Solunion Seguros, Compañía Internacional de Seguros y Reaseguros, S.A.

Solvency and Financial Condition Report

31/12/2017

Executive Summary

This report meets one of the requirements set out in law 20/2015, of July 14, on the Ordering, Supervision and Solvency of Insurance and Reinsurance Entities (LOSSEAR), and Royal Decree 1060/2015, of November 20, on the Ordering, Supervision and Solvency of Insurance and Reinsurance implementing it (ROSSEAR). The two laws transpose to Spanish law Directive 2009/138/EC of the European Parliament and of the Council of November 25, 2009 on the taking-up and pursuit of the business of Insurance and Reinsurance (hereinafter, Solvency II Directive).

Delegated Regulation (EU) 2015/35 supplements the aforementioned Directive and regulates the minimum content a Solvency and Financial Condition Report must contain.

A. Business and performance

Solunion Seguros, Compañía Internacional de Seguros y Reaseguros, S.A. (hereinafter SOLUNION, or "the Company") is a non-life business insurance company, which is the exclusive social purpose of the practice of insurance operations in the credit and bonding branches as well as other supplementary, ancillary or related businesses as soon as they are permitted by the insurance legislation.

SOLUNION is a jointly-controlled company consisting of a joint venture between the Euler Hermes and MAPFRE groups –each of which holds 50% of its share capital through Euler Hermes Luxembourg Holding S.à.r.l. and MAPFRE Global Risks, Compañía Internacional de Seguros y Reaseguros, S.A., respectively– comprising the businesses of credit insurance and the supplementary services of both groups in Spain and Latin America, and it is the parent of a series of subsidiaries in these businesses in Argentina, Chile, Colombia, Spain and Mexico. In December 2017, shareholders have expanded the scope of the agreement to include joint development of Bond insurance.

The result of the technical account at December 31, 2017 amounted to EUR 912 thousand (EUR 3,265 thousand in 2016), which, combined with the result of the non-technical account, EUR 3,722 thousand (EUR -2,012 thousand in 2016) generated profit before tax of EUR 4,634 thousand (EUR 1,253 thousand in 2016).

In 2017, the volume of earned premium in direct business amounted to EUR 142,983 thousand (EUR 134,594 thousand in 2016). The strong performance of the international business has resulted in total reinsurance premiums accepted of EUR 43,042 thousand (EUR 36,356 thousand in 2016).

The rate of claims to premiums written net of reinsurance has been located in 33% including as accidents the payments and variation of provisions of claims, the expenses attributable to benefits, the variation of other technical provisions and the Profit and external participation, lower percentage in 16 points to the previous year.

Operating efficiency continues to improve, with a cost ratio of 30.5% both 2017 and 2016.

B. System of Governance

SOLUNION has the following bodies for individual governance: the General Meeting, Supervision Committee, Board of Directors, Audit Commission, Investment Committee, Nomination and Compensation Committee and the Management Committee.

In the performance of its powers in the risk management Government, the Management Committee has the Risk, Actuarial and Reserve and Compliance committee's support.

These governing bodies enable adequate commercial and operating strategic management, and allow for a timely and proper response to any incidence that should arise at different levels of the organisation and its business and corporate environment.

With the aim of ensuring that the governance system has an appropriately structured, the Company has a series of policies that regulate fundamental functions (Risk Management, Compliance, Internal Audit and Actuarial) and ensure that such functions meet the requirements set by the regulator and are compliant with the governance guidelines set by the Company and the SOLUNION Group. Section B in this Report includes information on these fundamental functions.

Both executives and Company members that perform key functions and other employees fulfil the fit and proper requirements laid down in regulations and by the Company. Fit requirements relate to the possession of the qualifications, experience and knowledge necessary for a position, while proper requirements relate to the absence of negative circumstances that might affect one's performance. To facilitate compliance therewith, the Company has a Fit and Proper Policy.

Regarding the Risk Management System, the Board of Directors of SOLUNION establishes the policies and strategies required to identify, measure, monitor, manage and notify the risks that exist or to which the Company might be exposed, and its links.

The Company has adopted, for risk management, the "three lines of defence" model which encompasses:

a) The managers of the "first line of defence" assume the risks and have the controls necessary to ensure that risks do not surpass the established limits.

b) The internal control system and the areas of the "second line of defence," (Actuarial, Compliance, Internal Control and Operational Risk, Risk Management and Internal Audit) perform supervision independently of risk management activities of the first line of defence within the framework of the policies and risk limits established by the Board of Directors.

c) Internal Audit is the third line of defence, and independently guarantees the adequacy and efficacy of the Internal Control system and of other elements of the Corporate Governance System.

Within this framework, SOLUNION's structure is comprised of Areas which, in their respective frameworks, perform a number of independent supervisory activities within the scope of their respective areas with regard to assumed risks.

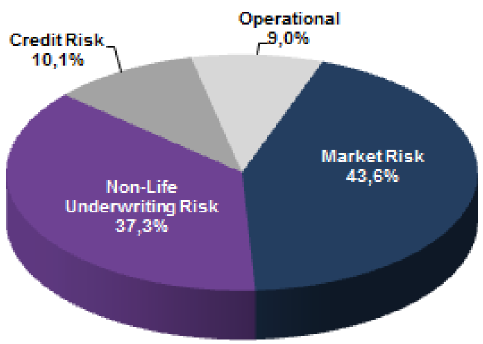
This governing structure reflects the requirements set out in the Solvency II Directive in relation to the system for management of business risks, carrying out its own implementation and development strategy of the Risk Management Area, wherein the Board of Directors of SOLUNION defines the reference criteria and establishes and/or validates the organisational structure of the same.

C. Risk profile

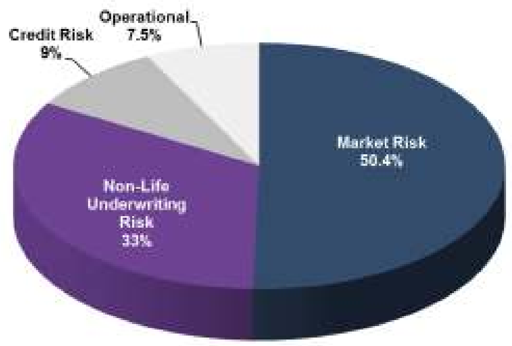
Following the entry into force of Solvency II, SOLUNION calculates the Solvency Capital Requirement (hereinafter SCR) in accordance with the requirements of the methodology laid down in the regulation for the calculation of required solvency capital, which is called the standard formula.

The following is the composition of the Company's risk profile, which is based on the risks set out in the standard formula methodology and the percentage of regulatory capital required for each of them:

2017



2016



The Company's risk profile has remained constant throughout the year. The risk which most intensely affects the Company is market risk, mainly due to the Company's positions in its related undertakings, as high exposure to the same is found in countries outside the European Economic Area. That is followed by non-life underwriting risk, to which catastrophic credit and bonding risk mainly contribute, due to the recession risk that burdens SOLUNION for 100% of the underwritten premiums and, lastly, credit and operational risks.

In addition to the risks mentioned above, the Company has carried out an internal process of identification of significant risks that might pose a threat for fulfilment of the strategic plan, the credit rating targets or that may prevent continued maintenance of the capitalisation level the Company deems appropriate for its risk profile.

With respect to significant concentrations of risk, the Company has policies that set limits on risk diversification. Similarly, limits are laid down in its Liquidity Risk and Investment Risk Management Policy for ensuring adequate diversification by issuer, country and sector of market risk.

SOLUNION has also considered a series of stress tests and scenario analyses for assessment of the resilience of the Company and the business model to adverse events. The results of these analyses show that the Company meets with regulatory capital requirements even in adverse circumstances.

Based on the outcome of these stress tests and sensitivity analyses, the Company will continue to have sufficient own funds to comply with the SCR. The solvency ratio is kept at acceptable values so as not to put the Company's solvency at risk at any time.

D. Valuation for solvency purposes

The total value of assets under Solvency II regulations amounts to EUR 227,377 thousand, while the value measured in accordance with accounting regulations would amount to EUR 289,291 thousand. This difference mainly relates to goodwill, prepaid fees and other acquisition costs, intangible assets, recoverable reinsurance and deferred tax assets, and investments that have not been valued to market in the accounting regulations.

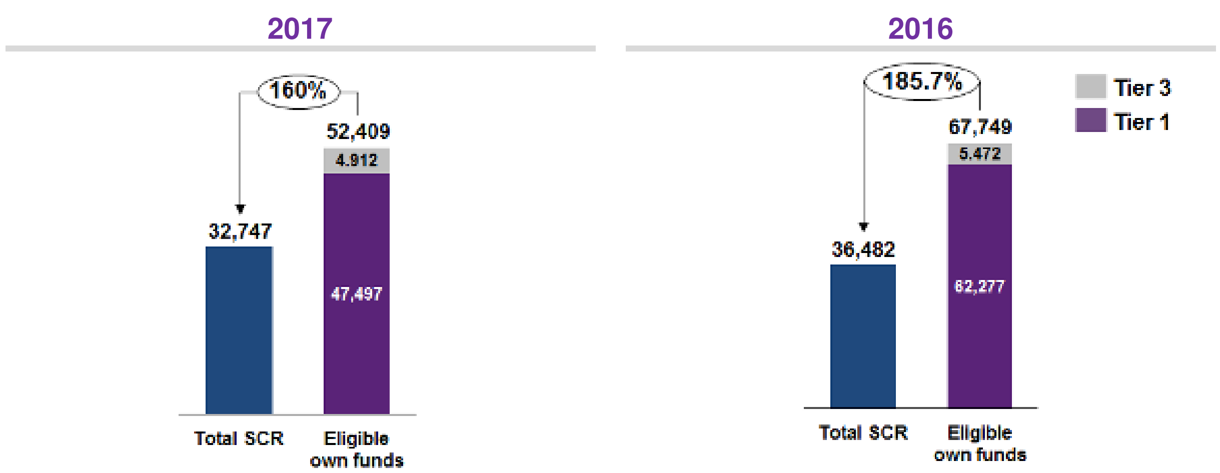
The total value of liabilities under Solvency II amounts to EUR 170,061 thousand, compared to EUR 190,449 thousand according to accounting regulations. The main difference between the two regulations lies in technical provisions, as these are measured according to market economic criteria under Solvency II. D.2 offers information on actuarial methodologies and assumptions used in the calculation of technical provisions, best estimate and risk margin.

E. Capital management

SOLUNION has an appropriate structure for management and vigilance of own funds, with a policy and management plan for this purpose, such that solvency levels are kept within the limits established by the regulation and by the Company's own risk appetite.

The company's solvency ratio, which denotes the share of its own funds available to meet the SCR, is 160%, while the share of its own funds available for meeting the MCR, that is, the minimum capital ratio required , reaches 580.2%. Therefore, the Company is in a suitable situation to be able to face future commitments taking into account the capital requirements established by the Solvency regulations II.

The entity's solvency ratio for SCR coverage in the years of study is as follows:



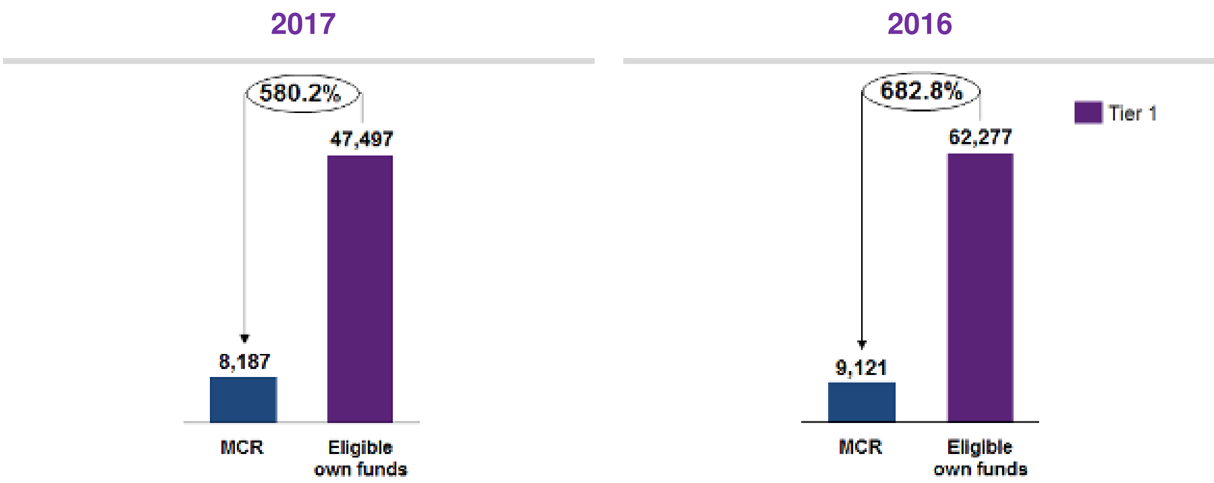
Data in thousands of euros

Eligible own funds to meet the Company's SCR have been reduced by 23%. This decrease comes from the adjustments generated by the effects of exchange rates and the increase in intangible fixed assets.

Intangible assets have been increased by the agreement signed with MAPFRE Global Risks, Compañía Internacional de Seguros y Reaseguros, S.A. in December 2017, under which it is committed to develop the necessary actions to achieve that its current clients of the bonding sector subscribe their policies with SOLUNION from January 1, 2018, leaving MAPFRE Global risks to operate in the bonding sector. The compensation of this agreement amounts to EUR 10 million counted as other intangible assets, of which 5 million have been paid in December 2017 and the remaining 5 million will be paid in three annual terms of the same amount with maturities on dates December 31, 2018, December 31, 2019 and December 31, 2020.

At December 2016 the amount of the Company's SCR was 36,482 thousand euros, reducing the capital load to close of 2017 in 3.7 thousand euros. This decrease is mainly due to the reduction in market risk in exposure to the risk of variable income and concentration.

The solvency ratio of the Entity for the coverage of the minimum required capital of solvency (hereinafter MCR, "Minimum Capital Requirement"):



Data in thousands of euros

Eligible own funds to meet the Company's MCR have been reduced by 24%. This decrease comes from the adjustments generated by the effects of exchange rates and the increase in intangible fixed assets.

At December 2016 the amount of the Company's MCR was 9,121 thousand euros, in December 2017 this amount has been reduced up to 8,187 thousand euros. This decrease is mainly due to the fact that in both cases the result is equal to the minimum limit of the combined MCR, which is obtained as the 25% of the SCR, amount that in 2017 has decreased by 3.7 thousand euros.

This level of capital is configured as the minimum level of security below which the financial resources of the Company should not descend.

A. Business and performance

A.1. Business

A.1.1. Activities of the Entity

Solunion Seguros, Compañía Internacional de Seguros y Reaseguros, S.A. is a company with the sole corporate purpose of carrying out insurance and reinsurance transactions in credit and bonding branches, and transactions supplementary, ancillary or related to this object to the extent allowed by insurance legislation.

Its registered office is in Madrid, at Avenida General Perón 40, 28020.

The Company is a jointly-controlled company consisting of a *joint venture* between the Euler Hermes and MAPFRE groups –each of which holds 50% of its share capital through Euler Hermes Luxembourg Holding S.à.r.l. and MAPFRE Global Risks, Compañía Internacional de Seguros y Reaseguros, S.A., respectively– comprising the businesses of credit insurance and the supplementary services of both groups in Spain and Latin America, and it is the parent of a series of subsidiaries in these businesses in Argentina, Chile, Colombia, Spain and Mexico. In December 2017, the shareholders have extended the agreement scope to include the joint development of the bonding insurance.

Supervision of the Company

The Directorate General of Insurance and Pension Plans (Spanish Supervisory Authority, hereinafter DGSFP) is the party responsible for the financial supervision of SOLUNION, as it is based in Spain. The DGSFP has the following website: www.dgsfp.mineco.es.

External audit

KPMG Auditores, S.L. issued, on April 27, 2018, the audit reports with no reservations relating to the individual and consolidated accounts of the Company at 31 December 2017. This company is headquartered at Torre de Cristal, Paseo de la Castellana 259C, Madrid, Spain.

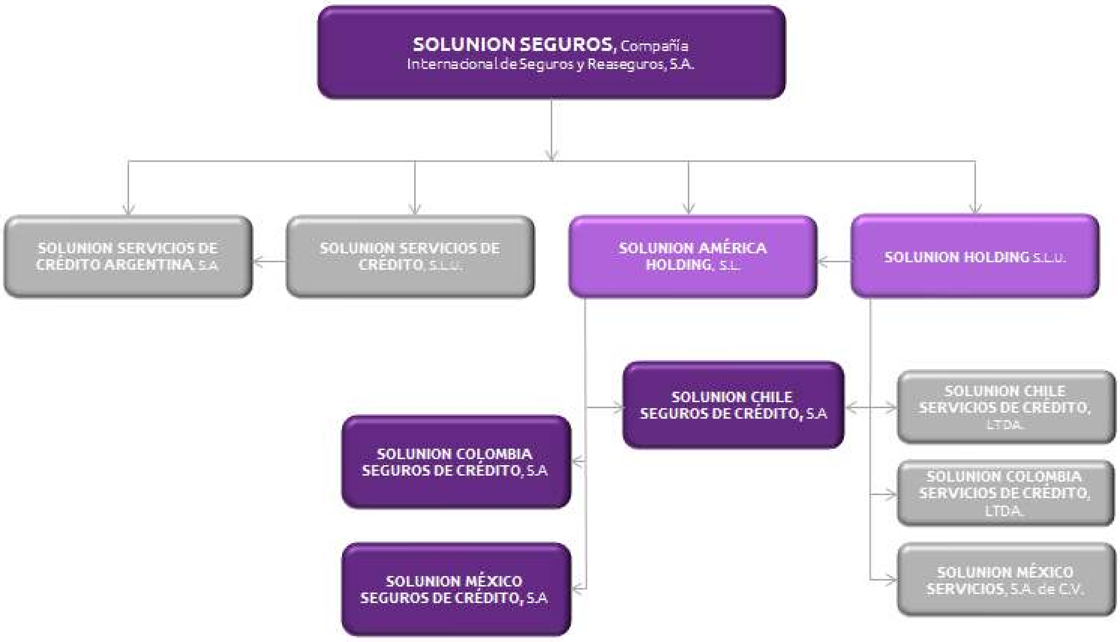
Holders of qualifying holdings

The following table reflects the individuals or corporate persons who directly or indirectly hold qualified investments in the Company:

Name	Legal form	Type of Shareholding	Location	Percentage of ownership
Euler Hermes Luxembourg Holding S.à.r.l.	Limited Company	Direct	Luxembourg	50%
MAPFRE Global Risks, Compañía Internacional de Seguros y Reaseguros, S.A.	Public Limited Company	Direct	Spain	50%

Details of the undertaking's position within the legal structure of the group

The following is the organizational structure indicating the Company's position within the group's legal structure:



Lines of business

The Company identifies the following line of business established by the Solvency II regulation.

- **Credit and Suretyship insurance:** consists of insurance obligations other than life assurance:
  - Direct Insurance (Modality 9)
  - Accepted proportional reinsurance (Modality 21)
  - Accepted non-proportional reinsurance (Modality 28)

Geographic areas

The most significant countries, in which the Company operates, in addition to Spain, are Mexico and Colombia, as described in Appendix S.05.02.01.

A.1.2. Business and/or events that have occurred over the reporting period that have had a material impact on the undertaking

The following significant events took place during 2017, with a significant effect on the Company:

Significant events of the year

SOLUNION has been nominated for fifth year in a row as the best credit insurer by the leading insurance broker association ADECOSE in Spain rewarding the strong focus on client service.

On July 19, 2017 and through Ministerial Order EIC/773/2017, the Company obtained administrative authorization to expand its activities to Bonding, class 15 in conformity with the classification specified in the Annex to Law 20/2015 on the Management, Supervision and Solvency of Insurers and Reinsurers.

On September 2017 14, A.M. Best has confirmed previous financial strength rating of A- (Excellent) to Solunion Seguros, Compañía Internacional de Seguros y Reaseguros S.A. (Solunion).

In December 2017, Company shareholders MAPFRE and Euler Hermes signed a strategic agreement to expand the coverage of SOLUNION activities to Bonding, which will be jointly developed in Spain through the Company's launch of the new business in that class.

Corporate matters

On January 1, 2017, following Dr Gerd-Uwe Baden's resignation, Mr Michele Pignotti was appointed member and Chairman of the Board of Directors; also, Mr Ignacio Baeza Gomez was appointed member and Vice Chairman of the Board of Directors following Mr Alfredo Castelo Marín's resignation.

On November 10, 2017, the Company's Extraordinary General Shareholders Meeting agreed to modify the Articles of Association so as to include Bonding in the Company's corporate purpose and change the corporate name to SOLUNION SEGUROS, Compañía Internacional de Seguros y Reaseguros, S.A.

Main activities in 2017

- General matters

2017 was marked by strong commercial activity, particularly in Spain where more than 1,000 new policies were signed. Spain meets the objective of being the second largest company in the credit market.

Solunion's upward trend is reinforced in a year where most countries have managed to grow their portfolio: Spain +3.3%, Colombia +6%.

- New products

2017 has seen the launch of Póliza Compromiso (the Commitment Policy) in Spain, a policy that complements the offer of Solunion by providing a solution to capital goods companies and companies that already work in projects with 6 months of development.

- Commercial action

Special mention must be made to the following actions carried on 2017 that give continuity to the strategy put in place in previous years:

- Reinforcement of the multichannel strategy with the development and consolidation of bank channel. Participation of Solunion in Soluciona Empresas of Bankia.
- Emphasis on the activities with the shareholders' networks, primarily MAPFRE, in all the countries of the group.
- Good performance of the retention rate in Spain and in most LATAM countries.

- Risk underwriting

Macroeconomic development in 2017 proved to be better than expected, allowing a greater flexibility with the risk underwriting policy to assist in the growth of our clients and the company, and contributing at the same time to ensure profitability.

- Information and technology systems

Whilst information and technology systems continue to be based on solutions provided by Euler Hermes and MAPFRE, SOLUNION has already set up its own pilot interface, MiSolunion, to enhance the relationship with clients.

