and when necessary suggestions on amendments to the Committee's Charter are made to the Board for approval.

Committee members are nominated by the Board of Directors for their experience in the specific areas of the Committee they take part in. Every Committee consists of a mix of Board members, representatives of voting members to ensure execution and communication on every level of the Association. In line with the fit and proper requirements, the Advisory Board Committees perform annually a self-assessment.

After each meeting, the Board of Directors is informed of discussions through the circulation of written minutes. The Board also receives in the written minutes the Committee's recommendations for approval. Committee members, travelling on BlueRe business will be reimbursed for travel expenses according to the Committees expense policy.

In line with the fit and proper requirements, every Committee performs annually a self-assessment. The self-assessment form is yearly circulated in October in order to enable to report on the outcome to the Committee and the Board of Directors scheduled in March of the next year.

#### Principle: remuneration

BlueRe's overall remuneration system has been designed to deliver compensation, driven by both mutual and individual performance, and according to its Members' interests. The focus will be on long-term performance and will be aligned to market levels. Our principles are inspired by the Financial Stability Board principles for sound compensation practices.

Board Members as well as Executive Directors receive no remuneration. Only Independent Directors receive a fixed cash amount per year which is approved by the General Meeting for the current financial year. No variable nor incentive programs are included for any Board member.

Members of Advisory Committees receive no additional compensation, fixed or variable, for their contribution to the Mutual.

Actual expenses in connection with Board and Committee meetings are reimbursed.

Members of the Management Committee receive no additional compensation, fixed or variable, for their contribution to the Mutual.

Staff is employed on a contractual basis. Their remuneration is subject to annual reassessment. A desire to ensure that BlueRe is able to attract and retain personnel with the best possible qualifications and the existence of sound succession plans have a decisive influence on the

remuneration. The compensation package consists of two integrated elements: a base pay and an annual pre-agreed, personalized incentive bonus.

Base salary levels are designed to compensate staff for their responsibilities and their experience. Market levels for comparable positions are targeted for the base pay and the base pay levels are subject to regular reviews.

The annual incentive bonus recognizes and rewards individual performance as well as team performance but is never a substantial proportion of the compensation package. The funding levels for the annual incentive bonus are dependent upon non-financial criteria such as personal development and contribution to an improved Member-relationship. Bonuses are not guaranteed because they are not consistent with the pay-for-performance principle.

Annually, the Managing Director will present the total remuneration package to the Chairman of the Board of Directors for approval. He will conduct an independent review on the suggested bonuses and the proposed compensation policy for the next year.

Key/critical functions that are outsourced will follow the outsourcing policy and the outsourcing process in which a market competitive remuneration assessment is included.

### 3. Fit & Proper, external functions and internal control

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#### Principle: Fit & Proper

Two standards of evaluation are at the centre of the fit and proper policy:

1) Expertise (« fitness »):

A person is considered as being expert ("fit") for a specific function when he / she combines knowledge and experience, skills and the professional behaviour required for the function in question.

2) Professional worthiness (« properness »):

The professional worthiness concerns the honesty and the integrity of a person. A person is considered as professionally honourable ("proper") in the absence of indicating elements the opposite and when there is either no reason for questioning reasonably the good reputation of the person involved. In other words, we can leave the principle that the person will execute in an honest, ethical and integrate way the tasks which are assigned to him (her).

This policy applies to all people occupying critical functions in BlueRe. The critical functions are the following:

- The members of the Board;
- The members of the Management Committee;
- Four key functions defined in the Directive Solvency II: Actuarial, Compliance, Risk Management and Internal Audit Function;
- Any other function which BlueRe would estimate as critical for the smooth running of the company either internal or external.

Critical functions should have the necessary professional expertise, the skills and the worthiness to be able to perform their functions. The same requirements apply to the holders of any critical outsourced function.

"Fit and proper" implies a thorough process of evaluation which allows to obtain, by means of various relevant elements, the most complete possible image of the capacity of a person for a determined function. The evaluations concerning, on one hand, the expertise and, on the other hand, the professional worthiness of a person, are complementary.

The available information which can support a "fit and proper" file is always used and balanced according to their relevance and to their importance compared with the responsibilities. Several weighting factors allow not granting the same importance for all the elements of the case. BlueRe takes into account following weighting factors:

- The gravity of the information in the light of the objectives of the prudential control;
- The seniority of the information;
- The attitude and/or the motivation of the concerned person with regard to the information;
- The combination of available information.

A global overview of histories and available information allows to obtain a less static and precise image of the functioning of the person. The combination of the information gives an idea of the way of functioning and/or the carelessness of a person and can lead to the conclusion that the interested is not considered (any more) as being capable or has to improve its expertise on a very precise point.

The evaluation of capacity takes place as in principle before the entry in a function or during a change of function.

*Principle: Qualities required of the Mutual's officers in key functions*

It is important that BlueRe has officers in key functions that collectively and individually have an adequate profile to lead the Association.

BlueRe shall notify the C.A.A. in advance of any proposed appointment or dismissal of mutual officers in key functions. This notification will mention the applicable internal rules. Also, the Association will inform the C.A.A. of any changes in the distribution of tasks among company officers.

*Principle: Independent key functions*

Key Functions play a critical role in lending independent credibility to statements used by internal and external stakeholders. While any consideration of the effectiveness of the function involves a wide variety of issues, it is fundamental to private and public confidence that the key function operates in an environment that supports objective decision-making on issues that have a material effect. In other words, the key function must be independent in both fact and appearance.

Standards of independence are promoted in BlueRe to ensure an environment in which the key function is free of any influence, interest or relationship that might impair professional judgment or objectivity.

