



XL Insurance Company SE

AN AXA GROUP COMPANY

Solvency and Financial Condition Report

Year Ended
31 December 2024

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Summary

Unless otherwise stated, all amounts in this report are presented in thousands of Euros (€'000), with the Euro being the Company's reporting currency in the Financial Statements. This includes the Quantitative Reporting Templates (QRT) included in Section E.

Effective January 18, 2019, the Company changed domicile from the United Kingdom to Ireland, and as such is now regulated by the CBI.

Effective December 31, 2019, the Company completed two European cross-border mergers, with entities that were also ultimately owned by AXA SA. These companies were AXA Corporate Solutions Assurance (ACS), which was a French domiciled commercial insurance company and AXA ART Verisicherung AG (AXA ART), which was a German domiciled insurance company focusing on fine art and specie insurance. All comparatives reflect the combined operations of the three legacy entities.

Business and performance

The principal activity of the Company is the transaction of general (re)insurance business (the business). The business conducted is primarily commercial insurance, providing property, casualty, financial lines and specialty products to industrial, commercial and professional firms.

The Company issues policies globally through its network of branches (or through the use of fronting partners) in the major locations of its (re)insurance clients and their respective (re)insurance risks. Its branches are in Europe and the Asia Pacific region. This allows the Company to service brokers and clients efficiently providing both local service and global expertise, ensuring that it is able to deliver solutions to the often complex risks of multinational companies. As the Company's clients expand into new and emerging markets, the Company seeks to ensure that it can support that international expansion with the capability to provide local (re)insurance solutions and local service.

The Company is a member of the AXA XL division within the AXA Group. AXA XL, through its operating carriers, is a global insurance and reinsurance group of companies and other enterprises situated around the world. The operating entities are structured into regions. The Company provides the main insurance company platform to operate under the AXA XL brand from branches within Europe and Asia Pacific.

Further details of the Company's business and performance are provided in Section A below. Also refer to AXA's Annual Report for the year ended 31 December 2024 for additional information on the AXA Group's performance. A link to the 2024 earnings presentation is [here](#).

The results of the Company for the year show an overall profit before tax of €546m (2023: profit of €293m). The two key drivers of the result are:

- Underwriting profit of €280m (2023: profit of €17m).
- Investment income of €211m (2023: Income of €272m)

The 2024 underwriting result produces a combined operating ratio for the year of 82.5% compared to 98.8% in 2023. This is the outcome of recent remediation efforts on underperforming lines business and targeted growth where the return is adequate for the Company's risk profile. The combined operating ratio was significantly favourable to plan due to low levels of large and CAT losses along with reinsurance recoveries on legacy reinsurance covers. The gross premium written was €5,956m in 2024, an increase of €155m when compared to the previous year.

The total investment return was a profit of €211m compared to €272m in 2023 and was slightly above plan. There is a positive contribution from underlying investment income, unrealized gains and realized gains.

In 2025 the Company will continue to focus on underwriting excellence, prudent expense management and transformation of processes to support profitable growth. The Company expects to continue to target growth in identified strategic pillars and paying special attention to market segments showing challenging rate changes. The Company is confident of continuing to see the impact of the significant underwriting portfolio actions implemented in recent years.

System of governance

The Board and management are committed to effective corporate governance and have established a comprehensive framework for the Company's operations. The key component of this framework is the Board, which has ultimate responsibility for the implementation and maintenance of an effective corporate governance framework, and the various Board and management committees through which the Board discharges its Legal and Fiduciary responsibilities.

The Board is responsible for the Internal Control Framework (ICF) and the Company operates a 'Three Lines of Defence' model where (1) the Business, (2) Risk Management and Compliance and (3) Independent Audit work together to ensure that risk management is effective.

The Risk Management Framework (RMF) determines risk appetites and risk limits, establishes risk policies, identifies and manages the risks to the Company's objectives and monitors the capital requirements. All of this is captured by the Risk Management Framework and Own Risk and Solvency Assessment (ORSA) activities that are carried out throughout the year with oversight by the Board. The Company is supported by a number of Group-wide processes in the achievement of its risk management objectives.

In line with the recently implemented IAF (Individual Accountability Framework) regulations XLICSE maintains an up to date Management Responsibilities Map (MRM). This document includes an overview of the business, its system of governance, key functions and divisional interactions. It also documents details of key individuals (CF1 and PCF role holders) and their reporting lines, allocation of responsibilities, statements of responsibilities and governance and management arrangements for XLICSE.

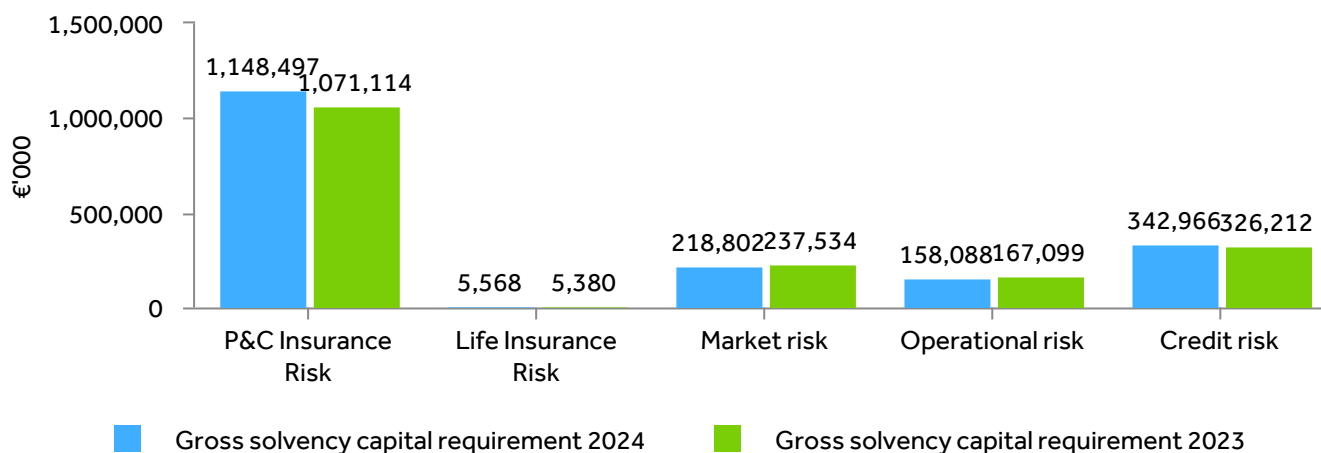
Further details of the Company's Systems of Governance are provided in Section B below.

No material changes were made to the Company's system of governance during the reporting period.

Risk profile

The key risks within the Solvency Capital Requirement (SCR) are shown below:

Key Risk Drivers in the SCR 2024 vs 2023



XLICSE received approval to use an Internal Model to calculate the SCR on the 28th December 2023 and effective from the 31st December 2023. As such, the 2024 SCR has been calculated on an Internal Model basis, same as 2023.

The risk profile of the Company, as a non-life insurance company, is dominated by underwriting risk. Underwriting and loss experience is reviewed regularly for, among other things, loss trends, emerging exposures, changes in the regulatory or legal environment as well as the efficacy of policy terms and conditions. Underwriting risk is also identified through:

- Business planning;
- Underwriting processes (including guidelines and escalation authorities);
- Reserving and claims processes;
- Enterprise Risk Management (ERM) risk assessment processes;
- The use of Realistic Disaster Scenarios (RDS) and other scenarios; and
- Independent underwriting peer reviews.

Underwriting risk is mitigated through the purchase of reinsurance, controls over the Actuarial function, rate adequacy, underwriting authorities and guidelines, and the new product process. The increase in underwriting risk is predominantly driven by growth in the business and changes in the outward reinsurance programme. Underwriting risk is the most material risk XLICSE is exposed through the primarily commercial insurance coverages provided including property, casualty, financial lines, and specialty products to industrial, commercial and professional firms.

Market risk for the Company is driven primarily by spread and interest rate risk from the bonds held against claims liabilities, and interest rate risk from both investments held and claims liabilities. There are also risk charges from the equities and investments in properties and property funds as well as currency risk driven by the asset and liability currency mix.

Counterparty default risk is driven primarily by reinsurance recoverable balances, fixed income credit & other receivable balances. Counterparty default risk for XLICSE is largely driven by the high reinsurance assets, and premiums receivable including a small exposure to unrated/low rated counterparties. The vast majority of reinsurance recoverables are held with highly rated counterparties (mainly internal) and collateralised where possible. In addition, all receivables balances are shocked within credit risk.

Operational risk at December 31, 2024 is set by assessing the specific risks XLICSE is exposed to under the Internal Model.

Further information on each separate category of risk can be found in detail in Section C below including a description of the measures used to assess these risks and a description of the material risks which the Company is exposed to.

Valuation for solvency purposes

An analysis of the valuation of non-technical assets and liabilities in the Solvency II balance sheet, together with the recognition and valuation bases applied, is provided in Sections D.1 and D.3.

Section D.2 discloses the value of technical provisions as well as a description of the bases, methods and main assumptions used for their valuation for solvency purposes.

Capital management

The Company is required to measure its assets and liabilities according to the European Solvency II Directive and its associated rules, regulations and guidelines. This regulatory framework for the European insurance industry adopts a dynamic risk-based approach based on economic principles that measure assets and liabilities to appropriately align insurers' risks with the capital they hold to safeguard policyholders.

The Company calculates its SCR using the AXA internal model as at December 31, 2024.

Eligible own funds shown below includes a foreseeable dividend of €465m (2023: €400m).

The SCR and minimum capital requirement (MCR) at 31 December 2024 and 2023 are set out below: .

	2024	2023
	€'000	€'000
Total eligible own funds to meet the SCR	2,251,214	2,352,588
SCR	1,410,609	1,294,158
Ratio of Eligible own funds to SCR	159.6 %	181.8 %

The Company's objectives in managing its capital are to:

- Match the profile of its assets and liabilities, taking account of the risks inherent in the business;
- Maintain financial strength to support new business growth; and
- Satisfy the requirements of its regulators and policyholders.

At 31 December 2024 the Company's Basic Own Funds were assigned to the Solvency II tiers as shown in the following table:

2024	Tier 1 - unrestricted	Tier 2	Tier 3	Total
	€'000	€'000	€'000	€'000
Ordinary share capital	314,969	—	—	314,969
Share premium	274,187	—	—	274,187
Reconciliation reserve	1,162,057	—	—	1,162,057
Ancillary Own Fund item	—	500,000	—	500,000
Total basic own funds after deductions	1,751,214	500,000	0	2,251,214

The classification into tiers is relevant to the determination of eligible own funds. These are the own funds that are eligible for covering the SCR and the MCR. No restriction applies to eligible own funds covering the SCR. As Tier 2 own fund items are subject to restrictions when covering the MCR, the amount of Tier 2 items eligible to cover the MCR is less than 100% of the total amount of Tier 2 items included in the table above. This is reflected in the table below:

	2024	2023
	€'000	€'000
SCR	1,410,609	1,294,158
MCR	501,321	507,219
Total eligible own funds to meet the SCR	2,251,214	2,352,588
Total eligible own funds to meet the MCR	1,751,214	1,852,588
	%	%
Ratio of Eligible own funds to SCR	159.6 %	181.8 %
Ratio of Eligible own funds to MCR	349.3 %	365.2 %

The Company does not use any matching adjustment and has not used transitional adjustments to the relevant risk-free interest rate term structure or transitional measures on technical provisions. It has used the volatility adjustment in the current year.

The Company met all of the SCR and MCR compliance requirements during the reporting period.

Deferred Tax

Under Solvency II, the Company calculates the deferred tax assets as the temporary differences between the valuation of an asset/liability on the Solvency II balance sheet and its tax base.

The total amount of deferred tax asset after offsetting with deferred tax liabilities recognised in the Solvency II balance sheet is €87m, this relates to temporary differences between the tax base and the respective value in the Solvency II balance sheet.

Solvency II applies an equivalent recognition test as is applied under IFRS and Irish GAAP. A deferred tax asset can only be recognized to the extent it is probable that future taxable profit will be available against which the unused tax losses and unused tax credits can be utilized. The criteria for holding a deferred tax asset is similar under Irish GAAP and Solvency II and a review under both basis of accounting has been performed.

The Solvency Capital Requirement has been adjusted by €64m for the loss-absorbing capacity of deferred taxes.

Loss carry back and probable future taxable profits had not been used to demonstrate likely utilisation.

Probable future taxable profits had not been used to demonstrate likely utilisation.

Significant Business or other events

During the year the Ancillary Own Fund item for €500m was renewed for a further 5 years, expiring December 31, 2029. Subsequent to year end the Company opened three new branches in Denmark, Belgium and Norway.

A. Business and Performance

A.1. Business

A.1.1 Name and legal form of the undertaking

The registered office is:

AXA XL
Wolfe Tone House
Wolfe Tone St
Dublin 1
D01 HP90
Ireland

A.1.2 Supervisory authorities

Central Bank of Ireland
P.O.Box 559
New Wapping Street
North Wall Quay
Spencer Dock
Dublin 1
Ireland

Group Supervisor

Autorité de Contrôle Prudentiel et de Résolution (ACPR)
4, place de Budapest
CS 92459
75436 PARIS CEDEX 09
France

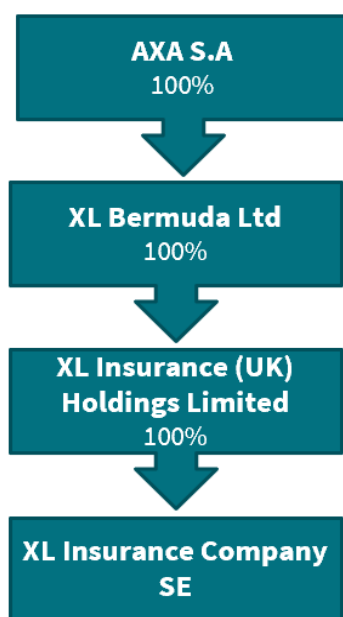
A.1.3 External auditor

Ernst & Young
Harcourt Street,
Dublin 2,
Ireland

A.1.4 Company holders and position within legal structure of the Group

The Company's immediate parent company is XL Insurance (UK) Holdings Limited, a company incorporated in England and Wales. The Company's ultimate parent undertaking is AXA S.A, a company incorporated in France.

The Company position within the legal structure of the Group can be seen from the simplified structure chart below:



A.1.5 Related undertakings

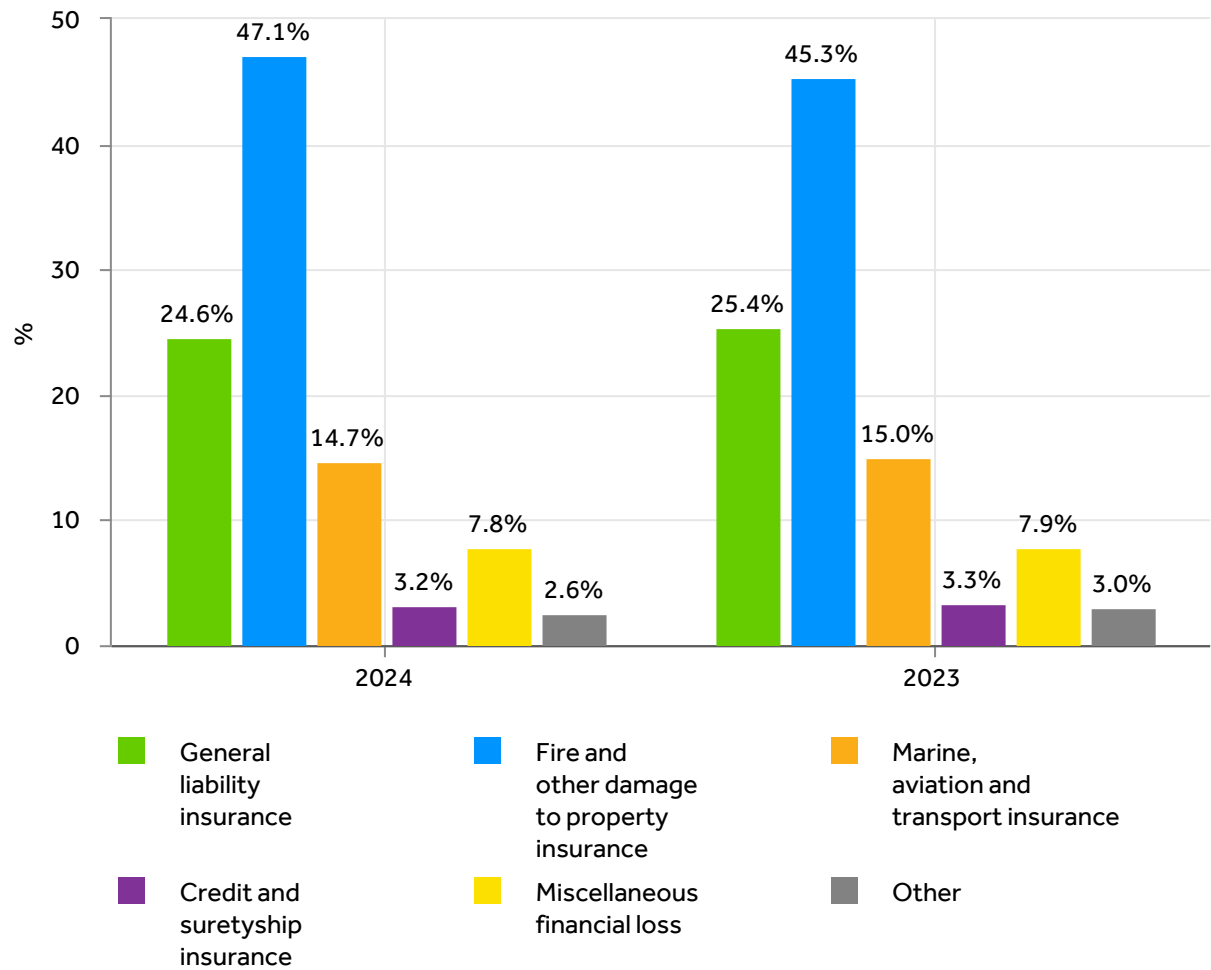
In accordance with Brazilian regulatory requirements, our company maintains a participating interest known as a Principal Representative Office named XL Insurance Company SE Escritorio De Representacao No Brasil LTDA. This office enables the Company to legally transact insurance and reinsurance within Brazil. The office itself does not generate revenue or hold tangible assets, it does pay local expenses and taxes, and as such is held at a value of 0 on the balance sheet.

A.1.6 Material lines of business and geographical areas

The Company issues policies globally through its network of branches (or through the use of fronting partners) in the major locations of its (re)insurance clients and their respective (re)insurance risks. Its branches are in the Europe and Asia Pacific regions. This allows the Company to service brokers and clients efficiently providing both local service and global expertise, ensuring that it is able to deliver solutions to the often complex risks of multinational companies. As the Company's clients expand into new and emerging markets, the Company seeks to ensure that it can support that international expansion with the capability to provide local (re)insurance solutions and local service.

Gross Premium Written by line of business and geography are presented below:

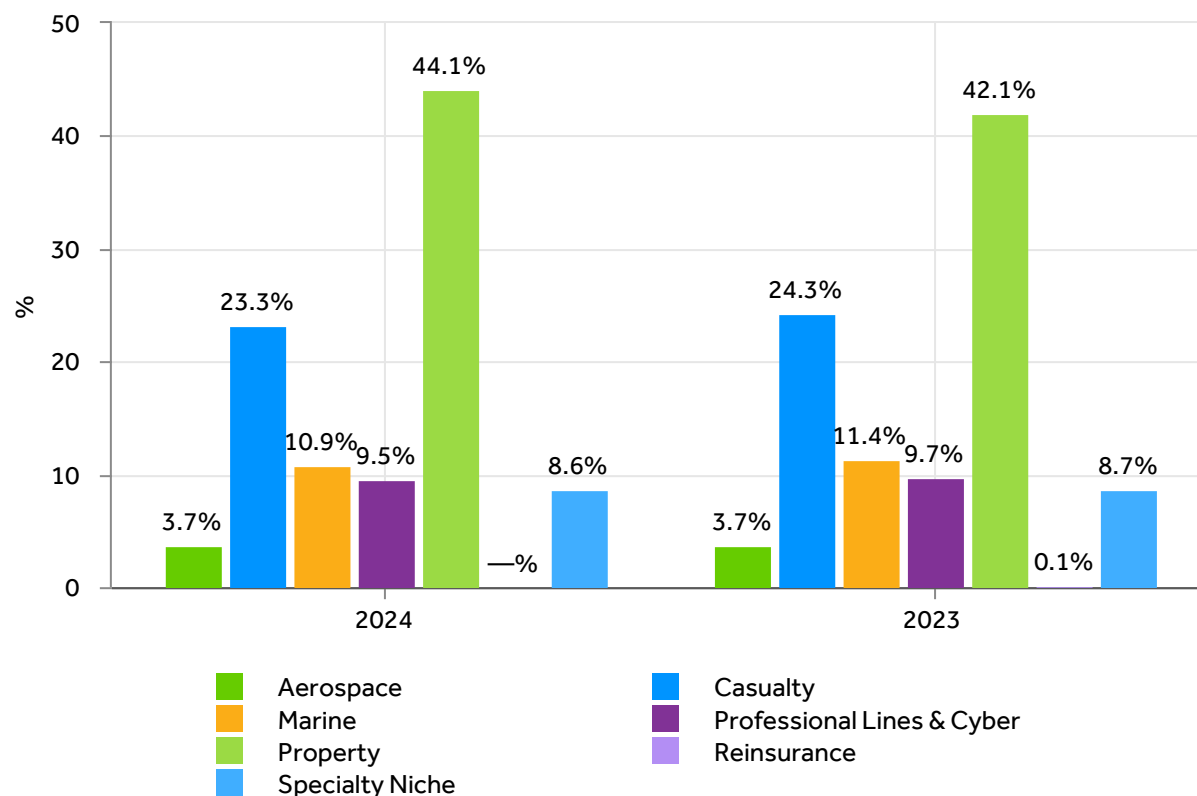
Gross Premium Written by Solvency II Business Mix



The business mix is consistent with 2023 with key variances noted below:

- General liability insurance (decrease of 0.8%)
- Fire and other damage to property insurance (increase of 1.8%)
- Marine, aviation & transport insurance (decrease of 0.3%)
- Credit and suretyship insurance (decrease of 0.1%)
- Miscellaneous financial loss (decrease of 0.1%)
- Other: This reflects an decrease of 0.4% in Motor lines of business

Gross Premium Written by Business Mix



AXA XL and the Company manages its business based on product groupings with consideration towards legal entities and branches. These groupings are mapped into Solvency II lines of business for regulatory reporting purposes.

Property which includes International & North American property, Construction and Energy represents the largest portion of the Company's gross written premium and constitutes 44.1% (2023: 42.1%) of the Company's gross written premium. It is focused on the delivery of global insurance solutions to large sophisticated corporate clients.