The Target Program has completed its first phase by creating independent spaces for SOLUNION systems in the Miami and Alcalá Data Centers, and by creating its own database and homogeneous workspace for the employee throughout the Organisation.

Support from MAPFRE and Euler Hermes Technology Teams continues and guarantees access to the best technological solutions. This means moving forward on digitization and on defining new tools and features that will support the growth of the Company's activities.

A.2. Underwriting performance

Quantitative figures on the Company's business and underwriting results in 2017 and 2016 by line of business, as shown in figure S.05.01.02, indicate that the Company ended the year with gross written premiums of EUR 144,147 thousand (EUR 132,454 thousand in 2016), of which the net amount was EUR 12,190 thousand (EUR 10,562 thousand in 2016). The variation in gross written premiums with respect to the previous year has resulted in an increase of 8.8%.

Also, the gross claims rate in direct and proportional accepted reinsurance business fell to EUR 70,477 thousand (EUR 66,424 thousand in 2016), and after discounting the effect of reinsurance corresponding to EUR 66,417 thousand, the net claims amounts to EUR 4,060 thousand (EUR 5,187 thousand in 2016).

The technical result has amounted to EUR 912 thousand (EUR 3,265 thousand in 2016).

By geographic area of the Company, as shown in figure S.05.02.01 of the Appendix, the following five countries, in addition to Spain, most important regarding the volume of gross earned premiums in the year 2017 were: Mexico, Colombia, Chile, Italy and Argentina. The gross earned premiums for these countries amounted to EUR 39,154 thousand (EUR 31,364 thousand in 2016), which represented an increase of 24.8% compared to the previous year

A.3. Investment performance

A.3.1. Information on income and expense arising from investments by asset class:

The following table presents quantitative information on investments' income and expense, all of which correspond to investments in the available-for-sale portfolio:

	Finance income and expense		Net gain or loss	
	2017	2016	2017	2016
FINANCIAL ASSETS	**756**	**705**	**280**	**286**
Financial investments in capital	-	-	-	-
Shareholdings in investment funds	-	-	564	-
Fixed income securities	787	745	(284)	286
Other assets	(31)	(40)	-	-
FINANCIAL LIABILITIES	**(5)**	**(4)**	**-**	**-**
Deposits received on ceded reinsurance	-	-	-	-
Other liabilities	(5)	(4)	-	-
TOTAL	**751**	**701**	**280**	**286**

Data in thousands of euros

The financial result amounts to EUR 1,031 thousand in 2017 (EUR 987 thousand in 2016), this represents 8.45% (9.34% in 2016) of the net earned reinsurance premiums (EUR 12,189 thousand in 2017, EUR 10,562 thousand in 2016).

Some of the following events influenced investment in the Company:

2017 was marked by a rare synchronization of economic cycles across the US, Europe and China, pushing the world economy above 3% growth for the first time in 7 years. Global trade accelerated to 4.3%, in spite of the protectionist rhetoric. Despite higher growth, the absence of inflation in a late and favourable phase of the global cycle puzzled central bankers across the world.

Interest rates in the Eurozone broke the bearish trend in 2017 that had prevailed over the last few years, keeping the rate at 0%.

Funding conditions in the Eurozone continue to be very favourable during 2017, although the euro area's sovereign-debt yields have declined slightly since September of that year. Thus, the Spanish debt to 10 years closed in 2017 in 1.57%, whereas in the case of the German "Bund" was located in 0.42%.

The economic expansion of the Eurozone remains solid in different countries and sectors. The advancement of real GDP is based on the growth of private consumption and investment, as well as on exports, which benefit from widespread global recovery. The world economy continues to grow at a solid pace, and recovery shows signs of synchronization around the world. For the next few years, macroeconomic projections for the Eurozone envisage an annual growth in real GDP of 2.3% in 2018, 1.9% in 2019 and 1.7% in 2020.

A.3.2. Information about any gains and losses recognised directly in equity:

The following is the quantitative information regarding income and expenses arising from investments broken down by type of asset and liability recognized directly in equity at the end of the 2016 and 2017 exercises:

	2017	2016
FINANCIAL ASSETS	**544**	**987**
Financial investments in capital	-	-
Shareholdings in investment funds	-	242
Fixed income securities	544	745
Other assets	-	-
FINANCIAL LIABILITIES	**-**	**-**
Deposits received on ceded reinsurance	-	-
Other liabilities	-	-
TOTAL	**544**	**987**

Data in thousands of euros

In 2017, fixed income securities have been a positive effect on the equity of EUR 544 thousand (EUR 987 thousand in 2016, of which 242 thousand euros come from Shareholdings in investment funds and 745 thousand euros Fixed income securities).

A.3.3. Information on asset securitisation

SOLUNION does not invest in this type of assets.

A.4. Performance of other activities

A.4.1. Other income and expense

During this year, the Company has incurred the following "other" significant income and expenses other than those arising from the underwriting activity and from the return on investment, including:

	2017	2016
Income from property, plant and equipment and from investments	5,920	191
Expense on property, plant and equipment and investments	(223)	(212)
Other income	46	27
Other expenses	(2,021)	(2,018)
NON-TECHNICAL RESULT	**3,722**	**(2,012)**

Data in thousands of euros

The result from activities other than the exclusively insurers is EUR 3,722 thousand at the end of the year 2017, mainly due to the dividends distribution by the group's companies for a total amount of EUR 5,920 thousand. In particular, the subsidiary Solunion América Holding, S.L. (formerly MAPFRE América Caución y Crédito, S.L.) agreed on July 20, 2017 the distribution of an extraordinary dividend from reserves by gross amount of EUR 732 thousand, and on 19 December of 2017 the distribution of a dividend to account by gross amount of EUR 2,439 thousand. On the other hand, the subsidiary Solunion Holding, S.L.U. (formerly called Euler Hermes ACI Holding, S.L.U.) agreed on December 19, 2017 the distribution of a dividend on account by gross amount of EUR 2,560 thousand.

At the end of the year 2016, the non-technical result of the Company was negative in the amount of EUR 2,012 thousand due to the amortization produced in the exercise of the goodwill that the company owned, included in the heading "Other expenses".

A.4.2 Lease contracts

Operational leases

The Company is lessee of operating leases in the offices in which it provides its services and in which its registered office is located. Theses leases are entered into with related parties, and the contract ends on 31 December 2017.

Expense accrued in 2017 in operating leases amounted to EUR 644 thousand (EUR 645 thousand in 2016).

Future minimum payments to be made on non-cancellable operating leases at 31 December of the last two years were as follows:

	Up to one year		From one to five years		More than five years		Total	
	2017	2016	2017	2016	2016	2016	2017	2016
Buildings and other constructions	644	645	656	658	-	-	1,300	1,303
TOTAL	**644**	**645**	**656**	**658**	**-**	**-**	**1,300**	**1,303**

Data in thousands of euros

Finance lease

The Company does not have this type of lease.

A.5. Any other information

There are no additional disclosures worth mentioning.

B. System of governance

B.1. General Information on the system of governance

SOLUNION's system of governance aims to ensure sound and prudent management under a common operational and organisational model for the Group that establishes hierarchical and functional relationships, a common risk governance structure, key functions and written corporate governance policies that include fit and proper requirements to be met by directors, executives and key functions.

B.1.1 Company's own System of Governance

The system of governance of SOLUNION has the following characteristics:

1. Operational structure comprising three levels: shareholders, holding company and business units.
2. Organizational structure according to objectives-based operating model.
3. Common risk management governance structure for SOLUNION:
4. Key functions of system of governance: (i) Risk management, (ii) Compliance, (iii) Actuarial and (iv) Audit, which make up a three-line of defense system.
5. Written corporate governance policies.
6. Adaptation of local bodies of administration and representation of SOLUNION Latam companies to the regulation of their respective countries.
7. Directors, executives and individuals with key functions of SOLUNION must be persons of acknowledged commercial and professional propriety, and possess adequate knowledge and experience to enable sound and prudent management of SOLUNION, in accordance with the company's fit and proper policy.

The governing bodies of SOLUNION are regulated by the shareholders' agreement entered into by the shareholders, the articles of association and the mandatory standards established by the legislation applicable to each of the Group companies.

The following outlines the main functions and responsibilities of the Company's Governing Bodies:

- **General Meeting**: This is the highest governing body, and it has the power to decide on any matter relating to SOLUNION. It may give instructions to the Company's governing body or subject to its authorisation the adoption by the governing body of decisions or arrangements on management matters relating to the Company.

  The General Meeting comprises the shareholders of SOLUNION and its meetings may be ordinary, for the sole purpose of approving company management, the financial statements of the previous year and deciding on the application of profit, or they may be extraordinary.

- **Supervision Committee:** This is the non-executive body through which SOLUNION shareholders: (i) are periodically informed by the CEO of SOLUNION on financial data, the situation in commercial and risk, information and claims matters, and the most significant matters of SOLUNION; and (ii) issue guidelines on management matters submitted for their consideration, to be submitted to the pertinent governing bodies as necessary.

  It consists of the Chairman and Vice-Chairman of SOLUNION as the shareholders' representatives. The SOLUNION Corporate Affairs Director shall act as Secretary. It shall meet at least monthly, except in months when meetings of the Board of Directors are held or in August, notwithstanding its capability to meet whenever it is deemed appropriate or to receive information in writing outside meetings.

- **Board of Directors**: this is the body responsible for directing, managing and representing the Company, and for overseeing the performance of SOLUNION management. It has full powers of representation, disposition and management. Its decisions are mandatory for the Company, except in matters attributed to the General Meeting, and it designates and removes members of Company committees, including the Management Committee.

  It comprises an odd number between six and twelve directors as determined by the General Meeting, and it will select from its own members a Chairman and Vice-Chairman, and appoint a non-director Secretary. Members of the Board of Directors must meet the requirements of SOLUNION's fit and proper policy, are appointed for a term of three years. They may be re-elected up to the age of 70.

  The position of CEO of the Company is not remunerated, and it is incompatible with the performance of executive positions or duties in SOLUNION.

  The Board of Directors shall meet at least four times a year to receive information on accounting, administration, finance, technical and statistical matters relating to the previous calendar quarter, and provided it is necessary to decide on matters under its competence. It shall have achieved quorum when half plus one of its members are in attendance, notwithstanding the adoption of resolutions via a written vote outside a meeting, and resolutions are adopted by an absolute majority of directors in attendance, except for matters that require a qualified majority under the Charter.

  <u>Board supporting committees</u>

  The Board has supporting committees to address certain management matters relating to the following: Audit, Investment, Nomination and Compensation.

  - **Audit Commission**: It shall have the responsibilities set down in the Charter for advising and making recommendations to the Board on the following:

    a) preparation of financial statements;

    b) the nomination of accounts auditors and independent experts and the performance of their functions;

    c) reporting and financial policy processes;

    d) internal audit operation and functions, and

e) the organisation and effectiveness of internal control and risk management systems.

It comprises four members of the Board of Directors elected in consideration of their financial or accounting experience, and one of them shall be designated in consideration of their knowledge and experience in accounting or auditing, or both. They shall be elected for a three-year term, and it shall designate a Chairman, Vice-Chairman and Secretary from among its own members.

It shall meet at least four times a year, and whenever necessary to decide on matters under its competence, and decisions shall be adopted by a simple majority of the members in attendance.

It has the status of Audit Committee for the purposes of the Third Additional Provision of Law 22/2015 of Accounting and Auditors.

- **Investment Committee**: will have the responsibilities set out in its Charter to provide guidelines in all matters relating to management of financial assets, and advises and offers recommendations to the Board of Directors on investment matters.

  It comprises four members of the Board of Directors elected for three years, including a Chairman and Vice-Chairman.

  It shall meet at least four times a year, once a quarter, and whenever necessary to decide on matters under its competence, and decisions shall be adopted by a simple majority of the members in attendance.

- **Nomination and Compensation Committee**: will have responsibilities set out in its Charter to coordinate SOLUNION's Nomination and Compensation Policy, and it advises and offers recommendations to the Board of Directors on matters of compensation and benefits for senior executives of SOLUNION and matters related to: governance, recruitment and selection of candidates for key executive positions and managers of key functions, compensation policies and plans and yearly allocation and payment programmes.

  It comprises four members of the Board of Directors elected for three years, including a Chairman and Vice-Chairman.

  It shall meet at least two times a year, once every six months, and whenever necessary to decide on matters under its competence, and decisions shall be adopted by a simple majority of the members in attendance.

- **Management Committee:** The Company Management Committee assists the CEO in the effective ordinary management of the Company's operations and of countries in which SOLUNION operates, in strategic, operational and coordination matters, in accordance with the rules and policies of SOLUNION and the general policies and strategies defined by the Board of Directors of SOLUNION.

It comprises the CEO of the Company, who chairs it, and the Corporate Directors of Finance, Administration and Organisation, Risk, Information and Claims (RIC), and Market Management, Commercial and Distribution (MMCD) of SOLUNION, who are full members and voting rights, Corporate Directors of Communication, Human Resources, Information Technology, New Business, Legal and Compliance, and the SOLUNION Corporate Affairs Director be permanent guests and to invite any individual to inform the committee on specific subjects under its competence.

The nomination of the members of the Company's Management Committee, who must meet the requirements set out in SOLUNION's fit and proper policy, will be made by the Board of Directors, pursuant to a favourable report by the Nomination and Compensation Committee. As a general rule, the committee will meet as many times as necessary, and on an extraordinary basis to deliberate on matters submitted to its consideration by any of its full members.

Support Committees of Company Management Committee

The Company's Management Committee shall have the support of the Risk, Actuarial and Reserves and Compliance Committees for the performance of its duties relating to governance of risk management.

- **Risk Committee:** It is tasked with overseeing the risk management function and system, particularly compliance with Risk Appetite, and it comprises full members of the Management Committee and the head of the Group's internal control and risk management (without the right to vote).

  It has the following competences: (i) to oversee the performance of business units' risk committees in their tasks of control of compliance in their respective areas of all the Group's risk management rules, guidelines and policies; (ii) to verify, at least yearly, that the risk appetite limits are effective and appropriate for the Group; and (iii) to escalate to the Board of Directors proposals for review of the Risk Management Policy.

- **Actuarial and Reserves Committee:** advises and offers recommendations to the Management Committee on the actuarial function and policy, and comprises full members of the Management Committee and the head of the Group's actuarial area (without the right to vote).

  Competence to oversee the actuarial function and policy within the Group, and to establish reserves in the framework of policies and rules approved by the Board of Directors.

- **Compliance Committee:** tasked with verifying the functioning of the compliance function, overseeing correct application of general compliance guidelines and principles within the Group and to provide support in this area to the Group's head of compliance, and is composed of the full member of the Management Committee, the Corporate Director of Human Resources and the Group Compliance Officer (without the right to vote.).

  It has the following competences: (i) to collect information on compliance risk management assigned within the framework of its competences and to be apprised of any significant incident in compliance that affects or may affect the Group's activity; (ii) to oversee the functioning of the Ethics Whistleblowing Channel and hear any complaints made therein and examine them, adopt any appropriate resolutions and ensure enforcement of the same;

(iii) to receive advisory from the Group Compliance Officer on regulation applicable to the Group, the potential consequences of changes in the legal environment of SOLUNION's operations and to determine and assess compliance risk, and (iv) resolve any matters that, owing to their complexity, that are escalated to it for its interpretation by the Group's head of compliance.

B.1.2. Key functions

As set out in current regulation, the Board of Directors approved the latest revision of the Internal Audit Policy in its meeting of March 24, 2017, Actuarial and Compliance Policies, in its meeting of September 18, 2017, and the Risk Management Policy in its meeting of December 11, 2017.These policies establish the operational independence of these key functions and their direct line of reporting to the governing body.

The names of individuals responsible for key functions have been reported to the Dirección General de Seguros y Fondos de Pensiones.

RISK MANAGEMENT FUNCTION

SOLUNION has an effective risk management system regulated in the corresponding risk function, encompassing the strategies, processes and information procedures necessary to identify, measure, monitor, manage and notify on a continuous basis of risk that it is or may be exposed to individually or overall, and includes risk management function structured to facilitate the application of the risk management system and allows for proper supervision of risks through the adoption of decisions that enable the identification, measurement, supervision, management and monitoring of the same. This function encompasses SOLUNION's internal control process, which is included in the framework of internal control and operational risk, and ensures that the risk policy is applied coherently across the entire Group.

COMPLIANCE FUNCTION

The SOLUNION compliance function includes advisory of governing bodies on compliance with laws, regulations and administrative rules that affect SOLUNION and of the internal rules and regulations laid down in the Code of Ethics and Conduct, and the evaluation of the impact of any change in the legal environment in SOLUNION's operations and the determination and evaluation of compliance risk in countries where it operates. Hence, the compliance function identifies internal and external non-compliance risks that may arise from SOLUNION's activity, advises on risks identified, alerts of potential non-compliance and follows up on the measures adopted for the correction thereof, with the aim of attaining a global compliance environment

ACTUARIAL FUNCTION

SOLUNION has an actuarial function that provides for performance of the actuarial function by individuals with sufficient knowledge of actuarial and financial mathematics and sufficient experience for the tasks assigned in relation with the coordination of calculation of technical provisions and the appropriateness of its method of calculation, base models and assumptions, and the sufficiency and quality of the data used; evaluation of the coherence of internal and external data used in calculation of technical provisions; verification of the best estimates with the experience and information of governing bodies on the reliability and adequacy of the calculation of technical provisions; the underwriting policy and reinsurance arrangements, and the contribution to effective application of the risk management system.

AUDIT FUNCTION

SOLUNION's audit function includes verification of the adequacy and effectiveness of the internal control system and of other components of the company's system of governance, and it is implemented in accordance with the regulation for ordering, supervision and solvency of insurance and reinsurance entities and of audit, and it includes an audit function as performed by internal audits of the two shareholders, which is objective and independent of operating functions. The conclusions and recommendations arising from the internal audit are reported to SOLUNION's Board of Directors, which determines what steps should be taken with respect to each, and ensures that such steps are carried out.

More information may be found on key functions in Sections B.3, B.4, B.5, and B.6.

B.1.3. Relevant General Meeting of Shareholders and Board of Directors resolutions

On January 1, 2017 D.Michele Pignotti was appointed member and chairman of the Board of Directors, due to the resignation of Dr. Gerd-Uwe Baden, and Mr. Ignacio Baeza Gómez was appointed member and Vice-President of the Board of directors, due to the resignation of D. Alfredo Castelo Marín**.**

On November 10, 2017 The Company's Extraordinary General Shareholders' meeting agreed to amend the social bylaws to include the bonding branch in the social object and to change the social name by Solunion Seguros, Compañía Internacional de Seguros y Reaseguros, S.A.

B.1.4. Balances and remuneration to the members of the administrative, management or supervisory body

The following table shows the remuneration received in the last two years by key management personnel, consisting of one woman and three men in 2017 and 2016.

	2017	2016
Short-term remuneration	**647**	**744**
Salaries	594	650
Fixed allocations	25	69
Per diems	-	-
Life insurance	8	6
Other	20	19
Post-employment remuneration	**13**	**14**
Defined contribution	13	14
Years of service award	-	-
TOTAL	**660**	**758**

Data in thousands of euros

Remuneration paid to the members of the Administrative body and employees of the Company is determined in accordance with prevailing regulations as well as the Company's remuneration policy, the latest revision of which was approved by the Board of Directors on June 19, 2017.

The overall objective of the Company's remuneration policy is to define guidelines that are effective - meaning that they are aligned with the global strategy and business objectives, the risk management policy and the tolerance to such risks approved by SOLUNION- to foster sound and prudent management of the business and effective risk management.

Its objectives include:

- Supporting SOLUNION's business strategy by attracting and retaining talent.
- Incentivising employees' contribution to the Company's objectives.
- Promoting sound and effective risk management through establishment of requirements on remuneration aimed at prudent and appropriate management of business and to avoid remuneration mechanisms that foster excessive risk-taking by SOLUNION.
- Avoiding conflicts of interest.

Remuneration systems may include both fixed and variable components. Also, individual and collective performance standards that may be the basis for any right or variable component of remuneration are reviewed on a yearly basis.

B.1.5 Additional information

In 2016, the Company approved a new medium-term incentives plan for certain members of the Group's management team on an extraordinary, non-vesting and multi-year basis, in effect between January 1, 2016 and March 31, 2019. Payment of incentives was subject to compliance of certain corporate and specific objectives, and their permanence in the group. At the end of each exercise, an assessment of the fulfilment of the objectives is made by registering the amount earned in the income statement with credit to a provision account.

B.2. Fit and proper requirements

The Company has a fit and proper policy, the latest revision of which was approved by the Board of Directors on June 19, 2017, which facilitates application of regulatory requirements and ensures a high level of fit and proper requirements throughout the Group for managers and key functions.

Managers and Holders of the key functions of SOLUNION must be persons of recognized commercial and professional honour and possess adequate knowledge and experience to make possible the sound and prudent management of SOLUNION. Further, fit and proper procedures must apply for evaluation of other personnel in accordance with internal rules and regulations, both when under consideration for a specific position and on a permanent basis. The following principles shall apply to ensure fulfilment of these objectives.

With respect to fit, the necessary qualifications, knowledge and experience will depend on the position.

a) Members of the Board of Directors and local Administration Bodies must possess adequate experience and knowledge and, as a group, must also possess sufficient knowledge and professional experience in at least the following areas, as minimum: (i) insurance and financial markets; (ii) strategies and business models; (iii) system of governance; (iv) financial and actuarial analysis; and (v) regulatory framework.

b) Members of the Management Committee and the Local Management Committees of the Business Units will, possess the qualifications, knowledge and experience necessary to perform the responsibilities of each Committee and specific tasks assigned to them in the Management Committee.

c) Holders of key functions must possess the appropriate knowledge and experience to perform the tasks assigned to them under the policy of the key function and, as the case may be, applicable legislation.