The governance structure of BlueRe plays an important role in monitoring and safeguarding the independence of key function. The Board of Directors and advisory committees guarantee an environment that permits the key function to carry out its responsibilities free of any unreasonable restraints. The Board of Directors and/or advisory committees meet on a regular and frequent basis with the key function and discuss any contentious issues that have arisen without the necessity that management is present.

When appointing or reappointing a key function, the Board of Directors and/or advisory committees acknowledge that the candidate is independent in accordance with applicable standards.

### ***Internal Audit function***

The key role of the Internal audit function carried out by the Internal Auditor, is to assist the Board in discharging its governance responsibilities by delivering:

- An objective evaluation of the existing risk and internal control framework;
- Systematic analysis of business processes and controls;
- A source of information on irregularities and unacceptable levels of risk;
- Reviews of the compliance framework and specific compliance issues;
- Evaluations of operational and financial performance;
- Reports on the evolution and the quality of the Solvency II implementation;
- Recommendations for more effective and efficient use of resources;
- Feedback on the values and ethics of the association;
- Review of the questionnaire on prevention of money laundering and financing of terrorism;
- Review of the Internal Procedure Manual and the Memorandum Corporate Governance.

The Internal Auditor is appointed/renewed for a period of 1 year by the Board of Directors.

Therefore, internal audits take place at the various divisions of the Mutual at regular times and at least once a year. The Internal Auditor will write down his observations and recommendation in a report to the Board. After approval, the report will be disclosed to the C.A.A.

In case the internal audit report contains any remark, management will react, in writing, prior to next session of the Internal Auditor. The Internal Auditor will be responsible for the appropriate follow-up of the conclusions and the recommendations inherent to the audit.

The Internal Audit function, being the Internal Auditor, is a key function and has to be fit and proper by performing annually a self-assessment.

Due to the size and the activity (mono-line) of BlueRe, the Internal Audit function is outsourced. The Internal Audit function therefore needs to comply with guidelines of the outsourcing policy.

### ***Compliance function***

The compliance function carried out by the Compliance Officer, assesses the conformity of codes of conduct and procedures in relation to the policy of ethics in the Association. These rules arise from BlueRe's own integrity policy as well as from its legal status and other regulatory provisions to identify and evaluate compliance risks.

The responsibility for compliance within the organisation is defined at four levels:

- the Board of Directors is responsible for defining the compliance principles to which the Association has to adhere;
- the Management Committee being in charge of the daily management of the Association is jointly responsible for implementing a compliance policy and a permanent compliance function;
- the Compliance Officer must identify and assess the compliance risks, supervise the implementation of applicable laws and establish appropriate compliance checks and controls;
- at operational level, compliance is the responsibility of all staff members through adherence to applicable laws and the internal policies, standards and procedures.

Appropriate measures have been taken to ensure the objectivity and independency of the compliance function.

The Compliance Officer informs the Board of Directors in writing at least once a year regarding the situation on compliance within the Mutual in a report that is also disclosed to the C.A.A.

In accordance to the responsibilities of ensuring that BlueRe complies with all regulatory principles set out by the Luxembourg authority and the overall internal policy, the compliance function has primarily been in relation to monitoring performances in the following areas:

- Internal Procedure Manual;
- Corporate Governance;
- Transactions for the own account of the members or staff;
- Financial instrument transactions;
- Respect of the private life of a Member or staff member;
- System of incompatibility of mandates;
- Assistance towards the internal audit and internal control;
- Eventual domains/fields designated by the Board of Directors;
- Prevention of fraud;
- Anti-money laundering measures;
- Prevention of financing terrorism.

The Compliance function is a key function and has to be fit and proper by performing annually a self-assessment.

The Compliance function can rely on a Charter in which is explained the responsibilities and duties. The Charter is regularly reviewed.



### *Risk Management function*

The Management Committee is responsible for implementing the risk management strategy and designing the structure. The Management Committee is primarily accountable for setting the Mutual's risk management strategy and structure into motion, providing oversight and independent reporting to the Board of Directors.

The Risk Management function, deploys practices to identify, assess, monitor and mitigate various risks to BlueRe's business. Because risks are not limited to one department, the Risk Management function carries out his duty throughout the Association.

Risk practices can therefore be conducted at various levels of the Association. The objectives and events under consideration determine the scope of the risk practice to be undertaken. Main domains for assessment are:

- Strategic assessment: Evaluation of risks relating to the Association's mission and strategic objectives including the Solvency position;
- Operational assessment: evaluation of the acceptability of insured risk;
- Country risk assessment: evaluation on culture and legislation of countries;
- Internal Control risk assessment: evaluation by report and risk log;
- Fraud risk assessment: evaluation of potential instances of fraud;
- Conduct an ORSA-process and stress testing;
- Inform, and alert where necessary in case risk tolerances are breached;
- Expose the state of the risks.

The Risk Management function will on a regular basis report within the Management Committee and to the Board of Directors on the effectiveness of his assessments. In his reporting, the Risk Management function will identify those risks which require attention and propose proper risk treatment.

The Risk Management function is a key function and has to be fit and proper by performing annually a self-assessment.

### *Actuarial function*

The Actuarial function is in charge of the control of the calculations and to give a level of comfort to the management and the Board of Directors on actuarial processes.

BlueRe is required by law to have a mathematic investigation to assess the risk in contribution and claim liabilities in respect of insurance policies. The actuary verifies annually the computations on the basis of recognised actuarial methods and publishes them in an actuarial function report. The actuarial report contains recommendations or comments to improve the reliability of future valuations of insurance policy liabilities and solvency requirements.

The Board of Directors executes the efficiency and reliability on the work performed by the actuarial function. The Board of Directors challenges the work of the actuary and therefore withholds the actuarial function.

According to article 48 of the Directive Solvency II the Actuarial function has the following responsibilities:

- Coordination of the technical provisions calculation;
- Control the data quality;
- Advice on the underwriting and reinsurance policies;
- Redaction of the actuarial function report.

