# MEDITERRANEO VIDA DE SEGUROS Y REASEGUROS S.A.U GROUP

**IDEPENDENT INSURANCE REPORT** 

18 May 2023





(This independent auditors' report has been translated into English solely for the convenience of international readers. Accordingly, only the original Spanish version is authoritative.)

To the Board of Directors of Mediterráneo Vida de Seguros y Reaseguros, S.A.U:

# Objective and scope of our work

We have carried out the work of reviewing, with reasonable security scope, the following aspects of the information contained in the attached report on the financial and solvency situation of Mediterráneo Vida de Seguros y Reaseguros, S.A.U. (hereinafter the parent company) and subsidiaries (hereinafter Mediterráneo Vida Group) as of December 31, 2022, according to the provisions of article 6 of Circular 1/2017, of February 22, of the Dirección General de Seguros y Fondos de Pensiones, which establishes the content of the special review report on the financial situation and solvency, individual and group, and the person responsible for its preparation:

- a) The scope and structure of the group subject to supervision, in accordance with article 132 of Law 20/2015.
- b) Entities excluded from such supervision, in accordance with article 133 of Law 20/2015.
- c) The adequacy of the method applied for the calculation of the solvency of the group and the treatment used for each company in accordance with the provisions of articles 145 and following of Law 20/2015, of July 14, as well as in its regulatory development regulations and in the regulations of the European Union of direct application.

No other aspects, other than the previous ones, included in the report on the financial and solvency situation of Mediterráneo Vida Group have been reviewed.

The objective of our work is to verify that the aspects mentioned in sections a), b) and c) above of the information presented by the Directors of the Parent Company, comply with the requirements established in Law 20/2015, of July 14, as well as in regulatory development regulations and in the regulations of the European Union of direct application, in order to provide complete and reliable information.

This work does not constitute a financial statements audit nor is it subject to the regulations governing the activity of the audit in force in Spain, so we do not express an audit opinion in the terms provided in the aforementioned regulations.



# Responsibility of the Board of Directors of Mediterráneo Vida de Seguros y Reaseguros, S.A.U.

The Directors of Mediterráneo Vida de Seguros y Reaseguros, S.A.U, the parent company of Mediterráneo Vida Group, are responsible for the preparation, presentation and content of the report on the financial situation and solvency of Mediterráneo Vida Group, in accordance with Law 20/2015, of July 14, on the organization, supervision and solvency of insurance and reinsurance companies, and its implementing regulations and with the regulations of the European Union of.

The Board of Directors is also responsible for defining, implementing, adapting and maintaining the management and internal control systems from which the information necessary for the preparation of the aforementioned report is obtained. These responsibilities include the establishment of such controls as they deem necessary to enable the preparation of the information contained in the group solvency and financial condition report, to be free from material misstatements due to non-compliance or error.

# Our independence and quality control

We have done our work in accordance with the standards of independence and quality control required by Circular 1/2017, dated February 22, of the Dirección General de Seguros y Fondos de Pensiones , which sets the content of the special report for the review of the financial situation and individual and group solvency and the person responsible for its preparation, and by Circular 1/2018, dated April 17, of the Dirección General de Seguros y Fondos de Pensiones, which develops the report models, the action guides and the periodicity of the scope of the special review report on the financial situation and solvency, individual and group, and the person responsible for its preparation, modified by Circular 1/2021, of June 17, of the modified by Circular 1/2021, of June 17, of the Dirección General de Seguros y Fondos de Pensiones.

# Our responsibility

Our responsibility is to carry out a review aimed at providing a reasonable level of assurance on the sections" Objective and scope of our work " regarding the information referred to in article 6 of Circular 1/2017, of February 22, contained in the attached report on the financial and solvency situation of Mediterráneo Vida Group, corresponding to December 31, 2022, and express a conclusion based on the work done and the evidence we have obtained.

No other aspects, other than the previous ones, included in the report on the financial and solvency situation of Mediterráneo Vida Group have been reviewed

Our review work depends on our professional judgment, and includes assessing risks due to significant errors.



Our review work has been based on the application of the procedures aimed at collecting evidence described in Circular 1/2017, of February 22, of the Dirección General de Seguros y Fondos de Pensiones, which sets the content of the special report for the review of the financial situation and solvency, individual and groups, and the person responsible for their preparation, and in Annex V of Circular 1/2018, of April 17, of the Dirección General de Seguros y Fondos de Pensiones, which develops the reporting models, the action guides and the periodicity of the scope of the special review report on the financial situation and solvency, individual and groups, and the person responsible for its preparation, modified by Circular 1/2021, of June 17, of the Dirección General de Seguros y Fondos de Pensiones

The following were responsible for reviewing the solvency and financial condition report:

- Main reviewer: Alfredo Yagüe Martín who has reviewed all aspects of an actuarial nature and is responsible for the coordination tasks entrusted by the aforementioned circulars.
- Professional reviewer: Rubén Manso Olivar who has reviewed the aspects of a financial accounting nature.

The reviewers assume full responsibility for the conclusions they make in the special review report.

We consider that the evidence we have obtained provides a sufficient and adequate basis for our conclusion.

#### Conclusion

In our opinion, in relation to the attached report on the financial and solvency situation of Mediterráneo Vida Group as of December 31, 2022, they are in accordance with the provisions of Law 20/2015, of July 14, as well as its regulatory development regulations and the directly applicable European Union regulations, In all significant respects, the following issues:

- a) The scope and structure of the Mediterráneo Vida Group, subject to supervision by the Directorate-General for Insurance and Pension Funds, as set out in the attached report.
- b) entities excluded from such group supervision;
- c) The method applied for the calculation of the solvency of the group and the treatment used for each company.



# Madrid, 18 May de 2023

Name of the Society of Actuaries	Name of the Society of Actuaries	Name of the Society of Actuaries
Analistas Financieros Internacionales	Calle Marqués de Villamejor, 5 28006 Madrid Spain	A78603206
Name and signatura of the actuary	Bussines address	Collegiate number
Alfredo Yagüe Martín (signed on the original)	Calle Marqués de Villamejor, 5 28006 Madrid Spain	2704

Name and signatura of the responsible auditor	Bussines address	No. ROAC
Rubén Manso Olivar	Calle General Castaños 15,1 Dcha	19202
(signed on the original)	28004 Madrid	
	Spain	





# SOLVENCY AND FINANCIAL CONDITION REPORT OF THE GROUP

May 2023 (Annual closing 2022)



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#### **EXECUTIVE OVERVIEW**

Mediterráneo Vida, S.A. de Seguros y Reaseguros (Sociedad Unipersonal) (hereinafter, "Mediterráneo Vida", the "Parent Company", the "Company", "MedVida" or "MV") has as its corporate purpose the performance of any type of life insurance and reinsurance, including collective retirement and pension fund management operations with or without an insurance guarantee and, in general, the other forms and practices provided for in insurance and pension fund legislation.

On 29 December 2022, and once all the necessary authorisations had been obtained, Mediterráneo Vida made effective the purchase of the entire share capital of CNP Partners de Seguros y Reaseguros S.A. from the sellers CNP Assurances S.A. and CNP Caution S.A. On the same day, and following approval by the Board of Directors, the name of the acquired company was changed to MedVida Partners de Seguros y Reaseguros, S.A. (Sociedad Unipersonal) (hereinafter "MedVida Partners"). The acquisition of the aforementioned significant shareholding has converted the Company into a "participating company" ("entidad participante") in MedVida Partners, who is the "investee company" ("entidad participada"). Consequently, Mediterráneo Vida and MedVida Partners constitute a group of insurance companies subject to supervision by the Directorate General of Insurance and Pension Funds ("DGSFP"), registered on 29 December 2022, with the code GRC0677.

At the end of 2022 the MedVida Group (hereinafter the "Group" or "MedVida Group") is composed of Mediterráneo Vida, S.A. de Seguros y Reaseguros (Sociedad Unipersonal) as parent company and the following companies as subsidiaries: Thames International S.à r.I., Severn International S.à r.I., Alzette Associates S.à r.I., Jarama Associates S.à r.I., Guadiana Associates S.à r.I. and Trent International S.à r.I.; and the companies MedVida Partners S.A. de Seguros y Reaseguros and its subsidiary MedVida Sviluppo S.R.L. (formerly CNP Partners de Seguros y Reaseguros, S.A. and CNP Sviluppo S.R.L., respectively).

The Group's corporate purpose is to provide life and non-life insurance and reinsurance, including collective retirement and pension fund management operations with or without an insurance guarantee and, in general, all other forms and practices provided for in insurance and pension fund legislation. The Parent Company's registered office is located in Alicante, where its main facilities are located, Edificio Hispania, calle Ausó y Monzó nº 16, 8th Floor.

Details of subsidiaries of the Group:

Designation	Address
MedVida Partners S.A. de Insurance and Reinsurance	Carrera de San Jerónimo 21, Madrid, Spain
MedVida SVILUPPO S.R.L.	Via Albricci 7, Milan, Italy
Thames International S.à r.l.	6, Rue Eugène Ruppert. L-2453 Luxembourg
Severn International S.à r.l.	6, Rue Eugène Ruppert. L-2453 Luxembourg
Alzette Associates S.à r.l.	6, Rue Eugène Ruppert. L-2453 Luxembourg
Jarama Associates S.à r.l.	6, Rue Eugène Ruppert. L-2453 Luxembourg
Guadiana Associates S.à r.l.	6, Rue Eugène Ruppert. L-2453 Luxembourg
Trent International S.à r.l.	6, Rue Eugène Ruppert. L-2453 Luxembourg

The Group is active in life and non-life insurance (accident, health and various pecuniary losses), deferred savings insurance (capital-income) with profit-sharing, insurance in which the policyholder assumes the investment risk, accident insurance, as well as immediate annuity insurance throughout Spain, Portugal and Italy.

The Group's significant business lines in 2022 were:



Segment	Business line
	Savings: Insurance with/without profit sharing.
Risk Life	Unit Linked: Insurance linked to indices and investment funds.
RISK LIIE	Risk: Other life insurance risk.
	Annuities: Other life insurance.
Non-life	Risk: Non-life insurance relating to payment protection risks

The MedVida Group operates mainly in Spain, with part of its business also in Italy and Portugal. At 31 December 2022 the main distribution channels are through the insurance banking operator of the Banco Sabadell Group and the financial channel, through commercial agreements with credit institutions and financial agents in Spain, Italy and Portugal.

The Parent Company maintains quota share reinsurance agreements with SCOR Global Life Reinsurance Ireland, Designated Activity Company, whereby Mediterráneo Vida cedes 99% of its individual life business.

On 30 June 2022, an agreement was reached with Metrópolis (Metrópolis S.A., Compañía Nacional de Seguros y Reaseguros) for the transfer of its life insurance portfolio to Mediterráneo Vida. This transaction is subject to the required regulatory authorisations and is expected to be completed in 2023.

The sole shareholder of Mediterráneo Vida is the English limited liability company Ember Alpha Limited (99% owned by the "Elliott Funds" International, L.P. and Elliott Associates, L.P., hereinafter the "Elliott Funds").

The Group's business plan aims to effectively manage the hedging of obligations arising from insurance contracts through investment in assets with low exposure to market risk and liquidity adjusted to the nature of the liabilities. This investment structure is designed to reasonably generate the returns necessary to meet the Group's future obligations (both short and long term) and minimise reinvestment risks.

In June 2017, Mediterráneo Vida transferred most of its financial assets to the Luxembourg limited liability companies Water International Finance, s.à r.l. (hereinafter "WIF") and Water Associates Finance, s.à r.l. (hereinafter "WAF"). This transfer of assets was implemented under the Framework Agreements signed for this purpose called Global Master Agreements (hereinafter "GMAs") and Global Master Future Agreements (hereinafter "GMFAs" and, together with the GMAs, the "Framework Agreements"). The sole shareholders of WIF and WAF are the Elliott Funds. At the end of 2022 the transfer of assets had fallen below 50% of the Parent Company's assets.

During 2022, the Parent Company issued two subordinated debt securities on the Irish Global Exchange Market (28 July and 20 December 2022 for a nominal amount of 30,000 thousand euros and 21,000 thousand euros, respectively). On 28 January 2023 both bonds were merged into a single debt issue; the resulting total nominal amount is 51,000 thousand euros; the first redemption option date is 28 January 2028 and the maturity date is 28 January 2033. The interest rate is 8.875% per annum payable semi-annually.

#### **Consolidation method**

The method used to calculate the group solvency is based on the consolidated financial statements, allowing diversification benefits to emerge within the group. The data presented in this report are taken from the Group's consolidated financial statements, which have been prepared in accordance with International Financial Reporting Standards as adopted by the European Union.



The annual accounts for the financial year 2022 were authorised for issue on 30 March 2023, the opinion of the joint auditors PricewaterhouseCoopers and Grant Thornton being unqualified.

Below is a summary of the Group's financial and solvency position at year-end 2022. The solvency ratio at year-end was 171%, well above the regulatory capital requirement. Shareholders' equity has been reduced by €40 million assuming that a dividend of this amount is approved during 2023.

(Amounts in thousands of €)	2022
TOTAL ASSETS	3,834,067
TOTAL LIABILITIES	3,593,338
SURPLUS OF ASSETS OVER LIABILITIES	240,729
Subordinated liabilities	49,999
Foreseeable dividends and distributions	-40,000
Own funds allocated to the management activity	-1,521
Available Own Funds	249,207
Eligible Own Funds for SCR	249,207
Tier 1:	191,667
Tier 2:	49,999
Tier 3:	7,541
Eligible Own Funds for MCR	204,402
Tier 1:	191,667
Tier 2:	12,735
SCR Global	145,564
MCR	63,675
Excess/(Capital Need)	103,643
Solvency Ratio (% SCR Coverage)	171%
% MCR coverage	321%

As regards the quality of the available own funds, 77% have the highest rating (Tier 1), 20% Tier 2 and the remaining 3% Tier 3. After analysing the eligibility of the available own funds and applying the corresponding limits, the eligible amounts of own funds result in an SCR coverage ratio of 171% and an MCR coverage ratio of 321%.

# Status of the Inspection procedure Mediterráneo Vida, Parent Company (Inspection Order 41/2017)

On 14 August 2019, the DGSFP issued the Resolution on the inspection it carried out on the basis of Inspection Order 41/2017 on the Company's situation as at 31 December 2017 and the accounting and solvency information submitted by the Company up to 31 July 2018.

Pursuant to this Resolution, the Company was required to submit a Plan approved by its Board of Directors, including the actions to be taken with respect to various aspects of the Framework Agreements, and other additional issues.

The Company submitted this Action Plan to the DGSFP on 14 November 2019 and on 22 June 2020 an addendum to the aforementioned Plan. The Company is carrying out the actions envisaged in the Action Plan as detailed in point A.5. and has established controls to monitor compliance with it.