While certain positive requirements are to be met for a person to be considered fit, no such positive criteria exist for property, but we must attend to the absence of negative circumstances which are indications that a Person could not meet the honourability requirement, such as the existence of:

a) any prior conviction or proceeding in course that may lead to a criminal conviction, especially crimes under legislation applicable to financial services (such as laws on money laundering, market manipulation or dealings with insider information, fraud and financial crimes) corporate violations, insolvency and consumer protection laws;

b) any prior conviction or proceeding in course that may give rise to a conviction for a significant disciplinary or administrative offence;

c) administrative penalties relating to violation of legislation applicable to financial services, or any investigation in course or enforcement action by any regulatory or professional body;

d) any significant inconsistency relating to a candidate's education or professional experience;

e) any other fact that involves a risk of financial crime, violation of the law or a danger to the sound and prudent management of the business, and

f) any other fact set out in insurance regulation.

Process to ensure fitness and propriety.

To ensure the fit and proper, adequate processes during recruiting and specific periodic reviews are necessary.

The following individuals/bodies will be responsible for fit and proper evaluations:

- Of the members of the Board of Directors: the shareholders.
- Of the members of the Management Committee and the Company Management Committee: the Board of Directors or designated committees.
- Of the holders of key functions (heads): the Board of Directors or designated committees.

The Company must ensure that an evaluation of the fit and proper is made during the hiring process of members of senior management or holders of key functions, whether internal or external to SOLUNION. Employment or service contracts may be entered into only after successful completion of a recruiting process as described below.

a) Job descriptions/fit requirements for position:

A description of the job and definition of the fitness requirements of the job, and the key tasks and responsibilities thereof are available, so as to enable sound and prudent performance of the job function. Candidates for membership of the Board of Directors are evaluated in accordance with the Company's legally mandated fit requirements

b) Curriculum vitae; background check:

External candidates: all candidates must present up-to-date curriculum vitae at the start of the recruitment process. The final candidate for a position in senior management or holder of a key function will be subject to a background check that includes:

- Submission by the candidate of copies of the required qualifications;
- Submission by the candidate of proof of good repute and absence of insolvency, including a certificate of good conduct or the appropriate documents (such as verification of criminal record, police certificate of good conduct), prior to the passage of three months following the date of issue;
- Verification of references and search in public media by the human resources area responsible for recruitment, subject to applicable privacy laws and regulations.

In the event of failure to submit any of the documents required of the candidate to check the background, the department/body responsible for hiring will decide what steps to take (such as request for a sworn affidavit to serve as proof).

Internal candidates: when the candidates have been employees of the SOLUNION Group for less than four years, or in certain justified cases, it must be ensure that the curriculum vitae is on file. Such candidates will also be subject to the background check described above.

Where a key function is outsourced, under the outsourcing policy, written confirmation shall be required that the person responsible complies with the criteria of aptitude and honourability established in the Policy of the same name.

If a function is partially outsourced, it must be considered as a lesser degree than the starting point, in order to apply all the considerations that are included in the Externalization Policy, that is to say, if a function is partially subcontracted, it will be treated as an important activity, the definition of which is in the same document.

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

B.3.1 Governance framework

The risk management system is a set of strategies, processes and information procedures necessary to identify, measure, monitor, manage and notify on a continuous basis the risks to which the Company is or may be exposed, and their interdependencies.

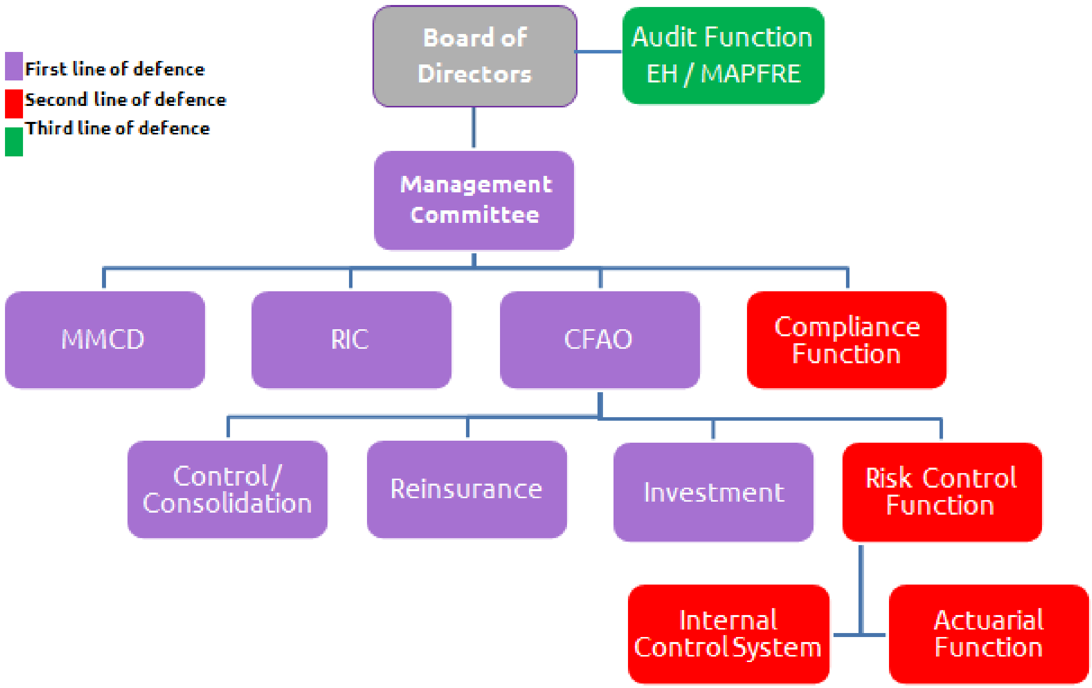
The risk management policy implements the structuring and functioning of the risk management system. The policy is applied to Group entities within the limits envisaged in regulations applicable to the activities regulated in countries where it operates, and it has the aim of preserving the Group's solvency and fostering the development of its business via the following:

- definition of a strategy for the risks it takes on;
- inclusion of risk analysis in the decision-making process;
- establishment of general guidelines, basic principles, and general framework of risk management to promote their consistent application in the Group.
- dissemination of the risk management policy among executives and employees to achieve a risk management culture that ensures its effectiveness.

The Company adopts the three-lines of defence model as an organisational scheme of risk management, which is widespread in literature on business risk management and corporate governance, such that:

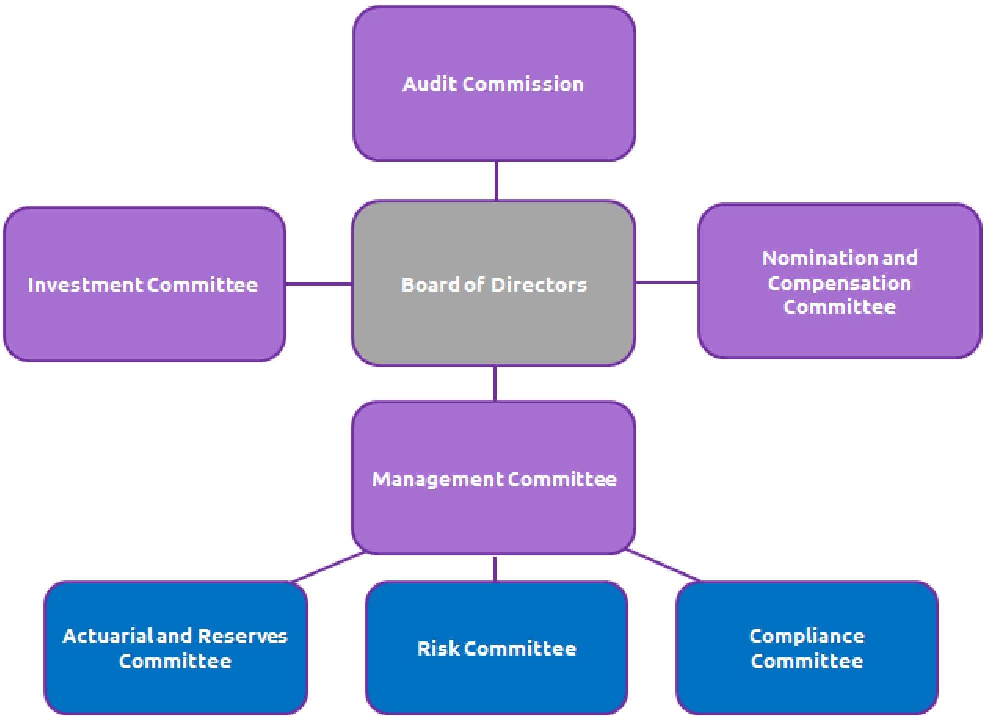
- The first line of defence consists of operations managers, who assume risks and possess the controls.
- The actuarial, compliance and risk management functions, as well as the Internal Control System, dependent on the first, make up the “second line of defence”, that supervise the first line of defence within the framework of the policies and limits established by the Board of Directors, and report to the Management Committee.
- Internal Audit is the third line of defence, and independently guarantees the appropriateness and efficacy of the internal control system and of corporate governance.

The following is a diagram of the three lines of defence with commentary:



Governance of risk management in SOLUNION has bodies with global powers across the Group and bodies in each business unit.

The following diagram shows the governance structure of risk management in SOLUNION:



The governing bodies of SOLUNION have the following powers over the risk management system, in accordance with the Code of Good Governance:

- Board of Directors:
  - Approval or authorisation of the risk identification, management and control policy.
  - Analysis of the information to be regularly received on the status and development of risks and of the decisions of the Management Committee to verify their adequate management and control.
  - Adoption of measures to correct situations deemed inappropriate.

  It relies on the Audit Commission, the Investment Committee, the Nomination and Compensation Committee and the Management Committee in risk management work.

- Management Committee:
  - Responsibility for implementation of policies and standards on risk management.
  - Supervision of performance of second-line of defence functions and policies.
  - Information on risk management to the Board of Directors and escalation of proposals for action.
  - Operational decisions made within framework of policies and standards approved by Board of Directors.

  Relies on Actuarial and Reserves Committee and Risk Committee, to which the Internal Control Committee and the reinsurance area report, and on the Compliance Committee.

- Risk Committee:

  Comprises all full members of the Management Committee, the head of the actuarial function and the head of Management risk and Internal Control of the Group (without the right to vote), will be tasked with supervising the risk management function and system, particularly compliance with risk appetite. The Head of Risk Management and Internal Control of the Group will receive the meeting minutes of established Holding Committees and of the Local Risk Committees may attend such meetings without a vote, and report to the Risk Committee any decision or potential risks that may affect the Group's solvency position.

- Actuarial and Reserves Committee:

  Comprises all members of the Management Committee, the head of Management risk and Internal Control of the Group and the head of the actuarial function of the Group (without the right to vote), will be tasked with overseeing the actuarial function and policy in the Group, and with the establishment of technical provisions within the framework of policies and standards approved by the Board of Directors.

- Compliance Committee:

  Comprises full members of the Management Committee, the Corporate Director of Human Resources, corporate affairs and technology and information and the Group Compliance Officer (without the right to vote), it is tasked with overseeing the compliance function and policy in the Group within the framework of the policy and standards approved by the Board of Directors.

Given that risk management is a local responsibility, notwithstanding the entities being a part of a business group and its integration in an organisational structure directed by the Group's holding structure, each business unit has a local risk committee that will oversees compliance with all the Group's risk management standards, guidelines and policies. It will comprises the heads of each corporate area of each unit and it will be tasked with overseeing the functioning of the risk management system and advising the local Management Committee for relevant decision making.

These risk committees will be under the supervision of the Holding Risk Committee.

The risk management function enables adequate oversight of risks through the adoption of decisions that facilitate the identification, measurement, supervision, management and monitoring of the same. This function encompasses SOLUNION's internal control process, which is included in the framework of internal control and operational risk, which is the policy of the internal control function. Also, the risk function coordinates the assessment and oversight of the Company's most critical risks.

B.3.2. Risk management objectives, policies, and processes

As noted above, the risk function is tasked with risk supervision. The procedures are as follows:

- Identification: to enable management and control of risks, each has its own policy, which prevails in its area over the general policy, and specifies particular aspects for the treatment of each risk.

- Measurement: for measurement of risks, the Group's Risk Management area establishes rules for setting the parameters for measuring risks in accordance with regulations, determining the technical means for calculating capital needs in accordance with the entirety of risks, and verifying that the measurement of the same is correct.

- Limits: the Board of Directors of SOLUNION defines the risk appetite of the risk management system, and sets both the limits to be applied to risk taking and the necessary measures for the Risk Committee to verify, at least once a year, that the limits are effective and appropriate for the Group.

- Supervision: risk takers in each area of the Company are responsible for ensuring that the actions taken are consistent with the established technical standards and that the risks taken do not exceed the limits defined in the risk management system.

  Supervision that risks are within limits is performed by the risk management function and the other functions of the second line of defence in their respective areas.

- Management and mitigation: risk takers in each area of each Business Unit first line of defence must take the necessary measures in their respective areas to mitigate risks to which the company is exposed, in accordance with the applicable policy and subject to the risk limits.

  Supervision that necessary mitigation measures are being taken will be the responsibility of the other functions of the second line of defence in their respective areas, which will report to Risk Management.

  Measurement of capital optimization and its measurement will be the responsibility of the risk management function, along with the actuarial function.

- Information and monitoring: areas in the second line of defence provide, at least every six months, governing bodies with information that allows for adequate monitoring of risk control, unless the nature of the risk allows for reporting on a yearly basis.

  Notwithstanding the foregoing, information must be reported immediately if the event of risks that: (i) exceed established limits; (ii) may cause losses equal to or higher than such limits, or (iii) may compromise the Company's solvency requirements or its business continuity.

  Own Risk and Solvency Assessment (ORSA) reports include monitoring of material risks that may affect the Company.

- Breach of limits: when a risk exceeds the established limits, the Company's governing bodies may adopt measures aimed at:

  - Authorising an excess beyond the risk limit, in which case sufficient documentation and notification of the governing bodies and the Group's risk management area is essential, along with the reason for such authorisation and an indication of any additional risk taken owing to the same. If the excess surpasses the limits set by the Group's parent, the governing bodies, the Group's risk management area and the Group's governing bodies are notified.

  - Cancel risk.

  - Contract additional protection that allows for adjusting the risk to established limits, subject to an assessment of the consequences of breach by the supplier of such protection and its impact on operational risks.

  - Raise additional capital resources as necessary to keep the risk taken within established risk limits.

To define and manage each of its risks, SOLUNION has established a framework of policies that have been approved by the Company's Board of Directors.

The strategies, objectives, and informing procedures for the key risks to which the Company is exposed, reflected in the risk appetite approved by the Entity's Board of Directors or equivalent body establishes the degree of risk the entity is prepared to assume to reach its business objectives with no relevant deviations, including in adverse situations.

Details are shown below of the main risks faced by SOLUNION (both those included in the Solvency Capital Requirement and those not included) with respect to their identification, measurement, management, monitoring and notification.

Type of Risk	Description	Measurement and management	Monitoring and notification
Underwriting risk	Groups the following risks for non-life: - Premium risk - Reserves risk - Catastrophic risk - Reinsurance mitigation	Standard formula	Annual
Market risk	Covers the following risks: - Interest rate - Equities - Real estate - Spread - Concentration - Currency	Standard formula	Annual
Credit risk	Reflects any possible losses arising from unexpected default by counterparties and debtors in the following 12 months.	Standard formula	Annual
Liquidity risk	The risk the Company are unable to realize its investments and other assets in order to settle its financial obligations when they fall due.	Liquidity position. Liquidity indicators.	Continuous
Operational risk	Includes those which arise due to failed internal processes, people and systems, or from external events	Standard formula The Company performs qualitative dynamic analysis of processes.	Annual Continuous
Technical provisions recognition risk	Due to the existence of reserves that are insufficient for the company to settle its obligations.	Control of calculation of technical provisions External validation	Continuous Annual
Business continuity risk	This relates to possibility that future events will give rise to consequences that are adverse for the achievement of the Company's economic or business objectives, or for its financial position.	Business continuity plans.	Annual

Type of Risk	Description	Measurement and management	Monitoring and notification
Compliance risk	The risk of losses due to legal/regulatory sanctions or reputational losses arising from the infringement of internal/external laws and regulations, as well as applicable administration regulations.	The Company monitors, assesses, and informs the governing bodies on exposure to risk arising from activities performed. Monitoring and recording of significant events	Continuous Annual
Reputational risk	Includes the following risks: - Business ethics and corporate governance - Organizational structure - Market competition	Through corporate policies	Continuous
Outsourcing risk	Risk arising from arrangements with service providers for the performance of one of the Company's functions.	On-site *inspections* by the Company of supplier facilities Control of fit and proper requirements	Annual
Reinsurance risk	This is risk arising from fluctuations in the solvency of counterparties in reinsurance terms within a one-year period.	Standard formula	Annual

All calculations arising from the standard formula must be updated in any year in which a change in the risk profile is detected, except in case of a significant event.

Generally, as mentioned previously, the Board of Directors must be periodically informed of the risks to which the Company is exposed.

B.3.3. Own risk and solvency assessment

Pillar II includes the Own Risk and Solvency Assessment (.hereinafter ORSA, for its acronym in English), which is a key element of Solvency II. The ORSA process is integrated and is part of the Risk Management System, and it has mechanisms to identify, measure, monitor, manage and report the risks in the short and long term of the entity, during the period envisaged in the strategic plan, as well as the sufficiency of capital resources according with the understanding of their real solvency needs. To this end, it will contemplate all the significant risks or potential sources of risk to which the entity is exposed, and facilitates undertaking initiatives aimed at its management and mitigation. This requirement should define how companies can create value for different stakeholders, in order to integrate its business risk management framework in its process of governance decision/making, and to show that this framework is also appropriate for the nature, scale and complexity of the risks in their business.

Performance of the ORSA requires a forward-looking exercise of bespoke strategic analysis that encompasses all the pillars of Solvency II, based on risk tolerance and appetite, the strategic and business plan, the environment, the moment in the cycle in which the assessment occurs, the governance system implemented and the quality of the own funds, in order to advise the Board of Directors on the viability of the company in the long term. Hence, an integrated approach is needed throughout the Company.

The process of critical risk assessment of SOLUNION aims to ensure that the Company's critical risks are identified, assessed, managed, mitigated and monitored.

In addition to supporting risk management, this process also ensures that SOLUNION is capable of meeting external regulatory requirements, that is, both the Solvency II requirements and local regulatory requirements.

At an overall level, the ORSA process is organised around the following components:

This process is detailed below:

1. **Risk appetite and limits.**

   The first step is to establish a risk strategy that clearly defines a risk appetite for the achievement of business objectives. The risk strategy should be revised at least yearly, simultaneously with changes in the business strategy.

   The Board of Directors of SOLUNION defines the risk appetite, which becomes part of the risk management system, and sets both the limits to be applied to risk taking and the necessary measures for the Risk Committee to verify, at least once a year, that the limits are effective and appropriate for the Company.

2. **Strategic and business plan.**

   The solvency capital needs are calculated so was to be sufficient in order to face all the risks that current impact the business or that may impact it in the future, using as the reference the period of time covered by the Business Plan (2018 to 2020).

3. Analysis and evaluation of critical risks.

An assessment of critical risks is made in order to identify, assess and, as appropriate, mitigate potential risks to obtain a set of critical risks to be monitored and controlled on a yearly basis.

The process of critical risk assessment includes all risk categories and it is designed in order to:

- Identify the main critical risks.
- Assess and define critical risks (assessment of residual risks).
- Establish a risk appetite that is acceptable for each critical risk.
- Identify and prioritise mitigation activities.
- Guide the preparation of reports and the approval of critical risks.
- Control the development of risk exposure and mitigation plans.

4. Standard formula of required solvency capital

This formula is used to calculate solvency capital needs with a methodology and principles established by EIOPA in the framework of Solvency II for all market, counterparty, assurance and operating risks.

SOLUNION calculates the Solvency Capital Requirement (SCR) in accordance with the principles, assumptions and parameters established by EIOPA in the standard formula.

According to the nature, complexity and proportionality, it is considered that the Company does not significantly depart from the assumptions applied in calculation of the standard model, thus justifying its use. Hence, it would not be deemed necessary to replace the subset of parameters used with specific Company parameters or apply an internal model.

5. Stress testing.

Once the projection is made of the Solvency Capital Requirement for the base scenario – that is, for the 2018-2020 business plan, to complete the solvency forecast – the Company has applied diverse stress scenarios for the years 2018-2020, the results of which are set out in the Report.

6. ORSA report.

The ORSA report presents the results of the Own Risk and Solvency Assessment obtained by SOLUNION. It also sets out and documents the Company's overall solvency needs according to the risk exposures and capital requirements using the standard calculation defined by the regulatory implementations of Solvency II at the date of issue of this Report.

The ORSA is prepared and approved annually, although it would be prepared within a shorter term for extraordinary reasons if the Board of Directors requests it.

It should be noted that, at the publication date of this report, the 2017 Orsa Report has not yet been issued, so the point of reference is the 2016 ORSA.

B.4. Internal control system

B.4.1. Internal control

SOLUNION has an operational risk and internal control framework whose latest review was approved on September 18, 2017 by the SOLUNION Board of Directors. The framework sets out the most important actions to be implemented to maintain an optimal internal control system.

The operational risk and internal control framework provides a general model of functioning that realises a set of principles, guidelines and policies that can establish a definition of the function at a global level and its current implementation at every level of the Company to ensure continuity and uniformity in its application.

SOLUNION conceives internal control as a system whose performance requires the involvement and commitment of all members of the organisation, and not an isolated organisational area, that has been created to monitor the Company's actions in relation to the risks to which it is exposed.

This framework is based on a governance system and organisational structure that lays down a model of three lines of defence in internal control.

- **First line of defence**: Operational areas, business lines or support units. They are responsible for the application of internal control procedures in every process in which they intervene and for which they are responsible, and manage the risks that originate in these processes.

- **Second line of defence**: Risk Management Area It is a body that is independent from areas for the implementation of the internal control system with responsibility for defining applicable policies and procedures, coordinating and supervising evaluation and control activities, launching action plans and generating management reporting for different areas and governing bodies.

- **Third line of defence**: Internal audit, as an independent evaluator tasked with overseeing the correct functioning of the internal control system, compliance with policies and procedures and final evaluation of the effectiveness of the action plans and initiatives launched.