The Actuarial function is a key function and must be fit and proper by performing annually a self-assessment.

### *Statutory Auditor*

BlueRe must have its annual accounts audited by one or more registered auditors amongst the members of the Luxembourg Institute of Registered Auditors. The Statutory Auditor conducts his audit in accordance with International Standards on Auditing as adopted for Luxembourg by the *Commission de Surveillance du Secteur Financier*. Those standards require that they comply with ethical requirements and plan and perform the audit to obtain reasonable assurance whether the annual accounts are free from material misstatement.

The Statutory Auditor and his remuneration are to be appointed by the Annual General Meeting on recommendation of the Board of Directors. The Mutual informs the Luxembourg authority of the nomination. Within the Mutual, the statutory auditor reports in writing to the Managing Director.

Deloitte Audit - Represented by Mr. L. Bardon, Statutory Auditor  
20, Boulevard de Kockelscheuer  
L-1821 Luxembourg

### *Investments / "Prudent person" principle: policy and implementation process*

Investments of BlueRe are based on the following principles:

- Investments shall be made in the sole interest of BlueRe and its key stakeholders;
- Investments shall be made with care, diligence and prudence;
- Investments shall be carefully diversified as to minimise the risk of large and unexpected losses;
- BlueRe may engage different investment managers with varying investment philosophies and strategies in order to attain its business objectives;

- Appointed investment managers shall adhere to BlueRe's investment strategy for which they were engaged and shall make reasonable efforts to preserve capital while understanding that losses do occur at individual securities;
- Appointed investment managers shall make reasonable efforts to manage and control risks and maintain risk taking within the guidelines and are proportionate to the expected returns;
- Cash must be deployed productively at all times by investing in short-term cash-equivalents while maintaining the desired liquidity level.

The monitoring and control of the investment process is done on the basis of the three lines of defense. The 1st line of defense is the Asset Manager of BlueRe (or external investment manager). The second line of defense is the FIAC and the third line is the Board of Directors.

#### Principle: Internal Control System

The permanent internal control system has to lean on an analysis and a measure of the risks, regularly updated, by every person in charge of business units (which are risk owners).

Every stakeholder within BlueRe has an internal control responsibility. The Board of Directors is responsible for promoting a high level of integrity and for establishing a culture within the Association that emphasises and demonstrates to all levels of personnel the importance of internal control. Management is responsible for the implementation of the internal control principles. It is therefore essential that everyone, included all personnel, understands the importance of internal control and engages actively in the process according to their responsibilities and specific duties.

For the identification and description of risks, BlueRe has focused on key risks and on management related controls that mitigate those risks. BlueRe's key risks definitions are based on existing information such as different control reports and regularly self-assessments. To lead to an efficient identification of those controls, interviews were conducted with every member of the Management. All this information has come together in a working document referred to as BlueRe's risk log.

The risk log identifies BlueRe's key risks. The management crosschecks the type of risk with existing control measures to see how they are currently mitigated. This exercise is performed at the end of each year and in preparation for the year to come.

In the risk log, BlueRe additionally estimates the potential loss given default of each risk category in case the risk should occur. In order to quantify each individual risk, BlueRe therefore combines two parameters which are the probability of occurrence and the (financial) loss impact. Furthermore, an evaluation is made on the effectiveness of the current controls so that the Association can target threats and plan actions where needed.

Finally, BlueRe emphasises that risk awareness is a priority of every member of staff.

### *Policies and procedures*

Policies and procedures are instruments of organization and control that contribute to the realization of the fixed objectives. They have to be in adequacy with the various identified, easily accessible risks and be the object of a communication and adequate trainings. They must be updated also regularly. The risk owners are responsible for the maintenance of processes and procedures.

### *Control plans*

Internal control processes occur throughout the entire organisation, at all levels and in all functions, since everyone in BlueRe bears responsibility in internal control. Focus will be on "at the top" perspectives, but adequate controls must exist and understood in all departments and by all employees with access to control mechanisms. BlueRe uses the four eyes principle to protect itself against mistakes and dishonesty in day-to-day management and outgoing payments and communication.

The Management Committee takes all necessary internal control measures to ensure that all the divisions of the Association have job descriptions with clear responsibilities. The Management Committee is responsible for implementing the risk management strategy and designing the structure, so it is integrated into the organisational structure.

### *Reporting and recommendations*

The reporting is the responsibility of the Risk management function.

Further to a report on a situation of failure or inefficiency or an evolution of the permanent control, various participants can emit a recommendation (the Supervisor, the Statutory Auditor, the Internal Auditor) or introduce an action of correction / prevention. The impulse of actions of correction or prevention and their follow-up are the current responsibilities of the management. The level of formalization in the action plan possibly implemented and its follow-up must be proportioned at the incurred risk, at the difficulty of implementation, at the desire at the risk of the Mutual.

## 4. Risk Management System, ORSA process and risk management function

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### Principle: Risk Management System

The appetite for risk represents the underlying foundation of any effective Risk Management System. Understanding risk appetite helps Boards and Management to make better strategic and tactical decisions. It enhances understanding of Board and stakeholder expectations and enables risk-reward decision-making. It reduces the likelihood of unpleasant surprises.

The ability to take on risks is determined by more than just a capacity to absorb losses. The ability to manage risks based on skill sets and experience, systems, controls and infrastructure is also crucial. Understanding risk appetite helps in the efficient allocation of risk management resources across a risk portfolio, and may enable the pursuit of business opportunities that, without an understanding of the appetite, would otherwise be rejected.

The Risk Appetite Framework (RAF) is defined as being the overall approach, including policies, processes, controls, and systems, through which risk appetite is established, communicated, and monitored. It includes a risk appetite statement, risk limits, and an outline of the roles and responsibilities of those overseeing the implementation and monitoring of the RAF.