#### A. Activity and results

#### A.1 Activity

The corporate purpose of the MedVida Group is to carry out any type of life insurance and reinsurance, including collective retirement and pension fund management operations with or without an insurance guarantee and, in general, all other forms and practices provided for in insurance and pension fund legislation. Its main offices are located in Alicante, Edificio Hispania, calle Ausó y Monzó nº 16, 8th floor, and in Madrid at Paseo de la Castellana 110, 2nd floor.

In 2014, the Parent Company transferred the exclusive rights it had over the Banco Sabadell network for the marketing of pension plans and life insurance, with the exception of group savings and occupational pension plans, and therefore has not marketed any new individual insurance products since then. Mediterráneo Vida continues to receive new incoming premiums, the contractual regular premiums and, in some portfolios, the extraordinary premiums requested by the customer in existing savings policies, as well as renewal premiums for life-risk business (these are annual renewable premiums).

The Parent Company operates in the areas of life insurance and deferred benefit savings insurance (capital-income) with profit-sharing, insurance in which the policyholder assumes the investment risk, accident insurance, as well as immediate life annuity insurance throughout Spain, mainly through the bancassurance operator of the Banco Sabadell Group.

Since 29 December 2022, MedVida Partners has been a wholly-owned subsidiary of Mediterráneo Vida, S.A., de Seguros y Reaseguros (Sociedad Unipersonal), and operates in Spain (the Company's headquarters), Italy (with a branch since December 2013) and Portugal (under the freedom to provide services) in the Life and Non-Life branches (Accident, Sickness and various pecuniary losses). It has specialised units to support each distribution channel.

# The Group's business lines

Segment I	3usiness line
	Savings: Insurance with/without profit sharing
Risk Life	Unit Linked: Insurance linked to indices and investment funds
	Risk: Other life insurance risk
	Annuities: Other life insurance
Non-life	Risk: Non-life insurance relating to payment protection risks

# Responsible supervisory authority

The Directorate General of Insurance and Pension Funds (hereinafter "DGSFP") is responsible for the financial supervision of the MedVida Group. The DGSFP is located at Paseo de la Castellana, 44, 28046 Madrid (Spain), and its website is www.dgsfp.mineco.es.



#### **External audits**

The consolidated annual accounts of the Group are audited on a joint audit basis by PricewaterhouseCoopers Auditores, S.L. and Grant Thornton Auditores, S.L.P. (GT), as is the case for the annual accounts of the Parent Company.

The contact details for both companies are:

PricewaterhouseCoopers Auditores, S.L.

Address: Paseo de la Castellana, 259 B. Edificio Torre PwC - 28046 Madrid

Telephone: 902.021.111

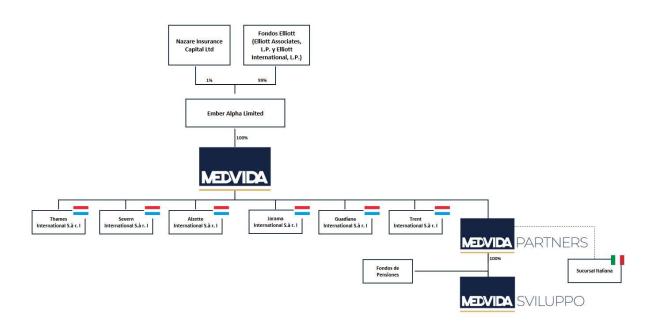
Grant Thornton Auditores, S.L.P.

Address: Paseo de la Castellana, 81, 28046 Madrid

PricewaterhouseCoopers Auditores, S.L. and Grant Thornton Auditores, S.L.P. issued unqualified audit reports on 30 March 2023 on the individual and consolidated annual accounts of Mediterráneo Vida at 31 December 2022.

# Legal structure

The simplified structure of the MedVida Group is as follows:



Mediterraneo Vida owns 100% of the shares of 6 Luxembourg mortgage holding companies and the insurance company MedVida Partners.

Company name	Mediterráneo Vida, S.A. de Seguros y Reaseguros (Sociedad Unipersonal)
Company type	Life insurance
Legal form	Sociedad Anónima
Supervisory authority	Dirección General y Fondos de Pensiones
Consolidation method	Accounting consolidation



Among its objectives, the MedVida Group aims to efficiently manage the coverage of obligations arising from insurance contracts through investment in assets with low exposure to market risks and liquidity adjusted to the nature of the liabilities and to offer excellent levels of service to policyholders, insured parties and the commercial networks through which the MedVida Group companies operate.

# A.2 Underwriting results

On 29 December 2022, and once all the necessary authorisations had been obtained, Mediterráneo Vida made effective the purchase of the entire share capital of CNP Partners de Seguros y Reaseguros S.A. from the sellers CNP Assurances S.A. and CNP Caution S.A. On the same day, and following approval by the Board of Directors, the company name of the acquired company was changed to MedVida Partners de Seguros y Reaseguros, S.A. (Sociedad Unipersonal) (hereinafter "MedVida Partners").

The acquisition of 100% of the share capital of MedVida Partners has made Mediterráneo Vida the parent company of MedVida Partners. As a result, Mediterráneo Vida and MedVida Partners constitute a group of insurance companies subject to supervision by the DGSFP, registered on 29 December 2022, with the code GRC0677.

Given the acquisition date, 29 December 2022, only the balance sheet of the Group includes the figures of the new subsidiary. The business combination did not result in any contribution to the consolidated income statement as the acquisition took place on 29 December 2022.

Therefore, the result of the Group through the result of its Parent Company for the financial year 2022 was as follows (in thousands of euros):

I. Technical account	2022
I.1 Net premiums earned for the financial year, net of reinsurance	74,937
a) Earned premiums	88,668
al) Direct insurance	88,668
a3) Change in impairment of premiums receivable (+ or -)	0
b) Reinsurance premiums ceded (-)	-13,740
c) Change in the provision for unearned premiums and unexpired risks (+ or -)	91
c1) Direct insurance	91
d) Change in the provision for unearned premiums, reinsurance ceded (+ or -)	-82
I.2. Revenue from tangible fixed assets and investments	156,714
b) Income from financial investments	104,433
b1) Group companies	0
b2) Income from financial investments	67,720
b3) Other financial income	36,713
c) Impairment losses on property, plant and equipment and investments	714
c1) Property, plant and equipment and investment property	0
c2) Financial investments	714
d) Gains on the realisation of tangible fixed assets and investments	51,567
d2) Financial investments	51,567
I.3. Income from investments relating to insurance where the policyholder bears the investment risk	2,135
I.4. Other Technical Income	0
I.5 Claims for the year, net of reinsurance	178,340



a) Benefits and expenses paid	175,714
al) Direct insurance	179,958
a3) Reinsurance ceded (-)	-4,244
b) Change in provision for benefits (+ or -)	1,990
b1) Direct insurance	694
b3) Reinsurance ceded (-)	1,296
c) Expenditure chargeable to benefits	636
I.6. Change in Other Net Technical Provisions for Reinsurance (+ or -)	-67,534
a) Provisions for life insurance	-66,232
al) Direct insurance	-66,349
a3) Reinsurance ceded (-)	117
b) life insurance provisions where the investment risk is borne by policyholders	-1,329
c) Other technical provisions	27
I.7. Profit Sharing and Premium Rebates	1,411
a) Profit-sharing benefits and expenses and rebates	2,371
b) Change in the provision for profit-sharing and rebates (+ or -)	-960
I.8. Net operating expenses	3,647
a) Acquisition costs	4,124
b) Change in the amount of deferred acquisition costs	0
c) Administrative expenses	1,630
d) Commissions and participations from ceded and retroceded reinsurance	-2,107
I.9. Other Technical Costs	1,409
c) Other	1,409
I. 10. Expenditure on tangible fixed assets and investments	95,155
a) Expenditure on the management of tangible fixed assets and investments	42,741
a2) Investment expenditure and financial accounts	42,741
b) Value adjustments for tangible fixed assets and investments	518
b1) Depreciation of tangible fixed assets and investment property	7
b3) Impairment of financial investments	511
c) Losses on property, plant and equipment and investments	51,896
c2) Financial investments	51,896
I.11.Expenditure on insurance investments where the policyholder assumes the investment risk	2,541
I.12.Subtotal (Result of the Technical Account)	18,817

II. Non-technical account	2022
II.1. Income from tangible fixed assets and investments	473,846
b) Income from financial investments	40,961
b1) Group companies	0
b2) Income from financial investments	16,497
b3) Other financial income	24,464



c) Impairment losses on property, plant and equipment and investments	0
d) Gains on the realisation of tangible fixed assets and investments	432,885
d2) Financial investments	432,885
II.2. Expenditure on tangible fixed assets and investments	478,159
a) Investment management costs	42,145
a) Investment management costs a1) Investment expenditure and financial accounts	42,145
(b) Value adjustments for tangible fixed assets and investments	42,143
b3) Impairment of financial investments	
c) Losses on property, plant and equipment and investments	436,014
c2) Financial investments	436,014
(2) Financial investments	430,014
II.3. Other Income	64
a) Income from the administration of pension funds	0
b) Other income	64
e) outer mount	
II.4. Other Expenditure	12,289
a) Pension fund management expenses	0
b) Other expenditure	12,289
II.5 Subtotal (Result of the Non-Technical Account) (II.1 - II.2 + II.3 - II.4)	-16,538
II.6 Profit before tax (I.12 + II.5)	2,279
II.7 Corporate Income Tax	-703
II.8. Profit or loss on continuing operations (II.6 - II.7)	1,576
II.9. Profit from discontinued operations net of tax (+ or -)	0
II.10. Result for the financial year (II.8 + II.9)	1,576

In 2022, the actual return obtained on the assets of the Transitional portfolio was not sufficient to cover both the guaranteed interest rate and the future administration costs of these commitments, and therefore a supplementary provision has been recorded in the balance sheet of the Group, the balance of which at 31 December 2022 amounts to 23,097 thousand euros.

Based on the Chart of Accounts for Insurance Entities, but using the Solvency II lines of business as defined in Annex I of Delegated Regulation (EU) 2015/35, the premiums, claims and expenses by line of business of the Group through its Parent Company for the financial year 2022 are:



	Life/non-	Total		
2022 (in thousands of euros)	Profit-sharing insurance	Index-linked and investment fund insurance	Other life insurance	
Earned premiums				
Gross amount	74,366		14,302	88,668
Reinsurance ceded (Reinsurance share)			13,740	13,740
Net amount	74,366		562	74,928
Imputed premiums				
Gross amount	74,367		14,392	88,759
Reinsurance ceded (Reinsurance share)			13,822	13,822
Net amount	74,367		570	74,937
Claims (Claims incurred)				
Gross amount	148,954	966	30,783	180,703
Reinsurance ceded (Reinsurance share)			2,948	2,948
Net amount	148,954	966	27,835	177,755
Change in other technical provisions				
Gross amount				
Reinsurance ceded (Reinsurance share)				
Net amount				
Technical costs	5,316	30	1,186	6,532
Other expenditure				
Total expenditure	5,316	30	1,186	6,532

# A.3 Return on investments

The amount of net gains and losses by category of financial assets recognised in the Profit and Loss Accounts and in Equity of the Group through its Parent Company for the financial year 2022 is as follows:

	Thousands of euros							
Financial year 2022	Assets at fair value through profit or loss	Assets held for trading	Loans and receivables	Available-for- sale financial assets	Hedging derivatives	Total		
Financial income using the amortised cost method	2,021	(76)	14,166	46,558	(2,511)	60,158		
Dividends	-	-	-	554	-	554		
Change in fair value	(2,783)	(3)	-	(26)	(4,817)	(7,629)		
Impairment reversal	-	-	714	-	-	714		
Impairment losses	-	-	(511)	-	-	(511)		
Gains on disposal	2,972	-	-	22,829	47,779	73,580		
Losses on disposal	(115)	-	(70)	(23,100)	(46,536)	( 69,821 )		
Exchange rate differences	4,089		(7,347)	2,940	2,419	2,101		
Net Profit/(Loss)	6,184	(79)	6,952	49,755	(3,666)	59,146		
Change in fair value Reclassification of equity to	-	-	-	(416,131)	(33,125)	( 449,256 )		
gains and losses on disposals				3,702	160	3,862		
Net gains/(losses) equity	-	-	-	(412,429)	(32,965)	( 445,394 )		
Correction for accounting asymmetries				141,581		141,581		
Net gains/(losses) in equity				( 270,848 )	( 32,965 )	( 303,813 )		
Total	6,184	(79)	6,952	(221,093)	(36,631)	( 244,667 )		



Mediterráneo Vida has transferred part of its financial assets to the Luxembourg limited liability companies WIF and WAF. The sole shareholders of WIF and WAF are the Elliott Funds.

The companies WIF and WAF guarantee obligations to Mediterraneo Vida through the allocation of owned assets and the pledge of WIF and WAF shares, and on the "TPECS" bonds, with the provision of sufficient collateral for Mediterraneo Vida to substantially retain the risks and benefits of the transferred portfolio, which means that the transferred assets are not derecognised in the balance sheet of Mediterraneo Vida.

The Group has no investments in asset securitisations.

The result obtained by the Group through its Parent Company in the Profit and Loss Account derives mainly from financial assets classified as "Available for sale". The assets classified under this heading have yielded financial income of 46,558 thousand euros.

#### A.4 Results of other activities

Mediterráneo Vida has signed, from 1 December 2022, an operating lease contract with EDHISPANIA ALACANT, S.L. for the lease of the premises identified as door D (first floor) and doors A and B (eighth floor) of the office building located in Alicante, Edificio Hispania, calle Ausó y Monzó, number 16, post code 03006. The duration of the contract is one year from 1 December 2022. Once the initially agreed period has elapsed, the contract will be tacitly extended by annual instalments as long as one party does not give two months' notice to the other. The agreed price will be updated annually according to the movement in the General Consumer Price Index, with a maximum limit of 5%.

Mediterráneo Vida had entered into an operating lease agreement with Mutua Madrileña Automovilista, Sociedad de Seguros a Prima Fija since 25 June 2018 for the lease of the premises of the office building located in Madrid, Paseo de la Castellana number 110, which has been terminated with effect from 31 March 2023.

Since 20 February 2023, Mediterráneo Vida has entered into a lease agreement with MedVida Partners for the rental of a portion of the premises of the office building located at Carrera de San Jerónimo, 21; 28014 (Madrid). The duration of the contract is one year from 20 February 2023, extendable for periods of equal duration if neither of the parties objects to the extension. The agreed price will be updated annually according to the movement in the General Consumer Price Index.

Since 24 November 2021, Mediterráneo Vida has entered into an operating lease agreement with Argyll Management Limited for the lease of the premises of the office building located in London, 33 St James's Square. The term of the lease is for a period of twelve months, commencing on 22 November 2021. After the expiry of the initially agreed term, the lease will be automatically renewed for twelve-month periods.

In the Profit and Loss Account of the Group through its Parent Company, operating lease expenses corresponding to the rental of premises and garages amounting to 485 thousand euros have been included in the Profit and Loss Account.