Casualty constitutes a further 23.3% of gross written premium (2023: 24.3%) in the Company's portfolio. The Company specialises in the provision of insurance solutions for large global corporate clients utilising its global network. In addition to General Liability products, this category includes Motor, Environmental Pollution and Structured Risk Solutions.

Professional lines & Cyber constitutes 9.5% of gross written premium (2023: 9.7%) in the Company's portfolio and includes Management Liability, Professional Liability, Crime and Cyber.

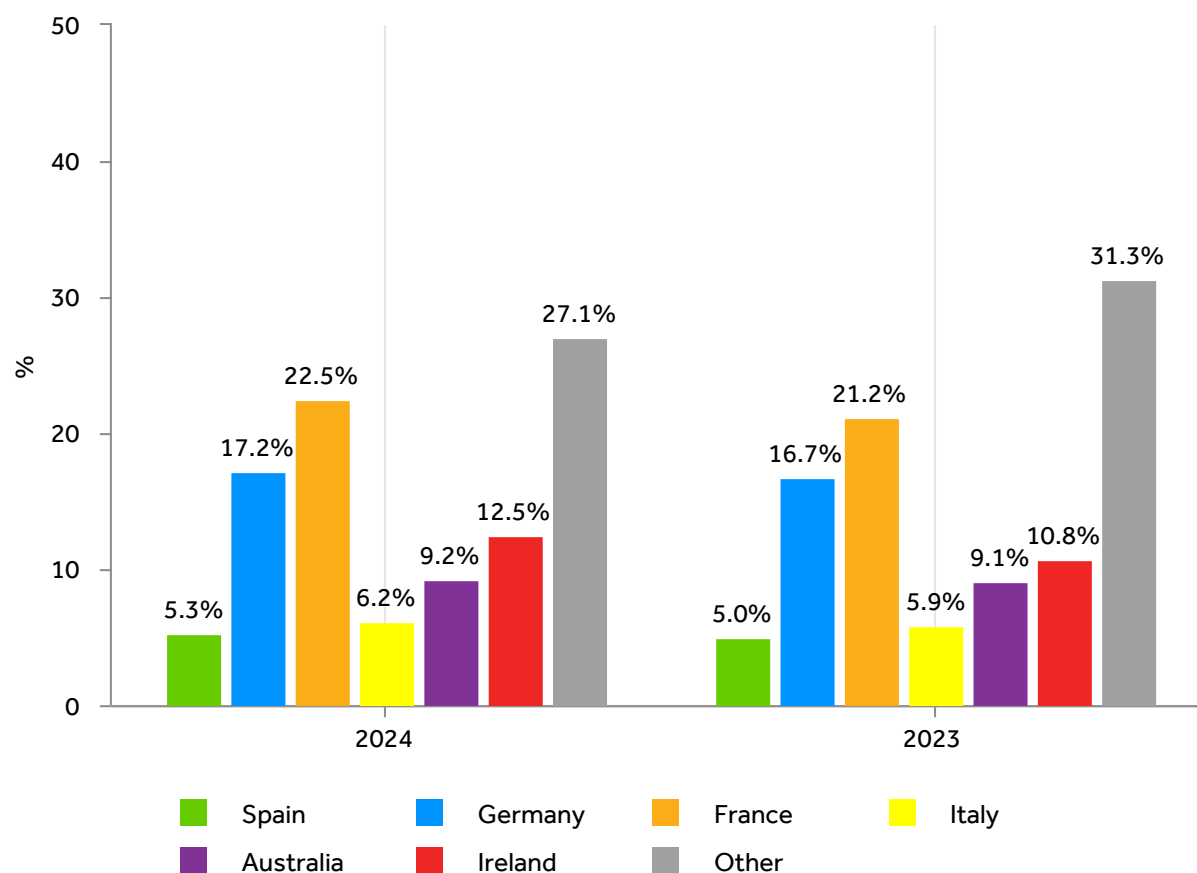
Marine constitutes 10.9% of gross written premium (2023: 11.4%) in the Company's portfolio and includes Marine cargo and Marine hull insurance.

Speciality Niche constitutes 8.6% of the Company's gross written premium (2023: 8.7%) and includes a number of portfolio's including Fine Art & Specie, Political risk and Equine and Crisis management.

Aerospace constitutes 3.7% of the Company's gross written premium (2023: 3.7%).

Reinsurance contributes 0.0% (2023: 0.1%) of the Company's gross written premium and represents business written from the India branch.

Gross Premium Written by Main Solvency II Geographic Areas



The proportion of GWP is broadly consistent 2024 v 2023, with an increase in Ireland noted as certain network partner business was transferred to Ireland from other branches.

A.1.7 Significant events in the last reporting year

During the year the Ancillary Own Fund item for €500m was renewed for a further 5 years, expiring December 31, 2029.

A.2. Underwriting performance

A.2.1 Underwriting performance: Current year

Since the Company prepares its financial statements in accordance with Irish GAAP, the underwriting performance information provided in this section is on an Irish GAAP basis unless otherwise stated.

The tables below provide the 2024 and 2023 gross written premiums and net earned premiums on a Solvency II Line of Business basis:

2024									
	Income protection insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Motor	Other Motor	Miscellaneous financial loss	Total
Gross Premiums Written	1,317	873,475	2,806,973	1,465,169	190,727	103,269	51,569	463,147	5,955,647
Net Premiums Earned	383	446,040	609,066	306,296	31,426	74,273	46,071	84,936	1,598,491

2023									
	Income protection insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Motor	Other Motor	Miscellaneous financial loss	Total
Gross Premiums Written	5,558	872,867	2,630,606	1,473,306	193,287	144,181	22,592	458,583	5,800,980
Net Premiums Earned	7,969	440,002	499,700	290,643	27,618	83,819	26,521	71,243	1,447,515

The business is not managed on a Solvency II basis, however the only significant difference from Irish GAAP is in the net loss ratio which is driven by the Solvency II adjustments to arrive at the economic balance sheet position.

The table below provides the 2023 and 2022 key performance indicators on a Irish GAAP basis:

	2023	2023
	€'000	€'000
Gross Premiums Written	5,955,647	5,800,980
Net Premiums Earned	1,598,490	1,447,516
Net Loss Ratio	52.5%	68.2%
Combined Ratio	82.5%	98.8%

The 2024 underwriting result is the outcome of recent remediation efforts on underperforming lines business and targeted growth where the return is adequate for the Company's risk profile. The gross premium written was €5,956m in 2024, an increase of €155m when compared to the previous year.

The combined operating ratio for the year was 82.5% compared to 98.8% in 2023. The combined operating ratio is significantly favourable to plan due to low levels of large and CAT losses along with reinsurance recoveries on legacy reinsurance covers.

tables below provide the 2024 and 2023 Gross Premiums Written and Net Premiums Earned performance by geographical area:

2024	IRELAND	FRANCE	GERMANY	AUSTRALIA	ITALY	Spain	OTHER	TOTAL
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Premiums written								
Gross Premiums Written	745,522	1,337,762	1,021,956	547,565	366,968	316,019	1,619,855	5,955,647
Premiums earned								
Net Premiums Earned	123,168	433,871	337,605	133,918	99,112	75,647	480,037	1,598,490

2023	IRELAND	FRANCE	GERMANY	AUSTRALIA	ITALY	Spain	OTHER	TOTAL
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Premiums written								
Gross Premiums Written	625,749	1,236,104	966,784	527,462	343,138	290,492	1,811,251	5,800,980
Premiums earned								
Net Premiums Earned	89,111	389,835	273,600	125,117	78,557	66,975	424,321	1,447,516

A.3. Investment performance

The primary objective of the Company's investment strategy is to maximize the risk adjusted return on economic capital employed subject to a variety of constraints including: maintaining adequate regulatory and rating agency capitalization; maintaining sufficient liquidity to ensure payment of claims, operating expenses and other obligations even during stressed scenarios; and generating stable net investment income.

The Company holds investment grade fixed and variable income portfolios denominated in a variety of currencies, which correspond to the respective liabilities of the Company. Assets representing capital of the Company, which are not matched to specific liabilities, are generally held in EUR.

The Company uses a fair value hierarchy for its fixed income and equity portfolios that prioritizes inputs to its valuation techniques which are used to measure fair value. The hierarchy gives the highest priority to unadjusted quoted prices in active markets for identical assets, and then quoted prices in markets that are not active or inputs that are observable either directly or indirectly. The cost less impairment accounting method is used for the Affiliates holdings.

The total investment return was a profit of €211m compared to €272m in 2023 and was slightly above plan. The core underlying net investment income remains strong. The Company holds investment grade fixed and variable income portfolios denominated in a variety of currencies, which broadly correspond to the respective liabilities of the Company. Assets representing capital of the Company, which are not matched to specific liabilities, are generally held in Euro.

A.3.1 Investment performance during the reporting period

Net income and expenses arising from investments by asset class during the reporting period were as follows:

Solvency II Asset Class	Net investment return 2024	Net investment return 2023
	€'000	€'000
Investment Fund		
Equities Fund	67,374	37,109
Bonds		
Government Bonds	73,642	106,508
Corporate Bonds	83,938	127,843
Collateralised securities	—	—
Cash and cash equivalents	11,878	12,866
Derivatives	—	—
Investment management expenses	(26,178)	(12,145)
	<u>210,653</u>	<u>272,181</u>

Below are components of the net investment return:

	2024	2023
	€'000	€'000
Income from financial investments	178,459	145,688
Net gains on the realisation of investments	39,586	22,098
Unrealised gains on investments	18,786	116,540
Investment management expenses	(26,178)	(12,145)
	<u>210,653</u>	<u>272,181</u>

A.3.2 Gains and losses recognized directly in equity

Realised gains and losses on investments are calculated as the difference between sale proceeds and purchase price.

Unrealised gains and losses on investments represent the difference between their valuation at the balance sheet date and their purchase price or, where acquired in previous years, their valuation at the last balance sheet date, together with the reversal of unrealised gains and losses recognised in earlier accounting periods in respect of investment disposals in the current period.

All investment gains and losses are recognized in the income statement.

A.3.3 Investments in securitisation

The Company invested in asset backed securities with a market value of €100m at December 31, 2024 (2023: €116m)

	2024	2023
	€'000	€'000
Agency mortgage-backed securities	—	3,312
Collateralised loan obligations	99,601	112,282
Total Fixed Income investments in securitisations	99,601	115,594

A.4. Performance of other activities

Other income and expenses are set out below:

	2024	2023
	€'000	€'000
Gain on foreign exchange	62,134	2,237
Other (charges)	(7,017)	1,519
	55,117	3,756

The Company operates in a number of overseas branches. Each overseas branch determines its own functional currency based on factors specific to its operations and is usually the currency of the primary economic environment in which it operates. Foreign exchange (FX) gains and losses resulting from the settlement of foreign currency transactions and the translation of foreign currency denominated monetary assets and liabilities at year end exchange rates are recognised in the income statement as part of other charges.

The Company has no leases classified as finance leases throughout the reporting period.

Leases, where a significant portion of the risks and rewards of ownership are retained by the lessor, are classified as operating leases. Payments made by the Company for operating leases are charged to the statement of profit or loss on a straightline basis over the period of the lease.

Total operating lease charges during the year:

	2024	2023
	€'000	€'000
Land and buildings	211	367
Other leases	22	—
	233	367

A.5. ORSA

The ORSA encompasses processes to identify, assess, monitor, manage and report the short to medium and also long term risks, with the aim of assessing:

- The overall solvency needs taking into account the specific risk profile, approved risk tolerance limits and the business strategy;
- The compliance, on a continuous basis, with the capital requirements and with the requirements regarding technical provisions; and
- Significance with which the risk profile deviates from the assumptions underlying the Solvency Capital Requirement (e.g. risk not completely reflected within the internal model).

The ORSA is a tool of the risk management framework, contributing to strengthen the culture of risk management, and giving a comprehensive and complete vision of the risks embedded in the Company.

The ORSA is not a single task undertaken at one point in time, but rather it encompasses the entirety of the risk and capital management activity undertaken during the year, as described in the annually approved ORSA policy. Key tasks within that activity are reviewed and approved by the Board as part of the process (e.g. capital to support the business plan and risk appetites) and included in the Board approved ORSA report. The production of the full ORSA report is performed annually but regular management information that is produced by the ORSA processes is provided continuously during the year.

A.6. Any other information

The Company has not availed itself of any transitional arrangements following the introduction of the Solvency II Directive.

There is no other material information regarding the business and performance of the undertaking.

B. System of Governance

The Board and management are committed to effective corporate governance and have established a comprehensive framework for the Company's operations. The key component of this framework is the Board, which has ultimate responsibility for the implementation and maintenance of an effective corporate governance framework, and the various Board and management committees through which the Board discharges its legal and fiduciary responsibilities.

The Board is responsible for the Internal Control Framework (ICF) and the Company operates a 'Three Lines of Defence' model where (1) the Business, (2) Risk Management and Compliance and (3) Independent Audit work together to ensure that risk management is effective.

The Risk Management Framework (RMF) determines risk appetites and risk limits, establishes risk policies, identifies and manages the risks to the Company's objectives and monitors the capital requirements. All of this is captured by the Risk Management Framework and Own Risk and Solvency Assessment (ORSA) activities that are carried out throughout the year with oversight by the Board. The Company is supported by a number of Group-wide processes in the achievement of its risk management objectives.

Further details of the Company's Systems of Governance are provided in Section B below.

No material changes were made to the Company's system of governance during the reporting period.

B.1. General information on the system of governance

This section provides details of the Company's Board and management structure along with roles, responsibilities and Committees.

The Company's governance framework begins with the Board and the Board Committees (for further information see below).

B.1.1 Board of Directors

The Board is composed of Executive and Non-Executive Directors.

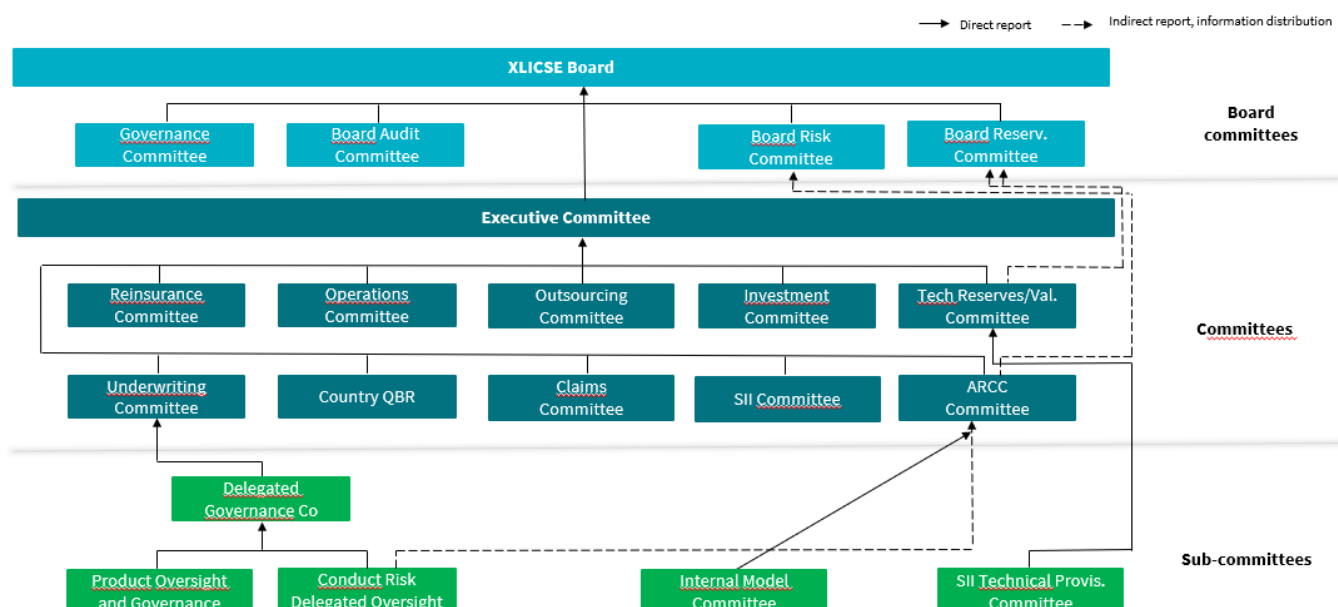
The names of the persons who are Directors of the Company as at the date of this report are:

Tom Barry	Independent Non-Executive Director, Chair of the Board and Chair of the Governance Committee
Xavier Veyry	Executive Director and Chief Executive Officer
Julie O'Neill	Independent Non-Executive Director and Chair of the Audit Committee
Doina Palici-Chehab	Non-Executive Director and Chair of the Reserving Committee
Helen Browne	Non-Executive Director
Paul-Henri Rastoul	Executive Director, General Secretary and Director of Strategy and Company Secretary
David Guest	Independent Non-Executive Director, Chair of the Risk Committee
Fabienne Blanc	Non-Executive Director

Board meetings are held six times a year with additional meetings held as required. Detailed Board reports are prepared and circulated in advance of meetings, addressing all major areas of the Company's operations, encompassing underwriting performance, financial results, risk management, compliance and reserving.

B.1.2 Board committees

Governance structure



The Board seeks to ensure that the operations of the Company are conducted within a framework of prudent and effective controls that enable effective risk management and conformity with applicable legal and regulatory requirements. The Board sets the risk appetite for the Company. Management is responsible for monitoring risks against risk appetite and for escalating any risks that breach risk appetite to the Board.

The Board recognises the need for strong organisational governance to ensure there is effective oversight of the management of the business, that senior management exercises its responsibilities appropriately, and that robust internal systems and controls are in place. The Board comprises members of the executive management team and Non-Executive Directors.

The Board delegates tasks and functions to others, including its Committees, by means of clear, documented delegations. Specifically, the Board delegates responsibilities to the following Committees as specified in each of their respective terms of reference which shall be reviewed by the Board on an annual basis; Audit Committee, Governance Committee, Reserving Committee and Risk Committee. The Board also delegates responsibilities to a formal management committee called the Executive Committee ("ExCo"). The ExCo further delegates to the Company's management committees. The Company's current governance structure chart is set out herein

The Company undertakes a thorough strategic planning process considered within the overall strategy of the AXA XL division and overseen by the Board. The ExCo is responsible for implementing the Company's strategy and for the on-going oversight and management of the risks associated with the strategy.

The ExCo is responsible for ensuring there is a governance framework in place to support the delivery of the Company's strategic plan by the business. The Company undertakes regular Board effectiveness and governance reviews to ensure the governance framework is effective and appropriate.

The Board is satisfied that the Company's system of governance is appropriate and effective, taking into account the nature, scale and complexity of the risks inherent in the Company's business.

Internal controls

The Company operates a 'Three Lines of Defence' approach to ensure effective and robust day to day governance is in place. The Operational line, or the 'first line of defence', starts with the employees, who are tasked with identifying and managing risk on a day to day basis as part of their roles. They are supported by the 'second line of defence', which is made up of oversight functions - specifically Risk Management. These functions have responsibility for overseeing and challenging day to day management, control and reporting of risks. The Risk oversight functions are independent of management and individuals with responsibility for taking on risk exposures. The Internal Audit Function provides the 'third line of defence' which provides independent assessment of the effectiveness of the Company's system of internal control and reports to the Audit Committee.

The company is also part of AXA XL division's Internal Control Programme which addresses internal controls across 30 macro-processes covering all AXA XL departments and processes, as well as having an Internal Financial Control Framework looking at key controls around financial reporting.

Board Audit Committee

The Board Audit Committee is responsible for oversight and review of the risk management and internal control frameworks, the financial and non-financial reporting processes as well as effectiveness, performance and independence

of the internal and external auditors. Its members are independent non-executive and non-executive directors. In terms of Risk Management, updates on the internal control framework are reported to the Board Audit Committee. In the case of the external audit process, this involves reviewing the appointment of the external auditors, their proposed audit scope and approach and their performance in the preparation of the statutory financial statements and any external reporting requirements. The Board Audit Committee is responsible for oversight of publicly disclosed non-financial information as required by law and regulation. In the case of the internal audit function, the role involves agreeing and monitoring the nature and scope of internal audit work to be carried out. This is aimed at providing assurance to management that the internal control systems are appropriate for the prudent management of the business and are operating as planned.

Board Risk Committee

The Board Risk Committee consists of non-executive and independent non-executive directors and is attended by some members of senior management. Key responsibilities of this committee include advising the Board in relation to material risk issues relating to, or arising from, the Company's strategy, risk appetite and tolerances; providing review and appropriate challenge to the risk strategy, risk appetite, stress testing, and overseeing and challenging the Risk Management and Compliance functions and advising the Board on the effectiveness of strategies and policies with respect to maintaining, on an on-going basis, amounts, types and distribution of both capital and own funds adequate to cover the risks of the Company.

Board Reserving Committee

The Board Reserving Committee consists of both non-executive directors and key executive management. The key responsibility of this committee is to oversee the governance of the setting of the technical provisions of the Company and to oversee and challenge the Company reserving processes and practice.

Board Governance Committee

The Board Governance Committee examines matters of governance, board composition and remuneration on behalf of the Board. The Board Governance Committee is a nominations committee with some limited additional responsibilities for remuneration, more particularly set out in its Terms of Reference

Executive Committee

The role of the XLICSE Executive Committee is to manage and oversee the execution of the strategy of XLICSE in line with its agreed business and strategic plans and its risk appetite, whilst ensuring compliance with applicable legal and regulatory requirements; as delegated by the Board.

Audit Risk and Compliance Committee ("ARCC")

The ARCC oversees the risk management framework of the Company, including its effective implementation in relation to material and emerging risk issues relating to or arising from strategy, risk appetite, risk tolerance and/or annual assurance. This role includes the monitoring of key risk exposures for all branches, the distribution network and related cover-holder arrangements. The Board has approved the risk policies which forms the risk management framework and has charged day to day monitoring of it to the ARCC

Claims Committee

The role of the XLICSE Claims Committee is to monitor and manage XLICSE's claims portfolio, providing regular updates to the Executive Committee with advice and guidance on the portfolio's progression.

Country Quarterly Business Review Committee

The role of the XLICSE Country Quarterly Business Review (QBR) Committee is to review the functions and the performance of the Local branches of the Company, identifying areas for attention and development, and regularly report its key findings to the Executive Committee. The Country QBRs are grouped by region: Northern Europe, Southern Europe, Asia and Australia. The Country QBR Committee's core responsibility is to provide the Executive Committee with oversight of the branches of the Company. It does not have a decision-making function.

Investment Committee

XL Insurance Company SE Investment & ALM Committee is an internal management committee of the Company overseeing investment activities for XLICSE.

Operations Committee

The role of the XLICSE Operations Committee is to oversee the operational performance and transformation initiatives of XLICSE, providing regular updates to the Executive Committee with advice and guidance on KPI and risk management, local transformation efforts, insurance operations, and global technology.