We define the risk appetite as being the nature and quantity of risks that BlueRe is ready to accept or to tolerate in the pursuit of its strategic objectives, taking into account the expectations of the stakeholders.

The risk tolerance defines the maximum amount of risk (bearing activities) needed to achieve all the organisational strategic objectives while simultaneously remaining compliant with the stakeholder's expectations.

The risk target is the optimal risk level to achieve the strategic objectives with respect of the tolerance limits.

The Board delegates to the Management Committee the responsibility of implementing adequate risk management processes and policies to ensure risk management is correctly embedded within all operations and in all departments. The Board and Management Committee are assisted in this task by the Risk Manager.

BlueRe's Risk Management Policy, its Risk Management System and ORSA are to be reviewed by the Board at least annually. The review will be based on input provided by the Risk Manager and Management. More regular reviews may be undertaken when required or when there is a material change in the business or risk profile of BlueRe or where a risk issue which raises doubts about the effectiveness of the Risk Management System has been identified.

### *Specific guidelines for each risk*

BlueRe's Risk Management system, based on a top-down as well as bottom-up approach, covers all existing as well as evolving risks that have the potential to materially impact the adequacy of its financial resources, the volatility of its results or its ability to meet its commercial, legal and regulatory obligations. These risks include, but are not limited to, the following:

Insurance risks refer to the risk of loss, or adverse change in the value of insurance liabilities, due to inadequate pricing and reserving practices. These risks may be caused by the fluctuations in timing, frequency and severity of insured events and claim settlements in comparison to the expectations at the time of underwriting.

Market risk is the risk of loss or adverse change in the financial position due to fluctuations in the level and in the volatility of market prices of assets, liabilities and financial instruments. This risk may be caused by fluctuations in foreign exchange rates, interest rates or equity, market liquidity, property and securities values.

Credit risk is the risk of loss or adverse change in the financial position due to fluctuations in the credit standing of issuers of securities, reinsurers, counterparties or any other debtors.

Operational risk, including compliance risk, refers to the risk of loss arising from inadequate or failed internal processes, people, systems, or from external events. This risk encompasses all functions rendered during conducting business, including strategy and business planning, underwriting, reinsurance purchasing, reserving, claims management, accounting, investments, treasury, information technology, legal and regulatory, and financial reporting functions.

Liquidity risk is the risk of a loss or inability to realise investments and other assets in order to settle financial obligations when they fall due.

Strategic risk is the risk of the current or prospective impact on earnings or capital arising from adverse business decisions, improper execution of decisions made, or lack of responsiveness to industry changes. Strategic Risk includes risks relating to accessing / raising capital, capital allocation, competition and maintaining ratings.

Reputational risk is the risk of potential loss through a deterioration of BlueRe's reputation or standing due to a negative perception of its image among members, counterparties, shareholders or supervisory authorities.

Emerging risks refer to risks that do not currently exist or are not currently recognised but have the potential to materially impact the adequacy of BlueRe's financial and operational resources, the volatility of its results and expected financial income or its ability to meet its commercial, legal and regulatory obligations following changes in the environment.

Not all quantifiable risks have been explicitly formulated in the standard formula; furthermore, for some risks, it is generally assumed that the exposure is at all times not material enough and therefore a SCR quantification within the context of a standard formula would not be proportionate.

Finally, for some risks it would be inappropriate to cover them through pillar 1 capital requirements, but these should be covered instead through pillar 2 requirements and in particular Risk Management System requirements for appropriately monitoring and disclosing the risk profile of BlueRe.

### ***Risk Reporting System***

Risk reporting is integral to BlueRe's management information system and takes place at several different levels throughout the business. It provides senior management, the Board and other stakeholders (e.g. regulators, rating agencies) with sufficient information to enable them to assess (1) the actual level of risk taken by the business compared with the desired level of risk agreed in the business plan and (2) the effectiveness of the control environment.

The Risk Manager will report to the Board of Directors at least annually. The Management Committee is informed at least monthly. The Risk Management function will annually disclose a risk management report as well as for the year to come a risk management plan.

The Management Committee will report to the Board at least yearly on its assessment of material risks and on any significant changes to the overall risk profile of the company including actions being taken to mitigate or control key risk exposures. It reports also on the failures in relation to the risk appetite and precises if that is an asset or a liability breach.

### ***Implementation process***

An effective governance system requires written policies embedding the governance processes. Risk management is therefore well described within BlueRe. Key reference documents are Procedure manual, Memorandum Corporate Governance and Risk Management policy.

Risk reporting is not a stand-alone item. For example, there is a nature flow towards the ORSA starting from budget and Business Plan towards the SCR calculation. The details and content of the ORSA process is described in the specific ORSA document.

### ***Principle: ORSA process***

The ORSA process seeks to draw together considerations of risk, capital and returns within the context of the overall business strategy, both in the present and forward looking, providing a holistic view of the capital, risk and return over the forecast period.

The ORSA process is used to:

- Ensure there is sufficient capital available to meet the current business requirements (Solvency II compliance);
- Determine the supplementary capital required to meet the growth and diversification plans and other strategic decisions;
- Ensure that any risks that exceed the risk appetite are identified, assessed and if required the remedial action plan in place;
- Provide assurance to the Board, financial regulators and other stakeholders that risk management and capital planning processes are embedded within the business.

BlueRe performs an ORSA at least annually or when the risk and solvency profile change significantly. The risk profile is continuously monitored against the risk appetite and periodically reported by the Risk Manager.

The overall purpose for the ORSA assessment is to ensure that we can continuously meet our current and planned future regulatory targets and internally set capital target, in the face of planned changes to the risk profile and business plans, and expected development in the external environment.