The definition of internal control and the different elements mentioned in the management framework are based on the COSO Report, according to which there is a direct relationship between the objectives that the entity wishes to achieve (in terms of efficiency and operational effectiveness; confidence in accounting and financial records; and conformity with external and internal rules and regulations), the components of the internal control system (which represent what the organization needs to achieve the objectives), and its organizational structure (operative units, legal entities, etc.) sets out a common internal control model that entities and companies can use to evaluate and check their own control systems.

By means of compliance with risk management policies and procedures, adequate treatment is performed of risk, ensuring that the risks taken on by SOLUNION remain at an acceptable level and, hence, do not endanger the achievement of the Company's strategic objectives.

Different internal and external events will be assessed, allowing for acting according to the impact such events represent at a business, operational and organisational level. For risk treatment, necessary corrective measures will be selected and applied to control and mitigate the assessed risks.

Ultimate responsibility in internal control at SOLUNION lies with the Company's Board of Directors. Nevertheless, as a general rule, the Management Committee is the executive body that is periodically informed of the results of risk assessment and controls, and to which any significant matters related to internal control are escalated. Therefore, the Management Committee has decision-making authority for any matter related to risk management and control in SOLUNION, approval of the operational risk and internal control framework and any subsequent modifications to the same, reporting and action plans launched to mitigate the Company's risk exposure or to implement improvements in the internal control function.

The Management Committee will regularly inform the Board of Directors on matters deemed critical in the area of control and it may also escalate to the Board any decisions as it deems necessary.

The Internal Control area prepares an internal control report that sets out the Company's current situation at the date of the analysis of risks and controls, allowing for updating the risk and control map. This map also serves as the basis for the following internal control cycle.

The Board of Directors, on March 24, 2017, approved the 2016 Annual Report on the Effectiveness of Internal Control Procedures, which shows the results of the analysis and the action plans to improve mitigation of the most significant risks. Internal audit issued an opinion on the review of the internal control system, concluding that the report showed the true and up-to-date situation of SOLUNION's internal control system. At the date of publication of this report, the annual Report of 2017 has not yet been issued. The risk and control evaluation is being carried out without any relevant facts being identified for the Company.

B.4.2. Compliance verification function

The compliance function identifies risks of external and internal non-compliance that may occur as a result of the Group's activity, advises as a result of such risk assessment, alerts on possible non-compliance and monitors the measures adopted for its correction, in order to ensure that the group's operations are adjusted in all areas to the general and sector-specific regulations and to the internal ones established by SOLUNION to achieve a global compliance environment.

The Company has a compliance policy, the latest revision of which was approved by the Board of Directors on September 18 2017, and which describes the compliance function in the Company.

The Policy states that, in accordance with the principle of decentralisation and to achieve coordinated implementation, the compliance function has teams that are proximate to business processes in order to assist all members of the organisation in fulfilling their responsibilities, and it is structured pursuant to specific regulatory requirements to which it is subject and to the principle of proportionality according to volume.

The head of the compliance function is responsible for reporting the monitoring of compliance risk to the Company CEO.

The process of compliance risk management enables determination and assessment of compliance risk, establishment of minimum parameters for the identification, measurement, mitigation, monitoring and reporting of compliance risk exposure and identification of compliance risks:

- Compliance risk identification: the identification process allows the set of compliance risks affecting the Group to be outlined, which forms the Compliance Universe.

- Compliance risk evaluation: an assessment of compliance risk consists of a quantification of the impact and probability of each of the identified risks. This assessment entails analysing the financial and non-financial impacts and prioritizing, according to these results, actions on risks.

- Compliance risk mitigation: mitigation of compliance risks is the response to compliance risk. Mitigation strategies should reduce the impact and/or probability of occurrence of identified compliance risks.

- Compliance risk monitoring: Monitoring of compliance risk allows for checking that risk mitigation activities are working properly and identifying any new risks affecting compliance. The business processes report to the Group's Head of Compliance any indication of the existence of a compliance incident and provide updated information on the status until it is resolved.

- Compliance risk exposure information. Compliance reports on the management process of this risk will include at least the results of the assessment of the compliance risk, compliance risks that may generate losses, the results of monitoring activities and the status of mitigation and rectification actions.

B.5. Internal audit function

As discussed in the Risk Management System section, Internal Audit is the risk management model's third line of defence, and should provide an independent guarantee of the adequacy and effectiveness of the internal control system as well as other elements of the governance system.

SOLUNION's internal audit function is outsourced to its shareholders, Euler Hermes and MAPFRE, through their internal audit teams, who perform audit activities under the responsibility of the Chairman of the Board of Directors.

This relationship is supported by an outsourcing contract and the activity is supervised by the CEO of the SOLUNION Group, who is responsible for overseeing the correct operation of the outsourced function.

B.6. Actuarial function

The company has an Actuarial Function Policy whose last review was approved by the Board of Directors on September 18, 2017, which describes the Actuarial Function in the Company.

The actuarial area coordinates mathematical, actuarial, statistical, and financial calculations used to specify technical provisions for the calculation of capital requirements of insurance companies, which contributes to achieving technical results and the Company's desired solvency levels. The Actuarial Area also prepares and fosters the use of predictive models in functional areas of insurance entities. The Actuarial Area has members with the sufficient qualifications, training and experience for satisfactory performance of their duties. Additionally, it will take appropriate measures to deal with possible conflicts of interest if additional tasks or activities are added to the current tasks and activities of the actuarial function.

Responsibility for the performance of actuarial quantifications and for other predictive models lies directly with the Company. They will also prepare technical documentation related to these evaluations.

The Group's actuarial area will set principles and general guidelines for action taking account of best statistical and actuarial practices for the Group for the purpose of coordinating and achieving uniformity in guidelines for actuarial calculations.

The Group's actuarial area oversees compliance with general principles and guidelines in actuarial evaluations. The Group's actuarial area will foster corrective actions in cases where irregularities are detected in certain quantifications, or its general guidelines have not been followed. It will also provide support to the actuarial or financial area of the Company to assist them in fulfilling their responsibilities.

At least annually, the Actuarial area shall issue a written report, addressed to the Company's Management in which reference is made to the adequacy of the level of technical provisions, and that an opinion is expressed on the subscription policy and Reinsurance. The deficiencies noted in the report will be accompanied by recommendations on how these deficiencies can be addressed, and a timetable for their correction will be fixed.

B.7. Outsourcing

Information on current outsourcing arrangements

SOLUNION has an outsourcing policy that establishes principles of management for the outsourcing of activities that enables the Company to manage its own suppliers map in accordance with methodology in place for outsourcing.

The existing governance structure ensures that the Company has sufficient control over critical functions, activities or services which have been outsourced, in the terms established in the Solvency II Directive and local enacting legislation.

SOLUNION's internal audit function is outsourced to its shareholders, Euler Hermes and MAPFRE, through their internal audit teams, who perform audit activities under the responsibility of the Chairman of the Board of Directors.

This relationship is underpinned by an outsourcing contract and the activity is supervised by the CEO of the SOLUNION Group, who is the business owner and responsible for overseeing the correct operation of the outsourced function.

By outsourcing the mentioned functions, other important activities and services, the Company streamlines its processes, as it can exploit the knowledge and specialisation of its suppliers and very often benefit from positive synergies.

B.8. Any other information

The Company's governance system reflects the requirements established in the Solvency II Directive on the system for management of risks inherent to its activity. It employs its own strategy for implementing and carrying out the risk management area, where it is the responsibility of the SOLUNION Management Committee to define the reference criteria and establish/validate its organisational structure.

Its structure is based on the related regulatory requirements, as well as the principle of proportionality related to its business size and the nature/complexity/size of the risks assumed by the Company.

C. Risk profile

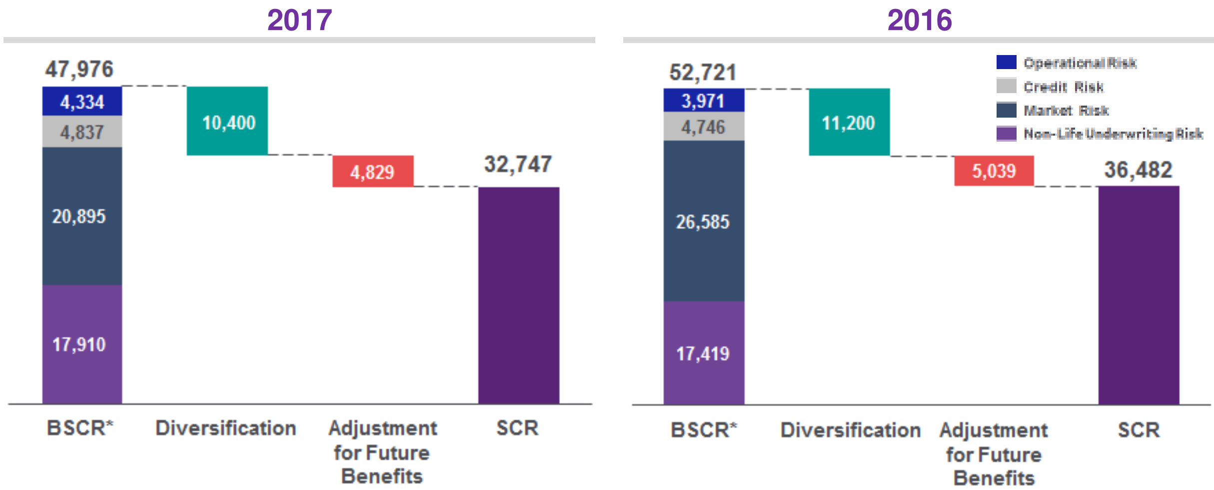
After the entry into force of Solvency II regulations, the Company calculates its Solvency Capital Requirements (SCR) in accordance with standard formula requirements. For the main risk categories, this total SCR is considered an excellent measurement tool for determining the Company's risk exposure, as it recognises the capital charge corresponds to key risks (such as underwriting, market, and credit risk). As explained below, the Company's exposure to other risks not included in the SCR calculation using the standard formula (risk of liquidity, technical provisions, business continuity, compliance, reputational and outsourcing) are not considered significant, since the Company applies effective measures to manage and mitigate them.

As indicated in regulations, the SCR corresponds to the Company's equity for limiting the probability of bankruptcy to one case per 200, or that the Company is still 99.5% able to meet its commitments to insurance beneficiaries and policyholders during the following year.

After the analysis carried out, it is concluded that the risk modules of the standard formula that apply to society are the following:

- Market risk
- Non-Life Underwriting risk
- Counterparty Risk
- Operational risk

The following graphs shows the risks that make up the risk profile of SOLUNION based on the regulatory capital required (reported in template S.25.01.21 of the Appendix):



* BSCR: SCR Components before Diversification.
Data in thousands of euros

In these graphs we can observe that the Company´s risk profile remains constant; for both 2016 and 2017 the risk that affects the Company most intensely is the market risk, which is followed by Non-Life Underwriting risk..

Following is the degree of exposure, risk by risk, as well as the reduction and mitigation techniques used by each Company to minimise them.

C.1 Underwriting Risk

C.1.1 Exposure to the risk

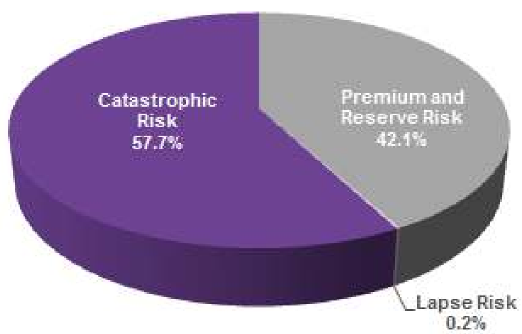
Underwriting Risk is defined as the risk of loss or adverse value changes in the commitments arising from insurance activities, due to incorrect pricing hypotheses and constitution of provisions.

It is also subdivided into:

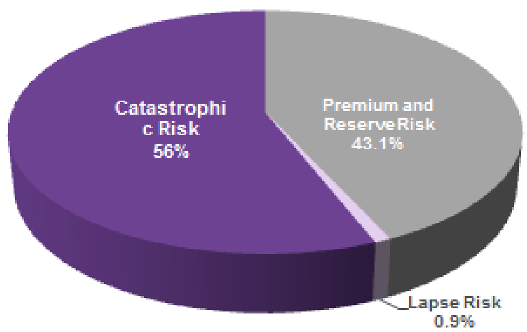
- Premium risk: is due to fluctuations at the time, the frequency and severity of the insured events. Premium Risk is related to the policies that will be underwritten during that period (including renewals and new business), and to risks in progress for existing contracts. It also includes the risk that claims provisions could be insufficient to cover the claims or that they could be increased.
- Reserves risk: is due to fluctuations at the time and the amount of the claims settlement.
- Catastrophic risk: CAT risks arise from extreme or irregular events that are not adequately reflected by mandatory capitals for premium and reserves risk. Therefore, it could be said that it is the risk of loss or adverse value changes of the liabilities derived from insurance, due to a notable uncertainty of the pricing hypotheses and constitution of provisions corresponding to extreme or exceptional events.

Underwriting Risk is included under the SCR Standard Formula calculation and entails 37% (33% in 2016) of the total SCR before diversification and taking into account the capacity of loss absorption. The composition of the underwriting risk is detailed below:

2017



2016



The module with the greatest impact, as in the year 2016, is the one corresponding to the catastrophic risk, which represents 57.7% of the underwriting risk SCR before diversification. The most significant component of this module is the recession risk, which generates a capital load of 100% of the expected premium in the next 12 months after the mitigating effect.

Next, there is premiums and reserves risk, which represents 42.1%. For its part, fall risk exposure is residual, with a 0.2% of underwriting risk SCR.

As can be observed in the previous charts, exposure to each of the risks has remained constant throughout the year.

C.1.2 Risk mitigation techniques

The Company minimises underwriting risk thanks to a number of measures:

- **Establish directives, limits, and exclusions in underwriting risk**:

  The Company establishes authorisation and exclusion limits for reducing undesired Underwriting Risk in its manual or policies, as well as the maximum acceptable exposure to specific risk concentrations.

- **Sufficient reserves or technical provisions set aside**:

  Claim handling and the sufficiency of technical provisions are basic principles of insurance company management. Technical provisions are calculated by the Company's actuarial teams and their amounts are validated by an independent third party not involved in the calculations. The establishment of technical provisions is regulated by specific policies.

- **Reinsurance utilization**:

  SOLUNION uses the reinsurance technique in order to balance the risk distribution contained in its portfolio and optimise its capital through: an increase in its underwriting capacity and available capital, stabilisation of its financial results and reduction of its losses, and protection of its equity.

- **Setting a sufficient premium**:

  Premium sufficiency is of special importance, and its determination is supported by specifically-designed IT applications, as well as by actuarial calculations.

To mitigate catastrophic risk specific reinsurance coverage is contracted. Additionally, there are reports that define the catastrophic exposure to which the Company is exposed, to estimate the scope of losses should a catastrophic event occur. Catastrophic risk underwriting is done based on the above information, the economic capital available, as well as the reinsurance mitigation capacity contracted.

Through its Reinsurance Area, the Company is responsible for correctly identifying the appropriate level of risk transfer for its previously-defined risk limits, and for defining/designing the types of reinsurance agreements based on its risk profile.

Once its reinsurance needs have been defined, the Company communicates them to the reinsurers to jointly plan the optimal structure and conditions for assignment contracts.

C.2 Market Risk

C.2.1 Exposure to the risk

Market Risk is the risk of loss or adverse modification of a financial situation, directly or indirectly arising from fluctuations in the volatility and level of market prices of assets, liabilities, and financial instruments.

Company investment strategy is based on prudent policy, and characterised by a high proportion of fixed-income securities with high credit ratings.

The following is a breakdown of the Company's investments with exposure to Market risk:

	2017		2016	
Asset category	**Market value**	**Portfolio composition**	**Market value**	**Portfolio composition**
Real estate investments	**49**	**0.1%**	**48**	**0.1%**
Financial Investments	**64,634**	**99.9%**	**74,188**	**99.9%**
Fixed-income securities	34,617	53.5%	34,760	46.8%
Equity securities and investment funds	-	-	2,796	3.8%
Holdings in Group companies	30,017	46.4%	36,632	49.3%
Total	**64,683**		**74,236**	

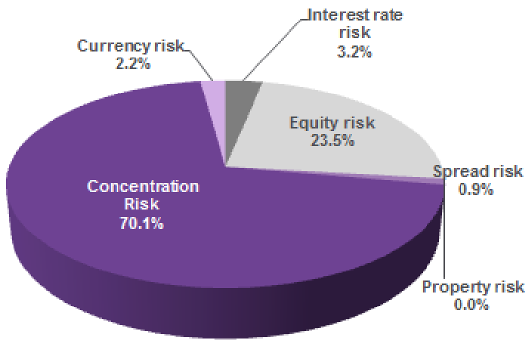
Data in thousands of euros

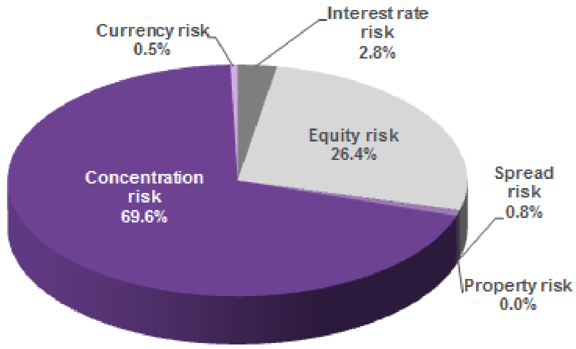
As of December 31, 2017, 99.9% of all Company investments were financial investments (99.9% of all in 2016) which are composed of participations in Group companies and fixed-income investments.

The sub-models existing within the investment risk to which the Company is exposed are listed below:

- Equity risk: sensitivity of the value of the assets, liabilities, and financial instruments to changes in the level or the volatility in the value of the equity and participations in Group companies.
- Concentration risk: additional risks to which an insurance or reinsurance company is exposed as a consequence of a lack of asset portfolio diversification or significant exposure to noncompliance risk of a securities issuer or a group of connected issuers.
- Interest rate risk: sensitivity of the value of the assets, liabilities, and financial instruments to changes in the temporary structure of interest rates or the volatility of the interest rates.
- Spread risk: sensitivity of the value of the assets, liabilities, and financial instruments to changes in the level or the volatility of credit differentials with regard to the time structure of risk-free interest rates.
- Currency risk: sensitivity of the value of the assets, liabilities, and financial instruments to changes in the level or the volatility of the currency exchange rates.
- Property risk: sensitivity of the value of the assets, liabilities, and financial instruments to changes in the level or the volatility of the market prices of the real estate property.

The SCR market risk entails 43.6% (50.4% in 2016) of the total SCR before diversification and taking into account the loss absorption capacity. The composition of the market risk is detailed below:





Equity risk has been reduced compared to 2016, mainly due to the lower exposure to equity, Investment Funds and participations in Group Companies.

There has been an increase in the currency risk with respect to 2016, due to the greater exposure in foreign currency that comes from the Accepted Reinsurance of the SOLUNION entities located in Latin America. Despite this increase in exposure, the contribution of this sub-module on Market risk remains residual.

The assets and liabilities denominated in foreign currency as of December 31, 2017 and 2016 are as shown below:

ASSETS	Euros		Dollars		TOTAL	
	2017	2016	2017	2016	2017	2016
Deposits other than cash equivalent assets	**5,377**	**3,087**	**713**	**251**	**6,090**	**3,338**
Reinsurance Share In Technical Provisions	**79,863**	**89,239**	**31,321**	**31,509**	**111,184**	**121,748**
Loans and receivables	**3,639**	**2,706**	**3,263**	**3,742**	**6,902**	**6,449**
Reinsurance deposits Accepted	94	68	1,819	1,539	1,913	1,608
Credit for reinsurance operations	3,545	2,638	1,444	2,203	4,989	4,841
TOTAL ASSETS	**88,879**	**95,032**	**35,297**	**35,502**	**124,176**	**131,535**
LIABILITIES	**Euros**		**Dollars**		**TOTAL**	
	2017	2016	2017	2016	2017	2016
Reinsurance operation debts	**8,131**	**7,119**	**577**	**1,271**	**8,708**	**8,389**
Technical provisions for benefits	**90,839**	**100,288**	**32,336**	**34,520**	**123,175**	**134,808**
TOTAL LIABILITIES	**98,970**	**107,407**	**32,913**	**35,791**	**131,883**	**143,197**

Data in thousands of euros

C.2.2 Risk mitigation techniques

The main method SOLUNION uses to mitigate market risk is following the Principle of Prudence (already explained in section B.3.2) and it establishes certain concentration limits when making investments, i.e. Risk Appetite, which is defined by the Board of Directors.

The Investment Committee defines the investment limits applicable, checking that they meet the diversification and dispersion limits.

Additionally, for each risk sub-model:

- Share investments are subject to the maximum limit of the investment portfolio, and issuer limits.
- Spread and concentration risks are mitigated by the high proportion of fixed income securities with credit ratings classified as degree of investment, and through issuer diversification.
- The Investment Risk Management and Liquidity Risk Policy establish an asset exposure limit for currency coverage in order to minimise foreign currency risk. It also looks for a correlation between the currencies in which the assets and liabilities are denominated. There is a list of assets in which it is permitted to invest, others that are not permitted and others for which prior approval is required from the Investment Committee.

C.3 Credit risk

C.3.1 Exposure to the risk

Credit Risk is the risk of loss or adverse modification of a financial situation arising from fluctuations in the solvency of values issuers, counterparties, and any other debtors to which insurance and reinsurance entities are exposed, materializing as counterparty non-compliance, differential, or market risk concentration.

The Company's Credit Risk Management policies distinguish between three types:

a. Exposure to which reinsurers are exposed: counterparty risk is generated mainly because of SOLUNION's heightened exposure in reinsurance agreements. The exposure level of reinsurance recoverables is affected by the heightened level of transfer defined in the reinsurance structure. (Reinsurers)

b. Exposure to banks, savings banks, credit cooperatives, financial entities, and other similar entities. Their exposure to Credit Risk is measured by their economic value. (Financial entities)

c. Fixed income securities, derivative instruments, and other financial investments not considered fixed income. Its exposure to Credit Risk is measured at its economic value, once possible mitigating factors have been deducted. (Investments)

Credit Risk is included under the SCR Standard Formula calculation.