# A.5 Any other information

On 28 August 2018, the DGSFP issued an Inspection Report to the Parent Company by Inspection Order 41/2017, based on a review of the Company's situation as at 31 December 2017.

After taking into consideration the various arguments submitted by the Parent Company, the DGSFP, on 3 July 2020, issued its Resolution indicating that the Board of Directors must apply the Action Plan submitted and ensure compliance with it.



This Action Plan included several commitments, already implemented by the Parent Company, and the commitment acquired to amortise the Framework Agreements signed with WIF/WAF over a period of between 5 and 10 years is still in progress. The Parent Company continues to implement these commitments in compliance with the agreement and, as at year-end 2022, since the start of this commitment, Framework Agreements have been amortised for an amount of 1,356 million euros at market prices at 30 September 2019 (761 million euros at 31 December 2021). The amount amortised is comfortably above the commitment made in the agreed amortisation plan, which at the end of 2022 was set at 1,237 million euros (950 million euros due to the natural reduction agreed in the Plan, plus 287 million euros due to the implementation of the accelerators, also agreed).

With respect to the conflicts in the international economic and geopolitical scenario, the war between Russia and Ukraine is causing, among other effects, an increase in the price of certain raw materials and the cost of energy, as well as the activation of sanctions, embargoes and restrictions towards Russia that affect the economy in general and companies with operations with and in Russia specifically. The extent to which this conflict will impact the Group's investment portfolio will depend on the development of future events that cannot be reliably predicted at year-end 2022. In any case, despite the existing uncertainty, the Directors of the Group companies consider that, due to the management of the investment portfolio, this event should not have a significant impact on this portfolio or on other business magnitudes.



#### B. Governance system

The Group's governance system comprises a transparent, appropriate organizational structure, appropriate to the requirements established by the Solvency II regulations, with a clear allocation of responsibilities, an adequate segregation of duties, an effective system that guarantees the transmission of information, as well as an adequate positioning of the key functions that are part of it. The ultimate responsibility for the governance system in the Group lies with the governing bodies of the Parent Company, which made effective on December 29 the acquisition of MedVida Partners, an investee company. The Company plans to carry out the merger of MedVida Partners before the end of the year.

With the aim of homogenizing decision-making and management aligning the internal control and risk management systems, as well as the group's information processes, the Board of Directors and the Audit Committee of Medvida and Medvida Partners are constituted by the same directors in both companies.

#### B.1 General information on the governance system

In order to ensure that the Parent Company has an appropriate structure, the Parent Company has policies in place that regulate key functions and ensure that these functions follow the requirements set by the regulator.

MedVida Partners, the investee company, is in the process of adapting its rules and policies in order to homogenise them within the MedVida Group, agreeing with the Group the processes that are directly applicable.

Mediterráneo Vida, the participating company, has established common risk management mechanisms, internal control and reporting procedures.

The Parent Company's governance system comprises the following key functions, supported by its various policies, which are subject to review and approval by its Board of Directors at least annually.

- 1. Risk Management Function
- 2. Regulatory Compliance Function
- 3. Actuarial Function
- 4. Internal Audit Function

These key functions report directly to the Board of Directors of the Parent Company.

Mediterráneo Vida has a specific unit for the Internal Control System, which reports to the Risks and Technology Department. The policy of this unit has been approved by the Board of Directors and is adapted to the Solvency II regime. This unit is responsible for ensuring compliance with the outsourcing policy, as well as compliance with the requirements of fitness and propriety and continuity.

# Functions of the Governing Bodies, Delegated Committees, other Committees and Key Functions of the Company

# **Governance and Administration of the Company**

According to the Articles of Association of the Parent Company, the governing bodies of the Parent Company are the General Meeting of Shareholders and the Board of Directors.

The Board has delegated the day-to-day management of the Parent Company to a Chief Executive Officer, concentrating his activity on the exercise of the functions of strategy, monitoring and control.



The Chief Executive Officer of Mediterráneo Vida, reporting to the Board of Directors, as the highest executive of the Parent Company, has been delegated all the powers of the Board of Directors, except those that cannot be legally delegated. His actions are always governed by these limitations, by the statutory framework and the guidelines set by the Board of Directors.

Mediterráneo Vida, the parent company, has a robust governance system and corporate governance structure, with its fundamental functions clearly defined and identified, a highly capable management team and close monitoring of the Group's management by the Board of Directors. The Board of Directors of the Parent Company in 2022 was composed of seven members: an Executive Director, three External Proprietary Directors (one of them being Chairman of the Board) and three Independent External Directors. Likewise, the Board of Directors of MedVida Partners has a Secretary and a Deputy Secretary (both non-directors). As of April 7, 2023, the Board consists of 8 members: an Executive Director, four External Proprietary Directors (one of them being Chairman of the Board) and three Independent External Directors. As a whole, the Board has extensive experience in the insurance sector, in its regulatory field and in the financial sector at national and international level, its members having held positions of high relevance both in private companies and in the Public Administration.

During the financial year 2022, the Board of Directors of the Parent Company was supported by the Audit Committee, the Remuneration Committee, the Business Development Committee and the Assets, Liabilities and Risks Committee. These committees met in 2022 with sufficient frequency and as necessary for the proper performance of their duties.

For information purposes, it is hereby stated for the record that, on 2 February 2023, the duties of the committees have been modified as follows: i) the Remuneration Committee has ceased its activity, with the Board of Directors of the Parent Company being the body in charge of assuming the responsibilities held to date by said Committee; ii) the Business Development Committee has ceased its activity and a Mergers and Acquisitions Committee has been established, in charge, in general, of the strategy and analysis of the Company's activity related to mergers and acquisitions business opportunities; iii) the Assets, Liabilities and Risks Committee has transferred those functions related to the strategy and analysis of the Parent Company's investments to a new Investment Committee which, in general, will identify and analyse new investment opportunities for Mediterráneo Vida.

The functions of these committees in 2022 were as follows:

# **Audit Committee**

The Audit Committee of the Parent Company is made up of three members: The Chairman of the Board and two Directors (two of whom are independent and one of whom is the Chairman of this Committee). The Secretary and Deputy Secretary of the committee are not directors.

The main functions of the Audit Committee of the Parent Company are as follows:

- a) Report to the General Shareholders' Meeting on any issues arising in connection with matters within its competence and, in particular, on the outcome of the external audit.
- b) Supervise the effectiveness of the Company's internal control and compliance, internal audit and risk management systems, and monitor any significant weaknesses in the internal control system detected by the auditor.
- c) Supervise the process of preparation and presentation to the Board of Directors of the financial information, as well as propose to the Board such recommendations as it deems appropriate in this area.
- d) Submit to the Board of Directors proposals for the selection, appointment, re-election and replacement of the auditor. The Committee shall also be responsible for all matters that may affect



the independence of the auditor and any other matters relating to the performance of the audit of the accounts.

(e) Review the retention of risks and rewards related to the transfer of assets.

#### **Remuneration Committee**

The Remuneration Committee of the Parent Company is composed of three members: the Chairman of the Board of Directors, a proprietary Director (being the Chairman) and an independent Director.

The powers of this committee are as follows:

- Propose to the Board of Directors any changes to the remuneration policy and incentive system applicable to employees.
- Assess the skills, knowledge and experience required to be a member of the Board of Directors, Chief Executive Officer, Senior Management or those responsible for Key Functions.
- Report to the Board on proposals for appointment or removal, as well as the contracts of Senior Management.

#### **Business Development Committee**

The Parent Company's Business Development Committee is composed of six members: the Chairman of the Board of Directors, the Chief Executive Officer, two proprietary Directors (one of whom is the Chairman of this committee) and two independent Directors.

This committee shall be entrusted with the functions of analysing, studying and proposing to the Board of Directors of the Parent Company, opportunities for the growth of the Group, including in particular those relating to acquisition operations by the Parent Company of other insurance companies or life insurance portfolios.

# Assets, Liabilities and Risk Committee (ALCOR)

The Assets, Liabilities and Risk Committee of the Parent Company is composed of 7 members: 2 directors, including the Chief Executive Officer, and 5 executives of the Company; the Control and Operations Director, the Chief Financial Officer, the Finance Director, the Chief Risk and Technology Officer and the Technical Actuarial Director.

The main powers and functions of the Assets, Liabilities and Risk Committee are as follows:

- Analyse the composition and evolution of asset and liability portfolios.
- Analyse how changes in financial markets affect the assets and liabilities of the balance sheet (ALM), establishing simulations that allow the impact on the financial statements to be measured, differentiating between own funds and balance sheet risks.
- Take decisions to bring the Company's situation in line with the defined investment and risk objectives, analysing the impacts at the level of both investment and divestment decisions.
- Analyse capital consumption, the solvency ratio, the real return on hedging assets and the
  allocation of equity investments. This analysis will be carried out taking into account the
  legislation in force, as well as any regulations under development, which could have a
  significant impact on the magnitudes monitored.
- Measure and monitor counterparty risk on a monthly basis by monitoring WIF/WAF collateral and remote collateral, assessing the impact that possible changes in the collateral may have



on counterparty risk, credit quality, liquidity and other characteristics, in order to substantially retain risks and rewards and keep the counterparty SCR within the established limits.

- Propose to the Board of Directors relevant decisions regarding the collateral control foreseen in the Framework Agreements, such as the inclusion of new asset classes in the portfolio of acceptable collateral.
- Propose to the Board of Directors the necessary measures and in particular those that may refer to the management of the Framework Agreements, in order to maintain at all times risks within the ratios defined in the Company's risk appetite policy.
- Analyse the evolution of product margins.
- Approve proposals for new products and commercial actions, after analysing the rates of assets, liabilities, commissions, price and profitability.
- Approve and review, at least annually, the policies of the Risk Management Function, Actuarial Function, ORSA, capital management, as well as the investment policy and risk appetite of the Company.
- Likewise, this committee is also responsible for the tasks set out in the above-mentioned policies.
- Approve and propose to the Board of Directors the Company's Resolution Plan, reviewing it at least annually.
- Determine the asset lending policy, as well as terms and classes of acceptable collateral.

# **Claims and Complaints Committee**

The Claims and Complaints Committee is responsible for periodically assessing complaints, both those dealt with by the Customer Service Department (currently outsourced to Benedicto y Asociados, Asesores S.L., headed by Mr. Antonio Benedicto Martí) and those submitted through the Claims Service of the DGSFP and those of a judicial nature, as well as analysing problematic or atypical claims and analysing the evolution/behaviour of the claims ratio for the year and its comparison with previous years.

The Claims and Complaints Committee is composed of eight members responsible for different departments of the Parent Company plus the Head of Customer Services.

The powers and functions of the Claims and Complaints Committee are as follows:

- Analyse the administrative, judicial and extrajudicial claims filed with the Company and to oversee their follow-up and finally their resolution based on information from the Customer Service Department, those received from the DGSFP, those made by customers, policyholders, beneficiaries, as well as those received through the MedVida website and its network of brokers.
- 2. Monitor the processing period of ongoing cases and, where appropriate, propose proactive actions if necessary.
- 3. Analysing problematic, atypical or doubtful claims, or those with doubtful legal or contractual coverage, in order to provide solutions in the interests of the company and policyholders/insureds/beneficiaries.
- 4. Introduce, to the extent applicable in the terms and conditions of the products in the Parent Company's portfolio, improvements in the contractual documentation in order to avoid possible claims.
- 5. Control and monitoring of compensation paid for benefits.



- 6. Analyse the evolution of the claims ratio for the year and compare with previous years.
- 7. Strengthen the internal controls established within the Parent Company to combat fraud.

#### **Risk Committee**

The Risk Committee of the Parent Company aims to discuss all issues related to risks, their assessment, measurement and monitoring, bringing together different views, trying to coordinate the different works and different departments.

Mediterráneo Vida's Risk Committee is composed of 9 members, including the Chief Executive Officer, the Director of Risk Management and IT (Chairman), the Director of Legal Affairs, the Director of Internal Audit, the Finance Director, the Director of Technical-Actuarial and Operations, the head of the Compliance Function, the Chief Financial Officer and the Chief Investment Officer.

The functions of the Risk Committee of the Parent Company are as follows:

- Discuss all issues related to risks, their assessment, measurement and monitoring.
- Monitor the status of the requirements received from Public Authorities, as well as the following reports: Annual Accounts, Solvency and Financial Condition Report (SFCR), Regular Supervisory Report (RSR) and Own Risk and Solvency Assessment (ORSA) Report, as well as those reported by the Core Functions.
- Discuss any relevant ongoing projects.
- Analyse proposals on possible outsourcing in order to assess whether they are to be considered critical or not, and to propose a person responsible for them before they are submitted to the Board of Directors.
- Take into account reports on outsourcing.
- Take into consideration any regulatory projects that may affect the consumption of capital
  or risks of any kind that may affect it.
- Monitor internal control and compliance scorecard indicators.

# Internal Control Bodies ("OCI" in their Spanish acronym)

During 2021, the internal control body was split into two:

- 1. OCI Money Laundering
- 2. OCI Criminal

# **OCI Money Laundering**

On 29 December 2022, following the acquisition of the Spanish subsidiary of CNP Assurance, called CNP Partners (now MedVida Partners), by Mediterráneo Vida, and in order to comply with Law 10/2010 of 28 April on the Prevention of Money Laundering and Terrorist Financing, both a Technical Prevention Unit and an Internal Control Body ("OCI") for Money Laundering were created at Group level, with the approval of the Boards of Directors of both companies.



The mission of the OCI Money Laundering is to adopt all necessary measures within the Group to analyse, control and report to the Executive Service of the Commission for the Prevention of Money Laundering and Monetary Offences of the Bank of Spain ("SEPBLAC") all information relating to transactions or events that may be related to money laundering.

The OCI Money Laundering is composed of 13 members: the heads of different departments of both companies.

The main functions of the OCI Money Laundering are as follows:

- Periodically review and approve a report analysing the Group's risk exposure to money laundering and terrorist financing, prepared by the Technical Unit for the Prevention of Money Laundering.
- Monitor the functioning of procedures for the prevention of money laundering and terrorist financing.
- Design, develop and implement programmes for better compliance, monitoring and control of money laundering prevention and customer relationship monitoring.
- Review and approve the Internal Regulations for the prevention of money laundering and the financing of terrorism and submit them to the Board of Directors for approval.
- Approve and promote training on the Prevention of Money Laundering and collaborate with the Company's departments at global level in the design and preparation of annual staff training plans on the Prevention of Money Laundering and approve them.
- Analyse suspicious transactions detected by employees for the purpose of deciding whether or not to report them to the Executive Service.
- Approve the admission of certain persons or entities subject to the authorisation of the OCI.
- Take the decision whether or not to execute certain operations.
- Keep in its confidential files all documentation relating to the prevention system.
- Annually approve an explanatory report containing all the actions carried out in prevention matters during this period: modifications to internal procedures, implementation of new computer applications, statistical data on the transactions analysed, communications by indicia, requirements received from SEPBLAC, degree of implementation of the improvements proposed by the external expert, etc.
- Provide the Representative to the Commission's Executive Service and the Compliance Officer with the material, human and technical resources necessary for the exercise of their functions.
- Guarantee that the person responsible for compliance with the obligations established in the legal regulations in force may have access without limitation to any information held by the entity, as well as any information held by the Group's entities.