As a management tool, it is designed to embed risk awareness within the business culture and decision making. It is integral to the successful delivery of the overall strategic plan as it provides the management with a good understanding of the risk it is assuming and the capital required to cover those risks. It must be treated as a management process rather than a compliance exercise.

### ***Time Horizon***

The time horizon of the ORSA is fixed to 5 years, same horizon as used in the strategic business plan. The strategic business plan is the Base scenario of the forecasted P&L and Balance Sheet. For the solvency projections in ORSA, best estimates, market value balance sheet and SCR from Pillar I calculations are used as starting point.

### ***Scenario-stress testing***

The Strategic Business Plan (SBP) figures will be used for projection of the technical provisions and cash flows in and out. The calculation of the projected SCR can then be done. The final result is the “Base Case” and gives the expected capital needs/surpluses.

Besides the base scenario, we analyse also the effects of adverse developments on its solvency position. This is done with the help of scenario analysis and stress testing: a scenario analysis is defined by assessing the impact of a combination of factors. Stress testing is an extreme scenario that crosses the boundaries of the SCR-MCR.

### ***Use of the ORSA results***

A part of the ORSA is the determination of the capital needed to manage the business. The results of ORSA are used for:



- Yearly evaluation of the risk appetite framework in relation to the capital position and the strategy;
- Start the strategic business plan with the most recent capital assessment;
- Monitoring capital position from regulatory, rating agencies and internal angle;
- The assessment of the target and realized solvency ratios.

### *Frequency and triggers of ORSA*

We perform an ORSA at least annually and an update when the risk and solvency profile change significantly. The risk profile is continuously monitored against the risk appetite and periodically reported.

Examples of trigger for updating the ORSA:

- An acquisition that significantly changes risk profile;
- A significant change in the financial markets that has an important impact on the value of the asset portfolio;
- A significant change in regulation.

The decision of performing an update of the ORSA is taken by the Management Committee.

## 5. Capital Management and SCR-MCR

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### *Capital requirements*

BlueRe currently does not have capital items other than unrestricted Tier 1 Own Funds. The major difference between the capital in the LUXGAAP financial statements and the excess over liabilities as calculated for Solvency II purposes, arises mainly from the revaluation of the equalisation reserve towards total basic own funds.

BlueRe uses the Standard formula to calculate its SCR and MCR.

### *Amounts of the undertaking's Solvency Capital Requirement and the Minimum Capital Requirement*

See QRT S.23.01.01 in annex.

### *Balance sheet SII versus LUXGAAP*

See QRT S.02.01.01 in annex.

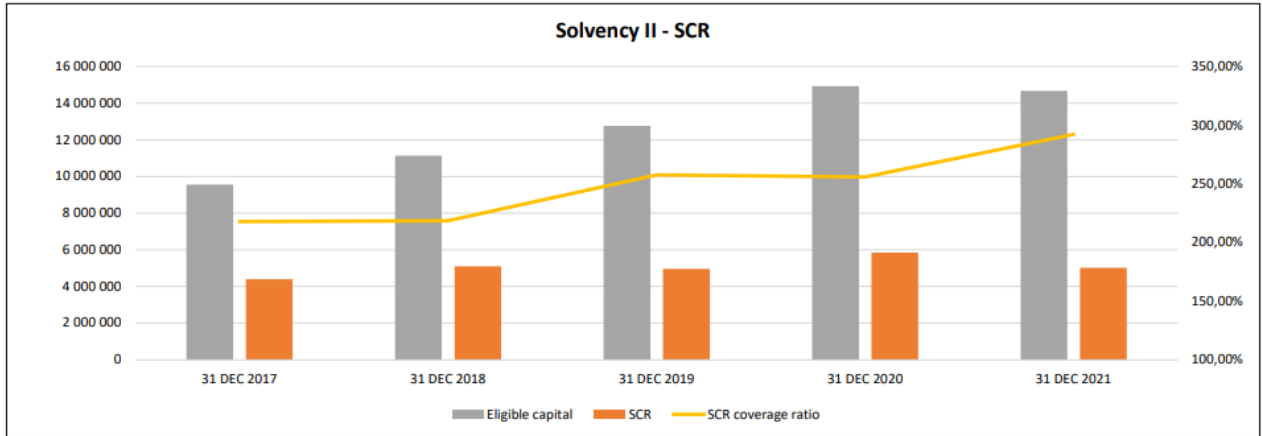
SCR Tree

BlueRe m.a.		SCR		5 024 400		↓	
		previous		5 841 625			
		ADJ	- 2 085 265	BSCR	7 033 854	OP	75 811
		previous	-	previous	5 775 747	previous	65 879
Market	2 532 850	Health	-	Default	146 408	Life	-
previous	1 197 736			previous	479 260	Non Life	5 877 802
						previous	5 091 084
Rate	770 812	SLT Health	-	CAT	-	Mortality	-
previous	305 738			Non SLT Health	-	Premium Reserve	1 313 862
						previous	1 138 007
Equity	1 153 629	Mortality	-	Premium Reserve	-	Longevity	-
previous	548 211			Lapse	-	Lapse	-
						previous	-
Property	18 752	Longevity	-	Lapse	-	Disability / Morbidity	-
previous	15 483					CAT	5 410 020
						previous	4 685 913
Spread	1 257 902	Disability / Morbidity	-			Lapse	-
previous	610 923					Expenses	-
						Revision	-
Currency	346 602	Lapse	-			Expenses	-
previous	158 584					Revision	-
						CAT	-
Concentration	-	Expenses	-				
previous	-						
	-	Revision	-				
previous	-						

SCR	Meeting of capital requirements
5 024 400	Capital requirements [standard formula]
14 683 851	Total to meet SCR
9 659 451	Overall Surplus (+) / Shortfall (-)
292,25%	Coverage ratio