Outsourcing Committee

The purpose of the XLICSE Outsourcing Committee is to ensure that there is an effective governance framework in place to support XLICSE's outsourcing arrangements.

Reinsurance Committee

The XLICSE Reinsurance Committee is an internal management committee formed to support and assist the Executive Committee with their responsibilities in respect of reinsurance purchases - external and intra-group.

Solvency II Committee

The role of the XLICSE Solvency II Committee is to monitor, review and approve the solvency II balance sheet, the solvency coverage ratio and QRTs of the Company before they are filed to the CBI.

Technical Reserves Committee

The role of the XLICSE Technical Reserves Committee is to oversee, challenge and sign-off the quarterly/annual GAAP reserves, and provide regular reports to the Executive Committee.

Underwriting Committee

The role of the Underwriting Committee is to oversee and monitor the XLICSE underwriting strategy (including Underwriting policy and appetite) and advise, make recommendations and raise issues to the XLICSE Executive Committee as appropriate.

B.1.3 Key Functions

Key Functions

The Company's risk management, compliance, internal audit and actuarial functions are the key functions in its system of governance (Key Functions). Holders of Key Functions are authorised to operate free from influences which may compromise their ability to undertake their duties in an objective, fair and independent manner.

Each of these Key Function holders:

- Operates under the ultimate responsibility of, and reports to the Board or Board Committee as appropriate;
- Cooperates with the other functions, where appropriate, in carrying out their respective roles;
- Is able to communicate, at their own initiative, with any staff member and have the necessary authority, resources and expertise and have unrestricted access to all relevant information necessary to carry out their responsibilities; and
- Promptly report any major problem in their respective area of responsibility to the Board.

There should be as much independence between functions as possible and the individuals carrying out the internal audit function do not assume any responsibility for any other function.

The Company has written policies in place in relation to risk management, internal audit, compliance and the actuarial function and further information on these functions is contained within sections B3 (Risk Management), B4 (Compliance function), B5 (Internal Audit) and B6 (Actuarial Function). The implementation of Key Functions within the Company is explained below.

As well as the required Key Functions, the Board has designated underwriting, finance and claims as functions which are of specific importance to the sound and prudent management of the Company. The finance function reports directly to the Board. The risk management function reports to the Board Risk Committee, Board Reserving Committee and the Board Audit Committee; the compliance function reports into the Board Risk Committee; the claims and actuarial functions report to the Board Reserving Committee whilst internal audit reports to the Audit Committee.

The underwriting, finance, claims, risk management, actuarial and compliance functions are members of the ExCo

B.1.4 Remuneration policy and practices

The AXA XL Division of AXA Group, of which the Company is a part, maintains a Remuneration Policy, the purpose of which is to outline how the Company ensures that the setting of remuneration is appropriate and transparent, and promotes sound and effective risk management within approved risk tolerance limits. The Company formally adopted the AXA XL Division Policy and has operated in conformity with it since 2019. The Remuneration Policy contains a multi-tiered governance and compliance structure including oversight at the AXA Group, AXA XL Division and Company levels. Together, the AXA Group and AXA XL Remuneration Policies are designed to support AXA Group and AXA XL's long-term business strategy and to align the interests of its employees and other stakeholders, by:

- Establishing a clear link between performance and remuneration over the short, medium and long term;
- Ensuring that the Company can offer competitive compensation arrangements across the multiple markets in which it operates while avoiding potential conflicts of interest that may lead to undue risk taking for short-term gain; and
- Ensuring compliance with SII regulations and any other applicable regulatory requirements.

AXA XL's Remuneration Policy follows four main guiding principles:

- Competitiveness and market consistency of the remuneration practices;
- Fairness, based on individual and collective performance in order to ensure remuneration is reflecting employee's individual quantitative and qualitative achievements and impact;
- Internal equity based on remuneration policies and procedures designed to ensure that employees are paid equitably based on criteria such as role, experience, education, skills, contribution or impact only; and do not discriminate on the basis of gender or other factors; and
- Achievement of AXA Group and AXA XL's overall financial and operational objectives over the short, medium and long-term as well as execution against medium and long-term strategic objectives as a prerequisite to fund any mid-to long-term award.

The balance of fixed and variable compensation is consistent with competitive market practice in the insurance industry. Variable pay for senior leaders of independent control functions is not aligned with the performance of the businesses they oversee and is designed to avoid conflicts of interest while appropriately balancing risk and reward.

An overview of the arrangements that are in place are as follows:

- **Fixed Remuneration** - The fixed component is comprised of base salary and any other fixed allowances. Fixed remuneration primarily reflects the relevant organizational responsibility, professional experience, technical and leadership skills required of the role, criticality or scarcity of skills as well as the individual's capability to sustainably perform the duties of the role.
- **Short-Term Incentives** - Individual bonus awards are determined based on an assessment of both business and individual performance. Business performance is linked to key performance indicators established at the beginning of the year whilst individual performance is assessed through a robust performance management process. Staff have a bonus target amount typically expressed as a percentage of base pay. Individual bonuses are not guaranteed and pay-outs are capped at 200% of individual target, which prevents employees from taking excessive risks to obtain an excessive pay-out.
- **Long-Term Incentive Plan** - Long-term incentive awards are reserved for those who perform at a high level, with the recipient's anticipated future contributions, individual potential and unique skills taken into consideration. Grants of long-term incentives are based on the criticality of the job within the organization, the criticality of the individual in the current job and potential for the future, and the sustainability of the individual contribution.

Supplementary Pension Schemes

The Company's remuneration program does not include any supplementary pension or early retirement schemes for members of the Board or its other Key Function holders.

Termination Payments

AXA XL ensures that termination payments are correlated to performance achievement and termination payments for Identified Staff beyond mandatory payments under national labour law may be subject to deferrals.

B.1.5 Material related party transactions

The Company actively monitors all related party transactions. The material transactions with shareholders, persons who exercise a significant influence on the undertaking, and with members of the administrative, management or supervisory body include the intra-Group reinsurance arrangements, and payments in respect of services provided to the Company.

As the Company is a wholly-owned subsidiary whose ultimate parent AXA SA (incorporated in France), the Company has taken advantage of the exemption contained in FRS 102 section 33 'Related Party Disclosures' from disclosing related party transactions with entities which form part of the AXA SA Group.

The Directors resolved to pay a dividend of €465m for 2024 in 2025 (2023: €400m) The Central Bank of Ireland have been notified in advance of the dividend payments.

B.2. Fit and proper requirements

B.2.1 Qualifications of the Board and Key Function holders

The Board regularly considers the qualifications necessary for its members. In this regard, the Board believes that its members should be persons with superior business judgement and integrity, who have knowledge or experience in the areas of insurance, reinsurance, financial services or other aspects of the business operations or activities, and who have distinguished themselves in their chosen fields of endeavour. In addition, the Board believes its members should have the talent and vision to provide oversight and direction in the areas of strategy, operating performance, corporate governance and risk management in order to protect the interests of the shareholder and the policyholder whilst maintaining the highest standards of ethical business conduct. The Company supports these objectives through an ongoing programme of Board training. The Board believes that each of its Directors contributes a strong background and

set of skills to enable the Board to meet its responsibilities and that Key Function and Senior Management Function holders possess the skills, knowledge and expertise to carry out their regulatory obligations.

The Board considers diversity among other factors in assessing the skills and characteristics of Director candidates and the Board as a whole. This consideration includes a broad evaluation of diversity of viewpoints, skills, experience and other demographics represented on the Board. This discussion and evaluation of diversity occurs at the Governance Committee with recommendations made to the Board.

The Board Diversity Policy sets out the approach to diversity for the Board of Directors of XLICSE.

In line with SEAR (Senior executive Accountability Regime) aspects of the IAF regulations all PCF role holders have documented Statements of Responsibility. These are maintained with the XLICSE MRM.

B.2.2 Recruitment process

All recruitment within the Company is undertaken in line with the standard AXA XL recruitment process and with regard to regulatory requirements.

Background checks are a standard practice and are completed by Human Resources (HR) prior to hire, with additional due diligence undertaken for regulated roles as required. Any offer of employment is made subject to the satisfactory completion of the relevant background/due diligence checks. These checks are commensurate to the regulatory status of the position and if not completed to the Company's satisfaction or the candidate provides false or misleading information, the Company reserves the right to withdraw the contract. For regulated positions background checks include (subject to any country specific local legal restrictions):

- a. Financial Stability
- a. Regulatory sanctions
- b. Employment history and references
- c. Academic and professional qualifications
- d. Identity check
- e. Directorships search.

Additional self-certifications are sought from proposed regulated role candidates.

B.2.3 Code of conduct

The Company is subject to AXA Group's Compliance & Ethics Code and AXA XL's Code Supplement ("the Code"). The Code sets out AXA Values : Customer First, Integrity, Courage and One AXA and the high standards of ethical behaviour and compliance that are expected of all employees. Areas covered include Treating Customers Fairly, Data Privacy, Dignity at Work, Financial Crime, Anti Competition, Conflicts of Interest and more. In addition, there is a Code for Representatives that explains what is expected of third parties. The Code also includes the Company's Speaking Up/ Whistleblowing policy and processes, and encourages reporting of Code violations.

B.2.4 Fit & Proper Assessment

AXA XL's Fit and Proper policy applies to individuals who are deemed to be the persons responsible for managing or overseeing AXA XL's operations or holding key functions. This includes :

Board members of regulated entities

Holders of Key functions in regulated entities

- i. Chief Executive Officer and where relevant Deputy Chief Executive Officer
- ii. Chief Financial Officer; Chief Risk Officer ; Chief Compliance Officer
- iii. Head of Internal audit
- iv. Actuarial Function holder

In alignment with the policy, AXA XL is required to ensure that for each regulated entity:

- i. Designated Key function holders have relevant professional qualifications, knowledge and experience to carry out their role appropriately – the fit requirement
- ii. There are no unresolved doubts about the individuals' reputation or integrity – the proper requirement
- iii. An appropriate and documented assessment of the above is carried out annually by HR for each individual within the scope of this policy, including being satisfied as to all professional qualifications

Additionally, the CBI Fitness and Probity Standards apply to persons occupying Controlled Functions (CFs), including Pre-approval Controlled Functions (PCFs). All proposed CFs are subject to regulated background checks and due diligence to ensure the Company is satisfied on reasonable grounds that the person complies with Standards set out by the Central Bank of Ireland and that the person agrees to abide by these Standards. PCFs require prior written approval of the CBI before being appointed.

On an annual basis, CFs and PCFs are required to declare that they continue to abide by the Standards and to declare if there is any material developments in relation to their compliance with the F&P Standards of which the Company should be aware.

Following implementation of IAF regulations in 2023 and enhancements to the F&P regulations (P)CF role holders are also subject to ongoing certification by the firm and expected to comply with CBI Conduct Standards and Additional Conduct standards as applicable.

Under the Individual Accountability Framework, the company is additionally required to proactively certify that CFs and PCFs are fit and proper and capable of performing their roles with integrity and competence.

B.2.5 Key Function Holders

The key functions relating to corporate governance and risk management identified by XLICSE are shown in the table below. Each key function holder is either a standing ex officio attendee of, or has a right of access to, the XLICSE Board outside of their own management reporting line. This gives the individual the operational independence to carry out their tasks and advise and inform the Board of any issues or concerns.

Key Function Holders		
CBI Definition	XLICSE Role Title	Individual in Role
The Risk Management Function	Chief Risk Officer	Eric Brown
The Compliance Function	Head of Compliance & Regulatory Affairs Europe	Paul Kierans
The Internal Audit Function	Head of Internal Audit	Joe Foy
The Actuarial Function	Head of Actuarial Function	Gary Dunne

B.3. Risk management system including the own risk and solvency assessment

B.3.1 Risk Management Framework (RMF)

The Company faces strategic, financial and operational risks related to, among others: underwriting activities, financial reporting, changing macroeconomic conditions, investment, reserving, changes in laws or regulations, information systems, business interruption, and fraud. An enterprise view of risk is required to identify and manage the consequences of these common risks and risk drivers on the Company's profitability, capital strength, and liquidity. This is managed by the Risk Management function, an integrated part of all business processes, who define and deploy the RMF.

For information on risk management by individual risk type, please see section C 'Risk Profile'.

The RMF is governed by the Audit, Risk and Compliance Committee (ARCC) and the annual plan for the Risk Management function is recommended for approval to the Board. The risk plan would be reviewed more regularly than annually if the Company was subject to a major change in regulatory requirements, strategy or organisational structure. The aim of the RMF is to:

- Support business objectives and strategy;
- Obtain management information to facilitate the identification and understanding of material risks including related mitigants;
- Contribute to the Company's overall internal control framework by helping to manage the inherent complexity within the business;
- Support the Company's Risk Management standing; and
- Support regulatory risk management requirements.

The ARCC meets quarterly and oversees the implementation and embedding of the RMF and monitoring of Company performance against risk appetite. The ARCC has responsibility for overseeing the preparation of the ORSA and makes recommendations and escalates any issues to the Executive and the Board, related to risk and capital management. The ARCC ensures that material, emerging and sustainability risks are identified and reported and that appropriate arrangements are in place to manage and mitigate those risks effectively. The Company's stress testing framework and outputs are reviewed by the ARCC and support understanding of the risk profile.

Risk Management Strategy

The risk management strategy is overseen by the Board and supports the delivery of the overall business strategy. To support the Board, the Company has an appointed Chief Risk Officer (CRO), and established a ARCC to oversee more detailed risk management activity and monitoring against the Board approved risk appetites.

The risk management strategy is to ensure that risk implications, as well as reward, are considered in both setting and implementing the Company's strategic and business objectives, and risks associated with the strategic direction of the business are appropriately monitored. The strategy is articulated in the risk policies and is achieved by incorporating risk processes, information and decisions in the day to day running of the business.

The Company's strategy involves taking on risk in order to generate return. Risks are selected and controlled or traded off through the risk strategy that focuses on:

- Retaining risk within an approved risk appetite that is consistent with the Company's strategic objectives, with appropriate levels of capital held by the Company;
- A diversified portfolio of underwriting, financial markets and counterparty risks;
- Managing excessive aggregation risk via a limit framework;
- Exercising consistency and transparency of risk management and control across the Company;
- Risk mitigation on key underwriting and financial market risks to protect capital from the impact of extreme events; and
- Risk reporting to the ARCC, the Board and other stakeholders (e.g. regulators).

Risk Appetite Framework (RAF)

The Company's RAF is a key dimension of the risk management strategy and mirrors the AXA Group RAF where relevant. The RAF distinguishes between 'Risk Appetite Statements' which apply to multiple risk types, and 'Risk Appetite Exposures' which apply to single risk types. In addition, there exist additional 'Risk Indicators' which are not explicitly specified in the scope of the RAF but are identified as required by the Company. The RAF is used to provide governance for setting new monitoring requirements, as well as reviewing and updating existing risk appetite statements, tolerances and limits, so that these are aligned with business and risk management strategies. The Company's RAF focuses on regulatory capital at risk, tolerances to risks from material individual events (e.g. natural catastrophes (NAT CAT)), liquidity standards, tolerance to specific investment related risks and operational risk.

The risk management strategy and risk appetite frameworks are supported by the following:

- **Risk Governance** - a clear and cost-effective organisational structure for risk management, including clear roles and responsibilities. The Company operates a 'Three Lines of Defence' governance structure, at a functional level as well as at Executive level.

- **Risk Policies & Standards** - The policies document the Company's approach to the management of each category of risk to which the Company is exposed. These policies are supported by AXA Group Standards which apply across the Division.

- **Risk definition and categorisation** - provides a common risk universe and language for risk to allow for categorisation of all risks in a way which facilitates links between the business and risk management processes.

- **Risk cycle and processes** - the approach taken to top down, bottom up, and process led - risk identification, quantification, management and control. The internal model is used in the risk assessment process.

- **Risk-based decision making** - The results of the ORSA and the insights gained in the ORSA process are taken into account for a range of business decisions.

- **Risk Management Information and Reporting, including ORSA production** - ensuring timely and accurate information is reviewed in line with the governance structure.

- **Skills, Resources and Risk Culture; Organisational Learning; Change Management Governance** - All enable a mature risk culture throughout the Company.

Risk Reporting

A risk dashboard is presented quarterly to the ARCC. The dashboard measures the status against risk appetite and other risk indicators using the latest output from the business and Internal Model. The dashboard includes information related to the monitoring against all of the Company's material risk categories. Highlights from the dashboard including performance against appetite and limits are reported to the Board Risk Committee through the CRO report.

The RMF remains appropriate for the year.

B.3.2 Internal/external credit assessments

Investments

Internal and external credit assessments are important tools in AXA XL's investment risk management processes. They have been a good indicator of the probability of default/downgrade and mark-to-market volatility due to yield/credit spread changes for credit markets as a whole.

Internal credit assessments are performed by the AXA Group Credit Team (ACT), an internal credit rating unit, and take priority over external credit assessments. To the extent that an issuer is not covered by the internal team, external credit ratings are used from reputable credit rating agencies.

AXA XL uses internal/external credit assessments mainly to classify bonds for the purposes of (1) strategic asset allocation, (2) capital modelling, and (3) investment risk governance.

The Fixed Income Concentration framework uses these ratings and applies varying base limits at an issuer level which tighten with lower credit quality (in addition to capital structure position and tenor).

The Exposure Per Asset Class framework uses the credit ratings to determine where exposures are classified for measurement and limit monitoring, with Speculative Grade exposure having a significantly tighter limit vs Investment Grade.

The credit ratings are used in the internal capital model for managing Market and Credit Risk.

BBB exposure is monitored and has a related investment guideline maximum monitored by Investment and Risk Management teams.

The ratings are used for the purpose of the Average Credit Quality calculation and related investment guidelines monitored by the Investment and Risk Management teams.

B.3.3 Own risk and solvency assessment (ORSA)

The ORSA encompasses processes to identify, assess, monitor, manage and report the short to medium and also long term risks, with the aim of assessing:

- The overall solvency needs related to the Company's risk profile;
- The compliance, on a continuous basis, with the capital requirements, which includes sensitivities and scenarios analyses, and with the requirements regarding technical provisions.

The ORSA is a tool of the risk management framework, contributing to strengthen the culture of risk management, and giving a comprehensive and complete vision of the risks embedded in the Company. AXA Group has established a policy on the ORSA to describe the common framework and rules to run and report on the ORSA across the Group. The Company ORSA utilises the common framework and rules. This ORSA policy has been adopted by Division and the Company has an addendum to this policy.

The Regulatory Capital Requirement is derived using the Internal Model. The results are presented at Executive level and the Board to provide a breakdown of the risk exposures to inform and drive risk and capital-based decision making.

The processes for the ORSA and production of the ORSA report are tailored to fit into the Company's organisational structures in a proportionate manner with techniques to assess the overall solvency needs and taking into consideration the nature, scale and complexity of the risks inherent to the business.

ORSA governance

All risk management and capital assessment processes form part of the ORSA. The ORSA is not a single task undertaken at one point in time, but rather it encompasses the entirety of the risk and capital management activity undertaken during the year, as described in the annually approved ORSA policy. Key tasks within that activity are reviewed and approved by the Board as part of the process (e.g. capital to support the business plan and risk appetites) and included in the Board approved ORSA report. The production of the full ORSA report is performed annually but regular management information that is produced by the ORSA processes is provided continuously during the year.

The frequency of each ORSA process mentioned above has been set to allow for appropriate identification, assessment, measurement, control and monitoring of risks to the business.

B.3.4 Pre-Emptive Recovery Planning

The Company reviews annually their Recovery Plan which is owned and approved by its Board to reflect the regulatory requirements. The Recovery Plan defines recovery indicators with defined limits and thresholds that would prompt the company to take specific action, and sets out the options available to restore its financial position in the event of the company coming under stress.

B.4. Internal control system

The 'Three Lines of Defense' approach which ensures effective and robust day to day governance is in place as described in Section B1 above.

AXA XL Internal Control team, in Risk Management, is in charge of maintaining the Internal Control Framework at AXA XL Division and of monitoring the overall system of controls, ensuring all controls are performed by somebody. A roll-out of controls is performed in all AXA XL key legal entities.

AXA Internal Control Programme was introduced year end 2018 at AXA XL in order to implement a robust and effective Internal Control Framework by:

- a. Implementing a risk-based approach to focus on risks that really matter;
- b. Promoting management accountability for controls;
- c. Introducing a common set of tools and techniques to be consistently used across the Group;
- d. Improving coordination between the different control functions.

AXA XL Internal Control team is also responsible for the Internal Financial Control framework, with controls in place across the Division on the financial reporting controls. This framework is in place at AXA XL for many years and provides reasonable assurance to legal entities within the Division that financial reporting is reliable and compliant with applicable laws and regulations and provides comfort over the completeness, accuracy and appropriateness of data.

Both the Internal Control Framework and the Internal Financial Control framework are primarily designed to operate across AXA XL Division, with output reported to legal entities.

The Internal Audit Function represents the 'third line of defence', provides independent assessment of the effectiveness of the Company's system of internal control and reports to the Audit Committee.

B.4.1 Internal Controls

The Risk Management function is committed to promote a robust Internal Control Framework, including Internal Financial Control, for the Audit Committee, executive management and external stakeholders to rely on for financial and regulatory reporting purposes.

The Internal Control's core strategic objectives include:

- a. Conducting an effective and efficient assessment of the design and operating effectiveness of internal controls, including controls over financial reporting;
- b. Identifying areas in which the inherent risk of financial misstatement is high so that management can address these risks before they manifest themselves in an actual misstatement;
- c. Providing executive management, the Company's Board and AXA Group reasonable assurance over AXA XL's processes – in particular on financial reporting; and
- d. Adding value by helping management promote a robust control environment.

The Internal Control team performs a regular assessment of the control framework which includes: risk identification, risk assessment and planning, documenting business processes, evaluation and validation of key risks, testing of controls, identification and management of issues. For the Internal Financial Control Framework, this cycle is annual and well established.

The team is also responsible for monitoring remediation plans until closure and for making regular reporting on controls results to AXA Group, to AXA XL Audit, Risk and Compliance committee, to the Audit Committee of key legal entities, to executive management and to external auditors and regulators.

The Internal Control Framework looks at 30 macro-processes that constitute AXA XL value chain for insurance and reinsurance business. For each macro-process key risks are defined and for each key risk, control objectives are defined to cover them. For each control objective, controls are designed and operated locally to efficiently meet control objective and mitigate the related key risk. AXA XL has finished the implementation of the Internal Control Framework end of 2022 with the description of all controls in the 30 macro-processes and first round of testing performed on all controls. Starting from 2022, AXA XL Internal Control Framework is in Business as Usual and controls will be tested over 3 years according to a test plan formalized and validated by AXA XL Chief Risk Officer.