- Such as spread and concentration risk, under Market Risk.
- Such as credit risk or counterparty noncompliance. This module distinguishes between two types of exposure:
  - Type 1 exposure: includes reinsurance contracts, cash in banks, among others, in which entities generally have credit ratings.
  - Type 2 exposure: includes accounts receivable from intermediaries, and policyholder debts, among others.

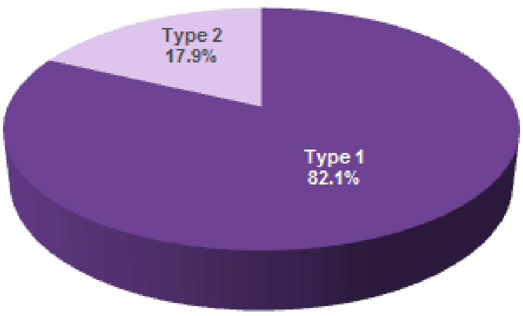
The following is a table reflecting the exposure to Credit Risk at December 31, 2017:

	2017	2016
Type 1 Expositions	103,455	109,930
Type 2 Expositions	5,139	3,585
TOTAL	108,594	113,515

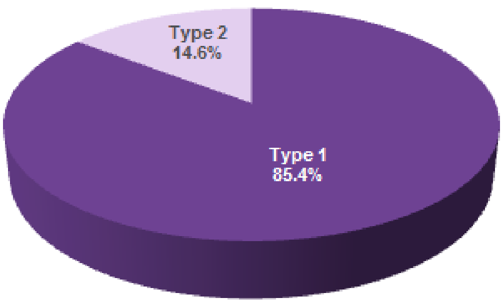
Data in thousands of euros

The SCR credit risk entails 10.1% (9% in 2016) of the total SCR before diversification and taking into account the loss absorbing capacity. The composition of the credit risk is detailed below:

2017



2016



C.3.2 Risk mitigation techniques

The policy followed for credit risk management sets limits in line with the counterparty's or investment instrument's risk profile, as well as exposure limits related to the counterparty's rating. A risk exposure monitoring and notification system is also set up.

The Company's Credit Risk investment policies are based on the application of criteria of prudence based on the issuer's solvency. Fixed-income investments are subjected to limits by the issuer and seek out geographic similarity between the issuers of assets and commitments.

The Company's strategy for reinsurance counterparties is to cede the business to reinsurers with proven financial capacity. The transfer of SOLUNION is mainly directed to the reinsurers of the shareholders Euler Hermes and MAPFRE, and aims to benefit from its wide capacity and high credit quality.

The chief principles which must be met which inspire the management of the use of reinsurance and other risk-reduction techniques within the Company are:

- The principle of optimizing capital consumption.
- The principle of optimizing conditions.
- Counterparty solvency principle.
- The effective transferability of risk principle.
- The principle for matching risk transfer level.

C.4 Liquidity risk

C.4.1 Exposure to the risk

The Liquidity risk is the risk that the insurance and reinsurance companies might not be able to realise its investments and other assets in order to meet its financial obligations at expiration.

The Company has an Investment and Liquidity Risk Management Policy which represent the framework of reference for handling Liquidity Risk. The entity's policy is based on maintaining sufficient cash to cover any situations arising as a result of its commitments with policyholders and creditors.

At December 31, 2017, the balance of cash and cash equivalents amounted to 6,090 thousand euros (3,338 thousand euros in the previous year), which is equivalent to 8.6% of total investments and cash equivalents (4.3% in 2016). Additionally, the majority of fixed-income investments have high credit ratings and are traded on organised a financial market, which grants a great deal of leeway for action in the face of potential liquidity tensions.

The Investment and Liquidity Risk Management Policy foresees the possibility at any moment of the need for large quality liquid amounts and forecasted cash entries sufficient to cover expected cash balances for the whole year.

C.4.2 Risk mitigation techniques

Liquidity risk is managed mainly by maintaining cash balances high enough to cover any incidence derived from the obligations facing the insurers and creditors, i.e. having a cash volume that, as a whole, ensures compliance with the limits established in the investment and liquidity risk management policy.

Likewise, the Investment and Liquidity Risk Management Policies establish liquidity risk limits for the investment portfolio and the correlation with liabilities, with regard to the short-term nature of its technical liabilities as well as management of the foreign currency investment.

C.4.3 Expected benefits included in future premiums

In calculating the best estimate of the technical provisions, the expected benefits included in the future premiums have not been taken into account.

C.5 Operational risk

C.5.1 Exposure to the risk

Operational Risk is the risk of loss arising from the inadequacy or errors in internal processes, personnel, systems, or external events.

Operational Risk is included under the SCR Standard Formula calculation. The Operational Risk model reflects those not previously included in the above modules. It includes legal risks, but not those arising from making strategic decisions, or reputational risk.

The operational risk SCR represents 9% (7.5% in 2016) of the total SCR (before diversification). Below is a table reflecting the results based on earned premiums and technical provisions:

	2017	2016
Operational risk module	**4,334**	**3,971**
30% BSCR	9,973	11,265
Maximum premiums and provisions	4,334	3,971
Accrued premiums risk	4,334	3,971
Technical provisions risk	3,318	3,660

Data in thousands of euros

The most critical inherent operational risks to which SOLUNION is exposed are included in the Annual Report on Internal Control Effectiveness.

C.5.2 Risk mitigation techniques

The identification and evaluation of operational risks and business processes are managed by the Company's Risk Management area, which creates Risk Maps for the Company, in which analyses on the importance and probability of occurrence of different risks are performed. The analysis is carried out through a computer platform dedicated to the evaluation, identification and monitoring of the risks that exist in the whole business.

This risk map is also used for handling control activities (process manuals, inventories of risk-associated controls, and the evaluation of their effectiveness), as well as corrective measures established to mitigate/reduce risks and/or the control environment.

The operational risk management model is based on a qualitative dynamic analysis of the Company's processes, so that each area/department manager identifies and evaluates the potential risks affecting business processes behind the scenes. Product development, issuing, claims/benefits, administration, sales activities, human resources, commissions, coinsurance/reinsurance, technical provisions, investments, technology systems, and customer support.

C.6 Other material risks

In addition to the risks that were just described, SOLUNION is exposed to other material risks:

- **Technical provisions recognition risk:**

The constitution of technical provisions is done according to the best estimate, as established by Solvency II regulations. The Group's Actuarial Function is in charge of overseeing risk management for inadequate reserves, as set forth in the Actuarial Function Policy and the Policy on the constitution of Technical Provisions.

The sufficiency of technical provisions is one of the fundamental factors to maintain SOLUNION'S solvency and the basis for meeting the obligations acquired with the insurance policyholders.

To guarantee and meet the sufficiency level of the provisions, there must be a monitoring system that guarantees reliability of the process for establishing technical provisions.

The Actuarial Area coordinates the calculations and guarantees sufficiency of provisions. Therefore, it is responsible for overseeing risk management for insufficient reserves.

Calculations are subject to independent review on at least an annual basis.

- **Business continuity risk:**

The business continuity risk is the one that SOLUNION assets support due to the possibility that future events may lead to adverse to meeting the financial and business goals, or the Group's financial situation.

This risk is discussed in the Business Continuity Policy, the purpose of which is to define the processes to follow before, during and after an incident that causes or can cause interruption in Company operations so as to reduce the impact on the business to a minimum.

To handle this risk, business continuity plans are developed, which include a sufficient set of procedures to adequately respond, from the moment in which the disaster is reported until return to normalcy. For this, the areas, internal departments, suppliers and services of the Company are taken into account and must be updated and revised continuously to include possible significant changes.

- **Compliance risk:**

Compliance risk includes potential losses due to noncompliance with current legislation or regulatory requirements, exposure to potential losses due to the lack of integrity of inaccuracy of documentation on specific transactions or the lack of signatures. This risk is discussed in the Compliance Function, in its corresponding Policy and in the Compliance Committee.

This risk is dealt with in the Compliance Function, in its corresponding Policy and in the Compliance Committee.

Monitoring compliance risk allows us to verify if the risk mitigation activities are working properly and identify new risks that affect compliance.

Compliance incidents are defined as events that could have a material financial or reputational impact on the Group.

The business processes report to the Group's Head of Compliance any indication of the existence of a compliance incident and provide updated information on the status until it is resolved.

- **Reputational risk:**

Reputational risk is defined as the possibility of a decrease in the Company's value due to being negatively perceived by shareholders, authorities, insurers, brokers, suppliers, consumers or other third parties.

Both, the Code of Ethical and Conduct, and the Function, Policy and Compliance Committee of SOLUNION manage the reputational risk.

In order to minimise the negative effects with regard to occurrence of reputational risks, a set of mitigation measures has been identified in order to prevent, identify and monitor this risk.

The following measures are carried out to mitigate the risk:

- In all areas of activity of SOLUNION, continue promoting ethical and socially responsible behaviour to reflect the principles that guide the actions of all employees, brokers and suppliers.
- Involve all employees, brokers and suppliers in the importance of preserving the Company's good image.
- Keep the crisis and reputational risk management procedures up to date.

- **Outsourcing risk:**

Outsourcing risk is the one that arises from the agreements between SOLUNION and an external service provider through which the provider carries out a certain process or activity (function, important activity or service) for a period of time.

The Outsourcing Policy for functions defines strict guidelines to ensure that the risk of outsourcing is properly managed, both with internal and external suppliers.

C.7 Any other information

C.7.1 The most significant concentrations of risk.

SOLUNION applies a system of procedures and limits enabling it to control the degree of concentration of insurance risk. The Company employs reinsurance contracts to reduce insurance risk arising from the concentration or accumulation of guarantees well over maximum acceptance limits.

In relation to market risk, the Company applies the limits established in the Investment Policy, which ensures sufficient diversification by issuer, country, and activity sectors.

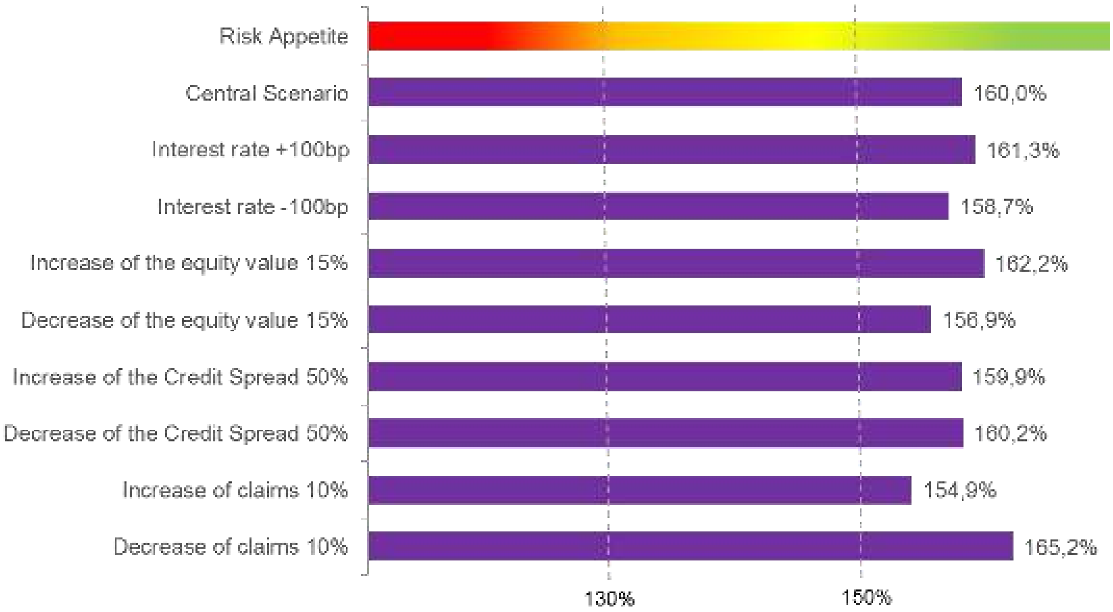
There are no future concentrations of risk expected during the activity planning period apart from the aforementioned.

C.7.2 Sensitivity analysis

The purpose of the sensitivity scenarios is to analyze the impact on the solvency ratio of changes in the risk profile. To analyze its impact in terms of the solvency ratio, the sensitivities are carried out in both directions, that is, by increasing and decreasing the exposure to risk.

Eight sensitivity scenarios involving movements in both the Company's balance sheet and the calculation parameters have been proposed. These movements are summarized in:

- Effect on interest rates: variations in interest rates imply changes in the valuation of assets and liabilities. A rise of the curve will imply a decrease of the value of the asset but also of the obligations of the entity, which in this case, are the technical provisions.
- Effects on the valuation of the equity: it supposes an increase and decrease of its valuation in the balance sheet of the entity and consequently, of the requirements of capital by equity risk.
- Effect of variations in the credit spread: it implies variations in the shock applied in the calculation of spread risk and consequently the capital requirements for this risk.
- Effects on claims, these variations suppose variations in the value of the gross and ceded technical provisions.



The sensitivities with the greatest impact in terms of eligible capital and capital consumption for the Company are the following:

- Decrease of equity: the structure of the company's portfolio of assets, with a great weight of the value of the participations in the group's entities, makes that any change in its valuation have a direct impact on its own funds and on the consumption of capital in market risk (in particular, equity risk and concentration risk).
- Increase of claims: The increase in claims decreases the results of the entity while at the same time increases the volume of technical provisions. These impacts are a decrease in the permissible own funds which, together with higher capital consumption, negatively impact on the solvency ratio.

Included in the annual ORSA process, a sensitivity study is conducted in terms of risk exposure and capital requirements as of the closing date of exercise. This annual procedure reflects the impact on the solvency ratio, if the fundamental risk parameters had changed.

C.7.3 Other matters

Off-balance-sheet positions

There are no significant exposures to the above risks arising from off balance sheet positions.

Transfer of risk to special-purpose entities

The Company does not transfer risk to special-purpose entities.

D. Valuation for Solvency Purposes

D.1. Assets

Information on asset valuation

This heading includes a description, for every type of asset, of methods and main hypotheses used for both valuations for the purposes of Solvency II and for the purposes of the financial statements. In the event that there were significant differences among the bases, methods and main valuation hypotheses of both balances, a quantitative and a qualitative explanation will be provided for them.

The valuation of the majority of the assets is based on the fair value in accordance with the delegated regulation. The determination of the fair value of the financial and non-financial instruments is carried out with the valuation methodology described in article 75 and the following of the delegated regulation and articles 9 and 10.

For a better understanding, it is important to consider that the model balance sheet presented is adjusted to Solvency II regulations, and therefore it was necessary to reclassify the date included under “Accounting value” since each model structures its balance sheet differently. Thus, under certain headings differences in classification arose between the data included in the financial statements and those reflected under “Accounting value.”

The valuation of each category of tangible assets is described below. The figures correspond to the balance sheet at the end of 2017 that has been reported in template S.02.01.02 of the Appendix.

	2017		
	Accounting Value	**Valuation changes**	**Solvency II Value**
Goodwill	**16,109**	**(16,109)**	
Deferred acquisition costs	**7,625**	**(7,625)**	
Intangible assets	**11,412**	**(11,412)**	**-**
Deferred tax assets	**9,189**	**2,713**	**11,902**
Assets and rights to reimbursement for long-term remuneration to the personnel	**4,599**	**-**	**4,599**
Property, plant & equipment held for own use	**650**	**-**	**650**
Investments (other than assets that are held for "index-linked" and "unit-linked" funds)	**81,292**	**(16,609)**	**64,683**
Property (other than for own use)	39	10	49
Participations	47,296	(17,279)	30,017
Bonds	33,957	660	34,617
Public debt	*27,805*	*540*	*28,345*
Private debt	*6,152*	*120*	*6,272*
Insurance other than life insurance, and health similar to insurance other than life insurance	**111,184**	**(12,212)**	**98,972**
Accepted reinsurance deposits	**1,913**	**-**	**1,913**
Credits for direct insurance and coinsurance operations	**30,360**	**-**	**30,360**
Reinsurance operation credits	**4,988**	**-**	**4,988**
Other credits	**3,162**	**-**	**3,162**
Cash and cash equivalents	**6,090**	**-**	**6,090**
Any other assets, not elsewhere shown	**718**	**(660)**	**58**
TOTAL ASSETS	**289,291**	**(61,914)**	**227,377**

Data in thousands of euros

D.1.1. Goodwill

In accordance with Solvency II criteria, goodwill was valued at zero, in accordance with Article 12 of Delegated Regulation 2015/35 dated October 10, 2014. Unlike under the Solvency II regulation, according to the PCEA, goodwill is value at its cost adjusted in line with accumulated amortisation and any possible impairment. The above goodwill represents the excess amount paid during a business combination for the fair value of identifiable assets acquired and the liabilities and contingencies assumed.

D.1.2. Deferred acquisition costs

For purposes related to the Solvency II balance sheet, “Deferred acquisition costs” are presented at 0 value, since the cash flows considered during the valuation of the technical provisions includes the total amount of expenses associated to the evaluated insurance contracts, including those arising from acquisition costs. On the contrary, in the presentation that is made in the regulation applicable to the Balance sheet under PCEA are disaggregated in this heading.

D.1.3. Intangible assets

As regards the Solvency II balance sheet, recognition of intangible assets unrelated to goodwill must be recognised at a value other than 0 only if they may be sold separately, and the Company may demonstrate the existence of a market value for the same or similar assets.

The Company recognises software under this heading, as well as, the agreement signed with MAPFRE Global Risks, Compañía Internacional de Seguros y Reaseguros, S.A. in the month of December 2017, under which it undertakes to develop the necessary actions to ensure that its current clients of the Bonding branch subscribe their policies with SOLUNION as of January 1, 2018, thus leaving MAPFRE Global Risks operate in the Bonding branch. The compensation of this agreement amounts to 10 million euros.

For this heading, which it considers does not meet the conditions established in the above Solvency regulations for market value recognition, and therefore they are presented at a 0 value.

Under PCEA guidelines, intangible assets are measured at cost less their accumulated amortisation and, where applicable, less the possible impairment, as opposed to the abovementioned Solvency II criteria.

D.1.4. Deferred tax assets

According to the Solvency II regulations, the deferred taxes corresponding to all the assets and liabilities that are recognized for tax or Solvency purposes are recognized and valued. Deferred taxes are measured under Solvency II as the difference between the values assigned to assets and liabilities for solvency purposes, and their assigned values as recognised and valued for tax purposes.

The Company recognised deferred tax assets on the Solvency II balance sheet, as it offset deferred assets and liabilities as set forth in EIOPA technical specifications, when they are taxes established by the same tax authority.

Under the regulations established in the PCEA, Deferred taxes are recorded for the temporary differences that arise as a result of the differences between the tax valuation of assets and liabilities and their book values.

Offsetting of deferred tax assets and liabilities is not contemplated under PCEA, unlike Solvency II valuation methods.

The differences between the Solvency II and accounting value of the deferred tax assets mainly arose due to the different valuation criteria used for the following items:

- Property
- Intangible assets

- Reinsurance recoverable amounts.
- Technical provisions.
- Property, plant & equipment held for own use
- Deferred acquisition costs

D.1.5. Pension benefit surplus

The Company does not have a surplus resulting from long-term remuneration to the personnel.

D.1.6. Property, plant & equipment for own use

In accordance with Solvency II criteria, property, plant & equipment held for own use must be measured at fair value.

Under PCEA regulations, property, plant, and equipment for own use is recognised at acquisition or production cost, corrected by the accumulated amortisation, and where applicable, the accumulated amount of impairment losses.

In this case, this item does not present valuation differences, so its amount is 650 thousand euros on both the economic and accounting balance sheets.

D.1.7. Investments (other than assets held for "index-linked" and "unit-linked" contracts)

All investments must be measured at fair value on the Solvency II balance sheet, regardless of the accounting portfolio under which they are classified. The determination of fair value is performed by following the same procedures and methodology used for determining fair value based on IFRS standard 13.

IFRS 13 defines fair value as the price received in exchange for an asset or paid for transferring a liability during an orderly transaction between market participants at the valuation date. In a fair value valuation, the transaction should take place in the main asset or liability's market, and where this does not exist, in the most advantageous market. Valuation techniques appropriate to the circumstances for which there is sufficient data to conduct a fair value measurement must be used, maximizing the use of relevant observable variables while minimizing the use of variables which cannot be observed.

In order to increase the coherence and comparability of the fair value measurements, IFRS 13 establishes a fair value hierarchy making it possible to classify the valuation technique variables used to determine fair value in three different levels.

Level 1 corresponds to unadjusted quoted prices on active markets. Level 2 uses observable data, or listed prices for instruments which are similar to those being appraised, or other valuation techniques in which all the significant variables are based on observable market data; Level 3 uses specific variables for each case. Nonetheless, we must stress the slight relevance of assets included in the last level.

Although the observable market transactions or information may not be available for all assets and liabilities, in any case the purpose of a fair value appraisal is always the same: estimate the price for an orderly transaction for selling or transferring the liability between market participants at the valuation date in present market conditions.

Under this heading, and based on the Solvency II balance sheet, the following investments are included:

D.1.7.1 ***Property (other than for own use)***

This category includes items which are not considered for own use, and are devoted to earning payments, capital gains, or both.

For the purpose of determining the fair value of the property, the market value is considered to be that corresponding to the appraisal made by authorized independent appraisal entities.As established in Order ECO / 805/2003 of March 27, on valuation standards of property, the Company requests the appraisals before two years have elapsed since the previous valuation and, regardless of the age of the previous valuation, whenever a significant alteration in the value of the same could have taken place

The regulations established in the PCEA indicate that the properties that are not considered for own use are recognised at acquisition or production cost, corrected by the accumulated amortisation, and where applicable, the accumulated amount of impairment losses, as opposed to Solvency II criteria, in which they are restatement at market value.

The difference in the two valuation criteria represented the recognition of the higher amount of properties on the Solvency II balance sheet in the amount of 9 thousand euros.

D.1.7.2 ***Participations***

In accordance with the text of Article 131 of the ROSSEAR, all affiliated companies that are either subsidiaries or have a participation or a relationship that could be considered a dominant or significant influence have been considered as subsidiaries.