	31 DEC 2017	31 DEC 2018	Change to 31 DEC 2017	31 DEC 2019	Change to 31 DEC 2018	31 DEC 2020	Change to 31 DEC 2019	31 DEC 2021	Change to 31 DEC 2020
SCR	4 394 803	5 094 566	+16%	4 952 309	-3%	5 841 625	+18%	5 024 400	-14%
Eligible capital	9 571 480	11 137 590	+16%	12 758 731	+15%	14 941 462	+17%	14 683 851	-2%
surplus	5 176 676	6 043 024	+17%	7 806 423	+29%	9 099 837	+17%	9 659 451	+6%
<b>SCR coverage ratio</b>	<b>217,79%</b>	<b>218,62%</b>	<b>+1%</b>	<b>257,63%</b>	<b>+39%</b>	<b>255,78%</b>	<b>-2%</b>	<b>292,25%</b>	<b>+36%</b>



## 6. Outsourcing

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### *Policy*

BlueRe updates and discloses yearly an outsourcing policy. The respect of this policy is compulsory every time a subcontracted activity can have a significant influence on the functioning of BlueRe. The activity, the service or the process are assessed by:

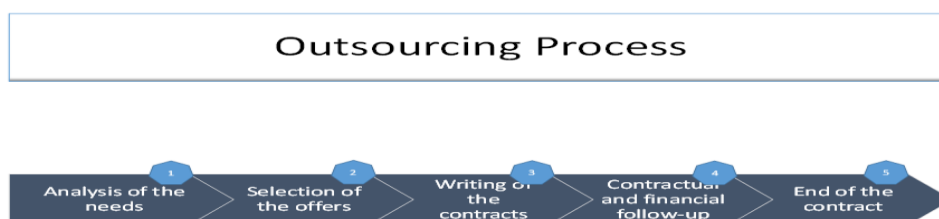
- Strategic impact: the concerned activity is inherent to the status of BlueRe;
- Significant impact on the control of the risks: the realisation of the tasks linked to the concerned activity implies significant risks and/or affects directly the control of the risks;
- Significant impact on the budget or the financial results: the realisation of the tasks linked to the concerned activity represents a significant cost and/or products a significant financial result.

### *Staffing and supervision*

Subcontracting does not reduce the responsibility of the Management Committee and the Board of BlueRe whether regarding the Members, supervisory authorities or other stakeholders: BlueRe has to keep ultimate responsibility of its activity.

For any subcontracted essential activity, the Management Committee of BlueRe appoints in house a person in charge of the subcontracted function to whom it delegates the correct application of the present policy. This person is in particular in charge of defining the contents of the subcontracting, the necessary internal resources, the interfaces between the parties, the controlling of the subcontracting, the establishment of the assessment of the subcontracted function (economic profits vs risks) and the reporting to the Management Committee.

The subcontracted organization of the outsourced function should allow a permanent control of the provider. The subcontracted organization will have in particular the obligation to raise any operational incident having an impact on the subcontracted activities, as well as in emergency situation. The process of subcontracting is resumed in the plan below. Each of the stages of the process is explained in the outsourcing policy.



## 7. Status of the SFCR and date

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For practical reasons, the SFCR is written in a masculine version where we often use words as he or his. In BlueRe, where we believe in equal rights, it is not more than normal that those words can be used if appropriate in their feminine form.

A Mutual is always evolving. To avoid continuous and minor adaptations to the SFCR, the Management Committee yearly evaluates and updates the SFCR where necessary. A minimal improved version is too insignificant to be presented to the Board of Directors. However, major modifications that have a structural impact on the organization should be approved by the Board of Directors. Their consent will be expressed by the signature of the Managing Director.

Latest review date	29-04-2022
Latest assessment by Management Committee	29-04-2022
Brought to the Board	01-06-2022

Approved by,



D. Vanwelkenhuyzen  
Dirigeant Agréé

# ANNEX

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## Quantitatives Reporting Templates (QRT)

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- S.02.01.02 - Balance sheet
- S.05.01.02 - Premium, claims and expenses by line of business
- S.05.02.01 - Premium, claims and expenses by country
- S.17.01.02 - Non-Life technical provisions
- S.19.01.21 - Non-Life insurance claims
- S.23.01.01 - Own funds
- S.25.01.21 - Solvency Capital Requirement - for undertakings on standard formula
- S.28.01.01 - Minimum Capital Requirement – Only life or only non-life insurance or reinsurance activity

All amounts are expressed in thousands of euros.



**S.02.01.02 - Balance sheet**

		Solvency II value		Statutory accounts value	
		C0010		C0020	
Assets	Goodwill	R0010			
	Deferred acquisition costs	R0020			3
	Intangible assets	R0030			
	Deferred tax assets	R0040			
	Pension benefit surplus	R0050			
	Property, plant & equipment held for own use	R0060	75		75
	Investments (other than assets held for index-linked and unit-linked contracts)	R0070	15 185		14 603
	Property (other than for own use)	R0080	0		0
	Holdings in related undertakings, including participations	R0090	0		0
	Equities	R0100	0		0
	Equities - listed	R0110	0		0
	Equities - unlisted	R0120	0		0
	Bonds	R0130	0		0
	Government Bonds	R0140	0		0
	Corporate Bonds	R0150	0		0
	Structured notes	R0160	0		0
	Collateralised securities	R0170	0		0
	Collective Investments Undertakings	R0180	15 032		14 450
	Derivatives	R0190	0		0
	Deposits other than cash equivalents	R0200	153		153
	Other investments	R0210	0		0
	Assets held for index-linked and unit-linked contracts	R0220	0		0
	Loans and mortgages	R0230	0		0
	Loans on policies	R0240	0		0
	Loans and mortgages to individuals	R0250	0		0
	Other loans and mortgages	R0260	0		0
	Reinsurance recoverables from:	R0270	0		0
	Non-life and health similar to non-life	R0280	0		0
	Non-life excluding health	R0290	0		0
	Health similar to non-life	R0300	0		0
	Life and health similar to life, excluding health and index-linked and unit-linked	R0310	0		0
	Health similar to life	R0320	0		0
Life excluding health and index-linked and unit-linked	R0330	0		0	
Life index-linked and unit-linked	R0340	0		0	
Deposits to cedants	R0350	0		0	
Insurance and intermediaries receivables	R0360				
Reinsurance receivables	R0370	3		3	
Receivables (trade, not insurance)	R0380	2		322	
Own shares (held directly)	R0390				
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	320			
Cash and cash equivalents	R0410	2 660		2 660	
Any other assets, not elsewhere shown	R0420	0		0	
<b>Total assets</b>	<b>R0500</b>	<b>18 245</b>		<b>17 667</b>	