- Take measures to ensure that employees, managers or intermediary channels who report wrongdoing in the entity are protected from retaliation, discrimination or any other unfair treatment.
- Ensure that the Group's anti-money laundering policy complies with applicable regulations and does not contradict the Group's policies at a global level.
- Annually analyse the external expert and internal audit reports and ensure their application and/or implementation within the organisation.
- Evaluate and pre-approve the action plan reflecting the recommendations of the external expert, prepared by the Technical Prevention Unit, and subsequently submit it to the Governing Board for approval.
- Regularly monitor the status of the actions included in the action plan.
- Analyse in depth the monthly reports received from the Italian branch.

In the exercise of its functions, the OCI Money Laundering may request the collaboration of the Group's Technical Unit for the Prevention of Money Laundering.

The Internal Audit Director of MedVida Group shall attend the OCI as a guest. However, the OCI shall operate organically and functionally separate and the Internal Audit Director shall in no case have the right to vote.

Any modification to the structure and functioning of the OCI or to the Internal Regulations on the Prevention of Money Laundering and Terrorist Financing shall be subject to approval by the Board of Directors. Any other employee may also attend as a guest, at the proposal of the members of the OCI.

#### **OCI Criminal**

OCI Criminal is composed of 8 members: the heads of different departments of the Parent Company.

It is the Internal Control Body in criminal matters approved by the Board of Directors and has sufficient independence, autonomy and power to act in order to carry out its functions.

Its main functions are:

- 1. Adopt and implement monitoring and control measures, prior to the commission of the offence, to prevent or significantly reduce the risk of the commission of the offence in accordance with the mandate received from the Board of Directors.
- Define the control environment to be implemented for the prevention of the commission of crimes ("the Criminal Defence Model"), based on legal requirements and the demands of internal policies and regulations, as well as promoting the development of the map of risks that could imply criminal liability for the Company for the commission of criminal offences.
- 3. Propose periodic updates of the Crime Prevention Manual, submitted by the Compliance Function, for subsequent approval by the Board of Directors, after review by the Audit Committee.
- 4. Define a training programme for the organisation's employees and keep the evaluation tests of the training carried out in this area.
- 5. Promote compliance with the disciplinary procedure and propose, where appropriate, the application of the appropriate disciplinary measures together with Human Resources when necessary.



- 6. Monitor and supervise the functioning, effectiveness and compliance of the Criminal Defence Model, without prejudice to the responsibilities of other bodies.
- Monitor and manage notifications received through the complaints channel.
- 8. Review and analyse the annual report on the validation of the adequacy of the Criminal Defence Model.

The head of the Internal Audit Function shall attend the OCI Criminal as an invited guest. In addition, the Head of Legal Affairs may delegate the attendance at the meetings of the OCI Criminal to any member of Legal Affairs.

Any modification of the structure and functioning of the OCI Criminal or the Criminal Liability Prevention Manual shall be subject to approval by the Board of Directors.

#### **Technology Committee**

In order to monitor the technology plan that supports the strategy of the Parent Company, based on business growth, efficiency and fair treatment of the customer, the Technology Committee of the Parent Company has been created to guide the technological innovation and digital transformation processes that are developed in the Group and that support the technological change it is undergoing in digital and innovation matters.

This committee is composed of 10 members, including the CEO, the company's executives and the heads of the technology area.

The Committee shall monitor all matters related to cyber security and cyber defence, and possible risks related to information technology and business operations, including the monitoring of outsourced technology services. The Committee shall also coordinate the company's processes related to the management of business information and technology and to projects related to technology and innovation that are developed by the different segments and areas of the Company. The Committee, through the Technology Department, shall inform, advise and propose to the Board strategic issues related to technology and innovation.

# **Fundamental functions**

In line with regulatory requirements, the Parent Company has key function holders who meet the fit and proper requirements, as well as written policies defining the procedures and duties of each function.

# **Risk Management Function**

The coordination of the Risk Management Function has been entrusted to the Risk Department of the Parent Company, which performs the role of the management function, with a functional link to the head of the core function.

Its core competencies are:

- To be responsible for ensuring the comprehensive, homogeneous and coherent management of the risks to which the Company is exposed, and therefore for coordinating the entire process of identifying, assessing, monitoring, controlling and mitigating significant risks, subject to the guidelines established by the Board of Directors and the regulations in force.
- 2. Coordinate compliance with the Risk Management Policy as well as the other policies for which it is responsible.



- 3. Coordinate risk management with the heads of the other units and the owners of the business processes identified in the risk map of the Parent Company, the latter being responsible for their identification, mitigation and evaluation on an ongoing basis.
- 4. Coordinate the calculation of Solvency Capital Requirement (SCR) and Minimum Capital Requirement (MCR) in each of its modules, as well as strategic and reputational economic capital.
- 5. Propose the risk indicators deemed necessary to comply with the Risk Appetite approved by the Board.
- 6. Monitor Risk Tolerance and Risk Appetite Limits.
- 7. Coordinate the quarterly risk management report of the Parent Company.
- 8. Coordinate the Own Risk and Solvency Assessment (ORSA) report.
- 9. Coordinate the preparation of the regulatory Solvency and Financial Condition Report (SFCR) and Regular Supervisory Report (RSR).

#### **Regulatory Compliance Function**

Its core competencies are:

- 1. To advise the Board of Directors on compliance with the legal, regulatory and administrative provisions that affect Mediterráneo Vida, as well as on compliance with the internal regulations of the entity itself.
- 2. Develop and implement a Compliance Plan.
- 3. Carry out verification tests to check that the entity's policies, documents and processes comply with regulations. Follow up on the aspects for improvement detected.
- 4. Collaborate with the Risk Management Function and coordinate that all regulatory risks are covered by the Internal Control System.
- 5. Periodically report to the Audit Committee on the most relevant aspects of compliance.
- 6. Prepare annual and quarterly Compliance and Internal Control reports, indicating conclusions and recommendations.
- 7. Collaborate with the Legal Department to identify new regulatory developments that may affect the entity.
- 8. Design and keep the Criminal Defence Model up to date.
- 9. Coordinate with the Personal Data Protection Officer (DPO), who ensures the protection of personal data, supervising, advising and verifying compliance with the applicable regulations.

Design, update (annual) and review (half-yearly) of the Action Framework to ensure fair treatment of its customers, reporting to the Audit Committee prior to its submission to the Board of Directors.

# **Actuarial Function**

The Actuarial Function is responsible for, inter alia, the following activities:

- 1. Coordinate the calculation of technical provisions.
- 2. Assess the adequacy of the methodologies and underlying models used, as well as the assumptions used in the calculation of technical provisions, in particular on the adequacy of mortality and survival tables, and their regular monitoring.
- 3. Document the execution, decision-making, results and monitoring of biometric assumptions and tables. Anticipate the impact of changes in underwriting risks.



- 4. Assess the adequacy and quality of the data used in the calculation of technical provisions in terms of their appropriateness, completeness and accuracy.
- 5. Report to the Board of Directors on the reliability, adequacy and sufficiency of the calculation of technical provisions.
- 6. Opine on the general underwriting policy and on the adequacy of reinsurance arrangements.
- 7. Contribute to the effective implementation of the risk management system, in particular as regards the underwriting risk modelling underlying the calculation of the Minimum Capital Requirement and Solvency Capital Requirement, as well as the Own Risk and Solvency Assessment (ORSA) process.
- 8. Introduce cross-checking mechanisms to check best estimates against experience.
- 9. Participate in product launches or modifications in order to advise on the adequacy of product premiums and reinsurance arrangements applicable to them.
- 10. The actuarial function for the purpose of determining the entity's underwriting policy must include sustainability risks, the specific tasks assigned to the actuarial function on this matter are developed in the "policy on the integration of sustainability risks".

#### **Internal Audit Function**

Its most significant competencies are:

- 1. Develop and implement a multi-year plan of audit activities using an appropriate risk-based methodology.
- 2. Implement the Annual Audit Plan including any special tasks or projects required by the Board of Directors, the Audit Committee or management.
- 3. Issue regular reports to the Audit Committee and management, summarising the results of audit activities.
- 4. The head of the Audit Function shall report to the Audit Committee:
  - The development and results of the Audit Plan and any other special work arising.
  - The proposed recommendations and their degree of implementation.

#### **B.2 Fit and Proper Requirements**

Persons exercising the effective management of the Parent Company or performing key functions within the Parent Company shall be persons of good character and integrity, and shall be professionally qualified, competent, experienced and honourable so as to enable the sound and prudent management of the company.

The following persons are required to meet the requirements of Fitness and Propriety:

- Senior management of the Company
- Those responsible for Key Functions
- Relevant Personnel (Directors and Heads of the Company's critical outsourcings)

The members of the Board of Directors collectively have appropriate qualifications, experience and expertise in:

- 1. Insurance and financial markets
- 2. Strategy and business models
- 3. Systems of Governance



- 4. Financial and actuarial analysis
- 5. Regulatory framework

The Company has a procedure in place to assess the fitness and propriety of persons who exercise effective management of the Company, perform key functions, as well as relevant personnel, both at the time of their appointment to a specific position and during their tenure.

There is a Group Code of Ethics, the purpose of which is to establish the general guidelines that must obligatorily govern the conduct of directors, employees and collaborators in the performance of their duties and in their commercial and professional relations, and which reflect the values that MedVida promotes as a company.

#### **Remuneration Policy**

The general principles of the Remuneration Policy of the Parent Company are as follows:

- 1. Risk management: Remuneration must be compatible with appropriate and effective risk management.
- 2. Proportionality: Remuneration policies shall be established in accordance with the principle of proportionality, depending on the size, complexity and type of business.
- 3. Balance: The fixed and variable components of remuneration schemes should be in a balanced and efficient relationship in which the fixed components should constitute a sufficiently high proportion of the total remuneration.
- 4. Strong capital base: Total variable remuneration shall be capped where it is incompatible with the maintenance of a strong capital base.
- 5. Sustainable strategy: The objectives for the achievement of the annual variable remuneration shall be aligned with the long-term strategy of the Parent Company.
- 6. Appropriate conduct: Remuneration systems and incentives shall not create conflicts of interest that result in a detriment to the customers of the Parent Company, and shall promote responsible business conduct and fair treatment of customers.
- 7. Objectivity: The application of the remuneration policy and decisions on individual remuneration shall be governed by internal and market remuneration benchmarks, taking into account the responsibility of the position, the professional experience provided, the commitment to achieving the established objectives and performance.
- 8. Non-discrimination on grounds of gender: the principle of non-discrimination on grounds of gender in remuneration shall be maintained at all times, so that equal pay for work of equal value and equal objective and personal conditions is guaranteed, without any discriminatory difference on grounds of sex.

The remuneration paid in accordance with the aforementioned principles is in line with the criteria of moderation and adapted to the results of Mediterráneo Vida, and should reinforce its strategic objectives, as well as promote effective risk management and future solvency.

Members of the Board of Directors, Management and persons performing Key Functions do not have supplementary pension plans or early retirement plans.



The members of the Board of Directors have not carried out transactions with the Company or with other group companies outside the ordinary course of business or on other than arm's length terms. Likewise, no transactions have been carried out with shareholders or with persons exercising significant influence over the Company.

In accordance with the Company's Articles of Association, the office of Director is free of charge, except for: (i) independent or external non-independent directors; and (ii) those who are attributed executive functions or work other than those inherent to their status as directors, regardless of the nature of their service relationship with the Group, who shall be remunerated. The maximum amount of annual remuneration for all directors is approved by the General Meeting, and the Board is empowered to distribute this amount.

# **B.3 Risk Management System**

Risk Management is the activity aimed at identifying, measuring, controlling, managing and continuously reporting the risks to which the Group companies are or may be exposed.

Risk Management shall comprise the assessment of the risks to which Group companies are exposed in such a way as to provide an objective conclusion to the Board of Directors in accordance with the defined Risk Appetite.

The key objectives of the Risk Management Policy are as follows:

- 1. Ensure that an adequate and sufficient risk management system is in place.
- 2. Ensure that, through the consistent and efficient application of the policies and procedures that make up the risk management system, risks are managed appropriately, facilitating the achievement of strategic objectives.
- 3. Coordinate the identification of the risks to which the Group is exposed.
- 4. Measure the impact, both economic and otherwise, that the materialisation of risks may have.
- 5. Keep the various risks to which the Group is exposed under control by means of appropriate monitoring.
- 6. Risk management, understood as the mitigation of risks, specifying limits and controls over risks to minimise their impact or frequency.
- 7. Maintain the flow of communication and report all events and information concerning risks between the different levels of Mediterráneo Vida.

Medvida's Risk Management Function Policy should be understood as the policy relating to the establishment of the control environment for MedVida's risks, including the control of asset transfer operations such as:

- Ensure that the counterparty risks arising from the Framework Agreements entered into with WIF and WAF allow the risks and rewards of the transferred assets to be substantially retained at all times.
- Establish and maintain controls to verify that the risk profile of Mediterráneo Vida's assets, before and after the transfer of assets to WIF and WAF, are not substantially different.
- Evaluate the scenarios that could give rise to significant variations in the counterparty risk derived from the Framework Agreements and draw up contingency plans that allow the



company to reach the solvency levels in accordance with its risk appetite policy in the event of any of these scenarios materialising.

The risks to which the Company is exposed are managed by evaluating quantitative risk indicators. These indicators are divided into two blocks: a first block which includes indicators that give an overall view of the Company's exposure to risk, and a second block which includes more specific risk indicators.

The head of the Risk Management Unit calculates, monitors and controls the following risk indicators;

# **Block I: Global Risk Indicators**

- Solvency Ratio: measures the Company's ability to meet expected or unexpected losses
  with its own capital. The solvency ratio is defined as the ratio between the Shareholders'
  Equity and the Global SCR calculated in accordance with the Standard Formula.
- Liquidity Ratio: measures the ability to meet payment obligations over the next 12 months with liquid assets currently held by the Parent Company.

The above quantitative indicators will be used to provide a view of the Parent Company's overall level of compliance with the target level set in the establishment of the Risk Appetite, which will be discussed in more detail in the following section.

# **Block II: Specific Risk Indicators**

- Market Ratio: this is the quotient between the Market SCR and the Global SCR as an
  expression of the weight of market risk with respect to the total risk to which the Parent
  Company is exposed.
- Life Ratio: this is the quotient between the Life SCR and the Global SCR as an expression of the weight of the Life underwriting risk with respect to the total risk to which the Parent Company is exposed.
- Counterparty Ratio: this is the ratio between the Counterparty SCR and the Global SCR as an expression of the weight of counterparty risk with respect to the total risk to which the Parent Company is exposed.
- Operational Ratio: this is the quotient between the Operational SCR and the Global SCR as an expression of the weight of operational risk with respect to the total risk to which the Parent Company is exposed.
- Reputation Ratio: measures the weight of reputational risk relative to the Parent Company's Global Economic Capital.
- Credit Quality Principle: Reinsurance business in the Parent Company is only contracted with companies that have a minimum credit rating of "BBB-" or above according to a recognised rating agency and in accordance with the provisions of the Strategy and Risk Appetite Document.