B.4.2 Compliance function

The compliance function is responsible for advising the Company's management and Board on compliance with applicable laws, regulations and administrative provisions adopted in accordance with the Solvency II Directive and other laws and regulations, and on the impact of changes in the legal and regulatory environment applicable to XLICSE operations. Our Compliance function provides expertise, advice and support to various departments of the Company to assess situations and compliance matters, analyse compliance risk and contribute to design solutions to mitigate those risks to which XLICSE is exposed.

The Head of Compliance is supported by the wider Irish Compliance team as well as members of the Legal & Compliance teams based in the various branches of the Company.

XLICSE's compliance, financial crime and monitoring functions manage a wide range of compliance related matters including (i) regular reporting on significant compliance and regulatory matters to senior management and to regulators, (ii) financial crime matters (which include anti-corruption, anti-bribery, anti-money laundering and anti-fraud programmes as well as international sanctions/embargo compliance), (iii) conduct, (iv) regulatory interaction.

The Company's compliance function undertakes an annual Compliance Risk Assessment to identify the most significant compliance risks to which the business is exposed. Based on this assessment, an Annual Compliance Plan is developed each year.

The compliance activities within XLICSE are articulated around a number of AXA Group Standards and Policies which set the minimum requirements expected to be covered by XLICSE. The AXA Group Standards contain standards and policies on significant risks affecting the compliance activities as well as the high-level control and monitoring principles to which XLICSE must adhere. Both the standards and policies contained in the AXA Group Standards (e.g. Compliance Governance, Anti-Money Laundering, Sanctions and Anti-Bribery) are mandatory. In addition, the compliance function has adapted the Group requirements and developed local policies to align with the relevant laws and regulations in the jurisdiction in which AXA XL operates and conducts business.

The Company's Compliance function reports to the Board on significant compliance matters. These include major regulatory changes that have compliance implications, results of the Compliance Risk Assessment, the Annual Compliance Plan, remediation plans and any other significant issues that require escalation.

The function is a critical contributor to the safe and sound operation of the Company and underpins the achievement of its strategy and business goals.

B.5. Internal audit function

AXA XL Internal Audit provides the Board and Executive Management with independent and objective assurance on the effectiveness of the overall control environment to help protect the assets and reputation of the organisation and help improve its operations.

AXA XL Internal Audit sets an annual plan of work, approved and monitored by the Audit Committee, based on an assessment of both the inherent risk and the adequacy of controls as well as consideration of cyclical coverage.

A report is issued at the conclusion of each audit assignment to relevant senior management, with the results and resolution status of internal audit issues presented regularly to the Audit Committee and management.

The AXA XL internal audit function has an audit charter to document its purpose, independence, scope, accountabilities, responsibilities, authorities and standards. The charter is approved by the Audit Committee each year.

The head of the AXA XL internal audit function has a direct and unfettered reporting line directly to his/her respective Audit Committee Chairman and reports functionally through to the Group Head of Internal Audit.

B.6. Actuarial Function

B.6.1 Roles and Structure

An Actuarial Function exists locally with the specific objective of adhering to the requirements of Solvency II. In addition to the Actuarial Function responsibilities under Solvency II, the CBI has introduced specific domestic requirements regarding the Actuarial Function and related governance arrangements which apply to all (re)insurance undertakings subject to Solvency II and which are supervised by the CBI.

The responsibilities assigned to the Actuarial Function under Solvency II and under the Domestic Actuarial Regime are held by one individual, the Head of Actuarial Function ("HoAF"). This role is a Pre-approval Controlled Function ("PCF") role and as such requires pre-approval from the CBI via the Fitness & Probity regime before the proposed individual can be appointed to the role. That individual shall have the prerequisite level of experience commensurate with the requirements of the role and the sophistication of the methodologies and techniques appropriately employed by the undertaking. The HoAF shall be a member of a recognised actuarial association, for example one that is a member of the Society of Actuaries in Ireland. Where an undertaking is designated as a High Impact undertaking (as is the case for the Company), the HoAF shall be an employee of the undertaking. The term "employee" means a direct employee of the undertaking or an employee provided through a group services company on a full-time basis.

The operational responsibilities of the Actuarial Function are shared by a number of key individuals who are supported by their respective teams. These teams are of sufficient size, and consist of suitably qualified and experienced people that meet the Company's minimum fitness and proper employment criteria. The teams are structured with varying lines of defence to facilitate effective peer review and independent challenge.

B6.2 Reports of the Actuarial Function to the Board and Regulators

The undertaking shall ensure that the HoAF provides an Actuarial Opinion on Technical Provisions ("AOTPs") to the CBI on an annual basis. The HoAF also provides an annual Actuarial Report on Technical Provisions ("ARTPs") to the Board Reserving Committee, supporting the AOTPs, to inform the Board Reserving Committee and management on their conclusions about the reliability and adequacy of the calculation of technical provisions ("TPs").

The HoAF presents the results of reserve and TP valuations to the Board Reserving Committee throughout the year.

The HoAF provides the Board Reserving Committee with Actuarial Opinions on the overall Underwriting Policy and on the adequacy of Reinsurance Arrangements on an annual basis.

The HoAF also provides the Board Risk Committee with an Actuarial Opinion in respect of each ORSA process carried out by the Company. The opinion is provided to the Board Risk Committee at the same time as the results of the ORSA process to which it relates

The Actuarial Function also produces an annual Actuarial Function Report documenting all material tasks that have been undertaken by the function, including the disclosure of key results and the evaluation of any deficiencies and recommendations for addressing any such deficiencies.

B6.3 Actuarial Function Responsibilities

The Actuarial Function is involved in many of the key processes across the Company's business and provides technical expertise and assurance over the methods used. The key responsibilities are:

- Estimation of the gross and net TPs;
- Ensuring the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of TPs and explaining any material effect of change of data, methodologies or assumptions between valuation dates on the amount of TPs;
- Assessing the sufficiency and quality of the data used in the calculation of TPs and where relevant providing recommendations on internal procedures to improve data quality;
- Informing the Board Reserving Committee on the reliability and adequacy of the calculation of TPs;

- Assisting in the execution of the risk management framework and ensuring effective governance framework around the review and validation of TPs (including loss reserves), policyholder obligations and potential exposures, including:
 - regular contact between reserving actuaries and underwriting and claims teams;
 - review of reserve valuations and TP estimations through an escalating series of reviews from reserving actuaries to the divisional Actuarial Function Holder;
 - review of TPs to provide sufficient independence from management; and
 - independent external analysis of the reserving requirements.
- Setting and maintaining actuarial standards to be applied across the business, ensuring that the actuarial methods and techniques are compliant with all the appropriate Division and local regulatory requirements;
- Providing, at least annually, an actuarial opinion on the overall underwriting policy and the adequacy of reinsurance arrangements;
- Assisting with the underwriting process, including those surrounding pricing and design of underwriting contracts and risk transfer mechanisms;
- Helping to maintain a competent, effective and efficient approach to pricing; and
- Comparing best estimates against experience.

B.7. Outsourcing

Outsourcing is a fundamental component of the Company's business model and enables it to more effectively service its customers while also providing access to scalable capacity and AXA Group or third party expertise in an efficient manner.

Outsourcing refers to an arrangement between the Company and a service provider (intragroup or third party) by which the service provider performs a process, a service or an activity that would otherwise be undertaken by the Company.

Outsourcing can increase operational risk exposure through reduced control over people, processes and systems. In order to mitigate this, the Company has established an Outsourcing Policy which sets out the principles for management of the risks arising from its outsourced arrangements and for monitoring the performance of the service providers. The Company has established a governance framework to support the application of the Outsourcing Policy and to ensure compliance with regulatory and Solvency II requirements. This framework incorporates the activities of the Executive and Outsourcing Committees. The role of the Outsourcing Committee is to ensure adequate controls are implemented, review key performance indicators and assess potential Outsourcing risk.

The Company has outsourced arrangements in place to cover delegated underwriting, delegated claims handling and intragroup arrangements with AXA Group companies to cover the provision of intermediary and support services, investment management and IT infrastructure.

The Company has criticality/materiality criteria for Outsourcing which specify the thresholds in place for determining materiality for notification, monitoring and reporting purposes taking into consideration the scale of the Company's business. Criticality/materiality for outsourced arrangements is assessed prior to signing a contract and is subsequently reviewed on an annual basis or when there are material changes to the arrangement. The Company's Board approves its critical/material outsourcing contracts.

Where AXA Group companies further outsource services (sub-outsourcing), they must also ensure that they comply with the requirements of the Company's Outsourcing Policy. Critical/material sub-outsourcing agreements and material changes to critical/material sub-outsourcing agreements are required to be notified to the Company and consent provided prior to commencement of/change to the arrangement. These agreements and material changes are approved by the Company's Executive Committee and notified to the Company's Board.

The Company had the following critical/material outsourced arrangements in place at year end 2024:

The provision of intermediary and support services to the Company is primarily through the AXA Group service company, XL Catlin Services SE (XLCSE), which is also headquartered and regulated in Ireland. XLCSE provides these services to XLCSE via a Master Services Agreement (MSA) and a Binding Underwriting Authority Agreement (Binder). The vast majority of staff providing functional support to the Company are employed by XLCSE and XLCSE is also responsible for sourcing services for the Company from external third parties. The services provided by XLCSE include actuarial, claims handling, compliance, finance, HR, IT, internal audit, legal, marketing, operations, risk management, tax, treasury and underwriting. A number of material ICT and intragroup service company sub-outsourcing arrangements have also been put in place under the MSA with XLCSE. The Company has put in place appropriate governance arrangements to control and monitor these services with oversight and management of XLCSE and sub-outsourcing arrangements provided by the Company's heads of function with clear accountability through the Executive Committee to the Board.

The Company also has binders in place, which cover the delegation of underwriting and claims authorities, with the following Group service companies established and regulated in Australia, Hong Kong and Singapore respectively: Catlin Australia Pty Limited, Catlin Hong Kong Limited and Catlin Singapore Pte Limited (covering Singapore & Labuan). The staff acting on behalf of these service companies are required to comply with individual underwriting and claims authorities which are issued by the Company.

The Company has an Investment Management Agreement (IMA) with XL Group Investments Ltd (XLGIL), which provides investment management services to the Company. XLGIL is the AXA XL Division's dedicated investment management centre of excellence and is established in Bermuda. It is responsible for advising on investment strategy, appointing sub-investment managers and custodians, providing investment reporting and setting benchmarks. Oversight is provided through the Company's Investment Committee and XLGIL monitors the performance of sub-investment managers and custodians for the XLICSE portfolio. .

B.8. Any other information

The system of governance is designed to protect the long-term interests of the Company's stakeholders while promoting the highest standards of integrity, transparency and accountability.

C. Risk Profile

Risk governance requires that the Company can comprehensively articulate the profile/universe of the risks over which its governance processes operate. To this end, the Company has an agreed approach to the definition and categorisation of risks.

Risk Universe

The risk universe is based on the AXA Risk Grid as follows:

- Financial risks, including market, credit, and liquidity;
- Insurance risk;
- Operational risk;
- Other risks, including emerging risks, reputational risks, and strategic & regulatory risks;
- Intangible risk (intangible assets).

The Regulatory Capital Requirement is derived using the Internal Model. A full breakdown of the key risk drivers can be found in Section E.2.2.

Key risks and capital drivers

The key risks and capital drivers are identified in the Internal Model, and from the risk identification processes.

Insurance risk is a significant risk XLICSE is exposed to and includes natural catastrophes and man-made perils.

C.1. Insurance risk

Risk definition

Underwriting risk (Insurance risk) is defined using the following categories:

Component	Definition
Underwriting risk	The risk of loss, or adverse change in the value of insurance liabilities, due to inadequate pricing, provisioning assumptions and reinsurance schemes, and risk of the premiums paid by policyholders not being sufficient to cover claims which have to be paid in case the insured event takes place.
Reserve risk	Reserve risk relates to policy liabilities (corresponding to business written in prior periods where the exposure has already been earned at the opening balance sheet date) being insufficient to cover the cost of claims and associated expenses within the time horizon of the solvency assessment. Key drivers of the Company's reserve risk include the risk that the timing or amount of actual claims payments differ from estimated timing or amounts, inflation, correlation between lines of business, legislative and regulatory changes, loss trend movements, timing and reporting changes at underlying ceding companies, and the excess nature of exposures in certain lines including non-proportional reinsurance.
Lapse risk	Lapse risk is the risk of loss, or of adverse change in the value of insurance future profits, resulting from changes in the level or volatility of the rates of policy lapses, terminations, renewals and surrenders. This includes policies where an assumption has been made about renewal that may not be warranted based on past experience either in terms of actual treaties or underlying policies issued and renewable.

Risk identification

Underwriting and loss experience is reviewed regularly for, among other things, loss trends, emerging exposures, changes in the regulatory or legal environment as well as the efficacy of policy terms and conditions.

Risk mitigation

Reinsurance purchase

The Company participates in AXA XL managed outwards 3rd party reinsurance risk transfer programme to support the Company's underwriting strategy within risk appetite and to ensure efficient use of capital. AXA XL work with the AXA Group Reinsurance department on the outwards reinsurance strategy placements. Business ceded varies by location and line of business based on a number of factors, including market conditions. The goals of the outwards reinsurance risk transfer programme include reducing exposure on individual risks, protecting against catastrophic risks, maintaining acceptable capital ratios and enabling the writing of additional business. The overall goal of the programme is to reduce volatility and enhance overall capital efficiency.

The adequacy of the AXA XL reinsurance strategy as a protection mechanism for the Company is considered and is approved by the Company Board as part of the annual business planning process, and the impact of that strategy is monitored quarterly at Executive level and Board.

The Company also has intra-Group reinsurance arrangements with related entities. The counterparty exposure to these internal counterparties is managed through a range of risk mitigation actions.

Actuarial Function

The reserving process performed by the Actuarial Function is highly structured, strictly defined and controlled, and includes several layers of oversight. This helps to mitigate the risk of large changes of reserves from one period to the next which are due to internal (not external) factors.

Rating adequacy

Underwriters are supported by dedicated teams of claims personnel and pricing actuaries. Premiums are set and adjusted based, in large part, on the industry group in which the insured is placed, the corresponding industry sector rating, and the perceived risk of the insured relative to the others in that group. The rating methodology used for individual insureds seeks to set premiums in accordance with claims potential. Underwriting guidelines and policy forms differ by product offering as well as by legal jurisdiction. Pricing tools are specialised and generally operate by line of business.

Underwriting authorities and guidelines

All underwriters are assigned individual underwriting authorities with the objective of preserving the capital base and controlling earnings volatility. Authorities within the business units are delegated through the underwriting management structure, and the annual review of underwriting limits is part of the business planning process. Authorities are also set in line with agreed risk appetites and risk tolerances for material individual events, RDS that cross multiple lines of business, and from risks related to some or all of the above that may occur concurrently.

The Company underwrites and prices most risks individually following a review of the exposure and in accordance with its underwriting guidelines. The Company seeks to meet its clients' needs while controlling its exposure both on a portfolio basis and on individual insurance contracts through terms and conditions, policy limits and sub-limits, attachment points and reinsurance arrangements on certain types of risks.

New product process and profitability reviews (PAP)

The new product process is designed to track and manage product innovation and obtain approval of new products by the Underwriting and Executive Committees.

This include a risk management opinion on new products. With respect to the existing business, regular reviews are being carried out especially on portfolios not achieving planned targets. These profitability reviews follow a strict framework.

Risk monitoring

On a quarterly basis catastrophe exposure valuations are measured against risk appetites, monitored and reported at Executive level and Board. This monitoring is both on an exposure (aggregate for CAT risk type) and per-risk basis. Realistic Disaster Scenarios (RDSs) are also produced annually and monitored and reported at Executive level and Board. In addition, Large Losses are regularly monitored at Board and Executive level.

Underwriting risk monitoring includes articulation of risk appetites per the Risk Appetite Framework (RAF). Alerts and limits are specified by risk category which include P&C UW - Property, P&C UW - Liability, P&C UW - D&O, P&C UW - Marine, P&C UW - Aviation, P&C NAT CAT Event impact - Peak peril, and P&C UW - Cyber.

Stress testing framework

There is an embedded stress testing framework that is used to understand possible impacts of major risks, including underwriting and reserving risks. These impacts include the earnings, underwriting, investments, liquidity and capital implications of low frequency, high severity events. For underwriting risks the main stress test approaches used cover, natural catastrophe peril exposure results production and RDS production as outlined below.

Test type	Reason performed
Nat Cat reporting	To monitor Nat Cat exposures against risk appetite
RDS reporting	To monitor non-Nat Cat exposures and to assist in the setting of overall risk limits

Natural catastrophe exposure results, and RDS exposure results, are used to monitor exposure to the defined scenarios and monitor compliance with underwriting risk tolerances and limits. RDS's are produced to understand the Company's exposure to defined non-Nat Cat scenarios, which have been designed by experts and cover both short and long tail lines of business and cross class event exposures. The ARCC (and Board) are informed of results of stress tests performed via risk dashboards and the ORSA report throughout the year where discussions and challenge include whether the results fall within relevant approved risk tolerances and limits.

C.2. Market risk

Risk definition

Market risk represents the potential for loss due to adverse changes in the fair value of financial and other instruments. The Company is principally exposed to the following market risks

Component	Definition
Interest Rate and Spread Risk	Financial loss or volatility of profits due to the combined sensitivity of the economic value of the investment portfolio and (re)insurance liability cash flows and debt securities issued to changes in the level or volatility of benchmark interest rates and credit spreads.
Market Risk Concentrations	Financial loss or volatility of profits due to the increased sensitivity of the market value of the investment portfolio to other risks specifically due to concentrations of investments such as in specific geographical region, industry or company.
Foreign Exchange Risk	Financial loss due to volatility in the value of the Company's assets and liabilities following changes in currency exchange rates.
Equity Price Risk	Financial loss or volatility of profits due to the sensitivity of the value of the investment portfolio to changes in the level or in the volatility of market prices of equities.

Additional Market risk components include;

- Real Estate
- Hedge Funds
- Private Equity
- Inflation

Risk Identification

The Company identifies market risk through the following processes:

Process	Description
Business planning	As part of the annual Investment Plan, a review is undertaken of the nature of assets required to support the business plan and the expected liabilities.
Investment risk appetite framework	The company Risk Appetite Framework sets maximum risk tolerances and is reviewed annually.
Risk reporting and processes	The risk assessment process assists in identifying if there are any changes to market risks already identified in the previous assessment.
Emerging risks	The Division operates an emerging risks identification process with Company representation. This assessment identifies key external factor changes that may give rise to Market risk issues.

Risk mitigation

The Company's investment management strategy ensures its continued compliance with the Prudent Person Principle set out in Article 132 of Directive 2009/138/EC.

Strategic Asset Allocation

The Strategic Asset Allocation ("SAA") process for AXA XL and the Company establishes a target allocation that is constructed to maximize enterprise value, subject to various considerations and constraints. It is subject to the risk tolerance established by management and is approved at least every 3 years by the Company's Board.

Authorities Framework / Risk Appetite Framework

In conjunction with the SAA, the Company has a Risk Appetite Framework modelled off the AXA Group framework, which limits exposure to various asset classes (with tighter limits for higher risk asset types), as well as duration and FX mismatches. There is also centralized investment risk monitoring through the Investment Authorities and Guidelines, which further monitors exposures by average credit quality, corporate industry sector, region (for municipal securities and emerging markets), BBB exposure, and leverage. These controls are implemented through regular compliance monitoring and reporting.

The Investment Risk Management Policy and market risk limits under the RAF address the key market risk factors and are commensurate with the volume and complexity of activity undertaken by the Company. The framework is designed to capture investment risks and to consistently and objectively measure, assess, manage and report such risks on an ongoing basis.

Investment Management agreement

An investment management agreement is in place between XL Group Investments Ltd ("XLGIL") and the Company. This includes guidance on type of investments and the weighted average credit ratings of the portfolio that can be made on behalf of the Company. Adherence to policies and limits are monitored on a regular basis and reported to the Company's Board.

Currency Risk Mitigation

The Company's currency exposure is mainly dominated by the Euro. The Company seeks to mitigate the currency risk by matching the estimated foreign currency denominated liabilities with assets denominated in the same currency. Asset liability management analysis is run regularly to adjust surplus and shortfall currencies, ensuring that the entity exposures are broadly matched.

Risk monitoring

Market Risk definition includes articulation of Risk Appetites per the Risk Appetite Framework, alerts and limits are specified by risk category and sub-category. For example, for the Risk Appetite 'Exposure per asset class' the sub categories include Fixed Income, Real Estate, Alternative etc.

The Company's investment portfolio mostly contains high rated government and corporate assets. Day-to-day management of the investment portfolio is conducted in accordance with detailed investment guidelines and risk tolerances that are closely monitored by AXA XL Investments. This hybrid implementation approach provides access to external asset managers with specialized skills across a broad range of investment products, as well as the flexibility to actively manage the overall structure of the portfolio in line with the Company's specific business needs.

Interaction between the internal and external managers provides additional insight to take advantage of opportunities as they present themselves.

The delegation of investment authority to XLGIL is supplemented by robust compliance monitoring with defined escalation and notification procedures. This framework is designed to identify investment risks on an absolute basis and relative to liabilities and to consistently and objectively measure, assess, manage and report such risks on an ongoing basis. The Risk Appetite Framework is cascaded down to the Company and approved by the Board. Any breaches in limits of the Risk Appetite Framework are presented at Executive level and escalated to the Board.

Stress testing framework

An embedded stress testing and scenario analysis framework is used to understand possible impacts across all major risks, including market risks. The following stress tests are used to identify risk exposures:

- Interest rate and credit spread sensitivity testing: by re-valuing current portfolio holdings assuming various changes in the level and term structure of interest rates and the level of credit spreads;
- FX stress tests on assets and liabilities; and
- Ad hoc scenario stress testing as deemed appropriate by Risk Management.

C.3. Credit risk

Risk definition

Credit risk is defined as the risk of loss due to an unexpected default, or deterioration in the credit standing of counterparties and debtors, or uncertainty of an obligator's continued ability to make timely payments in accordance with the contractual terms of the instrument.

Credit risk through the risk framework is categorised by the following:

Component	Description
Reinsurance Counterparty Risk	Risk of losses due to the default of a reinsurer or a deterioration of its credit worthiness.
Investment Counterparty Risk	Counterparty default risk is the risk of possible losses due to the unexpected default, or deterioration in the credit standing of investment counterparties.
Premium Counterparty Risk	Premium counterparty default risk is the risk of possible losses due to unexpected default, or deterioration in the credit standing of the premium debtors in relation to insurance contracts written.
Underwriting Counterparty Risk	Exposure to credit risk through certain credit sensitive underwriting activities which include, but are not limited to, Surety, Worker's Compensation, Environmental and Political Risk and Trade Credit.

Additional Credit Risk components include:

- Mortgage - Counterparty risk inherent to the direct mortgage business where real estate serves as collateral.