Wherever possible, participations in related undertakings are measured at their listed prices on active markets as regards the Solvency II balance sheet. However, due to the absence of quoted prices on active markets, the participations and subsidiaries were valued using the adjusted equity method, considering the solvency valuation specifics indicated for each investment or subsidiary.

Under PCEA, participations in related party equity is valued at cost, and where applicable, at the accumulated amount of impairment losses. As a result, a decrease was revealed in the valuation of participations on the Solvency II balance sheet in the amount of 17,279 thousand euros, vs. PCEA stipulations.

D.1.7.3 ***Bonds and obligations***

Bonds are classified as follows:

- Public debt:

  This sub-category includes those issued by central governments or organs forming part of a government structure. This includes instruments issued by autonomous or local administrations in European Union member states, which are considered similar to the debt instruments issued by their central governments.

- Private debt:

  Within this subcategory have been included those emissions made by institutions that cannot be included in the category of government issuers,

- Structured notes:

  Within this subcategory have been included those emissions that by having a series of specific characteristics are considered as structured products.

Bonds are valued at fair value or amortised cost depending on the category in which they were designated according to PCEA / IAS 39.It will be necessary to recalculate the public and private debt items valued at amortized cost to adjust them to their fair value.

D.1.8. Reinsurance recoverables

For the purposes of the Solvency II Economic Balance Sheet, the calculation of the reinsurance recoverables amounts is in accordance with the calculation of the technical provisions for the direct business, which means that these amounts will be recorded at their best estimate, taking into account additionally the temporary difference between recoveries and direct payments, as well as the expected losses due to non-compliance of the counterparty.

When determining the value of the amounts to be recovered from reinsurance from the amounts considered in the technical provisions, the following aspects have been taken into account:

- The expected value of potential reinsurance default based on its credit quality and the time horizon of the expected payment patterns.

- Expected reinsurance collection patterns based on historic experience.

For reinsurance recoveries extending beyond the established payment period outlined in current contracts in force, a renewal of current contractual terms is contemplated, with no substantial modification in contracted cost or coverage.

The classification among the different reinsurance businesses and the development of reinsurance claims are based on the hypotheses and assumptions made for direct insurance with regard to the technical provisions.

The value of the potential reinsurance recoverables arising as a result of technical provisions for direct business is directly linked to estimations and projections for future cash flows which might be subject to a number of factors of uncertainly, which are mainly the following:

- Development of direct business claims, to which reinsurance contracts are linked.

- Possibility of facing the future payments that the reinsurer has.

- Reinsurance payment pattern.

Under PCEA, technical provisions for cessions to reinsurers are listed under assets on the balance sheet, and are calculated in accordance with the reinsurance contracts written and using the same criteria applied to direct business.

D.1.9. Deposits to cedants

For the effects of a Solvency II balance sheet, the value of the potential recovery of deposits held by grantors is directly linked to estimations and projections for future cash flows which might be subject to a number of factors of uncertainly, which are mainly the following:

- The possibility of facing the future payments that the transferor has.

- Historic experience on the effective time horizon of these recoveries, as well as the possibility of offsetting these balances with totally different ones, generated by other types of transactions or contracts.

PCEA and Solvency II valuations coincide; therefore, there were no valuation differences.

D.1.10. Insurance and intermediaries receivables

For purposes of Solvency II economic balance sheet, when determining the value of loans with policyholders and intermediaries, the time effect implicit in the loans is irrelevant. The obligatory estimates of possible loan default with insurers related to bills pending payment are considered to correctly reflect their economic value.

Loans with policyholders and intermediaries pending collection only includes rights related to invoices effectively issued and presented for collection. As outlined in the section covering technical provisions, future cash flows from invoices pending issue corresponding to insurance obligations within the limits of the contractual framework are considered as part of the calculation of technical provisions.

PCEA and Solvency II valuations coincide; therefore, there were no valuation differences.

D.1.11. Reinsurance receivables

For purposes of the Solvency II economic balance sheet, when determining the value of amounts receivable from reinsurance transactions, the expected value of potential default by the reinsurer is considered, based on its credit quality and the time horizon of the recoveries.

This heading includes loans arising as a result of reinsurance transactions.

The value of potential reinsurance collections is directly linked to estimates and projections for future cash flows which might be subject to a number of factors of uncertainly, which are mainly related to the possibility of meeting the counterparty's future payment commitments.

PCEA and Solvency II valuations coincide; therefore, there were no valuation differences.

D.1.12. Receivables (trade, not insurance)

The item for receivables (trade, not insurance) includes adequate quantities for the employees or various partners of businesses that are not derived from insurance operations. It also includes adequate quantities for public entities since there is no reason to have separate lines for tax assets. According to PCEA credits are valued at amortised cost.

PCEA and Solvency II valuations coincide; therefore, there were no valuation differences.

D.1.13. Cash and cash equivalents

For the purposes of Solvency II valuations, cash and cash equivalents were valued under IFRS, which is the methodology that by default establishes for this heading the valuation methodology for the purposes of Solvency II.

Cash and cash equivalents includes cash in hand, deposits in current accounts, deposits held at call with banks, and other short-term highly liquid investments which are easily convertible in certain cash amounts, whose value is subject to fairly insignificant risk of change.

PCEA and Solvency II valuations coincide; therefore, there were no valuation differences.

D.1.14. Any other assets, not elsewhere shown

The item "Other assets, not included in other items" collects those assets not collected in other preceding sections and has been valued according to the IFRS at fair value.

Due to the varied nature of this line, below you will find a list of the assets that have been grouped together in this item:

- Commissions and other granted accrued reinsurance expenses are contemplated during the valuation of technical provisions, as they include the entirety of the associated expenses.

- Other: depending on the nature of the assets, they may need to be revalued at market value.

D.1.15. Additional information

There is no other additional information to be highlighted.

D.2. Technical provisions

Information on technical provision valuation

Following are the technical provision valuations using Solvency II criteria (hereinafter, “Solvency II Provisions”), including qualitative explanations for the main differences arising from their valuations using Solvency II and those used in preparing the financial statements based on the PCEA, as well as the ROSSEAR, which establishes the applicable criteria to be applied (hereinafter, “Accounting provisions” - under “Accounting value”) at 31 December, 2017.

	2017		
	Accounting Value	**Valuation changes**	**Solvency II Value**
Technical provisions calculated as a whole			-
Best Estimate (BE)			*110,605*
Risk margin (RM)			*3,043*
Other technical provisions	-	-	-
TOTAL TECHNICAL PROVISIONS	**123,175**	**(9,527)**	**113,648**

Data in thousands of euros

In general terms, the main difference between the two valuation methods is the criteria framework under which each regulation falls. While under Solvency II technical provisions are measured using market economic criteria, for financial statements, annual technical provisions are calculated based on accounting standards. The most significant differences were as follows:

With regard to the valuation of technical provisions, the Company, following the PCEA, establishes its accounting provisions according to ROSSEAR.

Under Solvency II, following Directive 2009/138/CE and the ROSSEAR articles on the valuation of provisions for solvency purposes, the value of technical provisions for non-life insurance is determined using two procedures:

- Technical provisions calculated as a total: this methodology is applied when future cash flows associated to insurance obligations may be replicated using financial instruments with a directly observable market value. In this case, the value of technical provisions coincides with the market value of these financial products used for replicating future cash flows; it is unnecessary to make a determination between best estimate and risk margin.

- For all other cases, the technical provisions are calculated as the sum of two parts: the best estimate plus the risk margin.

In the case of SOLUNION, the technical provisions of the insurance that use non-life techniques are obtained as the sum of the best estimate and the risk margin.

D.2.1. Best estimate and risk margin

Best estimate

The actuarial methods and statistics used to calculate the technical provisions must be provided according to the nature, volume and complexity of the risks facing the Company.

The best estimate of the (*Best Estimate Liabilities*, hereafter BEL) commitments of the Non-Life business are calculated separately from pending claim provisions and premium provisions.

a) Best estimate of the pending claims provision

Provision of claims refers to the projection of claims flows that occurred prior to the valuation date, whether or not they were declared. Future flows should include: payments for claims and administration expenses related to said claims.

Reserves are provided both in gross and transferred and are separated by currency.

The process for calculating the BEL of technical provisions for the purposes of Solvency II is considered to be similar to that for accounting provisions; therefore it is important to keep in mind that the BEL must reconcile with the financial statements.

The best estimate for the pending claims provision is based on the following principles:

- This corresponds to claims taking place prior to the valuation date, regardless of whether they have been declared or not.
- It is calculated by the current value of expected future cash flows associated to the commitments. Projected cash flows will include payments for services and related expenses: claims and investment management.
- Should there be any commitments transferred to a counterparty, the recoverable amounts are adjusted to contemplate the expected losses arising from non-payment.
- The best estimate considers the time value of money based on the consideration of the claim inflows and outflows.
- From a methodological point of view, it is determined as the difference between the final cost of claims and effective payments made, net of their potential recovery or collection.

According to the eighteenth additional disposition of the ROSSEAR, the calculation of the technical provisions for accounting purposes is made as long as Royal Decree 1317/2008 is not modified by which the PCEA is approved, according to the regime established in Royal Decree 2486/1998 of November 20, which approves the Regulations for the Ordination and Supervision of Private Insurance (ROSSP hereafter), and its development regulations.

The provisions for pending claims calculated for use in the financial statements include: the provision for claims pending settlement and payment; the provision for claims pending declaration; and the provision for internal claim settlement expenses. The provision for settling pending claims is calculated using statistical methods and therefore includes claims pending settlement or payment, as well as those not yet declared.

The above statistical calculation meets the requirements established in prevailing legislation (Article 43 of ROSSP). Regarding provisions for internal expenses arising from settlement of claims, the calculation is based on applying methodologies which permit the best possible quantification of this type of risk.

We conclude that the calculation of the best estimate of claims provision based on Solvency II criteria present the following differences with respect to those calculations based on financial statement requirements:

- While under Solvency II technical provisions are measured using market economic criteria, for financial statements, annual technical provisions are calculated based on accounting standards.
- The consideration of all cash flow sources.
- The credit risk adjustment to recoverable reinsurance amounts.
- The financial discount of cash flows.

b) Best estimate of the premiums provision

The best estimate for the premium provision is based on the following principles:

- It corresponds to future claims, or those which take place subsequent to the valuation date, corresponding to the remaining claim coverage period.
- This is calculated as the current value of expected cash flows associated to the portfolio in force, in accordance with contractual limits.
- Projected cash flows will include payments for services and related expenses: administration, acquisition, claim management, and investment management.
- Should there be any commitments transferred to a counterparty, the recoverable amounts are adjusted to contemplate the expected losses arising from non-payment.

The best estimate considers the time value of money based on the consideration of the claim inflows and outflows.

As indicated previously, the calculation of this provision is comprised of the flows corresponding to two portfolios:

- Current portfolio. This includes the following headings:
  - Expected loss ratio. Two methodologies may be used to calculate the current value of benefits payments:
    - The frequency and average cost method: claims are calculated as the result of exposure based on frequency hypotheses and final average costs.
    - Loss ratio method: the expected loss ratio arising from applying the final claim ratio to gross PPNC acquisition expenses.
  - Expenses attributable to the current portfolio: acquisition (without commissions), administration, chargeable to benefits, investment expenses, as well as other technical expenses.
- Future business: This includes the following headings:
  - Premiums corresponding to policies which have not yet been renewed but include company commitments to renew (this is the case for tacit renewals or those for pluri-

annual policies with annual guaranteed premium payments). This calculation includes the future performance of policyholders based on the applications of an estimated cancellation probability.

- Expected claims corresponding to future premiums. The same methodologies for claims in force may be used.

- Expenses attributable to future premiums (charged expense-to-premium ratio applying future premiums): acquisition expenses (including commissions), administration, chargeable to services, investment expenses, as well as other technical expenses.

SOLUNION does not consider the future business, since, due to its business characteristics, it does not produce tacit renewals and nearly all its portfolio should be subject to renegotiation in each renewal.

According to the eighteenth additional disposition of the ROSSEAR, the calculation of the technical provisions for accounting purposes is made, as long as Royal Decree 1317/2008 is not modified by which the PCEA is approved, according to the regime established in the ROSSP and its regulations development.

Under PCEA, this provision is recognised under the unused premium provision, which is calculated on a policy-by-policy basis, reflecting the tariff premium earned during the year which may be charged to future years, deducting the security surcharge, in accordance with Article 30 of the ROSSP [Regulation on Ordination and Supervision of Private Insurance], and complemented by the prevailing risk provision calculated segment-by-segment, where applicable. This provision supplements the unearned premium reserve for the amount that the latter does not reflect the valuation of risks and expenses to be covered for the coverage period that has not yet elapsed at the closing date. It is calculated in accordance with article 31 of the ROSSP.

Contract limits

As outlined in the Solvency II Directive, when calculating the best estimate, it is necessary to consider the contractual limits. In certain cases, this implies the inclusion of future premiums arising from commitments in force. If the contracts are profitable, cash inflows corresponding to these premiums will be higher than the outflows (payments and expenses); thereby generating a negative BEL. Depending on the product's profitability, the inclusion of contractual limits generates a decrease in the best estimate (if the contracts are profitable) or an increase (if they are not).

Contractual limits must meet a series of requirements. The obligations arising from the contract, including those which correspond to the insurance/reinsurance company's unilateral right to renew or increase its limits and corresponding premiums, will be included in its text, except for:

- Commitments provided by the Company after the date during which:
  - The Company has unilateral cancellation rights over the contract.
  - The Company reserves the right to reject premiums payable related to the contract.
  - The Company reserves the unilateral right to modify its premiums or services to which it is bound by virtue of the contract, so that the premiums clearly reflect the risks.
- All obligations which do not correspond to premiums which have already been paid, unless the policyholder may be forced to pay future premiums, and as long as the following conditions are met:

- The contract does not establish an indemnity for a specific undetermined event which may adversely affect the reinsured party.
- The contract does not include a financial guarantee for coverage provided.

As a conclusion, it can be indicated that the premium provision calculated according to the criteria established in Solvency II present the following differences with respect to those calculated according to the requirements required on the Annual Accounts:

- The application of the concept of contractual limits, which involves the consideration of future business. Under PCEA, future premiums must be taken into account if they contemplate the corresponding technical note.
- The consideration of all cash flow sources. In general, under Solvency II, the premium provisions for profitable products included in a portfolio in force are less than the provision for unearned premiums (PPNC) reflected on financial statements. In cases of premium inadequacy, the premium provision will be comparable to the PPNC plus the prevailing risk provision (without taking the discount effect into account). For future business, the Solvency II premium provision for profitable products will be negative.
- The credit risk adjustment to recoverable reinsurance amounts.
- The financial discount of cash flows.

Risk margin

This is a part of the technical provisions used for guaranteeing that the value of the provisions equals the amount that the Company would need to cover and meet the insurance and reinsurance commitments.

This item reflects the cost of providing a quantity of eligible own funds equal to the SCR needed to support the commitments assumed by the Company until the obligation set forth in the contract is fulfilled. The cost of financing for supplying the eligible own funds is known as the cost-of-capital rate.

To calculate the risk margin, the hypothesis of transferring the best estimate for the Company's current business to a theoretical insurance agency known as reference unit (hereafter RU) the SCR of which is called SCR_{RU}.

The method of calculating risk margin can be expressed in the following way:

$$Margen\ de\ Riesgo\ = CoC * \sum_{t\geq 0} \frac{SCR_{RU}(t)}{(1+r_{t+1})^{t+1}}$$

Where:

- CoC: cost of capital is 6%.
- $SCR_{RU}(t)$: obligatory solvency capital required from a RU.
- r: discount rate, taken from the risk-free curve.

There are several simplifications for calculating the risk margin:

- Level 1: details how to approximate the underwriting, counterparty and market risks.
- Level 2: it is based on the hypothesis that the future solvency capital requirements are proportional to the "best estimate" of the technical provisions for the year in question.
- Level 3: consists of using the modified duration of the liabilities to calculate the current Solvency Capital Requirements and all futures in a single step.
- Level 4: calculates the risk margin as a percentage of the best estimate of the net technical provisions for reinsurance.

The Entity calculates the risk margin with the methodology described as level 3.

<u>Degree of uncertainty regarding to the amount of technical provisions</u>

The value of the technical provisions is directly linked to the estimations and projections for future cash flows which might be subject to a number of factors of uncertainly, which are mainly the following:

- The probability that the obligation will materialise with regard to future cash flows.
- The moment the obligation materialises.
- Potential amount of the future cash flows.
- The risk-free interest rate.

The first three factors are generally estimated based on expert opinions, or using market data.

<u>Actuarial methods and hypotheses used when calculating technical provisions</u>

The main actuarial methodologies used by the Company in the calculation of technical provisions under Solvency II are as indicated below:

- A combination of generally-accepted deterministic methods used for the development of the final accident rate based on the selection of factors for the development of frequencies and average costs.
- Stochastic methods for determining claims assuming a probability distribution function.

The Company considered that the methodologies used are appropriate, applicable, and pertinent.

The following two key hypotheses were used during the calculation of the technical provisions:

- Economic hypotheses, which are contrasted against available financial and macroeconomic indicators which mainly include:

  - Interest rate structure broken down by the commitment currencies.

  - Exchange rates.

  - Market trends and financial variables.

- Non-economic hypotheses, which are mainly obtained from generally-available data based on the Company or external sector/market sources:

  - Realistic administration, investment, acquisition, etc. expenses which are incurred throughout the duration of the contracts.

  - Portfolio lapses and policy surrenders.

  - The frequency and severity of claims based on historical data.

  - Legislative changes.

Additionally, it is worth noting that under PCEA, Management's actions and policyholder behaviour are not included when calculating technical provisions, while under Solvency II, as indicated in its Directive, companies may establish a comprehensive plan covering future decisions considering the necessary time frame to calculate their best estimates, including a probability analysis of when policyholders might exercise certain rights included in their insurance policies.

The Company employs an effective actuarial method which guarantees the appropriateness and coherence of the underlying methodologies and models used, as well as the hypotheses used in these calculations.

D.2.2. Measures designed for managing long-term guarantees

The Company has not used the transitional measures for managing long-term guarantees established in Delegated Regulation 2015/35 dated 10 October 2014 and Directive 2009/138/EC, which include: reconciliation and volatility adjustments, transitional adjustment in the structure of risk-free interest rates, and the transitional deduction include in Article 308 *quinquies* of Directive 2009/138/EC.

For that reason, form S.22.01.21 regarding the impact on long-term guarantee and transitional measures is not included in accordance with the information included in Appendix I of April 30, 2014 on technical specifications.

D.2.3. Recoverables of premium and claims provision

See the explanation under above Section D.1.9

D.2.4. Significant changes in hypotheses used when calculating technical provisions

No significant changes have occurred with regard to the hypotheses used when calculating technical provisions.

D.3. Other liabilities

Below is a description of the bases, methods and main hypotheses used for both valuation for the purposes of Solvency II and for the purposes of the financial statements, for each class of other liability. In the event there are significant differences among the bases, methods and main valuation hypotheses for both balances, a quantitative and qualitative explanation will be provided for them.

	2017		
	Accounting Value	Valuation changes	Solvency II Value
Total technical provisions	123,175	(9,527)	113,648
Provisions other than technical provisions	2,400	-	2,400
Pension and similar obligations provision	4,599	-	4,599
Deposits received on ceded reinsurance	1,913	-	1,913
Deferred tax liabilities	2,083	-	2,083
Debts for insurance and coinsurance operations	23,175	-	23,175
Reinsurance operation debts	8,708	-	8,708
Other debts and payables	13,204	-	13,204
Any other liabilities, not elsewhere shown	11,192	(10,861)	331
TOTAL LIABILITIES	190,449	(20,388)	170,061
SURPLUS OF ASSETS VS. LIABILITIES	98,842	(41,526)	57,316

Data in thousands of euros

D.3.1. Provisions other than technical provisions

The value of the liabilities is directly linked to estimations and projections for future cash flows which might be subject to a number of factors of uncertainly, which are mainly the following:

- The probability that the obligation will materialise with regard to future cash flows.
- The moment the obligation materialises.
- Potential amount of the future cash flows.
- The risk-free interest rate.

The first three factors are generally estimated based on expert opinions within the area linked to the obligation, in environments with little statistical experience, or using market data.

For purposes related to the Solvency II balance sheet, 'Non-current commitments to employees" are included under "Other non-technical provisions" and were valued based on the same criteria as that used for the Company's financial statements.

The section "Other non-technical provisions" in fiscal year 2017 includes 713 thousand euros corresponding to the commitments for tenure awards, 88 thousand euros corresponding to other personnel expenses and 155 thousand euros corresponding to expenses for conventions, the settlement of which is estimated to be made in 2018. Additionally, 1,444 thousand euros corresponding to personnel expenses are included.

The valuation established by PCEA coincides with that established under Solvency II, so there are no valuation differences.

D.3.2. Pension benefit obligations

The PCEA/IAS 19 uses an adequate approximation for the valuation of liabilities for pensions on the balance sheet at market value. The amount is determined by the current value of estimated future cash flows.

The valuation established by PCEA coincides with that established under Solvency II, so there are no valuation differences.

D.3.3. Deposits from reinsurers

This heading includes amounts of deposits held by the Company to cover ceded and receded reinsurance technical provisions.

For the purposes of the Solvency II balance sheet, the valuation of deposits received from reinsurance transactions is considered to have to be valued at the amount at which they may be transferred or settled between duly-informed interested parties carrying out transactions in mutually-independent conditions.

PCEA and Solvency II valuations coincide; therefore, there were no valuation differences.

D.3.4. Deferred tax liabilities

Deferred tax liabilities are valued analogous to that indicated in deferred tax assets. The entity has deferred tax liabilities for a "book value" of 2,083 thousand euros in 2017

The difference between the Solvency II value and the accounting value of deferred tax liabilities is mainly explained by the following Balance sheet items:

- Property.
- Intangible assets.
- Reinsurance recoverable amounts.
- Technical provisions.
- Property, plant & equipment held for own use.
- Deferred acquisition costs

D.3.5. Insurance & intermediaries payables

This heading includes borrowings arranged as a result of transactions performed with insurers other than those related to claims pending settlement, as well as those related to cash balances with Company intermediaries arising from transactions performed.