In addition, the Company identifies in its business model its level of biometric risk appetite, differentiating at least the risks of longevity, mortality, disability and the exercise of policyholder options.

These sub-risks are measured in terms of capital in accordance with the Solvency II Directive and its technical specifications for the calculation of Solvency Capital requirements:

- Longevity ratio: the ratio of the Longevity SCR to the Life SCR as an expression of the weight of longevity risk relative to the total underwriting risk to which the Parent Company is exposed.
- ii. Mortality ratio: the ratio of the Mortality SCR to the Life SCR as an expression of the weight of mortality risk relative to the total underwriting risk to which the Parent Company is exposed.
- iii. Disability ratio: this is the ratio between the Disability SCR and the Life SCR as an expression of the weight of the disability risk with respect to the total underwriting risk to which the Parent Company is exposed.
- iv. Expense risk: the ratio between the capital requirement for expense risk (Expense SCR) and the Parent Company's underwriting risk requirement (Underwriting SCR).
- v. Catastrophe Risk: is the ratio of the Catastrophe Risk Requirement (Catastrophe SCR) to the Underwriting Risk Requirement (Underwriting SCR).
- vi. Ratio of the exercise of policyholder options: this is the quotient of the downside SCR and the Life SCR as an expression of the weight of the downside risk with respect to the total underwriting risk to which the Parent Company is exposed.

The Risk Appetite is dynamic and may change over time, depending on changes in strategy based on the results of the ORSA process. Where necessary, Risk Management will propose changes to the Parent Company's business strategy or risk appetite framework.

In addition to the aforementioned risk indicators, Mediterráneo Vida monitors the counterparty risk that could arise from the transfer of assets to WIF and WAF and the Framework Agreements. These Framework Agreements generate a counterparty risk which is monitored on a monthly basis to ensure that it does not exceed a threshold agreed between both parties.

Risk monitoring is recorded via two types of reports. The main purpose of these reports is to keep the Board of Directors of the Company informed about this type of risk, and to communicate the exposure to the risk profile to the rest of the Company.

- ORSA Report:
  - The ORSA report contains the results of the forward-looking internal risk assessment process.
- Quarterly risk reports and annual reporting to the Board of Directors:
  - This report compiles the monitoring of risk indicators on a quarterly basis.

These reports are reported directly by the Risk Management Function to the Directors.

The annual reports of the Function, as well as any other communication considered important by the head of the Function, are reported directly to the corresponding Board of Directors, thus evidencing



its independence. These communications may not be modified by other bodies or units of the Company, although they may be analysed by them.

# Own Risk and Solvency Assessment (ORSA)

The objective of the ORSA Policy is to enable the Parent Company to understand its current and future position with respect to its material risks, both quantitatively and qualitatively, and in relation to its risk appetite. In this way, the Parent Company is able to manage its risks and its business by making decisions based on the results of prospective risk assessments.

To this end, it has been equipped with a series of instruments to facilitate this work:

- A risk appetite framework, which takes the form of a set of risk tolerance indicators and thresholds, both quantitative and qualitative.
- A forward-looking risk assessment system, which takes into account not only the risks mentioned in Pillar I of the Directive, but also others that are understood to be relevant to the Parent Company.
- A system for reporting the results of the process in which the risk appetite scheme is monitored by comparison with the risk profile, which is implemented through the preparation of the ORSA Report.

As a result of this system, the overall risk profile is obtained. The prospective risk assessment includes the projection of capital needs and the equity available to cover them.

The Risk Management Unit of the Parent Company is responsible for executing the processes approved for the own risk and solvency assessment.

Both the Board of Directors of Mediterráneo Vida and those responsible for each of the business areas must know, based on the results obtained in the ORSA process, the risks to which it is exposed.

With this knowledge, the Parent Company acts in a dynamic and coordinated manner in the event of an adverse risk event, as the entire company will act in line with the risk appetite set by the Board of Directors. In addition, the results of the risk self-assessment are taken into account in strategic decisions and business monitoring.

This structure is considered appropriate in view of the principle of proportionality and the nature and complexity of the Parent Company's operations.

The own risk assessment is performed quantitatively using the Standard Formula for Pillar I risks, which form the regulatory capital requirement. To this requirement are added those risks to which the Parent Company is exposed with sufficient materiality to be considered and which are not sufficiently covered by the Standard Formula, known as Pillar II risks.

The Parent Company assesses ongoing compliance with capital requirements and technical provisioning requirements by applying the Volatility Adjustment, and additionally performs this assessment by reducing the Volatility Adjustment to zero.

In the process of internal assessment of all risks, both Solvency II balance sheet and capital consumption projections are made in line with the Capital Plan, in order to perform a forward-looking risk analysis.

The amount of available equity is also determined in order to assess the Parent Company's solvency in the short and medium term, using ratios.



The methodologies used for the configuration of the risk profile and the risk appetite scheme are documented in the various policies included in the Company's governance system, in particular the policies relating to risk management.

In this way, the Parent company can know well in advance the risks to which it would be exposed in the future, so that, in line with risk appetite, efficient capital management and planning can be carried out.

The periodic risk assessment process through ORSA has the following characteristics:

- Both the Board of Directors and management play an active role in the forward-looking internal risk assessment, guiding it and verifying its performance.
- Meets the overall solvency requirements taking into account the specific risk profile, the approved risk tolerance limits and the strategy.
- As a complement to the previous point, the process assesses the ongoing and prospective compliance with expected capital requirements.
- It is able to detect the extent to which its risk profile deviates from the Solvency Capital Requirement calculated using the Standard Formula.
- It uses methods that are proportionate to the nature, volume and complexity of the risks inherent in its business and that enable it to identify and adequately assess the risks it faces in the short and medium term and to which it is or could be exposed.
- The ORSA process is an integral part of its strategic plan, and considers all relevant risks that threaten the achievement of its objectives in relation to the current and future capital requirements set out in that plan.

Once the ORSA process has been completed and the corresponding report has been drawn up, it is approved by the Board of Directors at the proposal of the Assets, Liabilities and Risks Committee, which belongs to the Parent Company.

This communication will facilitate proper integration into the decision-making process and enable appropriate measures to be taken to control risks.

The evaluation of the ORSA process is annual, however, there are circumstances that would oblige an update to the internal risk assessment. The assessment will be updated in the event of a special event that may modify the levels of exposure to one or more risks, resulting in a change in their profile.

In particular, an update of the assessment will be carried out in the light of the following developments:

- Initiation of business in new lines of business, with a significant impact (over 20%) on total business.
- Termination of the business in a given line of business, with a significant impact on the total business.
- Regulatory change with an impact on the entity.
- Significant change in the economic environment.
- New positioning of the company in the market through mergers and/or acquisitions.
- Relevant strategic change or at the request of the board.



# **B.4 Internal Control System**

The Internal Control System consists of administrative and accounting procedures, appropriate reporting mechanisms at all levels of the Company and a Compliance Function.

The Company has two policies in this area, both approved by the Board of Directors:

- Internal Control Policy: its purpose is to establish the basic principles and the general framework of action for the control and management of risks of all kinds faced by the Company, in such a way as to maintain an effective Internal Control System.
- Compliance Verification Policy: its purpose is to carry out compliance verification activities in relation to the Company's own legal, regulatory, administrative and internal regulations. It also involves assessing the impact of any changes in the legal environment on the Company's operations and determining and assessing the risk of non-compliance. (The competencies of the Compliance Function are described in section B1 of this report).

Internal control is understood as a set of processes, continuous over time, to obtain reasonable assurance about:

- Effectiveness and efficiency of operations
- Asset protection
- The reliability and integrity of financial and non-financial information
- Appropriate risk management in line with the Company's strategic objectives
- Compliance with applicable laws and internal policies and procedures

The Company's Internal Control System is based on the integration of the following five components:

- Control environment
- Risk assessment
- Risk control
- Information and communication
- Monitoring

The Company carries out internal controls appropriate to the risks arising from its business and operational processes, ensuring that all personnel are accountable for their role in the Internal Control System and has the following lines of defence:

- 1. The operational areas and their heads are responsible for identifying and managing the risks to which the Company is or may be exposed on a day-to-day basis, and for establishing the necessary controls to mitigate the risks.
- 2. The Compliance, Actuarial and Risk Management functions play a monitoring and control role, ensuring that risk management is properly carried out.



3. Internal Control shall assess the conformity of the processes developed with the policies and procedures established by the different units of the Company, ensuring that the Internal Control System is effective, measuring the indicators and reporting them monthly to the Risk Committee and quarterly and annually to the Audit Committee and the Board through the reports of the Compliance and Internal Control Function.

Finally, the Internal Audit Function is responsible for checking the adequacy and effectiveness of the internal control system and other elements of the Company's governance system, in accordance with the provisions of the regulations governing the organisation, supervision and solvency of insurance companies and the auditing of accounts. The conclusions and recommendations derived from Internal Audit are notified to Management, the Audit Committee and the Board of Directors. The Board of Directors shall determine what actions are to be taken with respect to each of them and shall monitor that these actions are carried out.

#### **B.5 Internal Audit Function**

The Group has an Internal Audit Policy for each company which develops and specifies the competencies and responsibilities of the Internal Audit Function.

The mission of the Internal Audit Function is to advise and provide assurance to the Board and management that the governance, risk identification, assessment and management processes and controls in place across the Group's activities are effective and adequate to achieve the Group's business objectives in an efficient manner, as well as the protection of the organisation's assets, reputation and sustainability.

The Internal Audit Function should cooperate with supervisory bodies in the event of certain circumstances provided for by applicable legislation.

The scope of Internal Audit's work focuses on determining whether the processes in the governance, identification, risk management and control system are adequately designed and executed by management.

Internal Audit supports the Audit Committee in overseeing the proper design, implementation and effective functioning of risk governance, management and control systems.

The head of the Internal Audit Function reports functionally to the Audit Committee, which gives it independence from the rest of the Company's management and positions the Function at an appropriate level in the Company, providing the necessary support (communication, resource management, etc.) for its activity. Its reports and any other communication that the head of the Function considers important are reported directly to the Audit Committee of the Company, without prejudice to the fact that the Function may report to the Board of Directors if deemed appropriate by its head and/or at the request of the Audit Committee itself or the Board.

At least once a year, the Internal Audit Function prepares an Activities Report with the results of the actions foreseen in the Internal Audit Plan, which is reported to the Audit Committee and the Board of Directors.

#### **B.6 Actuarial Function**

The Actuarial Function will provide the necessary support to the effective management of the Parent Company (members of the Board of Directors and Executive Director) to manage risks, in particular underwriting risk and reinsurance risk, the latter being understood as the risk of loss or adverse change in the value of insurance liabilities due to inadequate pricing and provisioning assumptions.

In the course of its work, the Actuarial Function is authorised to request such information as it considers relevant.



The Actuarial Function communicates to the other Key Functions those facts relevant to the achievement of their objectives.

To promote joint risk management, the actuarial function will be represented in the following committees of the participating company: the Claims and Complaints Committee, the Assets, Liabilities and Risk Committee and the Risk Committee.

The Actuarial Function shall issue an annual report, including aspects specific to its functions and competences. This report shall include the weaknesses detected and recommendations on the measures to be implemented to correct such weaknesses. It is reported directly to the Board of Directors of the Company, providing evidence of the independence of the Governance Function. This report is also sent to the key functions and other relevant personnel.

# **B.7 Outsourcing**

The Parent Company has an Outsourcing Policy approved by the Board of Directors that takes into account the impact of outsourcing on its activities, as well as the information and monitoring systems that are implemented in the event of outsourcing, including outsourcing of activities or services in the cloud. MedVida Partners has its own Outsourcing Policy, which has been adapted to the Group's criteria, respecting consistency in the corporate governance system.

The objectives of the Parent Company's Outsourcing Policy are:

- a) Establish the framework for action to be taken into account by the institution to the extent that it considers outsourcing an insurance function or activity.
- (b) Ensure that outsourcing of critical or important operational functions or activities cannot be carried out in such a way that it could:
  - Significantly impair the quality of the governance system
  - Unduly increase operational risk
  - Undermine the ability of supervisory authorities to check that the company complies with its obligations
  - Affect the provision of a continuous and satisfactory service to policyholders
- c) Ensure that any decision to outsource critical or important operational functions or activities to cloud service providers is based on a comprehensive risk assessment that includes all risks involved in the arrangement, such as:
  - Information and communication technologies (ICT)
  - Continuity of activities
  - Legality
  - Concentration
  - · Other operational risks, and
  - The risks associated with data migration

The person responsible for the outsourcing initiative should provide a brief description of what the outsourcing consists of and the reasons that would justify it, proposing at least two potential providers (with exceptions that will have to be justified), conduct a detailed review of the potential provider



depending on whether the outsourcing is of insurance functions or activities or whether it is a cloud outsourcing.

In the case of outsourcing of critical or important functions or activities, these are notified in advance to the DGSFP, as well as any subsequent significant changes.

Medvida Partners has extended part of the investment management process to MedVida, in particular the activities related to risk management related to the acquisition, measurement, control and accounting of investments in unlisted assets including, where appropriate, derivative instruments. In any case, such intra-group outsourcing will be carried out in compliance with the provisions of the applicable regulations.



### C. Risk profile

Quantitative results for each risk category are included in each section of the risk profile.

Within the ORSA process, a quantitative capital consumption planning is carried out based on two processes, a forecasting process (projections) and a stress testing process (adverse scenarios).

# **Projection process**

Mediterráneo Vida projects the capital needs for each risk module, with the exception of Pillar II risks which are excluded from this capital projection.

The methodology followed for the projection of the various sub-modules of the SCR is appropriate to the context of a scenario that would be understood as the most likely, consistent with the economic conditions and the current situation of the Parent Company, and according to the expectations of business performance over the next three years.

Own funds are also projected, through the projection of the Solvency II balance sheet as the difference between assets and. In this way, the risk appetite indicators for Mediterráneo Vida's global risk can be projected.

For all these reasons, the methodology used to prepare these projections is based on the projection of assets and liabilities. Based on these projections, the new capital consumption and the new Solvency II balance sheets are obtained with the corresponding calculations, thus replicating the entire process and minimising the deviations derived from future estimates.

### Sensitivity process

The parent company, Mediterráneo Vida, has made consolidated sensitivities to movements in the interest rate curve, as well as widenings in market spreads, both in the public and private sectors. In addition to these sensitivities, and with a view to the first ORSA process that Mediterráneo Vida will execute as the head of the group, an analysis is carried out on the possible unfavorable deviations of the business variables and components of the biometric hypotheses that can have the greatest impact on the consolidated results of Grupo MedVida.