Liabilities	Technical provisions - non-life		R0510	477	118
		Technical provisions - non-life (excluding health)	R0520	477	118
		Technical provisions calculated as a whole	R0530	0	
		Best Estimate	R0540	118	
		Risk margin	R0550	359	
			R0560	0	
		Technical provisions - health (similar to non-life)	R0570	0	
		Technical provisions calculated as a whole	R0580	0	
		Best Estimate	R0590	0	
		Risk margin	R0600	0	0
			R0610	0	
		Technical provisions - life (excluding index-linked and unit-linked)	R0620	0	
	Technical provisions - health (similar to life)	R0630	0		
	Technical provisions calculated as a whole	R0640	0		
	Best Estimate	R0650	0		
	Risk margin	R0660	0		
		R0670	0		
	Technical provisions - life (excluding health and index-linked and unit-linked)	R0680	0		
	Technical provisions calculated as a whole	R0690	0		
	Best Estimate	R0700	0		
	Risk margin	R0710	0		
		R0720	0		
	Technical provisions - index-linked and unit-linked	R0730	0	10 069	
	Technical provisions calculated as a whole	R0740	0		
	Best Estimate	R0750	0		
	Risk margin	R0760	0		
	Other technical provisions	R0770	0		
	Contingent liabilities	R0780	3 018		
	Provisions other than technical provisions	R0790	0	0	
	Pension benefit obligations	R0800	0		
Deposits from reinsurers	R0810	0			
Deferred tax liabilities	R0820	0			
Derivatives	R0830	0	0		
Debts owed to credit institutions	R0840	50	50		
Financial liabilities other than debts owed to credit institutions	R0850	0	0		
Insurance & intermediaries payables	R0860	0			
Reinsurance payables	R0870	0			
Payables (trade, not insurance)	R0880	17	17		
Subordinated liabilities	R0890	0			
Subordinated liabilities not in Basic Own Funds	R0900	0			
Subordinated liabilities in Basic Own Funds	R0910	0			
Any other liabilities, not elsewhere shown	R0920	17	17		
Total liabilities	R0930	3 561	10 254		
Excess of assets over liabilities	R1000	14 684	7 413		

**S.05.01.02 - Premium, claims and expenses by line of business**

			Line of Business for: accepted non-proportional reinsurance	Total
			Casualty	
			C0140	C0200
Premiums written	Gross - Direct Business	R0110		0
	Gross - Proportional reinsurance accepted	R0120		0
	Gross - Non-proportional reinsurance accepted	R0130	2 554	2 554
	Reinsurers' share	R0140	0	0
	Net	R0200	2 554	2 554
Premiums earned	Gross - Direct Business	R0210		0
	Gross - Proportional reinsurance accepted	R0220		0
	Gross - Non-proportional reinsurance accepted	R0230	2 527	2 527
	Reinsurers' share	R0240	0	0
	Net	R0300	2 527	2 527
Claims incurred	Gross - Direct Business	R0310		0
	Gross - Proportional reinsurance accepted	R0320		0
	Gross - Non-proportional reinsurance accepted	R0330	0	0
	Reinsurers' share	R0340	0	0
	Net	R0400	0	0
Changes in other technical provisions	Gross - Direct Business	R0410		0
	Gross - Proportional reinsurance accepted	R0420		0
	Gross - Non- proportional reinsurance accepted	R0430		0
	Reinsurers' share	R0440		0
	Net	R0500	0	0
Expenses		R0550	315	315
Other expenses		R1200		0
Total expenses		R1300		315

**S.05.02.01 - Premium, claims and expenses by country**

			Home country	Total Top 5 and home country
			C0080	C0140
Premiums written	Gross - Direct Business	R0110	0	0
	Gross - Proportional reinsurance accepted	R0120	0	0
	Gross - Non-proportional reinsurance accepted	R0130	2 554	2 554
	Reinsurers' share	R0140	0	0
	Net	R0200	2 554	2 554
Premiums earned	Gross - Direct Business	R0210	0	0
	Gross - Proportional reinsurance accepted	R0220	0	0
	Gross - Non-proportional reinsurance accepted	R0230	2 527	2 527
	Reinsurers' share	R0240	0	0
	Net	R0300	2 527	2 527
Claims incurred	Gross - Direct Business	R0310	0	0
	Gross - Proportional reinsurance accepted	R0320	0	0
	Gross - Non-proportional reinsurance accepted	R0330	0	0
	Reinsurers' share	R0340	0	0
	Net	R0400	0	0
Changes in other technical provisions	Gross - Direct Business	R0410		0
	Gross - Proportional reinsurance accepted	R0420		0
	Gross - Non-proportional reinsurance accepted	R0430		0
	Reinsurers' share	R0440		0
	Net	R0500		0
Expenses incurred		R0550	315	315
Other expenses		R1200		
Total expenses		R1300		315