Risk identification

The Company identifies credit risk through the following processes:

Process	Description
Business planning	Analysis is undertaken of the credit risk exposures, loss experience and changes to the external environment (including market cycle and economic environment) to identify any changes to the credit risk profile for the forthcoming period of the business plan.
Underwriting	Each individual contract written is assessed, by underwriting process (which is subject to granular underwriting guidelines and escalation authorities) for the nature and level of credit risk that it brings to the business including consideration of the exposure by nature of the limit, the risks insured, the location of the risks and other underwriting criteria.
Risk assessment and processes	Through the risk assessment processes, the Company quantifies existing risks and also identifies new risks.
Emerging risks	The Division operates an emerging risks identification process. This assessment identifies key external factor changes that may give rise to credit risk issues. The process also evaluates potential opportunities that might arise from these emerging risks.

Risk mitigation

Credit risk is managed through:

• **Credit Risk Framework** - Credit risk aligns with the Division credit risk framework and Group superseding restrictions. Credit risk in the investment portfolio is managed through various frameworks applied at the Division and Entity level including Authorities & Guidelines, Fixed Income Concentration, Sovereign Risk Appetite, and Country of Risk. These address the credit quality of obligors and counterparties, diversification, exposure vs limits by rating, term and seniority, and quantitatively evaluate credit risk following a robust Credit VaR methodology. FRM Internal Credit Ratings (ICR) have been developed by taking into account the Group Credit Team (GCT) Internal Rating to decrease the dependency toward the 3 main Rating Agencies.

Exposure to credit spreads primarily relates to market value and cash flow variability associated with changes to credit spreads. Credit spreads in the investment portfolio are regularly reviewed in terms of the inherent potential for downgrade of individual obligors as well as the wider impact on the overall credit risk of the portfolio.

- **Legal Documentation** - Corporate functions and underwriting businesses are responsible for sound and legally enforceable documentation that should be in place for each agreement with credit risk content. Approved documentation is put in place before entering into a contractual obligation.
- **Intra-Group Credit Arrangements** - The Company derives significant reductions in risk resulting from intra-Group reinsurance arrangements as identified in section C1.
- **Underwriting Authorities and Limits** - See C1 Underwriting Risk.
- **Investment Portfolio** - Credit risk is also managed through the credit research performed by external investment management service providers, Group Risk Management, and the in-house portfolio management team.
- **Reinsurance Security Department** - The Company manages its credit risk in its external reinsurance relationships by transacting with reinsurers that it considers financially sound, and if necessary, collateral in the form of funds, trust accounts and/or irrevocable letters of credit may be held.
- **Premium Payment and Brokers** - The Company underwrites a significant amount of its (re)insurance business through brokers and credit and premium risk exists should any of these brokers be unable to pay premium due. A list of approved broking houses is maintained.

Risk monitoring

Credit Risk monitoring includes articulation of Risk Appetites per the Risk Appetite Framework (RAF), alerts and limits are specified by risk category, which include Sovereign Exposure and Reinsurance Counterparty Risk.

Risk Management consolidates credit exposure reports from corporate functions and underwriting businesses on a regular basis for aggregating, monitoring and reporting at Executive level and Board.

Investment portfolio

On a regular basis a review is undertaken of the investment portfolio to improve the Company's understanding of asset concentrations as well as, credit quality and adherence to its credit limit guidelines. Any issuer over its credit limit or experiencing financial difficulties, material credit quality deterioration or potentially subject to forthcoming credit quality deterioration is placed on a watch list for closer monitoring. Where appropriate, exposures are reduced or prevented from increasing.

Stress testing framework

There is an embedded stress testing framework that is used to understand possible impacts of major risks, including credit risks. Stress tests and scenario analysis are undertaken to monitor exposure to the defined scenarios that allows monitoring of exposure to credit risks. These scenarios help to understand potential losses to ensure that the Company is prepared to withstand projected losses from these events, including ensuring that there is adequate capital, and liquidity to manage through the event and maintain the Company as a going concern. Based on the factors considered in scenario and stress testing, all credit risks are deemed to be well managed.

AXA S.A. Credit Facility.

The Company may benefit in part from a \$1bn multi-currency facility, which AXA S.A. entered into July 2019, with the main insurance and reinsurance carriers of AXA XL. The credit agreement allows for letters of credit to be issued in a variety of currencies.

C.4. Liquidity risk

Risk definition

Liquidity risk is defined as the inability to meet cash and collateral posting obligations when they come due. Liquidity risk arises from three principal areas: operating, financing and investing cash flows. The RMF addresses how the Company manages liquidity both under a normal and a stressed environment.

Risk identification

The Company measures and monitors liquidity as follows:

- An internal stressed liquidity calculation is performed quarterly across all major legal entities of the Company over a 12 month horizon, including simultaneous shocks on capital market assumptions, operating cashflows and natural catastrophes.
- A short term liquidity risk scenario is applied to derivatives and portfolio financing positions to ensure sufficient collateral is held.
- AXA XL Treasury monitors concentration risk of cash at banks, along with upcoming funding requirements.

The Company continued to have sufficient liquidity during 2024, despite the continued volatile interest rate environment.

Risk mitigation

One of the principal objectives of liquidity risk management is to ensure that there is readily available access to funds with which to settle large or multiple unforeseen claims. It is generally expected that positive cash flow from operations (underwriting activities and investment income) will be sufficient to cover cash outflows under most future loss scenarios.

Cash requirements include all possible claims on cash from policyholders and operations. Some of these cash outflows are scheduled while others are known with much less certainty. The goal is to ensure sufficient liquidity in the asset portfolio, together with secured external cash sources, to provide for timely payment of potential cash demands under both normal business conditions and under extreme conditions resulting from unforeseen events over 12-month time horizon.

Liquidity risk is managed through:

Risk	Description
Asset-Liability Management (ALM)	Treasury conducts detailed ALM analysis to match the currency mix of its liabilities with appropriate assets. Investments manage the duration gap of assets and liabilities within a pre-defined range.
Special Funding Clauses	The major source of liquidity risk within underwriting contracts is the provision of rating triggers, which are common practice. These triggers typically necessitate the cancellation of the policy and the return of the cedant's unearned premium in the event of being downgraded below a certain rating level, which has the potential to be a material liquidity event when aggregated. There are controls in place to ensure that there is appropriate authorization for the inclusion of a downgrade clause in a contract.

Risk monitoring

The AXA XL Treasury and Risk Management departments serve as the focal point for liquidity monitoring, drawing on the expertise of other internal functions, as well as managing cash held at bank accounts covering day-to-day cash requirements, typically referred to as operating cash. Operating cash balances, together with cash managed within the investment portfolio, comprise the primary sources of liquidity for the Company. The Company also has access to several credit facilities.

Risk appetite is captured through risk reporting at Executive level and Board and monitored as part of the RAF. Risk appetite links directly to the stress testing framework outlined below.

Stress testing framework

There is an embedded stress testing framework that is used to understand possible impacts of major risks, including liquidity risks. A stressed liquidity analysis report is prepared on a quarterly basis by Treasury and Risk Management, which includes the Company's own view of the stressed sources and uses of liquidity over a 12 month horizon. Entities must maintain appropriate excess liquidity post simultaneous stresses from operating cashflows, capital markets and natural catastrophes.

Based on the above factors considered in scenario and stress testing, all liquidity risks are deemed to be well managed and within risk appetite, as reported via the Risk Dashboard and ORSA report to the ARCC and Board.

C.5. Operational risk

Risk definition

The Company defines operational risk as the risk of loss, resulting from inadequate or failed internal processes, personnel or systems, or from external events. Operational risks are defined consistent with the Basel II risk categorisation. In line with business objectives, the Company does not take on operational risk with a view to achieving enhanced return. Rather, it accepts operational risk as a consequence of writing (re)insurance business and having operations to support the writing of that business.

Risk identification

Operational risk is identified through the following processes:

Process	Description
Annual risk assessment	A risk register is maintained of the material operational risks faced by the Company. On an annual basis an assessment is performed on the risks on the risk register.
Consultation regarding new regulations	When the regulatory authorities announce potential changes to the regulatory environment (such as new rules and regulations) the Legal and Compliance teams are responsible for reviewing the proposed changes and for highlighting any change in regulatory risk that might arise.
Business planning	Any changes to the operational risk environment that arise as a result of the business planning (such as entry into new territories) must be identified and accounted for during the planning process.
Ongoing operations	Function heads and Risk Owners are responsible for identifying any new (or changed) risks during the normal course of business, and notifying the Policy owners and risk owners so any required changes to the risk register can be implemented.
Emerging risks	The Company operates a Division wide emerging risks identification process which captures emerging risks. This assessment identifies key external factor changes that may give rise to operational risk issues.
Internal loss data	The Company collects data relating to operational risk losses and near misses on a quarterly basis. The data collected is used, among other things, to track incidents, identify key risk indicators and to validate and challenge operational risk quantification.
External loss data	The Company purchases historical loss data from an external provider. Large events from this database are used to identify new emerging risks.

Risk mitigation and monitoring

The Company's risk register takes into account the controls in place that mitigate specific risks. The nature of the controls and the strength of control exercised are based upon the:

- Potential severity of the risk;
- Frequency of the risk occurring;
- Cost of implementing controls relative to the significance of the risk; and
- Appetite and tolerance for the risk.

An annual assessment is performed for all risks on the risk register. The assessment involves capturing the risk owner view of the potential severity should an incident occur relating to the risk, and the likelihood of such an incident occurring. Together this establishes the profile of each risk, allowing identification of top risks, thereby facilitating appropriate risk based monitoring.

On a quarterly basis Operational Risks are monitored and reported at Executive level and Board.

Purchase of insurance

It is recognised that while the Company may buy insurance with the aim of reducing the monetary impact of certain operational risk events (e.g. physical damage), non-monetary impacts may remain (including impact on the Company's reputation). This is considered in the risk assessment process and risk register.

The risks are monitored and managed through the risk framework and the operational loss event reporting process.

Risk appetite

The Operational risk appetite is established as an amount of financial impact to individual risks with an alert and limit set up.

Stress testing framework

To support the identification and quantification of operational risks within the business, the Company has a stress and scenario testing framework.

The operational scenarios are developed from the top risks assessed during the annual risk assessment process on a net assessment basis. The scenarios have multiple uses including:

- To monitor against tolerances; and
- To better understand economic and reputational impact of the identified top operational risk exposures.

Information and Communication Technology and Cyber Risks

Information Risk is defined as any risk which arises when the Company's information or information systems fail to deliver the expected value to the organisation, impacting business objectives and/or creating unacceptable operational losses. It includes any data systems, networks, and supporting resources (including budget, people, premises, and security) which process it. In order to support the business strategy and manage information and technology risk, the Company has, as part of AXA XL, an Information Risk Management (IRM) practice to oversee and assess the information risk landscape and facilitate sound risk decisions by establishing sustainable risk management capabilities which are integrated across the business. The IRM practice includes a suite of cyber and IT risks, such as fraud, malware, and IT outages, which are supported by Key Risk Indicators (KRIs) and scenario analysis as part of the overall Operational Risk Framework. Cyber and IT risks are also considered as part of 2nd opinions and independent controls testing, wider project reviews and regulation reviews to ensure that there is ongoing and proactive coverage for these risks.

The Information Risk framework remains fully embedded within the overall Operational Risk framework and continues to provide insight into the Company's technology, data, cyber security, and resilience risks, alongside increased oversight of material project risks. The ARCC serves as a key governance body for Information Risk decisions and overall governance for the Company.

C.6. Other material risks

Asset liability mismatch risk

Risk definition

Asset liability mismatch risk - arises directly from a mismatch between assets and liabilities due to changes in rates and spreads, equity and other non-fixed income markets/asset classes and credit risks, liquidity, foreign exchange and from events affecting both asset and liability values.

In particular, the following market risks influence both assets and liabilities and are hence key drivers of risk:

Component	Definition
Interest Rate and Spread Risk and Asset Composition Risk	Mismatches between asset composition and maturities and the profile of liability cash flows creates economic risks from changes in benchmark interest rates, spreads and asset values. This is due to changes in the nominal Mark-to-Market (MTM) value of assets not exactly offsetting changes in the nominal economic value (net-present value) of liability cash flows.
Inflation Risk	Inflation risk stems from the general increase of prices. Inflation may decrease the value of fixed income assets while it may increase the value of liabilities, subject to knock on impacts to interest rates. Inflation also explicitly impacts the values of directly linked assets (TIPS, etc.) and liabilities.
Foreign Exchange ("FX") risk	FX risk arises from mismatches in the currency denomination of assets relative to that of financial liabilities.

Risk mitigation, monitoring and Stress Testing Framework

The Company controls asset liability mismatch risk through:

Risk	Description
Asset Liability Management Analysis ("ALM")	The Company will conduct detailed ALM analyses to match the average duration and currency of its liabilities with appropriate assets. The SAA process, which it follows determines the target allocation that maximizes the value of the Company subject to risk tolerance and other constraints. The SAA considers management's risk tolerance, liability cash flows, business plan, liquidity considerations, capital market forecasts and regulatory requirements. The ALM/SAA process is first done at the AXA XL division level keeping division and legal entity constraints under consideration. The target allocations are then propagated down to the legal entities on additional considerations of each entity. This is mandatory to be completed at least once every three years.
Investment Risk Appetite Framework	Board approved Risk Appetite Framework limits are in place that address all the key market risk factors and are commensurate with the volume and complexity of activity undertaken by the Company.
Stress Testing Framework	The Company uses stress testing as one method to assess asset liability mismatch risk exposures.

On a quarterly basis these are monitored and reported at Executive level and Board.

Strategic risk

A strategic risk is the risk that a negative impact (current or prospective) on earnings or capital, material at the Company level, arises from a lack of responsiveness to industry changes or adverse business decisions regarding:

- Significant changes in footprint, including through mergers and acquisitions;
- Product offering and client segmentation;
- Distribution model (channel mix including alliances/partnerships, multi-access and digital distribution).

Given the nature of strategic risks, there is no capital charge assessment but rather a strong strategic RMF in place in order to assess, anticipate and mitigate these risks.

Reputational Risk

Reputational risk is the risk that an event will negatively influence the stakeholders' perceptions of the company. AXA XL maintains a Reputational Risk Framework, which encompasses a set of planned actions and policies established, while reputation problems are still latent, to reduce the probability and/or the expected costs of latent reputation problems becoming actual.

Emerging Risks

Emerging risks are risks which may develop in the future, or which already exist and are continuously evolving. They are marked by a high degree of uncertainty, and some of them may never emerge. Emerging risks may be difficult to quantify and can have potentially serious consequences if they are not anticipated in a timely manner. To assess the impact of emerging risks at AXA XL, there is a well-established emerging risks framework in place which is supported by all relevant Risk Committee's at both divisional and legal entity level. The Emerging Risks Team works in collaboration with the Emerging Risks Expert Network to identify, analyze, prioritize, quantify, monitor, and report on emerging risks that could have an impact on existing and future product offerings and business operations. All Risk Committees and the Emerging Risks Expert Network work together to undertake both strategic and risk management processes, assisting in identifying potential opportunities in the market and providing thought leadership around emerging risk issues to optimize underwriting and strategic decisions.

Climate Change

Climate change risks are a key area of consideration to XLICSE. In line with the release of "Guidance for Insurance Undertakings on Climate Change Risk" in March 2023 by the Central Bank of Ireland ("CBI"), XLICSE has set up a working group, chaired by the CRO, to support the Company in having a clear understanding on the impact of climate change on the company risk profile and setting out actions to demonstrate compliance with the Guidance. While activities are ongoing to address this guidance, currently the Board evaluate and oversee climate-related issues and risks in connection with, among other things, approval of Own Risk and Solvency Assessments ("ORSA") and business strategy and planning.

Climate change risks have potential impacts on our underwriting, investments, and company operations and therefore this risk has dedicated groups to ensure that the transversal nature is duly considered, appropriately managed and mitigated. XLICSE (through the work with AXA XL) has conducted a materiality assessment to identify its risk levels to key climate change risks: physical, transition and litigation. Given the long time horizon over which these risks may materialise and the considerable uncertainty in future projections, a series of stress tests have been developed to better understand the long term implications for these risks. This is an on-going journey, with the current processes described below.

Climate change risk is managed through the Risk Management Framework ("RMF"). Through this process risks are identified. In the case of risks pertaining to climate change, physical, transition and litigation risks have been long standing items in our emerging risks identification process. As these risks have developed, they are assessed and monitored for each risk type. For example, the potential physical risk impacts on our natural catastrophe risk are considered within our underwriting risk framework. This ensures that each element of climate risk is managed by those with most expertise, that relevant stakeholders are kept informed and that these risks can be cross compared to others

with similar characteristics. In addition, AXA XL has established a Climate Change Risk & Stress Testing Working Group, which has developed a framework to outline the methodology for identifying climate change-related risks, assessing their materiality, and providing a detailed description of the monitoring and mitigation processes for these risks, including scenario analysis and stress testing. Additionally, the framework includes a discussion on key risk indicators related to climate change, facilitating the monitoring of risks across physical, transition, and litigation domains. This ensures information is relayed across risk types and a transversal approach is also taken to the risk. Controls in relation to these risks are documented in the applicable risk policies where relevant.

Environmental, Social and Governance (ESG) risks

Regarding its long term viability, XLICSE, as part of AXA XL, is also focused on Environmental, Social and Governance related risks. A key aspect of Environmental risk is described under "Climate Change" but in addition, AXA XL seeks to promote issues related to progressing to Net-Zero, biodiversity protection and restoration, and sustainable water use. This includes commitments to engage clients in priority sectors on nature-related risks, provide biodiversity training to targeted teams and to achieve a 25% reduction in our operational carbon footprint by end of 2025. In social risk, an immediate area of focus is on Diversity, Equality and Inclusion ("DEI"), particularly in AXA XL's workforce as well as employee training on sustainability. This includes integrating sustainability commitments into our talent attraction, management and reward strategies by 2025 and prioritising DEI with our external stakeholders, also by 2025. The main governance issues for AXA XL include continuing to embed robust sustainability governance as well as reporting our progress annually, incorporating ESG into our risk management processes and developing a sustainable supply chain strategy with our Procurement teams (by end of 2026).

C.7. Any other information

There is no other material information in relation to the risk profile.

D. Valuation for Solvency Purposes

This section contains information regarding the valuation of balance sheet items for solvency purposes. The Solvency II Balance Sheet S.02.01.02 is shown in the Public QRT section at the end of this report.

A reconciliation between the Irish GAAP balance sheet and the Solvency II balance sheet is presented below.

A reconciliation between the Irish GAAP equity and Solvency II equity is provided in Section E1.2. Eligible Own Funds below.

Each material asset class is described in paragraph D.1. Valuation of technical provisions is described in paragraph D.2. Other liabilities are described in paragraph D.3

		2024		2023	
	Reference	Irish GAAP Value €'000	Adjustment €'000	Solvency II Value €'000	Solvency II Value €'000
Assets					
Deferred Acquisition Costs (DAC)	1	632,903	(632,903)	—	—
Deferred tax asset	2	56,749	(56,749)	—	—
Property, plant and equipment	3	120	—	120	32
Investments (excl participations)	4	4,945,449	273,888	5,219,337	5,598,125
Participations	5	—	—	—	8,009
Reinsurance recoverables	6	13,047,850	(4,204,034)	8,843,816	8,703,387
Deposits to cedants	7	83,837	—	83,837	108,575
Insurance and intermediaries receivables	8	2,300,048	(1,796,560)	503,488	546,213
Reinsurance receivables	9	2,071,487	(708,484)	1,363,003	1,800,602
Receivables (trade, not insurance)	10	68,041	(15,392)	52,649	85,265
Cash and cash equivalents	11	—	319,651	319,651	101,079
Any other assets, not elsewhere shown	12	49,667	(41,918)	7,749	1,671
Total assets		23,256,151	(6,862,502)	16,393,649	16,952,958
Liabilities					
Technical provisions (best estimates) - Non life & health similar to non life	13	17,376,387	(5,762,237)	11,614,150	11,749,932
Technical provisions (risk margin) - Non life & health similar to non life	13	—	369,061	369,061	357,706
Technical provisions (best estimates) - Life & health similar to life	14	—	61,538	61,538	54,644
Technical provisions (risk margin) - Life & health similar to life	15	—	1,710	1,710	1,520
Pension benefit obligations	16	8,563	—	8,563	8,373
Deposits from reinsurers	17	573,337	(557,641)	15,696	17,009
Deferred tax liabilities	18	66,619	20,868	87,487	66,514
Derivatives	19	—	171	171	10,922
Debts owed to credit institutions	20	129,044	477,732	606,776	585,485
Financial liabilities other than debts owed to credit institutions	21	—	290,629	290,629	330,772
Insurance & intermediaries payables	22	482	—	482	1,657
Reinsurance payables	23	1,780,647	(1,220,018)	560,629	807,710
Payables (trade, not insurance)	24	827,666	(302,967)	524,699	705,588
Subordinated liabilities	25	—	—	—	—
Any other liabilities, not elsewhere shown	26	570,950	(535,106)	35,844	2,537
Total liabilities		21,333,695	(7,156,260)	14,177,435	14,700,370
Excess of assets over liabilities		1,922,456	293,758	2,216,214	2,252,588

D.1. Assets

This section describes the bases, methods and main assumptions used in the valuation for solvency purposes of each material class of assets. The material quantitative differences between the value of assets in the 31 December 2024 balance sheets presented in Section D above are explained. The numbering of the balance sheet line items refers to the comments below. Based on the differences in this template a reconciliation is prepared to reflect the difference between the Irish GAAP equity and Solvency II equity.

The Solvency II Balance Sheet requires an economic (fair) valuation for all assets and other liabilities. On this basis, the following hierarchy of high level principles for the valuation of all assets and other liabilities is used:

- I. Undertakings must use quoted market prices in active markets for the same assets or liabilities as the default valuation method, notwithstanding if the applicable GAAP would allow a different approach. An active market is one in which transactions for assets or liabilities occur with sufficient frequency and volume to provide pricing information on an ongoing basis;
- II. Where the use of quoted market prices for the same assets or liabilities is not possible, quoted market prices in active markets for similar assets and liabilities with adjustments to reflect differences shall be used;
- III. If there are no quoted market prices in active markets available, undertakings should use mark-to-model techniques, which is any alternative valuation technique that has to be benchmarked, extrapolated or otherwise calculated as far as possible from a market input;
- IV. Undertakings have to make maximum use of relevant observable inputs and market inputs and rely as little as possible on undertaking-specific inputs, minimising the use of unobservable inputs;
- V. When valuing liabilities using fair value, an adjustment is required to remove the own credit risk of the liability;
- VI. The Company uses a fair value hierarchy for its investment portfolio that prioritises inputs to its valuation techniques which are used to measure fair value. The hierarchy gives the highest priority to unadjusted quoted prices in active markets for identical assets, 75% of the total portfolio, and then quoted prices in markets that are not active or inputs that are observable either directly or indirectly (25% of the total portfolio). The equity accounting method is used for the Affiliates holdings, 0% of the total portfolio.