The objective of these sensitivities is to identify the possible solvency needs that the Group would have to face in the event of these adverse movements. Of the results obtained at the end of 2022, no solvency needs have been observed in any of them, showing a great balance sheet solidity.

### Stress testing process

The forward-looking view should consider not only the possibility of the most likely scenario, but also alternative situations that could lead to critical situations that could jeopardise the Company's solvency.

In order to carry out the process, the Company has been conducting the analysis under two scenarios, stressing certain variables that make it up. The variables that have been stressed affect the behaviour of both assets and liabilities.

The process of selecting the variables to be stressed and the extent to which they are reviewed in each ORSA exercise depends on the Company's situation, the behaviour of the current and historical business environment and the market at the time the ORSA process is started.



# C.1 Underwriting risk

**Underwriting risk** refers to the potential adverse impact on Technical Provisions arising from a change in the non-financial assumptions used in their calculation.

Underwriting risk includes the biometric and operational risks to which life and non-life insurance is exposed. Biometric risks are those arising from the uncertainty in the assumptions regarding mortality, longevity and disability rates that are taken into account in the pricing of products and calculation of the obligations of all group companies to policyholders. Operational risks derive from the possible deviation in the amount of expenses used in pricing, as well as in the execution of contractual options by policyholders.

All Group companies adopt the measurement of life, health and non-life underwriting risks as set out in Directive 2009/138/EC of the European Parliament and of the Council. Therefore, the life underwriting sub-modules or sub-risks are taken into account: mortality, longevity, disability and catastrophe, the business risk sub-modules: expenses and lapses, the health modules: NSLT (similar to non-life), catastrophe, plus the non-life modules: premiums and reserves, lapses and catastrophe.

The sub-modules into which the life underwriting risk is divided are:

Mortality risk: this sub-module concerns all liabilities whose net value is sensitive to an increase in mortality rates.

Longevity risk: this sub-module concerns all liabilities whose net value is sensitive to a decline in mortality rates.

Disability risk: this sub-module concerns all liabilities whose net value is sensitive to an increase in disability, sickness and morbidity rates.

Catastrophic risk: this sub-module concerns all liabilities whose net value is sensitive to significant uncertainty in extraordinary event assumptions.

Lapse or surrender risk: this sub-module affects all liabilities whose net value is sensitive to changes in the level or volatility of policy discontinuance, cancellation, renewal and surrender rates.

Expense risk: this sub-module concerns all liabilities whose net value is sensitive to an increase in expenses.

The sub-modules into which the Health and Non-Life underwriting risk is divided are:

Premium risk: includes the risk that premium provisions will be insufficient to meet claims or will have to be increased. It also includes the risk arising from expense volatility.

Reserve risk: arises from fluctuations in the timing and amount of claims settlements.

Lapse risk: the risk of loss or adverse change in the value of commitments under cancellation and surrender insurance policies.

Catastrophe risk: this sub-module concerns all liabilities whose net value is sensitive to significant uncertainty in extraordinary event assumptions.

The quantification in terms of regulatory capital for the consolidated underwriting risk sub-modules to which the Group is exposed is as follows:



In thousands of euros	2022
Underwriting risk	112,616
Mortality risk	2,384
Longevity risk	19,096
Disability risk	62
Lapse risk	95,896
Expense risk	17,352
Catastrophe risk	1,196
Underwriting risk diversification	23,369

Consolidated underwriting risk is mostly concentrated in lapse risk.

#### In the case of MedVida:

Underwriting risk is measured on the basis of the following indicator:

Underwriting Ratio: this is the quotient between the Life SCR and the Global SCR as an expression of the weight of life underwriting risk with respect to the total risk to which the company is exposed.

#### Where:

SCR Underwriting: regulatory solvency capital for life risk, derived from the standard formula.

SCR Global: global regulatory solvency capital, derived from the standard formula.

As at 31.12.2022 the Risk Appetite target set for the life ratio in the Parent Company is:

Indicators	Definition	Risk ap	petite target	Failure to comply	Complies	Overcomplies 2	2022 December	Level of compliance
Life ratio Life R	atio = ife / SCRGlobal	<b>≤</b>	120%	> 130%	[110%, 130%]	< 110%	77%	Overcomplies

Indicator	2022
Life Ratio	77%

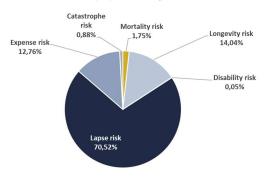
The life ratio remained at the same levels as in the previous year.

### In the case of MedVida Partners:

The ratio of underwriting SCR (Life+Non-Life+Health) to the overall SCR was 59.78% in December 2022 and 46.25% in 2021.

On a quarterly basis, the Technical-Actuarial Directorate reports the calculation of the life, health and non-life SCR and its sub-modules to the risk management manager.

Risk Underwriting Capital Requirements 12/31/2022 Group





Group companies keep their underwriting and claims business processes appropriately up to date in order to verify the adequacy of management procedures and to ensure the sufficiency and quality of the relevant data for underwriting and reserving, as well as their consistency with the Group's strategy.

The Technical-Actuarial Department carries out actions to monitor this risk, such as: (i) analysis of the claims ratio and the adequacy of the tables considered in the pricing of products and provisioning of commitments, (ii) monitoring of the sufficiency of the technical management surcharges established in the pricing of the product to cover the actual management expenses incurred and (iii) periodic monitoring of the surrender rates experienced in the most significant products.

Each of the products is marketed under the Group's underwriting standards, including maximum quantitative risk acceptance limits and general risk exclusions, in order to ensure adequate control of the risks accepted.

The Group grants redemptions, guaranteed returns and profit participations in certain products. All of these are valued in accordance with the contractual documentation of the product.

The main risk mitigation measure used by the Parent Company in the area of risk products is the use of the reinsurance programme, which, in general, has a limited impact in terms of capital savings but provides stability to the income statement. The reinsurance programme has its main impact on mortality, disability and catastrophe risks, although it may have an indirect impact on other risks.

With regard to reinsurance, as a risk mitigation technique in the calculation of the premium, MedVida has reinsured 94% of the accident business with Scor Global Life SE Ibérica and 6% with General Reinsurance AG, Cologne (Germany), assuming between 80% and 90% of the claims depending on the product. With regard to the life business, the Company has reinsured the life risk business aimed at individuals with Scor Global Life Reinsurance Ireland Designated Activity Company, which assumes 99% of the claims. In addition, MedVida has an excess of loss reinsurance contract (Catastrophic XL) with the reinsurer General Reinsurance AG in Cologne (Germany) to cover the risk retained by the Company (both life and accident products) in the event of a catastrophic event.

The mortality and disability risk assumed by MedVida under the approach currently applied in its reinsurance is entirely immaterial and not significant.

In addition, MedVida Partners has the following reinsurance:

#### • For business in Spain:

- Reinsurance contracts quota share and quota share with excess of loss according to business and product with Nacional de Reaseguro, General Reinsurance AG, Cologne (Germany), CNP Assurances branch in Spain, Swiss Re, according to business and product reinsured.
- Proportional facultative treaty in quota share of reinsurance contract and excess of loss for new business.
- o XL Catastrophic Contract with CNP Assurances.
- As of 29 December 2022, upon completion of the purchase by MedVida, two reinsurance contracts were signed with CNP Assurances and CNP Caution to cover the risks inherent in the PPI (payment protection) products.

### • For business in Italy

- XL Catastrophe Contract with General Reinsurance AG, Cologne (Germany).
- Excess of Loss Reinsurance contract for the Galvani business with the CNP Assurances branch in Italy. Coverage of claims incurred until December 2019.
- o Financial reinsurance contract with CNP Assurances for the Euro Fund product.



#### C.2 Market risk

**Market risk** exposure is measured by the impact of fluctuations in the level of financial variables such as equity prices, interest rates, real estate prices or exchange rates. Market risk arises from the level or volatility of market prices of financial instruments.

The sub-modules or sub-risks into which market risk is divided are measured in terms of capital in accordance with Solvency II Directive 2009/138/EC and its technical specifications for the calculation of solvency capital requirements.

The sub-modules into which market risk is divided are as follows:

- Interest rate risk: this sub-module concerns all assets and liabilities whose net value is sensitive to changes in the term structure of interest rates or in their volatility.
- Equity risk: this sub-module concerns all assets and liabilities whose net value is sensitive to changes in equity prices.
- Real estate risk: this sub-module concerns all assets and liabilities whose net value is sensitive to changes in the value of real estate.
- Currency risk: this sub-module affects all assets and liabilities whose net value is sensitive to changes in foreign exchange rates. The required capital calculation is made separately for each currency and then aggregated.
- Spread risk: this sub-module concerns all assets and liabilities whose net value is sensitive to changes in the level or volatility of credit spreads relative to the risk-free interest rate structure.

The following limits are included in the Parent Company's Investment Risk Management policy, with the aim of mitigating the associated risks. The Parent Company has calculated the consolidated risks obtained by aggregating the two companies, MedVida as a participating company and MedVida Partners as an investee company, using method 1 or the accounting consolidation method, as mentioned at the beginning of the report.

### Interest rate risk:

Interest rate risk arises from changes in the prices of assets and liabilities as a result of changes in the yield curve. This risk is measured on an aggregate basis and not on a product-by-product basis, unless required by applicable regulations. To measure the exposure of consolidated shareholders' equity to interest rate movements, the net DV01 of assets and liabilities (a measure used to gauge changes in value due to a 1bp parallel movement in interest rates) is calculated, and must be within the limits set by policy at any given time.

# Credit risk:

The limits to mitigate this risk from the Parent Company will be determined on the basis of the credit rating of the issue. Where the investment has a credit rating from an external Credit Rating Agency (ECAI), the *rating* will be selected in accordance with Solvency II criteria:



# Rating selection criteria

- Where the issue has only one rating from one rating agency, the rating of that rating agency shall be used.
- Where the issue is rated by two rating agencies, the worst one should be
- When the issue is rated by three rating agencies, the two best ratings will be used, and if the two best ratings are not equal, the worst of the two best ratings must be chosen.

In the absence of an explicit rating for an asset, the Parent Company may estimate the credit rating using market-accepted methodologies using an alternative method.

The credit rating shall be established in accordance with the grading scale referred to in Article 109a(1) of Directive 2009/138/EC, the credit rating of which is expressed from 0 to 6:

Rating	Rating Score (CQS)
AAA	0
AA	1
Α	2
BBB	3
BB	4
В	5
С	6

The following limits are set to mitigate credit risk:

# **CQS** limits

- The average rating of the portfolio will be at least 3.
- The portfolio's exposure to issuers with a credit rating below 3 shall not exceed 25%.
- The minimum rating at the time of purchase of an asset shall be BBB (i.e. CQS = 3), unless approved in advance by the ALCOR.
- Assets that are rated BBB or above that subsequently fall below BBB require
  the ALCOR's approval to continue to be held (and until such approval is received, that asset will be considered as external risk appetite).
- Counterparty/concentration risk: Exposure to counterparty risk arising from the Parent Company's investments shall be measured as the market value of the net exposure of any collateral held or received.



The maximum exposure to the same issuer other than sovereigns will be based on its rating:

Credit Rating (CQS)	Maximun Exposure
0-1	10%
2	7%
3	4%

If the exposure includes current accounts or time deposits, this limit is raised to 25%.

Residential mortgage loans to any individual borrower will be limited to €1m.

For alternative assets as a whole, including mortgage loans in this category, these are currently limited to 30%.

For alternative assets, the Company has established specific limits per asset class. The limits are (as a percentage of the total asset portfolio):

Asset class limits for alternative investments:

Mortgage loans: 30% Trade financing: 10%

Commercial real estate collateralised loans: 10%

Other alternative investments: 7%

Hedging instruments are permitted to facilitate efficient portfolio management or to hedge other risks:

### **Hedging instruments**

- For derivatives held for hedging purposes, any exposure to a single derivative counterparty shall be limited to 5% for each counterparty.
- In the case of derivatives held for efficient portfolio management,
  the exposure shall be limited to a total of 5% across all counterparties.
- Equity risk: The investment of equity assets is limited to 5% of the Parent Company's investment portfolio.
- Liquidity risk: The liquidity risk to which the Parent Company is exposed is managed by holding sufficiently liquid and marketable assets to meet liabilities as they fall due.
- Foreign exchange risk: Investments in the Parent Company's portfolio may be made
  in assets denominated in G10 and other approved currencies. In the case of nonEUR investments, hedging instruments may be used to hedge to EUR. The net
  exposure (after taking into account the effect of any hedging) to non-EUR
  investments shall be less than or equal to 5% of the portfolio.

The basis for calculating the above limits shall be the market value.



The consolidated market risk sub-modules to which the company is exposed are:

in thousands of euros	2022
Market risk	88,522
Interest Rate risk	14,528
Equity risk	31,469
Property risk	4,322
Spread risk	50,460
Concentration risk	208
Currency risk	253
Market risk diversification	12,718

Consolidated market risk is mostly concentrated in spread risk.

Among the consolidated market risks, spread risk and equity risk are the most important of all market risks, accounting for more than 80% of total market risk exposure.

The Parent Company measures market risk on the basis of the following indicator:

• <u>Market Ratio</u>: this is the quotient between the market SCR and the global SCR as an expression of the weight of market risk with respect to the total risk to which the Parent Company is exposed.

The Parent Company has maintained its market ratio for the period 2022. The market ratio reflects that this risk, together with underwriting risk, is the risk to which the Parent Company is most exposed.

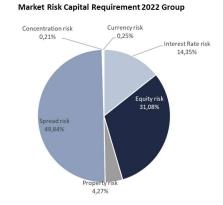
Indicators	Definition	Risk appetite target	Failure to comply	Complies Overcomplies	2022 December	Level of compliance
Market ratio	Market Ratio = SCR Market / SCRGlobal	≤ 120%	> 130%	[110%, 130%] < 110%	75%	Overcomplies

Indicator	2022
Market Ratio	75%

The assets have been invested in accordance with the principle of prudence as set out in Article 132

of Directive 2009/138/EC. The investment policy and the investment risk management policy are drawn up in accordance with the principle of prudence, setting out requirements regarding the type of eligible assets, the composition of the portfolio and the diversification of investments to ensure the security of investments.

In the context of market risk mitigation transactions, the Parent Company applies risk mitigation techniques, which transfer risks to third parties during the period. Specifically, there are two types of risk



mitigating derivatives, a floating vs. fixed interest rate swap contract, which neutralises the risk on



the volatility of interest rates associated with the mortgage loan portfolios. And a *cross currency swap* USD vs EUR has been contracted, the objective of which is to hedge part of the exchange rate risk of one of the bonds in the portfolio, which is denominated in dollars.

#### C.3 Credit risk

Credit risk is the risk of loss or adverse change in financial condition resulting from fluctuations in the creditworthiness of issuers of securities, counterparties and any obligors to which insurers are exposed, in the form of counterparty default risk, spread risk or market risk concentration.