**S.17.01.02 - Non-Life technical provisions**

				accepted non-proportional reinsurance	Total Non-Life obligation	
				Non-proportional casualty reinsurance		
				C0150	C0180	
Technical provisions calculated as a whole				R0010	0	
	Direct business			R0020	0	
	Accepted proportional reinsurance business			R0030	0	
	Accepted non-proportional reinsurance			R0040	0	
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole				R0050	0	
Technical provisions calculated as a sum of BE and RM	Best estimate	Premium provisions	Gross - Total	R0060	118	118
			Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	0	0
			Net Best Estimate of Premium Provisions	R0150	118	118
	Claims provisions	Gross - Total	R0160		0	
		Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	0	0	
		Net Best Estimate of Claims Provisions	R0250	0	0	
		Total Best estimate - gross	R0260	118	118	
	Total Best estimate - net	R0270	118	118		
	Risk margin			R0280	359	359
	Amount of the transitional on Technical Provisions	TP as a whole			R0290	0
Best estimate				R0300	0	
Risk margin				R0310	0	
Technical provisions - total	Technical provisions - total			R0320	477	477
	Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total			R0330	0	0
	Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total			R0340	477	477

**S.19.01.21 - Non-Life insurance claims**

Total Non-life business

- Gross claims paid (non-cumulative)
- Gross undiscounted Best Estimate Claims Provisions

BlueRe never had claims and currently has no claims, therefore, those two templates are empty.

**S.23.01.01 – Own funds**

			Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
			C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35	Ordinary share capital (gross of own shares)	R0010	0	0		0	
	Share premium account related to ordinary share capital	R0030	0	0		0	
	Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	7 413	7 093		320	
	Subordinated mutual member accounts	R0050	0		0	0	0
	Surplus funds	R0070	0	0			
	Preference shares	R0090	0		0	0	0
	Share premium account related to preference shares	R0110	0		0	0	0
	Reconciliation reserve	R0130	7 271	7 271			
	Subordinated liabilities	R0140	0		0	0	0
	An amount equal to the value of net deferred tax assets	R0160	0				0
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	0	0	0	0	0	
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220	0				
Deductions	Deductions for participations in financial and credit institutions	R0230	0	0	0	0	0
<b>Total basic own funds after deductions</b>		R0290	14 684	14 364	0	320	0
Ancillary own funds	Unpaid and uncalled ordinary share capital callable on demand	R0300	0			0	
	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310	0			0	
	Unpaid and uncalled preference shares callable on demand	R0320	0			0	0
	A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330	0			0	0
	Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340	0			0	
	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350	0			0	0
	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360	0			0	
	Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370	0			0	0
Other ancillary own funds	R0390	0			0	0	
<b>Total ancillary own funds</b>		R0400	0			0	0
Available and eligible own funds	Total available own funds to meet the SCR	R0500	14 684	14 364	0	320	0
	Total available own funds to meet the MCR	R0510	14 684	14 364	0	320	
	Total eligible own funds to meet the SCR	R0540	14 684	14 364	0	320	0
	Total eligible own funds to meet the MCR	R0550	14 684	14 364	0	320	
SCR		R0580	5 024				
MCR		R0600	3 900				
Ratio of Eligible own funds to SCR		R0620	292%				
Ratio of Eligible own funds to MCR		R0640	377%				

			C0060
Reconciliation reserve	Excess of assets over liabilities	R0700	14 684
	Own shares (held directly and indirectly)	R0710	0
	Foreseeable dividends, distributions and charges	R0720	0
	Other basic own fund items	R0730	7 413
	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	0
		R0760	7 271
Expected profits	Expected profits included in future premiums (EPIFP) - Life business	R0770	0
	Expected profits included in future premiums (EPIFP) - Non-life business	R0780	0
Total Expected profits included in future premiums (EPIFP)		R0790	0



### S.25.01.21 - Solvency Capital Requirement - for undertakings on standard formula

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0100
Market risk	R0010	2 533		
Counterparty default risk	R0020	146		
Life underwriting risk	R0030	0		
Health underwriting risk	R0040	0		
Non-life underwriting risk	R0050	5 878		
Diversification	R0060	-1 523		
Intangible asset risk	R0070	0		
Basic Solvency Capital Requirement	R0100	7 034		

			Value
			C0100
Operational risk		R0130	76
Loss-absorbing capacity of technical provisions		R0140	0
Loss-absorbing capacity of deferred taxes		R0150	-2 085
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC		R0160	0
Solvency Capital Requirement excluding capital add-on		R0200	5 024
Capital add-on already set		R0210	0
Solvency capital requirement		R0220	5 024
Other information on SCR	Capital requirement for duration-based equity risk sub-module	R0400	0
	Total amount of Notional Solvency Capital Requirements for remaining part	R0410	
	Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	0
	Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	0
	Diversification effects due to RFF nSCR aggregation for article 304	R0440	0

**S.28.01.01 - Minimum Capital Requirement – Only life or only non-life insurance or reinsurance activity**

		<b>MCR components</b>
		<b>C0010</b>
<b>MCRNL Result</b>	<b>R0010</b>	428

		<b>Background information</b>	
		<b>Net (of reinsurance/SPV) best estimate and TP calculated as a whole</b>	<b>Net (of reinsurance) written premiums in the last 12 months</b>
		<b>C0020</b>	<b>C0030</b>
<b>Non-proportional casualty reinsurance</b>	<b>R0150</b>	118	2 554

		<b>C0070</b>
<b>Linear MCR</b>	<b>R0300</b>	428
<b>SCR</b>	<b>R0310</b>	5 024
<b>MCR cap</b>	<b>R0320</b>	2 261
<b>MCR floor</b>	<b>R0330</b>	1 256
<b>Combined MCR</b>	<b>R0340</b>	1 256
<b>Absolute floor of the MCR</b>	<b>R0350</b>	3 900
<b>Minimum Capital Requirement</b>	<b>R0400</b>	3 900