Accounts payable are generally recorded as real amounts generated from reimbursements, i.e. their settlement value.

For the purposes of the Solvency II balance sheet, the valuation is considered consistent with those under PCEA, valued at the amount at which they may be transferred or settled between duly-informed interested parties carrying out transactions in mutually-independent conditions.

D.3.6. Reinsurance payables

Collects those debts with reinsurers as a consequence of the current account relationship established with them due to reinsurance operation ceded and retroceded.

For the purposes of the Solvency II balance sheet, the valuation is considered consistent with those under PCEA, valued at the amount at which they may be transferred or settled between duly-informed interested parties carrying out transactions in mutually-independent conditions.

D.3.7. Payables (trade, not insurance)

This section includes other payables unrelated to the insurance activity. For the purposes of the Solvency II balance sheet, the valuation is considered consistent with those under PCEA, valued at the amount at which they may be transferred or settled between duly-informed interested parties carrying out transactions in mutually-independent conditions.

D.3.12. Any other liabilities, not elsewhere shown

It also includes the amount of any other liabilities not included in other balance sheet items, whose valuation was discussed previously.

The difference between the amounts shown in both valuations is basically due to the elimination under Solvency II of the commissions and other granted accrued reinsurance expenses that are contemplated during the valuation of technical provisions, as they include the entirety of the associated expenses amounting to 10,861 thousand euros. Under PCEA regulations, these items fall under this heading.

D.3.9. Additional information

There is no other significant information to be highlighted.

D.4. Alternative methods for valuation

The Company does not have material assets for which alternative valuation methods must be used.

The Company does use alternative valuation methods for their liabilities.

D.5. Any other information

There is no other significant information to be highlighted.

E. Capital management

E.1. Own Funds

E.1.1 Own fund objectives, policies, and management processes

Solunion Seguros, Compañía Internacional de Seguros y Reaseguros S.A. has a Capital Management Policy whose last revision was approved by the Board of Directors on December 11, 2017.

The principal objectives of this Policy are the following:

- Provide the Company and Group with a procedure to check that the eligible own funds meet the applicable requirements.
- Ensure that the projections of eligible own funds contemplate the continuous compliance with applicable requirements throughout the period contemplated.
- Establish an identification and documentation process for funds with limited availability, as well as the circumstances in which own funds may absorb losses.
- Ensure that the Company has a medium-term Capital Management Plan.

The Medium-term Capital Management Plan considers the following elements:

- The compliance with Solvency regulations applicable throughout the projection period considered, paying particular attention to known future regulatory changes, and the maintenance of solvency levels compatible with the established in the Risk Appetite;
- Issuance of proposed eligible Own Funds instruments;
- the repayments, both contractual at maturity, and those that may be made on a discretionary basis before maturity, in relation to the elements of the Eligible Own Funds .
- the result of the projections in the Own Risks and Solvency Assessment ("ORSA"); and
- the expected dividends and their effect on Eligible Own Funds.

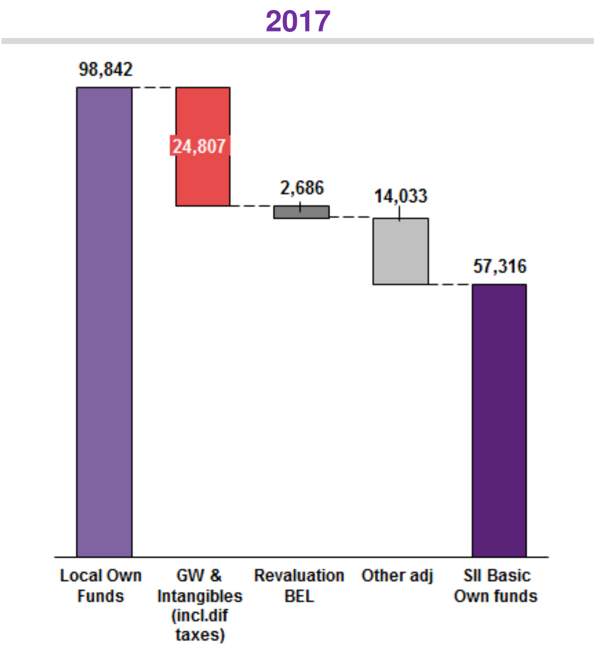
The Risk Management Area must submit the medium-term Capital Management Plan to the Board of Directors or equivalent body for approval. The plan is part of the ORSA Report. The projected period covers 3 years, and is aligned with the budget preparation approach.

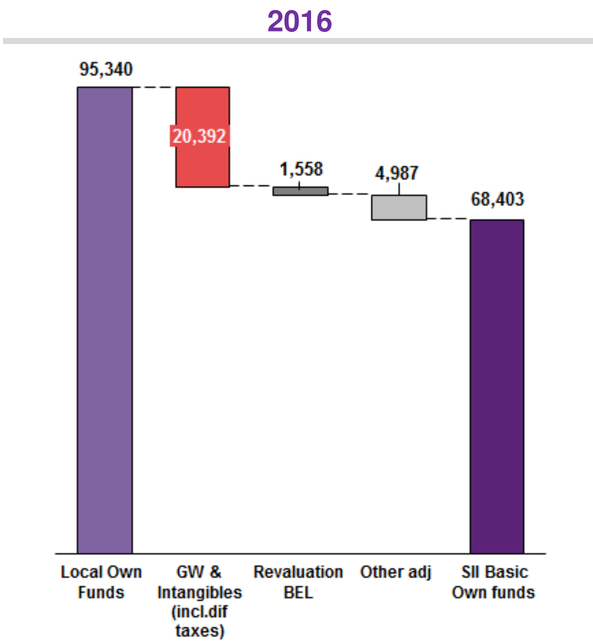
E.1.2 Structure, amount, and quality of own shares

<u>Structure, amount, and quality of own shares</u>

In figure S.23.01.01 of the Appendix, the structure, amount and quality of the basic and complementary own funds are shown, as well as the Company's coverage ratio, i.e. the level of own funds within the SCR, and the MCR.

Below is a comparison of the company's own funds at the end of 2017 and 2016 and an explanation of the origin of the changes in the value of the Solvency II own funds:





Data in thousands of euros

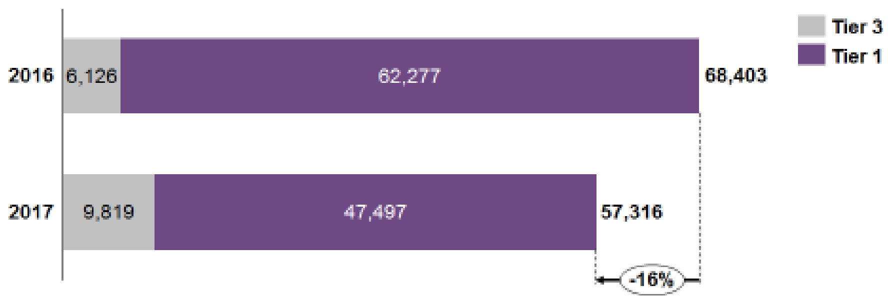
The Changes in Goodwill and intangible assets have increased due mainly to the agreement signed with MAPFRE Global Risks, Compañía Internacional de Seguros y Reaseguros, S.A. in December 2017, by virtue of which, It commits to develop the necessary actions to ensure that its current clients of the Bonding branch subscribe their policies with SOLUNION as of January 1, 2018, thus leaving MAPFRE Global Risks operate in the bonding branch.

As for other adjustments item, the increase is generated by the effect of the exchange rate and other movements.

Articles 72 and 73 of the LOSSEAR determine the classification and admissibility of own funds to meet the SCR, establishing the following quantitative limits:

- the eligible amount of the tier 1 elements must be at least equal to half of the SCR;
- the eligible amount of the tier 3 elements must be less than 15% of the SCR;
- the sum of the eligible amounts of the tier 2 and tier 3 elements must not surpass 50% of the SCR.

The Company´s available own funds on the basis of its classification:



Data in thousands of euros

As of December 2017, the company has its not restricted tier 1 own basic funds by an amount of EUR 47,497 thousand (EUR 62,277 thousand in 2016). These own funds have the maximum availability for absorbing losses. They are comprised of:

- ordinary paid-in share capital
- treasury shares

Additionally, it has Tier 3 basic own funds for an amount of EUR 9,819 thousand (EUR 6,126 thousand in 2016) composed of net deferred taxes.

All own funds are considered basic. Complementary own funds have not been computed.

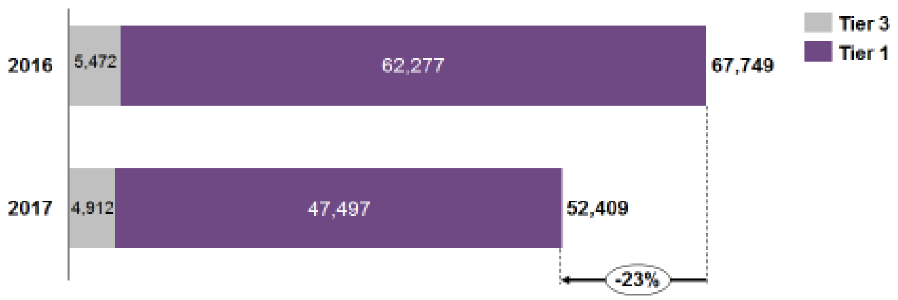
The eligible amount of own funds to cover SCR and MCR, broken down by levels.

Once the own funds have been classified, the LOSSEAR in Article 73 establishes eligibility limits for them, to cover the solvency capital required and the minimum capital required.

For the SCR coverage, the following quantitative limits are established:

- The regulation dictates that there must be at least 80% of the Admissible Own Funds classified as Tier 1.
- With respect to Tier 3, they are not fully eligible to cover the regulatory capital, but may represent a maximum of 15% of the SCR.
- The sum of Tier 2 and 3 will not represent more than 50% of the SCR.

The Company's own funds are included in Tier 1 and Tier 3, and, depending on the eligibility thereof, the eligible own funds for SCR coverage amount to:



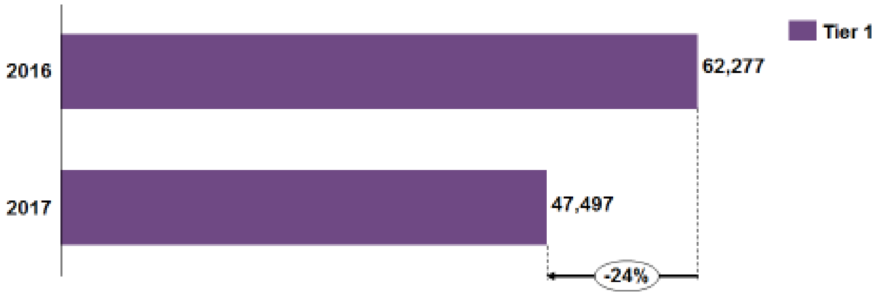
Data in thousands of euros

The Tier 1 eligible own funds are equivalent to the basic ones: however, those at tier 3 are equivalent to 15% of the regulatory capital, so the resulting admissible amount to cover the SCR is 52,409 million euros (67,749 euros in 2016).) 23% lower than the previous year.

With regard to the MCR coverage, the following quantitative limits are established:

- The admissible amount of the elements of tier 1 will be equal to at least 80% of the MCR.
- The admissible amounts of the tier 2 elements will not exceed 20% of the MCR.

Given the classification of the Company's own funds, the admissible amount to cover the MCR is 47,497 thousand euros (62,277 in 2016). The following table shows the detail:



Data in thousands of euros

Availability, subordination and duration of significant Own Fund items used to evaluate their quality

The Company's basic, restricted Level 1 funds hold the characteristics indicated in Article 93.1.a) and b) of Directive 2009/138/EC and they are fully disbursed and available to absorb losses. However, the Tier 3 own funds are not fully eligible to cover the regulatory capital as they do not have sufficient availability to absorb losses if necessary.

Difference between equity on the financial statements and surplus assets vs. liabilities for Solvency II purposes

When valuing assets and liabilities for the purposes of Solvency II, different criteria is used from that employed for the preparation of the financial statements. The above criteria differences lead to differences between the equity on the financial statements and surplus assets vs. liabilities for Solvency II purposes.

The quantitative and qualitative explanations are reflected under Sections D.1 Assets, D.2 Technical Provisions, and D.3 Other liabilities on this report.

Own Funds issued and instruments redeemed

No new own funds were issued during the fiscal year, and there were no redemptions of instruments.

Essential items on the Reconciliation Reserve

The amount of the Company's Reconciliation Reserve is (33.174) thousand euros and it is composed mainly of "Other items of basic own funds" and of "Surplus of assets vs. liabilities." A breakdown is shown below:

	2017	2016
Surplus of assets vs. liabilities	57,316	68,404
Treasury shares (included as assets on the balance sheet)	-	-
Dividends, distributions and foreseen costs	-	-
Other elements of basic own funds	90,490	88,818
Adjustments for own fund items restricted by FDL and CSAC	-	-
Total reconciliation reserves	**(33,174)**	**(20,414)**

Data in thousands of euros

E.1.3. Transitional measures

The Company has not considered items of its Own Funds to which the transitional provisions contemplated in Article 108 ter, sections 9 and 10 of Directive 2009/138/EC have been applied.

E.1.4. Complementary equity

All the Company's Own Funds are considered basic. The Company did not include any complementary own funds.

E.1.5. Items deducted from Own Shares

As of December 31, 2017, no items have been deducted from the own funds.

E.1.6. Other information

Other ratios apart from those included on template S.23.01

The Company does not use other ratios apart from other ratios apart from those included on template S.23.01.01, on its solvency.

Subordinated debt

The Company has no subordinated debt.

Main loss absorption mechanisms

The Company has no items of own funds requiring loss absorption methods to comply with Article 71, Section 1, Letter e of the Delegated Regulation.

Own funds issued and instruments rescued

During the year, the Entity has not issued equity instruments and no rescue of them has been made.

E.2. Solvency Capital Requirement and Minimum Capital Requirement

E.2.1. Amount of Solvency Capital Requirement

SCR amounts and Minimum Capital Requirements

The SCR by risk models has been calculated using the Solvency II standard formula methodology as of December 31, 2017, that is listed in Section C Risk Profile. Additionally, figures S.25.01.21 and S.28.01.01 of the Appendix contain more detailed information on the regulatory capitals.

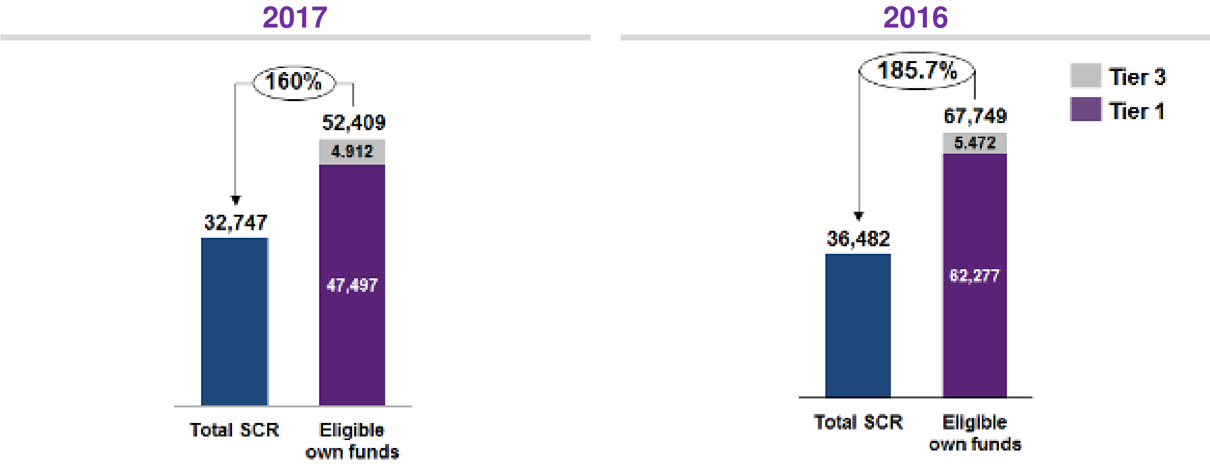
The Company's total SCR included in Appendix S.25.01.21 amounts to 32,747 thousand euros, corresponding to the level of own funds required by the supervisory authorities from the insurance and reinsurance companies for the purpose of absorbing significant losses and offering the policyholders and insurance beneficiaries a reasonable guarantee that the payments will be made upon maturity. For SCR calculation, no specific parameters have been used.

As detailed in Section C, SOLUNION'S risk profile is affected mainly by market risk. That is followed by non-life underwriting risk, to which catastrophic credit and bonding risk mainly contribute due to the recession risk. Third is credit risk, which is generated mainly because of SOLUNION's heightened exposure in reinsurance agreements.

The exposure level of reinsurance recoverables is affected by the heightened level of transfer defined in the reinsurance structure.

As of December 2016, the amount of the SCR was EUR 36,482 thousand, decreasing the capital charge by 3.7 thousand euros; this decrease has occurred in market risk and is mainly due to the reduction in exposure to equity and concentration risk.

The Solvency ratio of the Company is shown below; this ratio measures the relationship between eligible own funds and the SCR to absorb extraordinary ones arising from an adverse scenario of one every 200 years.



Data in thousands of euros

This ratio amounts to 160%, which means that it is within the risk appetite safety zone established for the Company and approved by the Board of Directors. At December 31, 2016, the solvency ratio was 185.7%.

Data used by the Company in calculation of the MCR Solvency

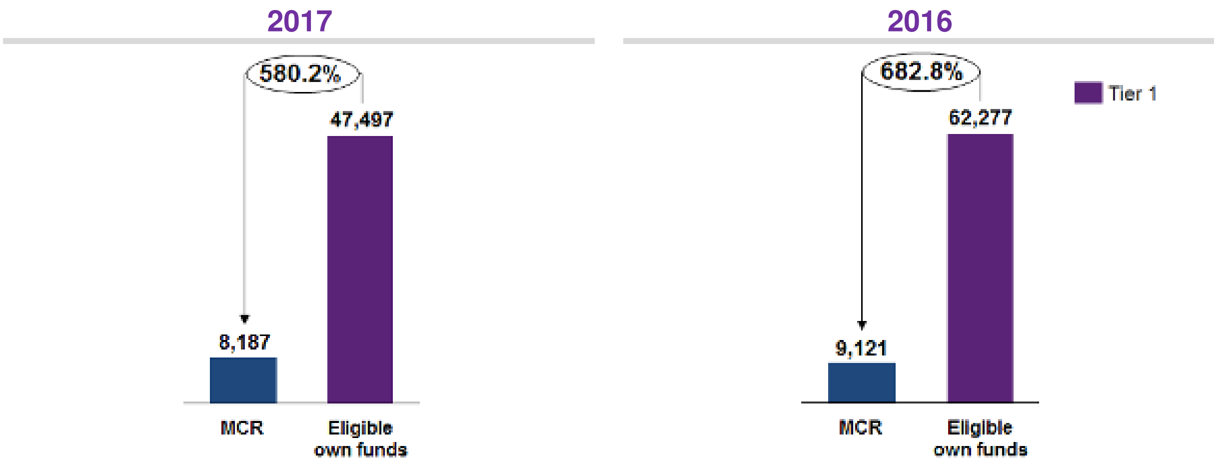
The Company calculated Minimum Solvency Capital Requirements (MCR) as indicated in Delegated Regulation 2015/35, Article 248. This amount is the capital amount that guarantees the minimum level of security, under which financial resources should never drop and has a value of 8,187 thousand euros.

To obtain the MCR, the linear MCR should be calculated, the value of which is 3,255 thousand euros. It was obtained applying the factors corresponding to data used in their calculation, and that are included in Appendix S.28.01.01. Likewise, the combined MCR is 8,187 thousand euros, which is obtained by applying the maximum and minimum limits to the linear MCR, 25% and 45% of the SCR.

Since the combined MCR is higher than the MCR's absolute limit (which is 3,700 thousand euros), the amount of the combined MCR is considered as the amount of MCR, which is, therefore, 8,187 thousand euros.

As of December 2016, it was 9,121 thousand euros; this decrease is mainly due to the fact that in both cases the result is equal to the minimum limit of the combined MCR, which is obtained as 25% of the SCR, an amount that in 2017 has decreased by 3.7 thousand euros.

The Company´s solvency ratio, which measures the ratio between eligible own funds and the MCR, amounts to 580.2% (682.8% in 2016).



Data in thousands of euros

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

SOLUNION did not use this option when performing its solvency valuation.

E.4. Differences between the Standard Formula and any internal model used

The Company does not use Internal Models in the calculation of their Solvency needs, it is governed by the Solvency II Standard Formula.

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

At December 31, 2017, the Company had sufficient SCR and MCR with eligible Own Funds; therefore, it was considered unnecessary to adopt any other action or corrective measure.