The Group's consolidated credit risk exposure is:

in thousands of euros	2022
Counterparty risk	14,018
Type 1	10,590
Type 2	4,199
Counterparty risk diversification	772

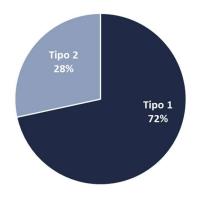
We can distinguish in counterparty default risk two types of exposures:

**Type 1 exposures: these** are positions for which credit ratings are generally available and include reinsurance contracts, derivative contracts and cash at bank, among others.

**Exposures type 2:** includes receivables from financial intermediaries and mortgage loan portfolios that comply with Article 191 of the Solvency II delegated regulation.

Looking at the exposures to default risk by taking consolidated positions, we see that the concentration to this risk is occupied by type 1 positions.

Counterparty Risk Capital Requirement 2022 Group



One of the sources of counterparty default risk that comes from the Parent Company is the counterparty risk due to the temporary transfer of assets to the WIF and WAF companies.

# Counterparty risk due to the temporary transfer of assets

Following the transfer of assets to the WIF and WAF companies as a result of the formalisation of the corresponding Framework Agreements, these companies are obliged to pay Mediterráneo Vida the same cash flows and at the same time as the transferred financial assets would have been paid.

The Parent Company monitors the counterparty risk that may arise from the transfer of assets and the framework contracts signed in order to evaluate contingency plans to manage the risks and



maintain the ratios in accordance with the Risk Appetite defined by the Board of Directors of the Company in different scenarios:

- Calculate the impact on counterparty risk based on Solvency II regulations.
- Ensure substantial retention of the risks and rewards of the transferred assets.
- Evaluate contingency plans to manage the above risks and maintain the ratios in accordance with the Risk Appetite defined by the Board of Directors of the Parent Company in different scenarios.

The calculation of counterparty risk is performed on a monthly basis in accordance with the calculation and valuation guidelines set out in the Solvency II rules for the standard formula, as set out in the EU Delegated Regulation 2015/35.

An independent expert performs a valuation of all assets provided as collateral on a quarterly basis including a description of the methodology used.

In addition, under the framework contracts, the Company has a series of rights and WIF and WAF a series of obligations that allow it to mitigate and adequately manage counterparty risk.

The counterparty risk generated by these Framework Agreements is calculated in accordance with Solvency II regulations. In accordance with the provisions of the EU Delegated Regulation 2015/35, counterparty risk can be mitigated by the provision of collateral arrangements. These agreements, in the case of Mediterráneo Vida, the head of the Group, include the pledging of shares and other securities that grant economic rights over the assets that form part of the collateral. Through these collateral agreements Mediterráneo Vida has access to the collateral and guarantees.

The Company receives a quarterly report on agreed procedures issued by the firm Grant Thornton from the counterparty to these framework contracts. This report audits the calculation and methodology of the counterparty risk, and also shows the differences of more than 5% of the movements in the collateral portfolio, in terms of composition and valuation.

The controls performed by the Company on collateral to monitor counterparty risk are described below:

### **Description**

Following the transfer of financial assets to the WIF and WAF companies as a result of the execution of the corresponding Framework Agreements, these companies are obliged to pay Mediterráneo Vida the same cash flows and at the same time as the transferred assets would have been paid.

At the time WIF and WAF received from Mediterráneo Vida the assets that were transferred to them, they constituted a portfolio of assets of the exclusive ownership of WIF and WAF, this portfolio is referred to as *transferred collateral or transferred guarantees*. Additionally other assets were contributed to WIF and WAF, by the Elliott Funds or any of their subsidiaries as *additional direct collateral*.

The pledged WIF and WAF assets that are considered for counterparty risk mitigation purposes as a result of the asset transfer transaction are as follows:



			_	Millones de Euros	
Garantías constituidas	Jurisdicción de la garantía	Activos subyacentes	Principales riesgos	dic-22	2021
Deuda cotizada privada				5	30
Prenda de primer rango sobre cuenta de custodia de valores y contratos de control	Nueva York	Bausch Health Inc. 5,75% 15/08/2027(US071734AC18)	Riesgo de tipo de interés y diferencial		
Activos hipotecarios				370	613
Prenda sobre los instrumentos de deuda (profit participating notes) emitidos por las sociedades tenedoras	Luxemburgo	Residential mortgages	Riesgo de contraparte con garantía inmobiliaria		
Prenda sobre los instrumentos de deuda (profit participating notes) emitidos por las sociedades tenedoras	Luxemburgo	Residential mortgages	Riesgo de contraparte con garantía inmobiliaria		
Tesorería			Riesgo de contraparte	57	98
Prenda de primer rango sobre las cuentas bancarias de efectivo y contratos de control	Nueva York	Cuentas a la vista			
Valor de mercado de los colaterales de activos transferidos				432	741

Dentro de cada tipología, los activos están ordenados de menor a mayor

Garantías Adicionales					
				Millones de Euros	
Garantías constituidas	Jurisdicción de la garantía	Activos subyacentes	Principales riesgos	dic-22	2021
Renta Variable no cotizada				1.477	1.256
Prenda de primer rango sobre la totalidad de las participaciones de la sociedades tenedoras (*)	Nueva York	Servicios educativos online (Academic Partnership)	Riesgo de renta variable no cotizada		
Prenda de primer rango sin desplazamiento de la posesión (equitable mortgage) sobre las acciones de las sociedades tenedoras (*)	Islas Caimán	Librerias	Riesgo de renta variable no cotizada		
Préstamos a entidades				-	30
Activos inmobiliarios				2.030	1.882
Prenda de primer rango sin desplazamiento de la posesión (equitable mortgage) sobre las acciones de las sociedades tenedoras (*)	Islas Calmán	Locales comerciales, Oficinas y Residencias	Riesgo inmobiliario		
Prenda de primer rango, sobre las participaciones de la sociedad tenedora (*)	Nueva York	Centro de datos	Riesgo inmobiliario		
Deuda cotizada pública				-	-
Prenda de primer rango sobre cuenta de custodia de valores	Nueva York	Letras del Tesoro EEUU	Riesgo de tipo de interés y diferencial		310101010101010101010101010101010101010
Tesorería			Riesgo de contraparte	-	-
Prenda de primer rango sobre las cuentas bancarias de efectivo y contratos de control	Nueva York	Cuentas a la vista			
Valor de mercado total de los Colaterales adicionales propiedad de WIF/WAF				3.507	3.168

(\*) First rank security interest in favour of Mediterráneo Vida on shares/units of the holding company holding the investment (see column "underlying assets" for the type of investment held by the company whose shares are pledged).

The assets detailed above are subject to the counterparty, liquidity and legal risks of the Luxembourg companies WIF and WAF. These risks, as well as the risks inherent to the assets they hold, are covered by the collateral and overcollateral provided by these companies, their subsidiaries and the Elliott Funds respectively, and the right of the Company to cancel the agreements at any time.

Both at the date of transfer of the financial assets and on an ongoing basis, the exposure to changes in the Parent Company's cash flows before and after the transfer of the financial assets has been analysed, resulting in a substantial retention of risks and rewards.

As at 31 December 2022, the market value of the total assets of WIF and WAF amounts to 4,666 (4,822 in 2021) million euros (according to the audited annual accounts of WIF and WAF and the valuation report issued by independent expert), the market value of the transferred financial assets is 882 million euros as at the same date (1,636 million euros in 2021).

Assets to meet the obligations to Mediterráneo Vida	2022	2021	Value of obligations to Mediterráneo Vida	2022	2021
Collateral for transferred assets	1,156	1,646			
Additional collateral owned by WIF/WAF	3,510	3,176			
Total market value of WIF/WAF assets (*)	4,666	4,822	Value of financial assets transferred	882	1,636

(\*) This value of the assets includes both the valuation at market prices and, in the case of certain debt assets, the valuation at amortised cost. These values are in accordance with the audited accounts of WIF and WAF, which have been prepared under International Financial Reporting Standards, and this does not have an impact on the accounting treatment of the transfer of financial assets carried out by Mediterráneo Vida.



In addition, an independent expert reviews the valuation of all assets provided as collateral on a quarterly basis, including a description of the methodology used.

### Counterparty risk tolerance

The counterparty risk generated by the Framework Agreements is calculated in accordance with Solvency II regulations. In accordance with the provisions of EU Delegated Regulation 2015/35, counterparty risk can be mitigated by the provision of collateral arrangements. These agreements, in the case of the Parent Company, include the pledging of shares and other securities that grant economic rights over the assets that form part of the collateral of WIF and WAF.

On a monthly basis, it is verified that the counterparty default risk is less than 5 per cent (as a percentage of the market value of the assets transferred). This report is included in the document known as the CPD Model (counterparty risk calculation), which is prepared by the WIF and WAF companies, and is also replicated by the Parent Company through the data reported by WIF and WAF.

	Maximum limit (risk tolerance)
Capital requirement for counterparty risk (generated by asset disposal contracts)	5% of the market value of the assets disposed of

The counterparty risk consumption calculations are performed independently for WIF and WAF, obtaining the SCR of the assets provided as collateral for each of the Market Risk modules (Interest Rate, Spread, Equity, Real Estate, Currency and Concentration) and for the Counterparty Risk module, including the diversification benefit. This calculated SCR is the *haircut* (or collateral adjustment) to be deducted from the asset valuations, thus reducing the value of the assets taken into account as collateral.

Corresponding discounts are also applied in the interest rate risk, concentration and counterparty risk modules.

The risk-adjusted value derived from collateral is used as a corrective measure to the market value of the collateral, and is applied as a discount. In this way the total market value of the collateral provided is corrected for all risks to which it may be exposed.

Once the risks of each of the assets have been calculated, according to the risks to which it is exposed, the overall capital consumption is calculated for each of the companies on the basis of the Standard Formula (the WIF and WAF SCR or *haircut*), including the diversification benefit of these assets.

The 2022 year-end results of the maximum tolerance limit for counterparty risk generated by the Framework Agreements are as follows:

Market risk SCR for collateral (in thousands of euros)		WIF	w	AF
	% of			
Market Risk SCR Summary	MV	EUR	% of MV	EUR
Interest rate scenario		Down		Down
Interest Rate risk	0.8%	20,957	0.8%	10,707
Equity risk	17.3%	462,107	17.0%	214,598
Property risk	19.1%	508,448	19.1%	240,919
Spread risk	0.1%	1,558	0.1%	731
Currency risk	22.2%	592,791	22.0%	277,973
Concentration risk	23.1%	617,028	22.9%	289,848
Undiversified Market Risk SCR	82.6%	2,202,889	81.8%	1,034,776



Diversified Market Risk SCR	51.3%	1,368,814	50.8%	642,836
Counterparty default risk SCR	0.2%	4,976	0.2%	1,969
Diversified Market + CDP risk	51.3%	1,370,066	50.9%	643,331
WIF/WAF Assets (excl. Elliott Swap)		286,032		146,760
Elliott Collateral		2,382,354		1,117,523
Total collateral		2,668,385		1,264,283
Market haircut pre-div.	-82.6%	-2,202,889	-81.8%	-1,034,776
CDP haircut pre-div.	-0.2%	-4,976	-0.2%	-1,969
Diversification benefits		837,799		393,414
Collateral post hc & div		1,298,319		620,951
Total implied haircut	51.3%	1,370,066	50.9%	643,331
CPD Risk (overcollateral if negative)		-628,070		-304,597
As a % of MV of the lent securities		-104.60%		-107.82%

There is a significant excess of collateral for the counterparty risk generated by the Framework Agreements.

On a quarterly basis, Mediterráneo Vida receives from the counterparty to these Framework Agreements a report on agreed procedures issued by Grant Thornton. The Parent Company performs controls to verify that the risks, before and after the transfer of assets, are not substantially different and therefore the risks and benefits thereof are retained.

These controls are carried out on the economic valuation, legal status, liquidity and credit quality of the asset portfolios initially contributed and on the subsequent movements that WIF and WAF propose to make, subject to approval by the Parent, in the collateral securing their obligations.

The analyses carried out were based on the economic value of the collateral at the present time and in a stressed environment and the ability to make it liquid, as well as reviewing the validity and enforceability of the pledges that have been pledged.

# Controls on collateral liquidity

To verify that the portfolio of assets transferred to WIF and WAF has a liquidity that does not have a material impact on the Parent Company's ability to meet its liabilities in relation to that which it had prior to the transfer of the Company's assets, liquidity is therefore analysed on the basis of Mediterráneo Vida's liability needs.

Based on these liquidity needs, the assets in the WIF and WAF portfolios are grouped by liquidity categories and must meet at least the following requirements for the Parent Company's liability needs.

The results of the controls as at 31.12.2022 are:

Description Control 1	Description Control 2	Description Control 3	
-Category 1 (cash and sight assets): the amount must exceed 1.5% of the value of GMA assets outstanding on the control date. This calculation takes into account the balances on current accounts with WIF and WAF and their subsidiaries WIH and WAH, as well as deposits with discretionary redemption by these companies at any time without penalty.	immediately convertible into liquidity): Their amount, cumulated with the amount of category 1, must exceed the sum of the flowe for the first 12 months.	Category 3 (Assets with liquidity of less than six months): Their amount, cumulated with the amount of categories 1 and 2, must be greater than the sum of the flows of the first 3 years since the report was made.	
Results Control 1 thousand of €	Results Control 2 thousand of €	Results Control 3 thousand of €	



Compliance	ок	Compliance	ок	Compliance	ок	
1.5% - GMA (lent securities)	13,245	LIABILITIES FLOWS OF NEXT 12 MONTHS	334,429	LIABILITIES FLOWS OF NEXT 3 YEARS	819,622	
COLLATERAL CATEGORY 1 (i)	56,778	COLLATERAL CATEGORY 2 or lower	735,668	COLLATERAL CATEGORY 3 or lower	4,606,256	

### Controls on the transfer of flows with counterparties

The Parent Company performs regular checks to verify the correct transfer of the flows committed by the WIF and WAF counterparties.

# Monthly:

- Extraction from the Mediterráneo Vida database of the list of coupons and maturities foreseen for the coming month.
- Internal reconciliation of the Asset Management Unit with the Accounting and Reporting
  Unit of the final positions of each of the bonds remaining in the portfolio. In this way, there
  is traceability in each period of the new GMFAs (Global Master Future Agreements)
  contracted with WIF and WAF and of the termination of these contracts due to the sale
  or maturity of assets.

The control result as at 31.12.2022 is:

	Nominals	Realisation value
Difference/Variance	0	0,07%
Compliance	ОК	ОК

Description	Nominals	Realisation value
TOTAL WIF/WAF	883,199,693	882,973,641
TOTAL MV (*)	883,199,693	882,397,589
Difference	0	-576,053
Check (Diff/TOTAL MV)	0.00%	-0.07%

<sup>(\*)</sup> Realisation value calculated with coupon D+2.