The differences between the Irish GAAP and Solvency II valuation for assets are set out below:

1. Deferred acquisition costs (DAC) are costs relating to the acquisition of new business for insurance contracts. Under Irish GAAP these costs are deferred to the extent that they are expected to be recovered out of future margins in revenues on these contracts. Recognition of DAC is not permitted under Solvency II;
2. Under Solvency II the valuation of deferred tax assets is determined by the differences between the economic valuation of an asset or liability on the Solvency II balance sheet and its tax base. A deferred tax asset can only be recognized to the extent it is probable that future taxable profit will be available against which the unused tax losses and unused tax credits can be utilized. The criteria for holding a deferred tax asset is similar under Irish GAAP and Solvency II and a review under both basis of accounting has been performed;
3. Property, plant and equipment is held at cost less any depreciation and impairment loss under Irish GAAP. This valuation is a proxy for fair value under Solvency II;
4. The reason for the differences between Solvency II and Irish GAAP for investments is that some assets are carried at cost under Irish GAAP compared to fair value under Solvency II. Accrued investment income is included within the value of the investment under Solvency II, whereas it is disclosed separately in the Irish GAAP balance sheet. In addition, certain cash instruments in the Irish GAAP balance sheet are classified as investments under Solvency II;
5. Participations are equivalent to Associates in the Irish GAAP balance sheet and are accounted for under the adjusted equity method under both Irish GAAP and Solvency II. The adjusted equity method is a method of accounting whereby the investment is initially recognized at cost and adjusted thereafter for the post-acquisition change in the investor's share of the investee's net assets, which for Solvency II is calculated on an economic basis;
6. See Section D2.2 for a discussion of reinsurance recoveries under Irish GAAP compared to Solvency II;
7. Deposits to cedants under Irish GAAP are measured at cost less provision for impairment and are not discounted. Cost less provision for impairment is a reasonable proxy for fair value for the Solvency II measurement given the short term nature of these assets;
8. Insurance and intermediaries receivables under Irish GAAP are measured at cost less provision for impairment and are not discounted. The valuation differs to Solvency II due to the fact that all of the not-yet-due insurance and intermediaries receivables are transferred to technical provisions under Solvency II (See Section D2 for details). As

this is simply a balance sheet reclassification between assets and liabilities there is no material impact on equity (apart from the fact that receivables not-yet-due are discounted within technical provisions). Only the due receivables remain in assets under Solvency II and are measured at cost less provision for impairment as a reasonable proxy for fair value given the short term nature of these assets;

9. Reinsurance receivables under Irish GAAP are measured at cost less provision for impairment and are not discounted. The Solvency II adjustment represents assumed premium debtors which are offset against technical provisions under Solvency II. Therefore there is no impact on equity for this adjustment. Cost less provision for impairment is a reasonable proxy for fair value for the Solvency II measurement given the short term nature of these assets;
10. Trade receivables under Irish GAAP are measured at cost less provision for impairment and are not discounted. There is no change in valuation under Solvency II as cost less provision for impairment is a reasonable proxy for fair value for the Solvency II measurement given the short term nature of these assets;
11. Cash and cash equivalents are measured at fair value under both Irish GAAP and Solvency II. The difference in cash valuation is because any bank accounts in an overdraft position are moved to debts owed to credit institutions. In addition, certain cash instruments in the Irish GAAP balance sheet are classified as investments under Solvency II;
12. Other assets are measured at cost less provision for impairment under Irish GAAP, which is a reasonable proxy for fair value under Solvency II given the short term nature of the assets. The difference is due to the fact that under Solvency II accrued investment income is included within the value of the investment; whereas it is disclosed within Other assets in the Irish GAAP section of the Balance Sheet.

D.2. Technical provisions

Items 6 and 13-15 from the Solvency II Balance Sheet in Section D above are combined below to present Net Technical Provisions:

		Solvency II Value	
		2024	2023
		€'000	€'000
Technical provisions (best estimates)	13-15	11,675,688	11,804,576
Technical provisions (risk margin)	13-15	370,771	359,227
Gross technical provisions		12,046,460	12,163,803
Reinsurance recoverables	6	8,843,816	8,703,387
Net technical provisions		3,202,644	3,460,416

D.2.1 Valuation Bases, Assumptions and Methods to Derive the Value of Technical Provisions

Technical provisions are valued based on best estimate cashflows, adjusted to reflect the time value of money using risk-free discount rate term structures with the volatility adjustment. In addition, there is a risk margin to reflect the uncertainty inherent in the underlying cashflows which is calculated using the approved internal capital model. The discount rate term structures are prescribed by EIOPA for each reporting period.

The best estimate for the claims provision is calculated by using GAAP reserves as the starting point and then performing a series of adjustments:

- Removal of any margins for prudence (as Solvency II technical provisions are established on a best estimate basis);
- Incorporation of expected reinsurance counterparty defaults (bad debt);
- Incorporation or the identification of events not in data (ENID) as appropriate;
- Incorporation of expected earned future premiums and commissions (payable and receivable);
- Other adjustments related to the consideration of investment and operating expenses, etc., and
- Discounting.

The best estimate for the premium provision is calculated by using the gross unearned premium reserve on a GAAP basis, and then performing a series of adjustments:

- Removal of the unearned premium reserves and incorporation of expected unearned future premiums and commissions (payable and receivable);
- Allowing for premiums from business that is legally obliged but not yet inceptioned as at the valuation date;
- Allowing for the expected gross and ceded losses arising from the unearned and legally obliged exposure;
- Allowing for expected reinsurance bad debt on the ceded losses;
- Allowing for the cost of future "losses occurring" reinsurance cover for the unearned exposure, and for the cost of reinsurance cover for the legally obliged exposure;
- Incorporation or the identification of ENID as appropriate;
- Other adjustments related to the consideration of investment and operating expenses, etc.;
- Adjustments for lapses as appropriate, and
- Discounting.

The Company has been authorised by the CBI to apply the Volatility Adjustment (referred to in Article 77d of Directive 2009/138/EC) to the EIOPA risk-free interest rate term structure, as part of the valuation of the (re)insurance obligations within the technical provisions. The Company has not applied any of the following adjustments to the EIOPA risk-free interest rate term structure:

- matching adjustments (referred to in Article 77b of Directive 2009/138/EC);
- transitional risk-free interest rate term structure (referred to in Article 308c of Directive 2009/138/EC); and
- transitional deductions (referred to in Article 308d of Directive 2009/138/EC).

At 31 December 2024, the total net technical provisions amounted to €3,259m (2023: €3,460m) comprising the following:

	2024	2023
	€'000	€'000
Claims Provision	3,366,852	3,621,400
Premium Provision	(534,980)	(520,211)
Risk Margin	370,771	359,227
Total Technical Provisions	3,202,644	3,460,416

The following tables show the breakdown of total net technical provisions as at 31 December 2024, for each material line of business:

2024	2024	2024	2024	2024
Solvency II Lines of Business	Best Estimate	Risk Margin	Total Technical Provisions	Percentage of Total
	€'000	€'000	€'000	%
General liability	1,334,682	190,699	1,525,381	48%
Fire and other damage to property	544,740	75,940	620,679	19%
Other	952,450	104,133	1,056,583	33%
Total	2,831,872	370,771	3,202,644	100%

2023	2023	2023	2023	2023
Solvency II Lines of Business	Best Estimate	Risk Margin	Total Technical Provisions	Percentage of Total
	€'000	€'000	€'000	%
General liability	1,414,274	186,121	1,600,395	46%
Fire and other damage to property	704,865	74,494	779,359	23%
Other	982,050	98,612	1,080,662	31%
Total	3,101,189	359,227	3,460,416	100%

The General Liability business makes up approximately 48% (2023: 46%) of the Company's net technical provisions because of the long-tail nature of potential liabilities. The main methods and assumptions used to calculate the General Liability technical provisions are consistent with those used on all the other lines of business, although the underlying parameters are specific to each line of business. For example, there is a higher discounting credit on the General Liability business relative to the other lines of business due to longer settlement durations.

The methods and assumptions are described above.

D2.2. Description of Recoverables from Reinsurance Contracts

The reinsurance recoverables for the claims provisions are sourced directly from the GAAP submissions.

Within the premium provisions, the estimated ceded recoveries are calculated by applying ceded-to-gross ratios reflecting the reinsurance programmes applicable to the gross claims amounts.

Principle of Correspondence

Under the principle of correspondence, the technical provisions allow for the renewal cost of future Losses Occurring during reinsurance programmes insofar as they would benefit already incepted policies. For unaccepted business, future reinsurance cost is explicitly allowed for, and its associative benefit is recognised within the ceded recoveries.

Reinsurance counterparty risk is the risk that ceded recoverables cannot be collected. To cover this risk a reinsurance bad debt ("RIBD") allowance is created. This RIBD allowance is calculated based on the credit rating for each reinsurer over the lifetime of the liabilities.

D2.3. Uncertainty / limitations associated with the value of the technical provisions

General As with all insurance business, there is inherent uncertainty over the exact amount that will be needed to settle the future liabilities. In addition to the inherent uncertainty regarding claims outcomes, there are a number of potential specific sources which contribute to further increasing this uncertainty. It should be noted that these potential specific sources of uncertainty are monitored and discussed regularly in reserving committees, risk committees and/or management committees, with actions taken as appropriate.

Legislative changes in particular jurisdictions A change to the legislative environment could impact the severity and frequency of losses which could have the potential to materially impact the total future claims cost for future projection periods. Social inflation and increasingly large court award verdicts have been observed over the last five years in the (re)insurance industry, and there continues to be uncertainty as this trend evolves. The catch-up in legal proceedings arising from the delay caused by the COVID-19 lock down continues to add uncertainty into reserve estimates.

Inflation The outlook for price and wage inflation has improved but remains uncertain. An increase in the total cost of settling individual claims could materially impact the future claims cost for future projection periods.

Exposure to large losses or an accumulation of losses The Company has exposure to large events or accumulation of a number of smaller events. The emergence of a large loss event of this type could significantly alter the estimate of financial projections on a gross of reinsurance basis. The Company note that the reinsurance protection in place mitigates the impact on a net of reinsurance basis. Further, a very large loss across the insurance market can significantly change the underwriting environment and can have a material impact on the financial projections.

Frequency trends An increase in the frequency claims occurring could materially impact the total future claims cost for future projection periods.

Reinsurance coverage A change in the reinsurance coverage purchased could lead to a material deviation from the estimates stated in the financial projections. For example, an increase in the level of reinsurance coverage purchased could lead to an increase in the combined ratio but, in turn, may lead to a reduction in the SCR.

D.3. Other liabilities

The following table details the value of each material class of other liabilities under both Irish GAAP and Solvency II at 31 December 2024 and comparatives for 2023.

Other liabilities	Reference	2024		2023	
		Irish GAAP Value	Adjustment	Solvency II Value	Solvency II Value
		€'000	€'000	€'000	€'000
Pension benefit obligations	16	8,563	—	8,563	8,373
Deposits from reinsurers	17	573,337	(557,641)	15,696	17,009
Deferred tax liabilities	18	66,619	20,868	87,487	66,514
Derivatives	19	—	171	171	10,922
Debts owed to credit institutions	20	129,044	477,732	606,776	585,485
Financial liabilities other than debts owed to credit institutions	21	290,629	—	290,629	330,772
Insurance & intermediaries payables	22	482	—	482	1,657
Reinsurance payables	23	1,780,647	(1,220,018)	560,629	807,710
Payables (trade, not insurance)	24	827,666	(302,967)	524,699	705,588
Any other liabilities, not elsewhere shown	25	570,950	(535,106)	35,844	2,537
Total other liabilities		4,247,937	(2,116,962)	2,130,975	2,536,566

Details on the material differences between the bases, methods and main assumptions between Irish GAAP and Solvency II valuation for liabilities are set out below:

16. Under both Irish GAAP and Solvency II the pension benefit obligations are measured as the excess of the projected benefit obligation over the plan assets. This is considered a reasonable proxy for fair value, particularly given the immateriality of the liability.
17. Deposits from cedants are held at amortized cost under both Irish GAAP and Solvency II. This is deemed a reasonable proxy for fair value given the short term nature of these liabilities.
18. Under Solvency II the valuation of deferred tax liabilities is determined by the differences between the economic valuation of an asset or liability on the Solvency II balance sheet and its tax base. The deferred tax liability valuation has changed given the differences between the tax base of the Solvency II balance sheet and the tax base of the Irish GAAP balance sheet.
19. The reason for the differences between Solvency II and Irish GAAP for derivatives is that derivatives are carried at cost under Irish GAAP compared to fair value under Solvency II.
20. Debts owed to credit institutions represent the reclassification of overdrafts from cash and cash equivalents when moving from Irish GAAP to Solvency II. They are measured at fair value under both Irish GAAP and Solvency II.
21. Financial liabilities other than debts owed to credit institutions are measured at fair value under both Irish GAAP and Solvency II.
22. Insurance and intermediaries payables are measured at amortized cost under Irish GAAP and are not discounted. The difference under Solvency II is a result of a balance sheet reclassification to move a debit balance to Insurance receivables.
23. Reinsurance payables are held at amortized cost under Irish GAAP. All of these amounts that are due to be paid at a future date have been transferred to technical provisions under Solvency II and therefore there is no impact on Own Funds for this adjustment (apart from an immaterial amount due to the discounting of reinsurance premium payables within technical provisions).
24. Payables (trade, not insurance) are held at amortized cost under both Irish GAAP and Solvency II. This is deemed a reasonable proxy for fair value given the short term nature of these liabilities.
25. Any other liabilities, not elsewhere shown include ceded unearned commissions. This income is deferred under Irish GAAP but written off as it is not permitted under Solvency II.

D.4. Alternative methods for valuation

Approximately 57% of fixed income investments re valued using the unadjusted quoted price in an active market for identical assets or liabilities that the Company can access at the measurement date. All remaining investments are valued using inputs that management consider to be Level 2. Level 2 inputs include: quoted prices for similar (but not identical) assets; quoted prices in markets that are not active; or other inputs that are observable or can be derived principally from or corroborated by observable market data for substantially the full term of the assets.

With respect to investments, it is common industry practice to use pricing services as a source for determining fair values where the pricing services are able to obtain sufficient market-corroborating information to allow them to produce a valuation at a reporting date. In the vast majority of valuations, the pricing services use market approaches to valuations using primarily Level 2 inputs. For a small percentage of fixed income securities, the pricing services may use some form of discounted cash flow analysis. Standard inputs to the valuations provided by the pricing services listed in approximate order of priority for use when available include: reported trades, benchmark yields, broker/dealer quotes, issuer spreads, two-sided markets, benchmark securities, bids, offers, and reference data.

Given the nature of the Company's debt security portfolio, management considers the approach to provide an appropriate measure of fair value, with limited valuation uncertainty.

The Company performs regular reviews of the prices received from third party valuation sources to assess whether the prices represent a reasonable estimate of the fair value. This process is completed by investment and accounting personnel who are independent of those responsible for obtaining the valuations. The approaches the Company take include, but are not limited to, annual reviews of the controls of the external parties responsible for sourcing valuations that are subjected to automated tolerance checks, quarterly reviews of the valuation sources and dates, and comparison of executed sales prices to prior valuations.

There are no other material assets or liabilities which are valued using alternative methods of valuation.

D.5. Contingent liabilities

There are no material contingent liabilities at December 31, 2024..

D.6. Any other information

A going concern assessment has been undertaken as part of the 2024 reporting process. The assessment considered the company's business activities, liquidity, solvency as well as position/reliance within the group.

The going concern assessment included consideration of the Company's current and forecast solvency and liquidity positions over a three-year period through management's 2025-2027 business plan and evaluates the results of stress and scenario testing. The Company's stress and scenario testing considers the Company's capacity to respond to a series of relevant financial, insurance or operational shocks should future circumstances or events differ from the current assumptions in the business plan, focusing on the impacts on solvency and liquidity.

On the basis of the most recent stress testing, the directors are satisfied that there are no material uncertainties which cast doubt on the ability of the Company to continue as a going concern over the period of assessment being at least 12 months from the date of approval of the return. For this reason the going concern basis has been adopted in preparing the return.

There is no other material information regarding the valuation of assets and liabilities for Solvency II.

E. Capital Management

E.1. Own Funds

This section provides a view of the capital management activities of the Company, its capital management methods and the structure, amount and quality of its own funds. Under Solvency II, capital is referred to as Own Funds. Own Funds are calculated from the excess of assets over liabilities in the Solvency II balance sheet, to which any subordinated debt is then added. This combined amount is known as Basic Own Funds. Total Own Funds may include Ancillary Own Funds which are off-balance-sheet items that can be called up to absorb losses. The Company has €500m of Ancillary Own Funds. Own Funds are classified into tiers and restrictions are applied to limit the extent to which the various components of Own Funds can be used to meet the capital requirements.

E.1.1 Objective, policies and processes for managing own funds

The objective of Own Funds management is to maintain, at all times, sufficient Own Funds to cover the SCR and MCR. The Own Funds should be of sufficient quality to meet the eligibility requirements in Article 82 of the Delegated Regulation. The Company allocates capital efficiently to achieve sustainable returns and facilitate growth, and strive to maintain capital levels that are consistent with the Company's risk appetite corporate strategy and statutory requirements.

The Company monitors its Own Funds and the Solvency Ratio at least quarterly and the Board receives a regular assessment of the capital position. The Committees which review solvency are described in more detail in Section B1 General Information on the System of Governance, and responsibility ultimately rests with the Board. As part of own funds management, the Company prepares ongoing solvency projections and reviews the structure of its own funds and future requirements. The business plan, which forms the base for the ORSA, contains a three year projection of funding requirements and this helps focus actions for future funding

It is the Board's authority to determine any material changes to the Company's capitalisation. This includes issuance, changes, redemptions and, on equity instruments, any distributive actions (dividends or share buybacks).

E.1.2 Eligible Own Funds

The starting point to determine Eligible Own Funds is to prepare the Company balance sheet on a Solvency II basis. The Solvency II balance sheet is derived from the Irish GAAP balance sheet by making the adjustments necessary to reflect the Solvency II valuation basis of assets and liabilities. This Solvency II balance sheet then provides the Basic Own Funds which are categorized into the three Solvency II tiers. There are restrictions on the amount of Tier 2 and Tier 3 capital which can be used to meet the SCR, as well as the MCR.

The difference between the net assets of the Company in the financial statements and the solvency valuation of the excess of the assets over liabilities is set out below. The adjustments are documented in section D covering valuation of assets and liabilities.

	2024	2023
Difference between equity shown in the financial statements and excess of assets over liabilities per Solvency II	€000's	€000's
Shareholder equity per financial statements	1,922,457	1,930,089
Adjustments for technical provision and risk margin under Solvency II	398,508	358,243
Adjustments for DAC	(632,903)	(583,866)
Deferred Tax Adjustment	(77,617)	(88,053)
Fair value uplift of investments	70,664	110,123
Other adjustments	535,106	526,053
Excess of assets over liabilities per Solvency II	2,216,214	2,252,589
Less dividend accrued	(465,000)	(400,000)
Basic Own Funds (Tier 1)	1,751,214	1,852,589

An additional analysis is performed to determine the eligibility of these Own Funds to meet the SCR. Own Funds of subsidiaries are assessed to identify any elements which are not fungible (i.e. cannot cover losses), not transferable or not liquid (within 9 months), and hence not available for the Company.

Tiering of Basic Own Funds

At 31 December 2024 the Company's Basic Own Funds were assigned to the Solvency II tiers as shown in the following table:

2024	Tier 1 - unrestricted €'000	Tier 2 €'000	Tier 3 €'000	Total €'000
Ordinary share capital	314,969	—	—	314,969
Share premium	274,187	—	—	274,187
Reconciliation reserve	1,162,057	—	—	1,162,057
Ancillary own fund	—	500,000	—	500,000
Total basic own funds after deductions	1,751,214	500,000	0	2,251,214

2023	Tier 1 - unrestricted €'000	Tier 1 - restricted	Tier 2 €'000	Tier 3 €'000	Total €'000
Ordinary share capital	314,969	—	—	—	314,969
Share premium	274,187	—	—	—	274,187
Reconciliation reserve	1,263,432	—	—	—	1,263,432
Ancillary own fund	—	—	500,000	—	500,000
Total basic own funds after deductions	1,852,588	0	500,000	0	2,352,588

The Company's ordinary share capital and reconciliation reserve are all available as tier 1 unrestricted Own Funds as per Article 69 (a) (i) of the Delegated Regulation. The ordinary share capital is not subordinated and has no restricted duration. There is no intention to increase share capital in the foreseeable future. The reconciliation reserve of €1,162m (2023:€1,263) comprises net assets from the Solvency II balance sheet of €2,216m (2023:€2,253m) less ordinary share capital of €589m (2023:€589m) and a foreseeable dividend of €465m. (2023: €400m) The change in valuation of the reconciliation reserve is driven by the change in net assets on the Solvency II balance sheet.

The Company had no defaults of principal, interest or other breaches with respect to its subordinated loan note during the period.

The Company received a capital commitment deed from XLB to provide €500m of capital should it be needed. The Company received an approval from the Central Bank of Ireland on 6 December 2019 to be able to recognize this as a Tier 2 Ancillary Own Fund item. The Company renewed this Own fund item in 2024 for a further 5 years.

The Company also has a Capital Maintenance Agreement of €400m (2023:€400m) which is not classified as Eligible Own Funds under Solvency II rules, but is a potential source of additional capital to the Company from the Group.

Eligible Own Funds to cover the SCR and MCR

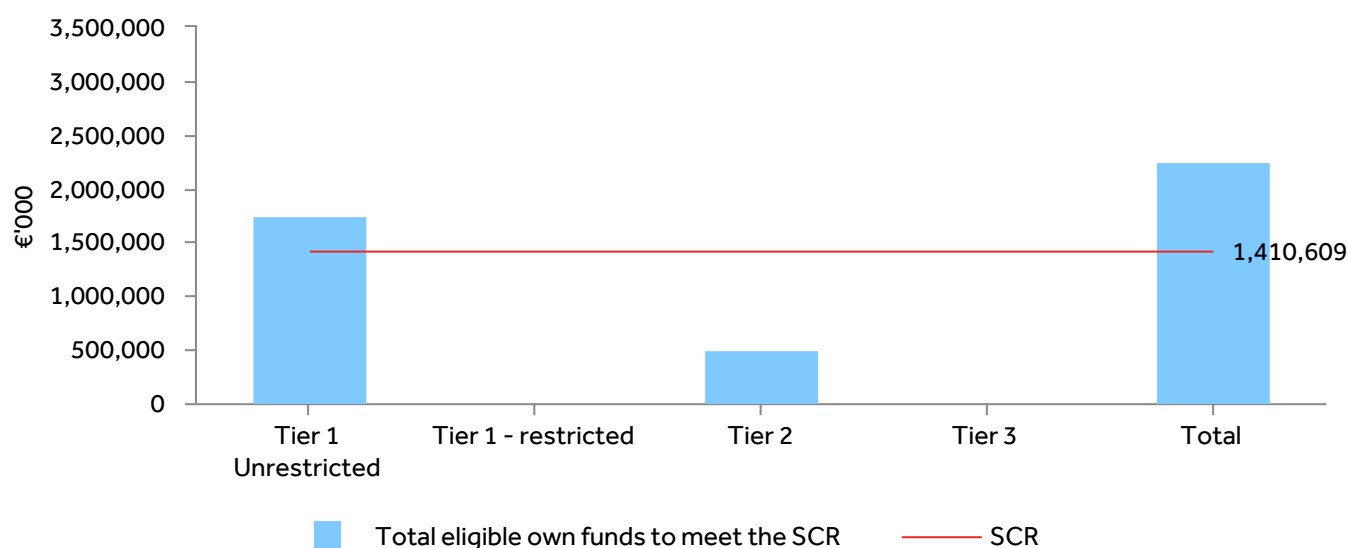
The classification into tiers is relevant to the determination of eligible Own Funds. These are the Own Funds that are eligible for covering the SCR and the MCR.