Appendices

List of forms reported (Data in thousands of euros):

S.02.01.02 – Balance sheet

S.05.01.02 – Premiums, loss ratio, and expense by business line

S.05.01.01 – Premiums, loss ratio, and expense by country

S.17.01.02 – Technical provisions for non-life

S.19.01.21 – Non-life claims

S.23.01.01 – Equity

S.25.01.21 – Obligatory solvency capital – for companies that use the standard form

S.28.01.01 – Obligatory minimum capital – Life or non-life insurance or reinsurance activity

S.02.01.02

Asset	Solvency II Value	
	C0010	
Intangible assets	-	R0030
Deferred tax assets	11,902	R0040
Pension benefit surplus	4,599	R0050
Property, plant & equipment held for own use	650	R0060
Investments (other than assets held for index-linked and unit-linked contracts)	64,683	R0070
Property (other than for own use)	49	R0080
Holdings in related undertakings, including participations	30,017	R0090
Equities	-	R0100
Equities - listed	-	R0110
Equities - unlisted	-	R0120
Bonds	34,617	R0130
Government Bonds	28,345	R0140
Corporate Bonds	6,272	R0150
Structured notes	-	R0160
Collateralized securities	-	R0170
Collective Investments Undertakings	-	R0180
Derivatives	-	R0190
Deposits other than cash equivalents	-	R0200
Other investments	-	R0210
Assets held for index-linked and unit-linked contracts	-	R0220
Loans and mortgages	-	R0230
Loans on policies	-	R0240
Loans and mortgages to individuals	-	R0250
Other loans and mortgages	-	R0260
Reinsurance recoverables from:	98,972	R0270
Non-life and health similar to non-life	98,972	R0280
Non-life excluding health	98,972	R0290
Health similar to non-life	-	R0300
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 cedents	1,913	R0350
Insurance and intermediaries receivables	30,360	R0360
Reinsurance receivables	4,988	R0370

	C0010	
Asset	**Solvency II Value**	
Receivables (trade, not insurance)	3,162	R0380
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	6,090	R0410
Any other assets, not elsewhere shown	58	R0420
Total assets	**227,377**	R0500

	C0010	
Liability	**Solvency II Value**	
Technical provisions - non-life	113,648	R0510
Technical provisions - non-life (excluding health)	113,648	R0520
Technical provisions calculated as a whole	-	R0530
Best Estimate	110,605	R0540
Risk margin	3,043	R0550
Technical provisions - health (similar to non-life)	-	R0560
Technical provisions calculated as a whole	-	R0570
Best Estimate	-	R0580
Risk margin	-	R0590
Technical provisions - life (excluding index-linked and unit-linked)	-	R0600
Technical provisions - health (similar to life)	-	R0610
Technical provisions calculated as a whole	-	R0620
Best Estimate	-	R0630
Risk margin	-	R0640
Technical provisions - life (excluding health and index-linked and unit-linked)	-	R0650
Technical provisions calculated as a whole	-	R0660
Best Estimate	-	R0670
Risk margin	-	R0680
Technical provisions - index-linked and unit-linked	-	R0690
Technical provisions calculated as a whole	-	R0700
Best Estimate	-	R0710
Risk margin	-	R0720
Contingent liabilities	-	R0740
Provisions other than technical provisions	2,400	R0750
Pension benefit obligations	4,599	R0760
Deposits from reinsurers	1,913	R0770
Deferred tax liabilities	2,083	R0780

	C0010	
Liability	**Solvency II Value**	
Derivatives	-	R0790
Debts owed to credit institutions	-	R0800
Financial liabilities other than debts owed to credit institutions	-	R0810
Insurance & intermediaries payables	23,175	R0820
Reinsurance payables	8,708	R0830
Payables (trade, not insurance)	13,204	R0840
Subordinated liabilities	-	R0850
Subordinated liabilities not in Basic Own Funds	-	R0860
Subordinated liabilities in Basic Own Funds	-	R0870
Any other liabilities, not elsewhere shown	331	R0880
Total liabilities	**170,060**	R0900
Excess of assets over liabilities	**57,317**	R1000

S.05.01.02

		C0090	
		Credit and Bonding insurance Legal defense insurance	
	Business line: non-life insurance and reinsurance obligations (direct insurance and proportional reinsurance accepted.	2016	2017
	Premiums written		
R0110	Gross - Direct Business	98,107	99,957
R0120	Gross - Proportional reinsurance accepted	36,054	42,715
R0130	Gross - Non-proportional reinsurance accepted		
R0140	Reinsurers' share	123,261	130,571
R0200	Net	10,900	12,101
	Premiums earned		
R0210	Gross - Direct Business	97,962	100,189
R0220	Gross - Proportional reinsurance accepted	34,190	43,631
R0230	Gross - Non-proportional reinsurance accepted		
R0240	Reinsurers' share	121,243	131,660
R0300	Net	10,909	12,160
	Claims incurred		
R0310	Gross - Direct Business	70,282	55,752
R0320	Gross - Proportional reinsurance accepted	82,835	24,380
R0330	Gross - Non-proportional reinsurance accepted		
R0340	Reinsurers' share	152,042	73,649
R0400	Net	1,075	6,483
	Changes in other technical provisions		
R0410	Gross - Direct Business	(25,472)	(7,343)
R0420	Gross - Proportional reinsurance accepted	(61,221)	(2,312)
R0430	Gross - Non- proportional reinsurance accepted		
R0440	Reinsurers' share	(89,946)	(7,020)
R0500	Net	3,253	(2,635)
R0550	Expenses incurred	5,081	10,683
R1200	Other Expenses		
R1300	Total expenses		

S.05.01.02

		C0160		C0200	
		Property		TOTAL	
	Line of business for: accepted non-proportional reinsurance	2016	2017	2016	2017
	Premiums written				
R0110	Gross - Direct Business			98,107	99,957
R0120	Gross - Proportional reinsurance accepted			36,054	42,715
R0130	Gross - Non-proportional reinsurance accepted	302	327	302	327
R0140	Reinsurers' share	648	297	123,909	130,868
R0200	Net	(346)	30	10,554	12,131
	Premiums earned				
R0210	Gross - Direct Business			97,962	100,189
R0220	Gross - Proportional reinsurance accepted			34,190	43,631
R0230	Gross - Non-proportional reinsurance accepted	302	327	302	327
R0240	Reinsurers' share	649	297	121,892	131,957
R0300	Net	(347)	30	10,562	12,190
	Claims incurred				
R0310	Gross - Direct Business			70,282	55,752
R0320	Gross - Proportional reinsurance accepted			82,835	24,380
R0330	Gross - Non-proportional reinsurance accepted			-	-
R0340	Reinsurers' share	(5,817)	1,510	146,225	75,159
R0400	Net	5,817	(1,510)	6,892	4,973
	Changes in other technical provisions				
R0410	Gross - Direct Business			(25,472)	(7,343)
R0420	Gross - Proportional reinsurance accepted			(61,221)	(2,312)
R0430	Gross - Non- proportional reinsurance accepted			-	-
R0440	Reinsurers' share	4,958	(1,722)	(84,988)	(8,742)
R0500	Net	(4,958)	1,722	(1,705)	(913)
R0550	Expenses incurred			5,081	10,683
R1200	Other Expenses				
R1300	Total expenses			10,683	10,683

S.05.02.01

		C0080		C0090		C0100		C0110		C0120		C0130		C0140	
		SPAIN		**ITALY**		**ARGENTINA**		**CHILE**		**COLOMBIA**		**MÉXICO**		**Total Top 5 and home country**	
		2016	**2017**	**2016**	**2017**	**2016**	**2017**	**2016**	**2017**	**2016**	**2017**	**2016**	**2017**	**2016**	**2017**
	Premiums written														
R0110	**Gross - Direct Business**	98,107	99,957		-									98,107	99,957
R0120	**Gross - Proportional reinsurance accepted**			1,721	3,235	1,896	2,291	6,496	7,465	9,181	10,865	12,559	13,782	31,853	37,638
R0130	**Gross - Non-proportional reinsurance accepted**							88	119	36	35	178	173	302	327
R0140	**Reinsurers' share**	89,174	89,430	1,485	2,797	1,749	2,173	6,493	7,470	9,177	10,865	12,091	13,451	120,169	126,186
R0200	**Net**	8,933	10,527	236	438	147	118	91	114	40	35	646	504	10,093	11,736
	Premiums earned														
R0210	**Gross - Direct Business**	97,962	100,189											97,962	100,189
R0220	**Gross - Proportional reinsurance accepted**			1,710	3,131	1,725	2,445	5,677	7,276	9,181	10,865	12,769	15,110	31,062	38,827
R0230	**Gross - Non-proportional reinsurance accepted**							88	119	36	35	178	173	302	327
R0240	**Reinsurers' share**	88,904	89,669	1,471	2,705	1,592	2,313	5,670	7,282	9,177	10,865	12,313	14,705	119,127	127,539
R0300	**Net**	9,058	10,520	239	426	133	132	95	113	40	35	634	578	10,199	11,804
	Claims incurred														
R0310	**Gross - Direct Business**	70,282	55,752											70,282	55,752
R0320	**Gross - Proportional reinsurance accepted**			(21)		543	1,475	6,530	6,408	8,189	6,780	9,852	8,287	25,093	22,950
R0330	**Gross - Non-proportional reinsurance accepted**														-
R0340	**Reinsurers' share**	69,352	50,911	(19)		528	1,422	6,463	6,413	8,184	7,203	9,747	7,873	94,255	73,822
R0400	**Net**	930	4,841	(2)		15	53	67	(5)	5	(423)	105	414	1,120	4,880
	Changes in other technical provisions														
R0410	**Gross - Direct Business**	(25,472)	(7,343)											(25,472)	(7,343)
R0420	**Gross - Proportional reinsurance accepted**			1,408	(943)	(667)	(177)	1,940	(2,206)	(1,669)	470	(3,267)	(528)	(2,255)	(3,384)
R0430	**Gross - Non-proportional reinsurance accepted**														-
R0440	**Reinsurers' share**	(29,352)	(6,506)	1,275	(846)	(702)	(147)	1,971	(2,198)	(1,626)	481	(3,453)	(462)	(31,887)	(9,678)
R0500	**Net**	3,880	(837)	133	(97)	35	(30)	(31)	(8)	(43)	(11)	186	(66)	4,160	(1,049)
R0550	**Expenses incurred**	6,817	10,861	228	(134)	(202)	(77)	(299)	14	(134)	105	(201)	806	6,209	11,575
R1200	**Other Expenses**														
R1300	**Total expenses**	6,817	10,861	228	(134)	(202)	(77)	(299)	14	(134)	105	(201)	806	6,209	11,575

	S.17.01.02	C0020	C0030	C0040	C0050	C0060	C0070
		Direct business and accepted proportional reinsurance					
		Medical expense insurance	**Income protection insurance**	**Workers' compensation insurance**	**Motor vehicle liability insurance**	**Other motor insurance**	**Marine, aviation and transport insurance**
R0010	**Technical provisions calculated as a whole**						
R0050	**Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole**						
	Technical provisions calculated as a sum of BE and RM						
	Best estimate						
	Premium provisions						
R0060	**Gross - Total**						
R0140	**Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default**						
R0150	**Net Best Estimate of Premium Provisions**						
	Claims provisions						
R0160	**Gross - Total**						
R0240	**Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default**						
R0250	**Net Best Estimate of Claims Provisions**						
R0260	**Total Best estimate - gross**						
R0270	**Total Best estimate - net**						
R0280	**Risk margin**						
	Amount of the transitional on Technical Provisions						
R0290	**TP as a whole**						
R0300	**Best estimate**						
R0310	**Risk margin**						
	Technical provisions - total						
R0320	**Technical provisions - total**						
R0330	**Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total**						
R0340	**Technical provisions minus recoverables from reinsurance/SPV and Finite Re- total**						

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		C0080	C0090	C0100	C0110	C0120	C0130
		Fire and other damage to property insurance	General liability insurance	Credit and Bonding insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss
R0010	Technical provisions calculated as a whole						
R0050	Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole						
	Technical provisions calculated as a sum of BE and RM						
	Best estimate						
	Premium provisions						
R0060	Gross - Total			25,223			
R0140	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default			22,663			
R0150	Net Best Estimate of Premium Provisions			2,560			
	Claims provisions						
R0160	Gross - Total			85,382			
R0240	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default			76,309			
R0250	Net Best Estimate of Claims Provisions			9,073			
R0260	Total Best estimate - gross			110,605			
R0270	Total Best estimate - net			11,633			
R0280	Risk margin			3,043			
	Amount of the transitional on Technical Provisions						
R0290	TP as a whole						
R0300	Best estimate						
R0310	Risk margin						
	Technical provisions - total						
R0320	Technical provisions - total			113,648			
R0330	Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total			98,972			
R0340	Technical provisions minus recoverables from reinsurance/SPV and Finite Re- total			14,676			

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		C0140	C0150	C0160	C0170	C0180
		Accepted non-proportional reinsurance				Total non-life commitments
		Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	
R0010	Technical provisions calculated as a whole					
R0050	Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole					
	Technical provisions calculated as a sum of BE and RM					
	Best estimate					
	Premium provisions					
R0060	Gross - Total					25,223
R0140	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default					22,663
R0150	Net Best Estimate of Premium Provisions					2,560
	Claims provisions					
R0160	Gross - Total					85,382
R0240	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default					76,309
R0250	Net Best Estimate of Claims Provisions					9,073
R0260	Total Best estimate - gross					110,605
R0270	Total Best estimate - net					11,633
R0280	Risk margin					3,043
	Amount of the transitional on Technical Provisions					
R0290	TP as a whole					
R0300	Best estimate					
R0310	Risk margin					
	Technical provisions - total					
R0320	Technical provisions - total					113,648
R0330	Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total					98,972
R0340	Technical provisions minus recoverables from reinsurance/SPV and Finite Re- total					14,676

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Gross Claims Paid (non-cumulative)

		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100			C0170	C0180	
		Development year														
	Year	0	1	2	3	4	5	6	7	8	9	10 & +		In current year	Sum of years (cumulative)	
R0100	Prior										221	12	Prior	12	233	R0100
R0160	N - 9	-	-	-	-	-	-	-	-	(66)	(203)		N-9	(203)	(269)	R0160
R0170	N - 8	-	-	-	-	-	-	-	(174)	(246)			N-8	(246)	(420)	R0170
R0180	N - 7	-	-	-	-	-	-	(31)	2				N-7	2	(29)	R0180
R0190	N - 6	-	-	-	-	-	(341)	(310)					N-6	(310)	(651)	R0190
R0200	N - 5	-	-	-	-	(115)	(455)						N-5	(455)	(570)	R0200
R0210	N - 4	6.282	37.680	6.448	1.825	4.887							N-4	4,887	57,122	R0210
R0220	N - 3	5.910	34.469	9.311	601								N-3	601	50,291	R0220
R0230	N - 2	7.264	127.839	6.939									N-2	6,939	142,042	R0230
R0240	N - 1	14.647	55.552										N-1	55,552	70,199	R0240
R0250	N	13.351											N	13,351	13,351	R0250
													Total	**80,130**	**331,299**	R0260

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Gross undiscounted Best Estimate Claims Provisions

		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290			C0360	
	Year	0	1	2	3	4	5	6	7	8	9	10 & +		Year end (discounted data)	
R0100	Prior										-	-	Prior	-	R0100
R0160	N - 9	-	-	-	-	-	-	-	-	-	(223)		N-9	(206)	R0160
R0170	N - 8	-	-	-	-	-	-	-	(49)	(292)			N-8	(275)	R0170
R0180	N - 7	-	-	-	-	-	-	(280)	(186)				N-7	(173)	R0180
R0190	N - 6	-	-	-	-	-	(629)	(358)					N-6	(335)	R0190
R0200	N - 5	-	-	-	-	(682)	(483)						N-5	(469)	R0200
R0210	N - 4	-	-	-	3.704	(425)							N-4	(426)	R0210
R0220	N - 3	-	-	39.220	3.516								N-3	3,391	R0220
R0230	N - 2	-	44.262	38.183									N-2	37,597	R0230
R0240	N - 1	10.401	39.926										N-1	39,653	R0240
R0250	N	6.637											N	6,625	R0250
													Total	**85,382**	R0260

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		C0010		C0020		C0030		C0040		C0050	
		Total		**Tier 1 - unrestricted**		**Tier 1 - restricted**		**Tier 2**		**Tier 3**	
		2016	**2017**	**2016**	**2017**	**2016**	**2017**	**2016**	**2017**	**2016**	**2017**
	Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35										
R0010	Ordinary share capital (gross of own shares)	40,149	40,149	40,149	40,149						
R0030	Share premium account related to ordinary share capital	42,542	40,522	42,542	40,522						
R0040	Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings										
R0050	Subordinated mutual member accounts										
R0070	Surplus funds										
R0090	Preference shares										
R0110	Share premium account related to preference shares										
R0130	Reconciliation reserve	(20,414)	(33,174)	(20,414)	(33,174)						
R0140	Subordinated liabilities										
R0160	An amount equal to the value of net deferred tax assets	6,126	9,819							6,126	9,819
R0180	Other own fund items approved by the supervisory authority as basic own funds not specified above										
	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	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										
	Deductions										
R0230	Deductions for participations in financial and credit institutions										

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		C0010		C0020		C0030		C0040		C0050	
		Total		Tier 1 - unrestricted		Tier 1 - restricted		Tier 2		Tier 3	
		2016	2017	2016	2017	2016	2017	2016	2017	2016	2017
R0290	**Total basic own funds after deductions**	68,403	57,316	62,277	47,497					6,126	9,819
	Ancillary own funds										
R0300	**Unpaid and uncalled ordinary share capital callable on demand**										
R0310	**Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand**										
R0320	**Unpaid and uncalled preference shares callable on demand**										
R0330	**A legally binding commitment to subscribe and pay for subordinated liabilities on demand**										
R0340	**Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC**										
R0350	**Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC**										
R0360	**Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC**										
R0370	**Supplementary member calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC**										
R0390	**Other ancillary own funds**										
R0400	**Total ancillary own funds**										
	Available and eligible own funds										
R0500	**Total available own funds to meet the SCR**	68,403	57,316	62,277	47,497					6,126	9,819
R0510	**Total available own funds to meet the MCR**	62,277	47,497	62,277	47,497						
R0540	**Total eligible own funds to meet the SCR**	67,749	52,409	62,277	47,497					5,472	4,912
R0550	**Total eligible own funds to meet the MCR**	62,277	47,497	62,277	47,497						

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		C0010		C0020		C0030		C0040		C0050	
		Total		Tier 1 - unrestricted		Tier 1 - restricted		Tier 2		Tier 3	
		2016	2017	2017	2016	2017	2016	2017	2016	2017	2016
R0580	SCR	36,482	32,747								
R0600	MCR	9,121	8,187								
R0620	Ratio entre fondos propios admisibles y SCR	185.7%	160%								
R0640	Ratio entre fondos propios admisibles y MCR	682.8%	580.2%								

		C0060	
	Reconciliation reserve		
R0700	**Excess of assets over liabilities**	68,404	57,316
R0710	**Own shares (held directly and indirectly)**		
R0720	**Foreseeable dividends, distributions and charges**		
R0730	**Other basic own fund items**	88,818	90,491
R0740	**Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds**		
R0760	**Reconciliation reserve**	(20,414)	(33,174)
	Expected profits		
R0770	Expected profits included in future premiums (EPIFP) - Life business		
R0780	Expected profits included in future premiums (EPIFP) - Non-life business		
R0790	**Total Expected profits included in future premiums (EPIFP)**		

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		C0030		C0040		C0120	
		Gross solvency capital requirement		USP		Simplifications	
		2016	2017	2016	2017	2016	2017
R0010	Market risk	26,585	20,895	26,585	20,895		
R0020	Counterparty default risk	4,746	4,837	4,746	4,837		
R0030	Life underwriting risk	-	0	-	0		
R0040	Health underwriting risk	-	0	-	0		
R0050	Non-life underwriting risk	17,419	17,910	17,419	17,910		
R0060	Diversification	(11,200)	(10,399)	(11,200)	(10,400)		
R0070	Intangible asset risk	-	0	-	0		
R0100	Basic Solvency Capital Requirement	37,550	33,243	37,550	33,243		

	Calculation of Solvency Capital Requirement	C0100	
		2016	2017
R0130	Operational risk	3,971	4,334
R0140	Loss-absorbing capacity of technical provisions	-	
R0150	Loss-absorbing capacity of deferred taxes	(5,039)	(4,829)
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC		
R0200	Solvency Capital Requirement excluding capital add-on	36,482	32,747
R0210	Capital add-on already set		
R0220	Solvency capital requirement	36,482	32,747
	Other information on SCR		
R0400	Capital requirement for duration-based equity risk sub-module		
R0410	Total amount of Notional Solvency Capital Requirements for remaining part		
R0420	Total amount of Notional Solvency Capital Requirements for ring fenced funds		
R0430	Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios		
R0440	Diversification effects due to RFF NSCR aggregation for article 304		

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		C0010	
	Linear formula component for non-life insurance and reinsurance obligations	**2016**	**2017**
R0010	**MCR^{NL} Result**	3.215	3.430

		2016		2017	
		C0020	C0030	C0020	C0030
		Net best estimate (of reinsurance/SPV) and TP calculated as a whole	**Net written premiums (of reinsurance) in the last 12 months**	**Net best estimate (of reinsurance/SPV) and TP calculated as a whole**	**Net written premiums (of reinsurance) in the last 12 months**
R0020	Medical expense insurance and proportional reinsurance				
R0030	Income protection insurance and proportional reinsurance				
R0040	Workers' compensation insurance and proportional reinsurance				
R0050	Motor vehicle liability insurance and proportional reinsurance				
R0060	Other motor insurance and proportional reinsurance				
R0070	Marine, aviation and transport insurance and proportional reinsurance				
R0080	Fire and other damage to property insurance and proportional reinsurance				
R0090	General liability insurance and proportional reinsurance				
R0100	Credit and bonding insurance and proportional reinsurance	12,203	9,333	11,634	12,129
R0110	Legal expenses insurance and proportional reinsurance				
R0120	Assistance and proportional reinsurance				
R0130	Miscellaneous financial loss insurance and proportional reinsurance				
R0140	Non-proportional health reinsurance				
R0150	Non-proportional casualty reinsurance				
R0160	Non-proportional marine, aviation and transport reinsurance				
R0170	Non-proportional property reinsurance				

	Linear formula component for life insurance and reinsurance obligations	C0040	C0040
		2016	2017
R0200	MCR (L) Result		

		C0050	C0060	C0050	C0060
		2016		2017	
		Net best estimate (of reinsurance/SPV) and TP calculated as a whole	Net total capital at risk (of reinsurance/SPV)	Net best estimate (of reinsurance/SPV) and TP calculated as a whole	Net total capital at risk (of reinsurance/SPV)
R0210	Obligations with profit participation - guaranteed benefits				
R0220	Obligations with profit participation - future discretionary benefits				
R0230	Index-linked and unit-linked insurance obligations				
R0240	Other life (re)insurance and health (re)insurance obligations				
R0250	Total capital at risk for all life (re)insurance obligations				

	Overall MCR calculation	C0070	C0070
		2016	2017
R0300	Linear MCR	3,215	3,430
R0310	SCR	36,482	32,747
R0320	MCR cap	16,417	14,736
R0330	MCR floor	9,121	8,187
R0340	Combined MCR	9,121	8,187
R0350	Absolute floor of the MCR	3,700	3,700

R0400	Minimum Capital Requirement	9,121	8,187