Eligible Own Funds to meet the Internal Model SCR and MCR at 2024 and 2023 is detailed below:

2024	Tier 1 - unrestricted €'000	Tier 2 €'000	Tier 3 €'000	Total €'000
Total eligible own funds to meet the SCR	1,751,214	500,000	—	2,251,214
Total eligible own funds to meet the MCR	1,751,214	—	—	1,751,214

2023	Tier 1 - unrestricted €'000	Tier 2 €'000	Tier 3 €'000	Total €'000
Total eligible own funds to meet the SCR	1,852,588	500,000	—	2,352,588
Total eligible own funds to meet the MCR	1,852,588	—	—	1,852,588

Eligible Own Funds to meet the SCR



The SCR is set at a level to ensure that insurers can meet their obligations to policy holders over the following 12 months with a 99.5% probability, giving reasonable assurance to policyholders that payments will be made as they fall due.

The table below shows the ratio of eligible Own Funds that the Company holds to cover the SCR and MCR at 31 December 2024 and 2023 :

	2024	2023
	€'000	€'000
SCR	1,410,609	1,294,158
MCR	501,321	507,219
Total eligible own funds to meet the SCR	2,251,214	2,352,588
Total eligible own funds to meet the MCR	1,751,214	1,852,588
	%	%
Ratio of Eligible own funds to SCR	159.6%	181.8%
Ratio of Eligible own funds to MCR	349.3%	365.2%

E.2. Solvency Capital Requirement and Minimum Capital Requirement

General principles

The Solvency II directive provides for two separate levels of solvency margin: (i) the Minimum Capital Requirement (MCR), which is the amount of own funds below which policyholders and beneficiaries are exposed to an unacceptable level of risk should the Company be allowed to continue its operations, and (ii) the Solvency Capital Requirement (SCR), which corresponds to a level of eligible own funds that enables insurance and reinsurance companies to absorb significant losses and that gives reasonable assurance to policyholders and beneficiaries that payments will be made.

Solvency Capital Requirement

The Company received formal approval over its internal economic capital model application in December 2023 with an effective date of 31st December 2023. The AXA Internal economic capital model is designed to allow AXA entities to choose the local calibrations which better reflect the local risk profile and to capture all the material risks to which AXA is exposed. As a result, it is believed the internal economic capital model reflects the overall solvency need of the Company more appropriately and better aligns the capital requirement metrics with Management decision making. This approved internal model is calibrated to a 99.5% VAR measure over a one-year time horizon.

E.2.1 SCR and MCR results

The SCR is the amount of Own Funds that the Company is required to hold in line with the Solvency II Directive. The Internal Model SCR calculation is calibrated to ensure that all quantifiable risks are taken into account.

The SCR and MCR under the Internal Model at 31 December 2024 and 2023 are set out below.

	2024	2023
	€'000	€'000
SCR	1,410,609	1,294,158
MCR	501,321	507,219

The Internal Model process is owned by the Risk Capital Modelling function and involves a cooperative cross-functional effort across the organization, with input from Risk, Finance, Actuarial, Underwriting, Capital Management, Investments and other relevant stakeholders. The results are subject to various levels of review, including by Senior Management.

The Internal Model MCR is calculated based on the same data sources used to produce the Internal Model SCR.

	MCR	
	2024	2023
	€'000	€'000
Linear MCR	501,321	507,219
SCR	1,410,609	1,294,158
MCR cap	634,774	582,371
MCR floor	352,652	323,539
Combined MCR	501,321	507,219
Absolute floor of the MCR	4,000	4,000
Minimum Capital Requirement	501,321	507,219

The non-life linear MCR is based on factors applied to net written premiums amounts in the previous 12 months and the net best estimate technical provisions both split by Solvency II Class of business. The charge for premium and technical provision elements are then summed to create a total charge.

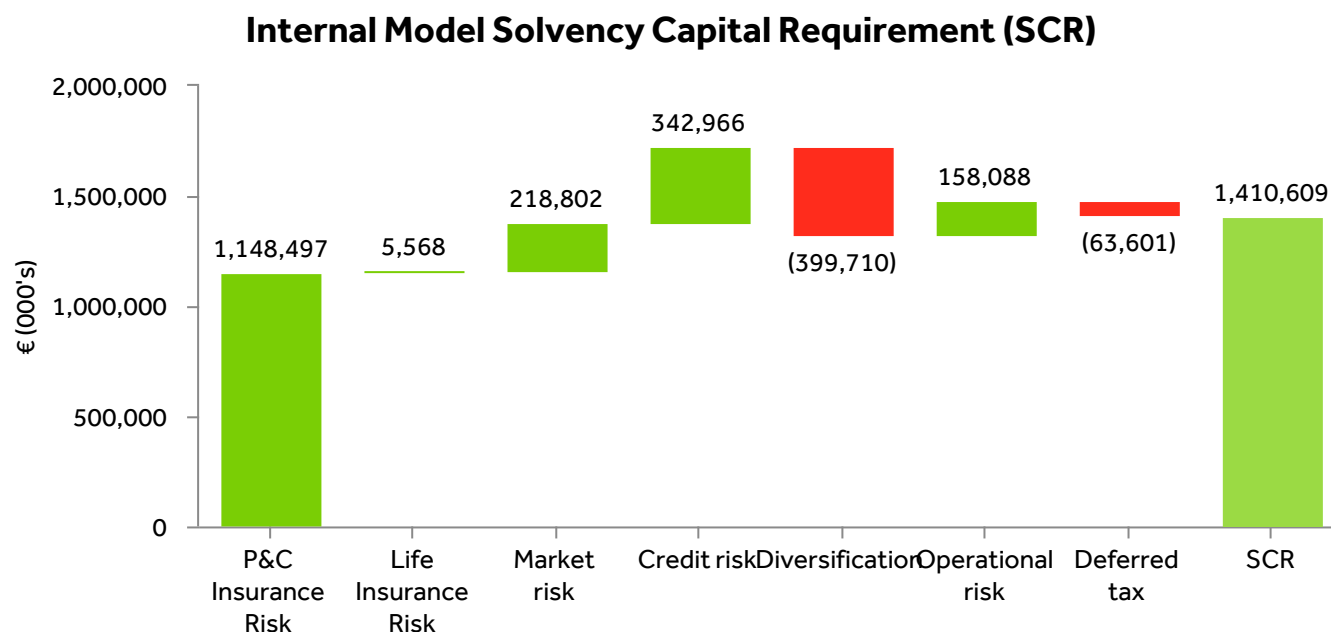
The following table illustrates the inputs to the MCR calculation for 2024 and 2023.

Inputs to MCR calculation	Net (of reinsurance) best estimate provisions		Net (of reinsurance) written premiums in the last 12 months	
	2024 €'000	2023 €'000	2024 €'000	2023 €'000
Motor vehicle liability insurance and proportional reinsurance	261,114	244,853	76,882	90,789
Other motor insurance and proportional reinsurance	—	4,869	46,796	29,191
Income Protection	17,063	22,314	418	3,201
Marine, aviation and transport insurance and proportional reinsurance	483,657	478,124	466,636	442,191
Fire and other damage to property insurance and proportional reinsurance	544,314	704,865	625,205	546,354
General liability insurance and proportional reinsurance	1,333,995	1,414,274	371,442	298,662
Credit and suretyship insurance and proportional reinsurance	—	—	43,388	36,144
Miscellaneous financial loss insurance and proportional reinsurance	257,894	275,327	89,678	75,614
Non-proportional health reinsurance	—	—	—	—
Non-proportional casualty reinsurance	2,252	—	—	1,077
Non-proportional marine, aviation and transport reinsurance	—	—	—	—
Non-proportional property reinsurance	5,984	14,619	1,387	2,399

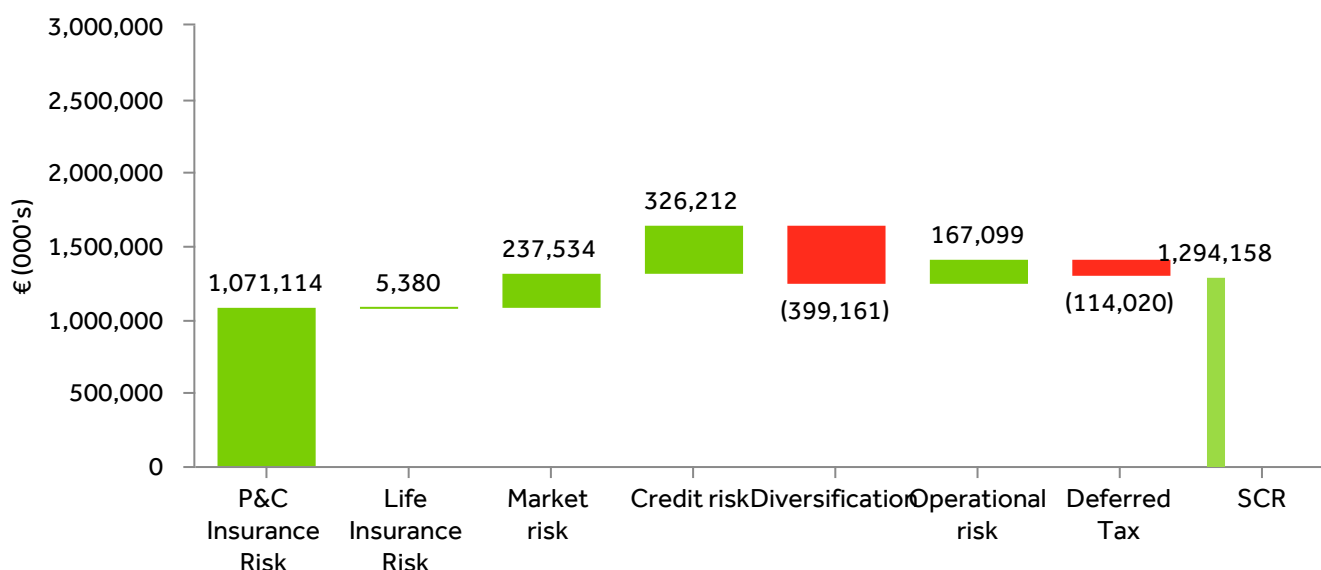
E.2.2 SCR by risk module

The Internal Model SCR by risk module is set out below:

2024



Internal Model Solvency Capital Requirement (SCR)



On December 31, 2024, the solvency capital requirement of the Company was €1,411 million net of tax.

E.3. Use of the duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement

The Company is not using the duration-based equity risk sub-module. This is not applicable to the Company as it does not provide retirement benefits.

E.4. Differences between the standard formula and any internal model used

General information

AXA has developed a robust economic capital model since 2007 and the AXA Group internal model has been used since 2009 in the Risk Management system and decision-making processes. The main goal of AXA using an internal model as opposed to the standard formula is to better reflect the Company's risk profile in the Solvency Capital Requirement. This is considered from several aspects.

- Taking into account local specificities – AXA is a global Company and operates in a wide range of insurance markets offering a variety of products and targeting different demographics and different risk exposures. It is therefore appropriate, to the extent possible, to calibrate stresses specifically to these risk profiles and to allow for the benefits of diversification of the different risks across such markets.
- Addressing shortcomings of the standard formula – Based on its expertise, the Group can improve on the approach of the standard formula, which is naturally constrained by its general scope, to have models which are more appropriate for the scope of the Group. For example, the internal economic capital model for market risks adds some risks not covered by the standard formula (government spread risk, interest rate implied volatility and equity implied volatility risk).
- Allowing for better evolution of the model over time – As the Group's experience increases, its business expands to new markets and product innovations create different risks, the flexibility of an internal model allows the specificities of these developments to be reflected. AXA Internal Model is calibrated to represent the value-at-risk of the loss distribution over a one-year time horizon at the 99.5th percentile at Solo and Group level.
- The AXA Internal Model forms an important piece of the AXA system of governance of which usage has been built and developed in strong relationship with the operating business lines and Risk Management department in a way to develop an internal model adapted to the undertaking's needs.
- The AXA Internal Model is used for assessing and managing the economic capital and is also a supportive decision-making tool in different business processes: strategic planning, underwriting, investment decisions, and project management. Besides, as integrated within the Risk Management system, the AXA Internal Model provides information for implementing the Own Risk & Solvency Assessment (ORSA) process, formulating risk strategies, monitoring risk appetite or producing risk reporting.

Main differences between the Standard Formula and the Internal Model

The AXA Internal Model is a centralised model which is based on Group methodologies. This ensures consistency in the modelling of similar risks across the Group while still allowing for local specificities when they exist, in particular via the calibration of underwriting risks at local levels, these local calibrations being then presented and validated by Group Risk Management. Validation encompasses both quantitative and qualitative aspects of the internal model, amongst which, in particular data quality. AXA's data quality policy requires data used as input in the internal model to be complete, accurate and appropriate.

The general architecture of the AXA's Internal Model consists in five main modules (Life, Market, Credit, P&C and operational risks). The Standard Formula in addition considers a separate Health risk category.

In general, in the 5 risks categories, the internal economic capital model provides models for sub-risks that are not adequately captured in the Standard Formula but are material to AXA.

Market risk

Interest rate implied volatility, equity implied volatility, Government spread, and inflation are explicitly modelled in AXA's Internal Model. The risk of concentrations in the portfolio is included in the corporate default calculation.

Due to the higher number of sub-risks and risk factors used in the internal model, the risks of the different asset classes and the diversifications among them can be captured more precisely than in the standard formula. For instance, the shocks depend on the economy, which means that for volatile markets higher shocks are assumed.

Credit risks

AXA's Internal Model addresses separately the default risk of corporate bonds whereas it is included in the calibration of spreads in the standard formula.

Property & Casualty risks

P&C lapse risk is not modelled in AXA's Internal Model as immaterial.

Operational risk

The standard formula for operational risk is factor-based (percentage of gross written premiums or technical provisions) and is not risk sensitive. AXA internal model for operational risks follows a forward-looking and Scenario-Based Approach (SBA). It relies on the identification and assessment of the most critical Operational risks of each entity complemented by a set of transversal Group scenarios.

Modelling techniques

In the standard formula simple models are used for most risk categories in order to derive the SCR. In most cases an extreme scenario is defined, which represents the 99.5th percentile. In the AXA Internal Model, sophisticated models are applied. In particular for Market, Credit, Property & Casualty, Life & Savings and Operational risk Monte Carlo simulations are used. This allows deriving the whole loss distribution.

Diversification

In the standard formula, no geographical diversification is explicitly recognised. The internal economic capital model aggregation considers geographical diversification as AXA Group is operating globally. The Solvency II framework requires the provision of a Probability Distribution Forecast (PDF) underlying the internal model that assigns probabilities to changes in the amount of Company's own funds. The following orientations have been chosen for the internal economic capital model assessment:

- The Property & Casualty and Market modules' modelling, using simulation-based approaches, allow the calculation of a full Probability Distribution Forecast.
- The modelling of the Credit risk leans on both simulation-based techniques and shock-approaches depending on the considered sub-risk. For the first techniques, full Probability Distribution Forecasts are available. Regarding shock-approaches, several percentiles, similarly to the approach performed for life risk, are calculated.

The overall aggregation process is based on an elliptical aggregation of the Market, Life, Credit, Property & Casualty and Operational requirements. This modular approach allows for the ranking of the main risks or sub-risks and provides a better understanding of the risks (sub-risks) and their impacts.

The Company also performs reverse stress scenarios. The aim of such scenarios is to exhibit combinations of Market, Credit, Life, P&C and Operational events (the shocks defined in the scenario are occurring simultaneously) that would yield the same amount as the SCR for a chosen valuation date. They allow the assessment of several impacts inherent to the internal model. They include back-testing for the correlation coefficients' accuracy. Indeed, performing such scenarios highlights potential cross and non-linearity effects. Based on this analysis The Company use conservative correlation coefficients.

These back-testing techniques are useful as they highlight potential shortcomings coming from the aggregation structure (relying on an elliptical framework and the associated assumptions).

Data

The data used for local parametrisation of the internal model comes predominantly from the Reserving process and from the Finance area. The data is validated for appropriateness prior to use in the internal model.

E.5. Non-compliance with the Minimum Capital Requirement and non-compliance with the Solvency Capital Requirement

The Company met all of the SCR and MCR compliance requirements during the year.

E.6. Any other information

XL Insurance Company SEs' solvency ratio calculated without applying the volatility adjustment amounted to 152.3% at December 31, 2024 compared to 159.6% when applying the volatility adjustment, an impact of 7.3%.

The basic own funds without considering the volatility adjustment would decrease by €36 million to €2,215 million, reflecting the increase in best estimate liabilities due to lower discount rate.

The total SCR would increase by €44 million mainly due to higher non-life reserve risk as a result of the movement in Best Estimate. The Minimum Capital Requirement would not increase.

There is no other material information regarding capital management.

Public Quantitative Reporting Templates

S02.01.01 Basic information

Undertaking name	XL Insurance Company SE
Undertaking identification code	LEI/635400PTQW4DT3C4DG08
Type of code of undertaking	LEI
Type of undertaking	3 – Non–Life undertakings
Country of authorisation	IE
Language of reporting	English
Reporting submission date	8/4/2025
Reporting reference date	12/31/2024
Currency used for reporting	EUR
Accounting standards	UK GAAP
Method of Calculation of the SCR	2 – Internal Model
Use of undertaking specific parameters	2 - Don't use undertaking specific parameters
Ring-fenced funds	2 - Not reporting activity by RFF
Matching adjustment	2 - No use of matching adjustment
Volatility adjustment	1 - Use of volatility adjustment
Transitional measure on the risk-free interest rate	2 - No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	2 - No use of transitional measure on technical provisions

S.02.01.02 Balance Sheet

		Solvency II value	
		2024	2023
		€'000	€'000
		C0010	C0010
Assets			
Intangible assets	R0030	—	—
Deferred tax assets	R0040	0	0
Pension benefit surplus	R0050	0	0
Property, plant & equipment held for own use	R0060	120	32
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	5,011,094	5,429,743
Property (other than for own use)	R0080	—	—
Holdings in related undertakings, including participations	R0090	—	8,009
Equities	R0100	16,264	13,784
Equities - listed	R0110	16,264	13,784
Equities - unlisted	R0120	—	—
Bonds	R0130	3,726,307	4,124,015
Government Bonds	R0140	2,084,225	2,403,779
Corporate Bonds	R0150	1,542,145	1,603,603
Structured notes	R0160	—	—
Collateralised securities	R0170	99,937	116,633
Collective Investments Undertakings	R0180	1,265,198	1,278,295
Derivatives	R0190	3,325	5,640
Deposits other than cash equivalents	R0200	—	—
Other investments	R0210	—	—
Assets held for index-linked and unit-linked contracts	R0220	—	—
Loans and mortgages	R0230	208,243	176,391
Loans on policies	R0240	—	—
Loans and mortgages to individuals	R0250	—	—
Other loans and mortgages	R0260	208,243	176,391
Reinsurance recoverables from:	R0270	8,843,816	8,703,387
Non-life and health similar to non-life	R0280	8,843,816	8,703,387
Non-life excluding health	R0290	8,830,686	8,686,984
Health similar to non-life	R0300	13,130	16,402
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	—	—
Health similar to life	R0320	—	—
Life excluding health and index-linked and unit-linked	R0330	—	—
Life index-linked and unit-linked	R0340	—	—
Deposits to cedants	R0350	83,837	108,575
Insurance and intermediaries receivables	R0360	503,488	546,213
Reinsurance receivables	R0370	1,363,003	1,800,602
Receivables (trade, not insurance)	R0380	52,649	85,265
Own shares (held directly)	R0390	—	—
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	—	—
Cash and cash equivalents	R0410	319,651	101,079
Any other assets, not elsewhere shown	R0420	7,749	1,671
Total assets	R0500	16,393,649	16,952,958

		Solvency II value	
		€'000	€'000
		C0010	C0010
Liabilities			
Technical provisions – non-life	R0510	11,983,211	12,107,639
Technical provisions – non-life (excluding health)	R0520	11,952,146	12,067,836
TP calculated as a whole	R0530	—	—
Best Estimate	R0540	11,583,956	11,711,211
Risk margin	R0550	368,190	356,625
Technical provisions - health (similar to non-life)	R0560	31,065	39,802
TP calculated as a whole	R0570	—	—
Best Estimate	R0580	30,194	38,721
Risk margin	R0590	871	1,081
Technical provisions - life (excluding index-linked and unit-linked)	R0600	63,249	56,164
Technical provisions - health (similar to life)	R0610	—	—
TP calculated as a whole	R0620	—	—
Best Estimate	R0630	—	—
Risk margin	R0640	—	—
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	63,249	56,164
TP calculated as a whole	R0660	—	—
Best Estimate	R0670	61,538	54,644
Risk margin	R0680	1,710	1,520
Technical provisions – index-linked and unit-linked	R0690	—	—
TP calculated as a whole	R0700	—	—
Best Estimate	R0710	—	—
Risk margin	R0720	—	—
Contingent liabilities	R0740	—	—
Provisions other than technical provisions	R0750	—	—
Pension benefit obligations	R0760	8,563	8,373
Deposits from reinsurers	R0770	15,696	17,009
Deferred tax liabilities	R0780	87,487	66,514
Derivatives	R0790	171	10,922
Debts owed to credit institutions	R0800	606,776	585,485
Financial liabilities other than debts owed to credit institutions	R0810	290,629	330,772
Insurance & intermediaries payables	R0820	482	1,657
Reinsurance payables	R0830	560,629	807,710
Payables (trade, not insurance)	R0840	524,699	705,588
Subordinated liabilities	R0850	—	—
Subordinated liabilities not in BOF	R0860	—	—
Subordinated liabilities in BOF	R0870	—	—
Any other liabilities, not elsewhere shown	R0880	35,844	2,537
Total liabilities	R0900	14,177,435	14,700,370
Excess of assets over liabilities	R1000	2,216,214	2,252,588

S.04.05.21 Premiums, claims and expenses by country

		Home country	Top 5 countries: non-life	Top 5 countries: non-life	Top 5 countries: non-life	Top 5 countries: non-life	Top 5 countries: non-life
		C0010	C0020	C0020	C0020	C0020	C0020
		Ireland	France	Germany	Australia	Italy	Spain
€'000							
Premiums written (gross)							
Gross Written Premium (direct)	R0020	260,151	1,154,036	867,699	511,802	281,358	234,541
Gross Written Premium (proportional reinsurance)	R0021	485,371	183,726	154,257	35,185	85,609	81,478
Gross Written Premium (non-proportional reinsurance)	R0022	—	—	—	577	—	—
Premiums earned (gross)							
Gross Earned Premium (direct)	R0030	265,743	1,089,614	825,285	494,575	263,722	203,882
Gross Earned Premium (proportional reinsurance)	R0031	442,771	188,399	157,316	33,201	78,478	80,688
Gross Earned Premium (non-proportional reinsurance)	R0032	—	—	—	577	—	—
Claims incurred (gross)							
Claims incurred (direct)	R0040	44,899	666,286	457,105	288,282	101,735	54,214
Claims incurred (proportional reinsurance)	R0041	212,019	42,871	58,274	72,020	30,381	69,645
Claims incurred (non-proportional reinsurance)	R0042	—	—	—	(2,543)	—	—
Expenses incurred (gross)							
Gross Expenses Incurred (direct)	R0050	156,042	335,759	247,884	103,936	89,904	73,217
Gross Expenses Incurred (proportional reinsurance)	R0051	25,576	39,209	25,924	(439)	13,446	15,231
Gross Expenses Incurred (non-proportional reinsurance)	R0052	—	—	—	(81)	—	—

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

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)						Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)	Line of business for: accepted non-proportional reinsurance				
		Income protection insurance	Motor Vehicle liability insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Miscellaneous financial loss	Health	Casualty	Marine, aviation, transport	Property	Total
		C0040	C0050	C0060	C0070	C0080	C0090	C0120	C130	C0140	C150	C160	C0200
		€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Premiums written													
Gross - Direct Business	R0110	1,225	55,472	655,469	1,883,914	1,100,991	176,880	431,825					4,305,775
Gross - Proportional reinsurance accepted	R0120	92	99,367	218,007	921,631	370,531	13,847	31,321					1,654,796
Gross - Non-proportional reinsurance accepted	R0130								—	(6,352)	—	1,429	(4,924)
Reinsurers' share	R0140	899	31,161	406,840	2,180,339	1,100,079	147,339	373,469		—	—	42	4,240,168
Net	R0200	418	123,678	466,636	625,205	371,442	43,388	89,678	—	(6,352)	—	1,387	1,715,480
Premiums earned													
Gross - Direct Business	R0210	1,151	52,816	625,812	1,740,301	1,117,527	134,759	440,180					4,112,546
Gross - Proportional reinsurance accepted	R0220	89	98,683	213,592	928,222	340,680	6,447	30,639					1,618,353
Gross - Non-proportional reinsurance accepted	R0230								—	(6,352)	—	1,438	(4,914)
Reinsurers' share	R0240	857	31,156	393,370	2,061,082	1,145,626	109,780	385,883		(66)	(7)	(187)	4,127,495
Net	R0300	383	120,343	446,033	607,441	312,582	31,426	84,936	—	(6,286)	7	1,625	1,598,490
Claims incurred													
Gross - Direct Business	R0310	(5,141)	60,788	338,697	725,813	756,686	53,749	141,949					2,072,541
Gross - Proportional reinsurance accepted	R0320	(1,752)	49,826	139,552	367,704	99,035	8,877	4,413					667,655
Gross - Non-proportional reinsurance accepted	R0330								—	(6,295)	—	(4,619)	(10,914)
Reinsurers' share	R0340	(1,359)	(5,170)	263,713	883,596	712,936	52,936	111,431		(1,092)	—	(92)	2,016,900
Net	R0400	(5,534)	115,784	214,536	209,921	142,784	9,690	34,932	—	(5,203)	—	(4,527)	712,382
Expenses incurred	R0550	2,897	40,350	211,633	216,147	159,113	(4,819)	12,048	—	(720)	—	657	637,305
Other expenses	R1200												—
Total expenses	R1300												637,305

S.12.01.02 Life and Health SLT Technical Provisions

Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Total (Life other than health insurance, incl. Unit-Linked)
C0090	C0150

Technical provisions calculated as a whole

Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole

R0020		
-------	--	--

Technical provisions calculated as a sum of BE and RM

Best Estimate

Gross Best Estimate

Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default

R0030	61,538	61,538
R0080		
R0090	61,538	61,538
R0100	1,710	1,710

Best estimate minus recoverables from reinsurance/SPV and Finite Re - total

Risk Margin

Amount of the transitional on Technical Provisions

Technical Provisions calculated as a whole

Best estimate

Risk margin

Technical provisions - total

R0110		
R0120		
R0130		
R0200	63,982	63,219

S.17.01.02 Non-life Technical Provisions

Direct business and accepted proportional reinsurance

		Income protection insurance C0030	Workers' compensa tion insurance C0040	Motor vehicle liability insurance C0050	Other motor insurance C0060	Marine, aviation and transport insurance C0070	Fire and other damage to property insurance C0080	General liability insurance C0090	Credit and suretyship insurance C0100
Best estimate									
Premium provisions									
Gross	R0060	(103)	—	(17,255)	(6,118)	(107,839)	(463,761)	(231,693)	(358,551)
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	287	—	(4,049)	(1,404)	(58,287)	(292,665)	(103,348)	(235,262)
Net Best Estimate of Premium Provisions	R0150	(390)	—	(13,206)	(4,715)	(49,551)	(171,096)	(128,345)	(123,290)
Claims provisions									
Gross	R0160	30,298	—	318,901	56,216	1,170,756	2,669,596	6,642,605	3,823
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	12,835	—	44,449	56,578	637,249	1,953,760	5,179,578	1,973
Net Best Estimate of Claims Provisions	R0250	17,462	—	274,452	(362)	533,508	715,836	1,463,027	1,849
Total Best estimate - gross	R0260	30,194	—	301,646	50,098	1,062,917	2,205,835	6,410,912	(354,728)
Total Best estimate - net	R0270	17,072	—	261,246	(5,076)	483,956	544,740	1,334,682	(121,440)
Risk margin	R0280	870	—	9,158	1,613	33,453	75,940	190,699	—
Technical provisions - total	R0320	31,065	—	310,804	51,711	1,096,370	2,281,774	6,601,611	(354,728)
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	13,123	—	40,400	55,174	578,961	1,661,095	5,076,230	(233,288)
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340	17,942	—	270,405	(3,463)	517,409	620,679	1,525,381	(121,440)

		Direct business and accepted proportional reinsurance	Accepted non-proportional reinsurance				Total Non-Life obligation
		Miscellaneous financial loss	Health	Casualty	Marine, aviation and transport	Property	
		€'000	€'000	€'000	€'000	€'000	€'000
		C0130	C0140	C0150	C0160	C0170	C0180
Best estimate							
Premium provisions							
Gross	R0060	(87,992)	(2)	(755)	(503)	(3,793)	(1,278,365)
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	(45,867)	3	(262)	(57)	(2,474)	(743,386)
Net Best Estimate of Premium Provisions	R0150	(42,125)	(4)	(493)	(446)	(1,319)	(534,980)
Claims provisions							
Gross	R0160	1,968,861	16	7,576	3,624	20,244	12,892,515
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	1,668,705	11	4,829	14,297	12,937	9,587,202
Net Best Estimate of Claims Provisions	R0250	300,156	5	2,747	(10,673)	7,307	3,305,314
Total Best estimate - gross	R0260	1,880,869	14	6,821	3,121	16,451	11,614,150
Total Best estimate - net	R0270	258,031	1	2,254	(11,120)	5,988	2,770,334
Risk margin	R0280	56,430	—	217	103	577	369,061
Amount of the transitional on Technical Provisions							
Technical provisions - total	R0320	1,937,299	15	7,037	3,225	17,028	11,983,211
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	1,622,837	14	4,567	14,241	10,463	8,843,816
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340	314,462	1	2,470	(11,016)	6,565	3,139,395

S.19.01.21 Non-life Insurance Claims Information

Total Non-Life Business

Accident year / Underwriting
year

Gross Claims Paid (non-cumulative)

(absolute amount)

Year		Development year											In Current year	Sum of years (cumulative)
		0	1	2	3	4	5	6	7	8	9	10 & +		
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0100	C0170	C0180
Prior	R0100											506	R0100	506
N-9	R0160	340	1,138	945	282	230	148	120	173	89	20		R0160	20
N-8	R0170	300	953	496	305	201	237	149	120	142			R0170	142
N-7	R0180	441	1,161	830	532	210	201	171	131				R0180	131
N-6	R0190	344	1,215	747	355	346	234	135					R0190	135
N-5	R0200	473	986	642	548	314	238						R0200	238
N-4	R0210	320	835	642	450	258							R0210	258
N-3	R0220	250	901	624	346								R0220	346
N-2	R0230	262	1,001	490									R0230	490
N-1	R0240	309	922										R0240	922
N	R0250	216											R0250	216
	R0260												3,403	24,973

Gross undiscounted Best Estimate Claims Provisions
(absolute amount)

Year		Development year											Year end (discounted data)
		—	—	—	—	—	—	—	—	—	—	10 & +	
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360
Prior	R0100											1,490	R0100 1,319
N-9	R0160	—	797	484	578	578	823	686	436	335	311		R0160 255
N-8	R0170	1,066	1,022	622	764	1,149	944	765	618	503			R0170 411
N-7	R0180	1,447	1,055	994	1,309	1,172	959	854	636				R0180 535
N-6	R0190	1,818	1,564	2,168	1,693	1,287	1,183	1,046					R0190 892
N-5	R0200	1,981	2,954	2,173	1,673	1,386	984						R0200 840
N-4	R0210	4,164	2,916	2,238	1,849	1,345							R0210 1,158
N-3	R0220	3,385	2,566	1,945	1,420								R0220 1,250
N-2	R0230	3,251	2,553	1,764									R0230 1,575
N-1	R0240	3,260	2,292										R0240 2,063
N	R0250	2,886											R0250 2,593
													R0260 12,893

S.22.01.01 Impact of Long term Guarantees

		Impact of the LTG measures and transitionals (Step-by-step approach)									
		Amount with Long Term Guarantee measures and transitionals	Without transitional on technical provisions	Impact of transitional on technical provisions	Without transitional on interest rate	Impact of transitional on interest rate	Without volatility adjustment and without other transitional measures	Impact of volatility adjustment set to zero	Without matching adjustment and without all the others	Impact of matching adjustment set to zero	Impact of all LTG measures and transitionals
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100
Technical provisions	R0010	12,046,459,690	12,046,459,690	—	12,046,459,690	—	12,185,506,570	139,046,880	12,185,506,570	—	139,046,880
Basic own funds	R0020	1,751,213,949	1,751,213,949	—	1,751,213,949	—	1,715,423,304	(35,790,645)	1,715,423,304	—	(35,790,645)
Excess of assets over liabilities	R0030	2,216,213,949	2,216,213,949	—	2,216,213,949	—	2,180,423,304	(35,790,645)	2,180,423,304	—	(35,790,645)
Restricted own funds due to ring-fencing and matching portfolio	R0040			—		—		—		—	—
Eligible own funds to meet Solvency Capital Requirement	R0050	2,251,213,949	2,251,213,949	—	2,251,213,949	—	2,215,423,304	(35,790,645)	2,215,423,304	—	(35,790,645)
Tier 1	R0060	1,751,213,949	1,751,213,949	—	1,751,213,949	—	1,715,423,304	(35,790,645)	1,715,423,304	—	(35,790,645)
Tier 2	R0070	500,000,000	500,000,000	—	500,000,000	—	500,000,000	—	500,000,000	—	—
Tier 3	R0080	—	—	—	—	—	—	—	—	—	—
Solvency Capital Requirement	R0090	1,410,609,304	1,410,609,304	—	1,410,609,304	—	1,455,020,214	44,410,910	1,455,020,214	—	44,410,910
Eligible own funds to meet Minimum Capital Requirement	R0100	1,751,213,949	1,751,213,949	—	1,751,213,949	—	1,715,423,304	(35,790,645)	1,715,423,304	—	(35,790,645)
Minimum Capital Requirement	R0110	501,320,962	501,320,962	—	501,320,962	—	510,708,143	9,387,181	510,708,143	—	9,387,181

Solvency Capital Requirement ratio	R0120	160 %	159 %	(1)%	159 %	— %	152 %	(7)%	152 %	— %	(8)%
Minimum Capital Requirement ratio	R0130	350 %	348 %	(2)%	348 %	— %	335 %	(13)%	335 %	— %	(15)%

S.23.01.01 Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
		€'000	€'000	€'000	€'000	€'000
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	314,969	314,969		—	—
Share premium account related to ordinary share capital	R0030	274,187	274,187	—	—	—
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	—	—	—	—	—
Subordinated mutual member accounts	R0050	—	—	—	—	—
Surplus funds	R0070	—	—	—	—	—
Preference shares	R0090	—	—	—	—	—
Share premium account related to preference shares	R0110	—	—	—	—	—
Reconciliation reserve	R0130	1,162,057	1,162,057		—	—
Subordinated liabilities	R0140	—		—	—	—
An amount equal to the value of net deferred tax assets	R0160	—		—	—	—
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	—	—	—	—	—
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds		—	—	—	—	—
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220	—	—	—	—	—
Deductions		—	—	—	—	—
Deductions for participations in financial and credit institutions	R0230	—	—	—	—	—
Total basic own funds after deductions	R0290	1,751,213	1,751,213	—	—	—
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300	—	—	—	—	—
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310	—	—	—	—	—
Unpaid and uncalled preference shares callable on demand	R0320	—	—	—	—	—
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330	—	—	—	—	—
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340	500,000	—	—	500,000	—
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350	—	—	—	—	—
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360	—	—	—	—	—
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370	—	—	—	—	—
Other ancillary own funds	R0390	—	—	—	—	—
Total ancillary own funds	R0400	500,000	—	—	500,000	—
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	2,251,214	1,751,214	—	500,000	—
Total available own funds to meet the MCR	R0510	1,751,214	1,751,214	—	—	—
Total eligible own funds to meet the SCR	R0540	2,251,214	1,751,214	—	500,000	—
Total eligible own funds to meet the MCR	R0550	1,751,214	1,751,214	—	—	—
SCR	R0580	1,410,609				
MCR	R0600	501,321				
Ratio of Eligible own funds to SCR	R0620	160 %				
Ratio of Eligible own funds to MCR	R0640	349 %				

Reconciliation reserve

Excess of assets over liabilities	R0700	2,216,214
Own shares (held directly and indirectly)	R0710	
Foreseeable dividends, distributions and charges	R0720	465,000
Other basic own fund items	R0730	589,157
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
Reconciliation reserve	R0760	1,162,057

Expected profits

Expected profits included in future premiums (EPIFP) - Life business	R0770	
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	1,763,513
Total Expected profits included in future premiums (EPIFP)	R0790	1,763,513

S.25.05.01 Solvency Capital Requirement - for undertakings using an internal model (partial or full)

		Solvency Capital Requirement	Allocation from adjustments due to RFF and Matching adjustments portfolios	Consideration of the future management actions regarding technical provisions and/or deferred taxes	Amount modelled
		C0010	C0050	C0060	C0070
Risk type		€'000	€'000	€'000	€'000
Total diversification	R0020	(1,564,597)	—	—	(1,564,597)
Total diversified risk before tax	R0030	1,474,210	—	—	1,474,210
Total diversified risk after tax	R0040	1,410,609	—	—	1,410,609
Total market & credit risk	R0070	437,456	—	—	437,456
Market & Credit risk - diversified	R0080	218,802	—	—	218,802
Credit event risk not covered in market & credit risk	R0190	534,662	—	—	534,662
Credit event risk not covered in market & credit risk - diversified	R0200	342,966	—	—	342,966
Total Business risk	R0270	—	—	—	—
Total Business risk - diversified	R0280	—	—	—	—
Total Net Non-life underwriting risk	R0310	1,719,743	—	—	1,719,743
Total Net Non-life underwriting risk - diversified	R0320	1,148,497	—	—	1,148,497
Total Life & Health underwriting risk	R0400	—	—	—	—
Total Life & Health underwriting risk - diversified	R0410	5,568	—	—	5,568
Total Operational risk	R0480	346,946	—	—	346,946
Total Operational risk - diversified	R0490	158,088	—	—	158,088
Other risk	R0500	—	—	—	—

Calculation of Solvency Capital Requirement

		€'000
		C0100
Total undiversified components	R0110	2,975,206
Diversification	R0060	(1,564,597)
Adjustment due to RFF/MAP nSCR aggregation	R0120	—
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	—
Solvency capital requirement, excluding capital add-ons	R0200	1,410,609
Capital add-ons already set	R0210	—
of which, capital add-ons already set - Article 37 (1) Type a	R0211	—
of which, capital add-ons already set - Article 37 (1) Type b	R0212	—
of which, capital add-ons already set - Article 37 (1) Type c	R0213	—
of which, capital add-ons already set - Article 37 (1) Type d	R0214	—
Solvency capital requirement	R0220	1,410,609
Other information on SCR		
Amount/estimate of the overall loss-absorbing capacity of technical provisions	R0300	—
Amount/estimate of the loss absorbing capacity for deferred taxes	R0310	(63,601)
Capital requirement for duration-based equity risk sub-module	R0400	—
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	—

Total amount of Notional Solvency Capital Requirements for ring-fenced funds	R0420
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430
Diversification effects due to RFF nSCR aggregation for article 304	R0440
Method used to calculate the adjustment due to RFF nSCR aggregation	R0450
Net future discretionary benefits	R0460

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

Linear formula component for non-life insurance and reinsurance obligations

		C0010		
		€'000		
MCRNL Result	R0010	500,029		
			Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
			C0020	C0030
			€'000	€'000
Medical expense insurance and proportional reinsurance	R0020	—	—	—
Income protection insurance and proportional reinsurance	R0030	17,063	418	—
Workers' compensation insurance and proportional reinsurance	R0040	—	—	—
Motor vehicle liability insurance and proportional reinsurance	R0050	261,114	76,882	—
Other motor insurance and proportional reinsurance	R0060	—	46,796	—
Marine, aviation and transport insurance and proportional reinsurance	R0070	483,657	466,636	—
Fire and other damage to property insurance and proportional reinsurance	R0080	544,314	625,205	—
General liability insurance and proportional reinsurance	R0090	1,333,995	371,442	—
Credit and suretyship insurance and proportional reinsurance	R0100	—	43,388	—
Legal expenses insurance and proportional reinsurance	R0110	—	—	—
Assistance and proportional reinsurance	R0120	—	—	—
Miscellaneous financial loss insurance and proportional reinsurance	R0130	257,894	89,678	—
Non-proportional health reinsurance	R0140	1	—	—
Non-proportional casualty reinsurance	R0150	2,252	—	—
Non-proportional marine, aviation and transport reinsurance	R0160	—	—	—
Non-proportional property reinsurance	R0170	5,984	1,387	—

Linear formula component for life insurance and reinsurance obligations

		C0040		
MCRL Result	R0200	1,292		
			Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
			C0050	C0060
Total capital at risk for all life (re)insurance obligations				
Obligations with profit participation - guaranteed benefits	R0210			
Obligations with profit participation - future discretionary benefits	R0220			
Index-linked and unit-linked insurance obligations	R0230			
Other life (re)insurance and health (re)insurance obligations	R0240	61,538		
Total capital at risk for all life (re)insurance obligations	R0250			—

Overall MCR calculation

		C0070
		€'000
Linear MCR	R0300	501,321
SCR	R0310	1,410,609
MCR cap	R0320	634,774
MCR floor	R0330	352,652
Combined MCR	R0340	501,321
Absolute floor of the MCR	R0350	4,000
Minimum Capital Requirement	R0400	501,321

Glossary

AC	Audit Committee
ACPR	Autorité de Contrôle Prudentiel et de Résolution
ACT	AXA Group Credit Team
AFR	Actuarial Function Report
ALM	Asset Liability Management
AOTP	Actuarial Opinion on Technical Provisions
APAC	Asia Pacific
APSS	Actuarial Profession Standards
ARTP	Actuarial Report on Technical Provisions
AXA	AXA SA
AXA XL	AXA division comprising legacy XL companies and certain existing AXA companies
BBNI	Bound But Not Incepted
Board	Board of Directors
BOF	Basic Own Funds
BSCR	Basic Solvency Capital Requirement
CBI	Central Bank of Ireland
CAT	Catastrophe
Code	Code of Conduct
Companies Act	Bermuda Companies Act 1981
Company Share	Each issued and outstanding common share, par value \$0.01 per common share of XLICSE
COR	Combined Operating Ratio
COO	Chief Operating Officer
CRO	Chief Risk Officer
DAC	Deferred Acquisition Costs
DTA	Deferred Tax Asset
DTL	Deferred Tax Liability
ENiD	Events not in Data
ERM	Enterprise Risk Management
ESG	Environmental, Social and Governance
Exco	Executive Committee
EUR	Euro
FIC	Framework for Internal Control
FX	Foreign exchange
GAAP	Generally Accepted Accounting Principles
GN	Guidance notes
HOAF	Head of Actuarial Function
HR	Human Resources
ICF	Internal Control Framework
ICM	Internal Capital Model
IIA	The Institute of Internal Auditors
IMA	Investment Management Agreement
Key Functions	The Company's risk management, compliance, internal audit and actuarial functions
LOD	Losses Occurring During
MCR	Minimum Capital Requirement
MTM	Mark to market
NAT CAT	Natural Catastrophe
OEP	Occurrence exceedance probability
ORSA	Own Risk and Solvency Report
P&C	Property and Casualty
PAP	Product Approval Process
PCF	Pre-approved Control Function

QRT	Quantitative Reporting Template
RAF	Risk Appetite Framework
RDS	Realistic Disaster Scenario
RI	Reinsurance
RIBD	Reinsurance Bad Debt
RM	Risk Margin
ARCC	Audit, Risk and Compliance Committee
RMF	Risk Management Framework
RMS	Risk Management Solutions
SAA	Strategic Asset Allocation
SCR	Solvency Capital Requirement
SF	Standard Formula
SF SFCR	Standard Formula Solvency and Financial Condition Report
SFCR	Solvency and Financial Condition Report
SII	Solvency II
S&S	Stress & Scenario
UC	Underwriting Committee
UEPR	Unearned Premium Reserve
XL	XL Group Ltd.
XLB	XL Bermuda Ltd.
XLCSSE	XL Catlin Services SE
XLGIL	XL Group Investments Limited
XLICSE	XL Insurance Company SE