### Daily:

- Through the payment of coupons, or where applicable through Terminations, the expected flows into the Parent's current accounts are monitored. This is recorded both in the current account statement and in the mails to the custodian requesting transfers of these flows from the single current account used to receive WIF and WAF flows (the Own Funds account) to each of the relevant portfolios.
- The Accounting Unit reconciles, after two days, the current accounts with the accounts. If there is an uncredited coupon or uncollected due date (which was not detected earlier due to an operational error), this is evidenced (this is recorded in the daily bank reconciliations).

There were no incidents by the close of 2022.

In addition to the above controls, the Parent Company has implemented a robust mechanism to regularly monitor and estimate any potential shortfall between the economic value of collateral (EcV)



and the economic value of the Mediterráneo Vida portfolio (IPMV). To this end, it has a collateral control framework. The main objective of this framework is to oversee and monitor possible deviations between the economic value of the obligations generated by the master agreements and the economic value of the collateral, controlling the tolerated levels set by the board of directors. By means of an early warning system, this control framework provides Mediterráneo Vida with key elements to report a possible shortfall, giving the possibility to initiate corrective actions in anticipation of a possible problem.

In addition, in the Addendum to the Action Plan, the Company established the procedure to be followed by the Board of Directors in the event that a breach of the Framework Agreements by WIF and WAF is detected and it is necessary to request the early termination of the Framework Agreements, where the escalation, the steps to be taken and the minimum content of the plan to be implemented are specified.

In the event of a breach by WIF and WAF of any of their contractual obligations listed above, the shares of both companies as well as the debt instruments issued by both companies would become the property of Mediterráneo Vida once the corresponding guarantees have been executed, so that either the dividends obtained from both instruments or the proceeds obtained from the sale of the former, or the capacity of Mediterráneo Vida to instruct the sale of assets on the balance sheet of WIF and WAF or any of the entities that make up their group would be used to acquire a portfolio of securities of the same or similar nature, quality, duration and profitability to that existing at the time of formalisation and subsequent evolution that could occur as a result of the Framework Agreements. This termination also has the liquidity and solvency guarantees subscribed by the shareholders, the Elliott International, L.P. and Elliott Associates, L.P. funds.

In this way, it is also ensured that in the event of enforcement of the aforementioned guarantees (and other guarantees granted in favour of the Parent Company), neither the substantial retention of risks and rewards nor the Parent Company's operability would be jeopardised.

#### C.4 Liquidity risk

The purpose of calculating liquidity risk is to ensure that the assets guarantee financial equilibrium, enabling the Parent Company to meet its commitments.

Liquidity risk is the risk arising from the loss caused by events that affect the ability to draw down funds to meet unexpected liability obligations, either due to a lack of cash and the impossibility of unwinding asset positions without incurring excessive costs. This risk is not covered by the mandatory capital requirements, but must be included in the risk profile.

The Parent Company has the necessary tools and methodologies to control this risk. The controls that form them are described below:

### a) Asset and Liability Management

Asset liability management (ALM) is a set of techniques and procedures to ensure that a company's investment and financing decisions are made correctly, taking into account the relationships between the various components of assets and liabilities.

The ALM analysis identifies the investments necessary to guarantee the asset-liability ratio in order to obtain the liquidity required to meet the company's obligations. The management of assets and liabilities must consider the risks included mainly within Market Risks (interest rates, credit, concentration, equities, currency and real estate), Counterparty Risk and Underwriting and Reserves Risk, derived from the application of the Standard Formula.

The results of the ALM analysis will highlight the mismatch in terms, both under the baseline scenario and under different stressed scenarios (where the robustness of the Company to changes in the risks



it faces is measured). The results of this review and any potential mismatches identified will be reported to the head of the Risk Management Function, who will report these results to the Assets, Liabilities and Risk Committee.

The results of the group's ALM analysis conducted to quantify its liquidity risk are presented below.

DV01	2022
Assets	1,192,599
Liabilities	1,192,928

To monitor interest rate risk, the company uses the DV01 indicator (sensitivity of Solvency II Own Funds to a one basis point movement in interest rates). The net DV01 at the end of 2022 was -329 euros. The Parent Company seeks to keep DV01 at levels close to zero by trying to reduce the sensitivity of Own Funds to changes in interest rates and by using derivative instruments to adjust it.

The Parent Company believes that the best risk mitigation tool is compliance with investment and reinsurance policies, and sets limits on the liquidity and diversification of the assets in which it can invest, which are reviewed and analysed periodically. As regards credit risk, exposure continued to be diversified into alternative investments that offer more attractive risk-adjusted returns. These alternative investments usually have a solid collateral framework that protects them from an adverse scenario of widening credit spreads.

### b) Ratio of liquid assets

In addition, Mediterráneo Vida calculates on a quarterly basis the ratio of liquid assets published by EIOPA in its Financial Stability Report. Mediterráneo Vida has sought to use the same methodology as that used by the European regulatory body in order to monitor this risk and to standardise criteria in order to be comparable with the results published in official reports.

### c) Liquidity ratio

The limits established under the Risk Appetite approved by the Board of Mediterráneo Vida refer to the tolerance limits on the risks of the Parent Company and their link between the risk profile and solvency needs. The risk indicator used to manage liquidity risk and its tolerance limits are set out below:

As mentioned in section C.2. Market Risk, the Parent Company has a Liquidity Ratio, defined as total liquid assets divided by projected liability payments in the medium term. It measures the ability to meet payment obligations over the next 12 months with liquid assets currently held by the Company.

Indicators	Definition	Risk appetite target	Failure to comply	Complies	Overcomplies	2022 December	Level of compliance
Liquidity ratio	Liquidity Ratio = Total liquid assets / Sum of the first 12 monthly flows of liabilities	≤ 120%	< 120%	[120%, 130%]	≥130%	941%	Overcomplies

Liquid assets:

- 1. Current account
- 2. Governments
- 3. Issues > 500 M.

# C.5 Operational risk



The risk of loss arising from inadequate or dysfunctional internal processes, personnel, systems, or external events.

The Internal Control Unit of the Parent Company, in collaboration with the various operating units, is responsible for ensuring the correct identification and categorisation of risk factors that may lead to operational risks. The Internal Control Unit reports annually to the head of the Risk Management Unit of the Parent Company the inputs necessary to calculate the operational Economic Capital.

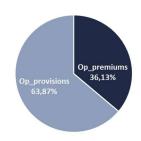
Its management is based on minimising the negative impacts and/or the frequency of materialisation of operational events through continuous improvement of quality and safety of processes by means of design and/or reinforcement of operational controls.

The Parent Company measures operational risk on the basis of the following indicator:

Operational Ratio: the ratio between the Operational SCR and the Global SCR as an expression of the weight of operational risk with respect to the total risk to which the Parent Company is exposed.

Operational risk is measured in terms of regulatory capital in accordance with Solvency II Directive 2009/138/EC

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(standardised formulation). In addition to the standardised measurement, operational risk is measured on the basis of the operational risk result for the calculation of the modified solvency capital (Economic Operational Capital) based on the frequency and severity of the risks included in the operational risk map obtained from the annual assessment process of the Parent Company through questionnaires (internal formulation).

The consolidated operational risk to which the MedVida Group is exposed is:

in thousands of euros	2022
Operational Risk	13,046

Consolidated operational risk is mostly concentrated in operational risk provisions.

With regard to operational risk mitigation, no risk mitigation techniques, which transfer risks to third parties, have been applied during the period 2022.

#### Monitoring of legal and operational risk arising from Framework Agreements

During 2020, all the changes agreed with the DGSFP in the action plan and its addendum on collateral were implemented, which has strengthened the position of the Parent Company in terms of the enforceability of collateral.

In addition, the Parent Company has a resolution procedure as mentioned above.

In addition, and as a complement to these controls, in order to continuously verify the retention of the risks and benefits of the transferred assets, the Parent Company has implemented, as indicated in its Action Plan, a monitoring of the following indicators at each quarterly and annual closing.

1.- Framework Agreements that guarantee the flows of transferred asset equivalents. Changes and modifications



- 2.- Investment Risk Policy Analysis
- 3.- Legal analysis of collateral
- 4.- Verification of closed structure
- 5.- No Substantial Transfer of Risks and Benefits
- 6.- Economic analysis of collateral
- 7.- Operational risk control
- 8.- Transfer Pricing Analysis.
- 9.- Changes in collateral and cash distributions.

These indicators are monitored on an ongoing basis by the Parent Company and are reported at each meeting of the Audit Committee and subsequently to the Board of Directors, after the quarterly and annual closes, for its knowledge and evaluation.

The Parent Company has an operational risk database managed by Internal Control, where incidents occurring in any of the Mediterráneo Vida processes are recorded, analysed and corrective measures are proposed.

### C.6 Other significant risks

The risks set out below are not included in the assessment of the consolidated Group SCR within the Standard Formula. The risks described below are considered in the ORSA processes by assessing their quantification in economic capital if they are material.

### **Emerging risks**

Emerging risks are defined as those emerging or changing risks that are difficult to quantify and that could have a material impact on the losses of the Company or the life insurance sector.

These risks are identified as part of a monitoring process. They are monitored and documented for analysis and follow-up at Group meetings.

### Strategic Risk

Strategic risk arises from a lack of entrepreneurial vision, which may lead to failure to meet the Company's economic and social objectives. It is a risk not covered by Pillar I of the Solvency II Regulation. The Group understands its exposure to strategic risk in its most literal sense as the risk that exists in the formalisation of mergers or acquisitions or termination of a distribution agreement.

### **Reputational Risks**

Reputational risk arises from image problems that the company may suffer due to the materialisation of other types of risk, generally of an operational nature. This is a risk not covered by Pillar I.

### Sustainability Risk

Sustainability risk is a non-financial risk that includes environmental, social and governance aspects of investments (ESG criteria), however, these risks impact the resilience of financial institutions, including insurers.

During 2022, the entities that make up the group, Mediterrráneo Vida as the participating company and MedVida Partners as the investee company, have adapted their governance system and their risk system to the current regulations on sustainability that are directly applicable to them, adapting the policies that have an impact on ESG risks.



The MedVida Group's risk management function is responsible for identifying, assessing, controlling and managing sustainability risks. These risks are also taken into account as elements in the assessment of the company's overall solvency needs.

### Risk to the client

Finally, the Parent Company considers customer risk to be the risks that may arise from inadequate management towards customers. Fair treatment of customers is measured under a comprehensive scorecard which includes the following main indicators:

- Claims and complaints
- Profit sharing
- The difference between durations and portfolio management

The result of these indicators is evaluated by the areas that elaborate them, in the case of finding significant discrepancies, they would proceed to their mitigation and their quantification in the economic capital would be evaluated.



### D. Valuation for solvency purposes

#### **D.1 Assets**

As at 31 December 2022, the most significant asset items of the insurance group and their valuation methods are as follows:

ASSETS	Value Solvency II (thousands of euros)	Solvency II assessment
Deferred tax assets	119,316	They are recognised when differences arise between the balance sheet valuation for SII and tax purposes.
Buildings, land and equipment for own use	11,724	Amortised cost
Real estate (other than for own use)	6,739	Amortised cost
Equities - equities	14,684	Fair value
Bonds - Public debt	1,628,437	Fair value
Bonds - Private debt	577,860	Fair value
Bonds - Structured Financial Assets	42,668	Fair value
Investment funds	82,419	Fair value
Derivatives	15,788	Fair value
Deposits other than cash equivalent assets	4,657	Amortised cost
Assets held for index-linked and unit-linked contracts	695,811	Fair value
Loans and mortgages	329,002	Fair value
Reinsurance recoverables	47,686	Best estimate adjusted for the reinsurer's default risk
Cash and cash equivalents	171,777	Amortised cost
Other receivables	69,895	Amortised cost
Other assets	11,639	Amortised cost

The most significant asset items relate to financial assets. The fair values of investments are based on market prices. The main source for obtaining these prices is the *Bloomberg* financial information system, supplemented, in specific cases where the information is not available, by the Reuters financial information system.

The methodology used to obtain the fair value of financial assets is detailed below, distinguishing by asset class:

#### **Debt assets**

The valuation is carried out daily using the most representative source of the market price, from the Bloomberg information system, on the basis of the contributor that best meets this criterion at any given time. The general criterion is based on the capture of the ex-coupon, spot, market selling price from the "BGN: Bloomberg generic price" contributor. The BGN is a consensus market price, calculated from a wide range of prices from reputable market contributors. In the event that BGN does not publish a price, the BVAL source will be taken as a representative price or another contributor of equal prestige will be selected, taking the quotation that it sends to the Company through the communication channel established for this purpose.

The realisation value of fixed income securities must include the accrued coupon. This is not captured from any external source, but is calculated directly by the portfolio valuation and accounting system according to the convention of the reference market.



### Shares or units in other collective investment undertakings

The valuation is performed daily by capturing the latest available net asset value of the institution.

#### Currencies other than those of the financial statements

The counter-valuation to the base currency of the portfolio of assets denominated in a currency other than the base currency of the portfolio is made at the *historical closed* rates published on Bloomberg for the various currencies.

If the prices of an asset available in the market are not of sufficient quality, the fair value of the asset is established using alternative valuation techniques (marked to model).

#### Portfolios on mortgage loans

At a general level, the valuation is performed using discounted cash flows. The discounting is performed with an updated interest rate curve and a discount spread/differential, based on information available in the capital markets. Flows are projected at the individual mortgage level based on their attributes (outstanding balance, interest rate, time to maturity, etc.). The projected contractual flows, i.e. the theoretical amortisation tables, are adjusted to reflect the effect of defaults, prepayments and recoveries. This adjustment is made on the basis of pre-calibrated parameters.

### **Hedging Derivatives / Investment Derivatives**

The valuation is performed daily by capturing as the market price the price published by the calculation agent through the established communication channel (Bloomberg, Email). The valuation is checked daily by modelling the assets according to market standards (mark to model).

### Reinsurance contracts

The amounts of reinsurance recoverables include amounts that the Company is entitled to receive from reinsurance contracts with third parties.

MedVida has signed relevant quota share reinsurance agreements with SCOR Global Life Reinsurance Ireland, Designated Activity Company, whereby Mediterráneo Vida cedes 99% of its individual life business.

In the accident business, MedVida has 94% of its accident business reinsured with Scor Global Life SE Ibérica and 6% with General Reinsurance AG, Cologne (Germany), assuming between 80% and 90% of claims depending on the product.

The Group's reinsurance recoverable at 2022 amounts to 47,686 thousand euros for life risk, life savings, non-life and health insurance products.

#### Significant differences between the bases, methods and main assumptions

The significant differences between the bases, methods and main assumptions used by the Insurance Group for solvency valuation and those used for valuation in the financial statements, by asset class, are as follows:

### Advance fees and other acquisition costs.

In the financial statements, the amount of commissions and other acquisition costs for direct insurance that are charged to the following year(s) in accordance with the period of coverage of the policy and the limits set out in the technical note are shown under the heading "Prepaid commissions and other acquisition costs". It amounts to 8,396 thousand euros.



For the purposes of the Solvency II balance sheet, the heading of prepaid commissions and other acquisition costs is valued at zero, given that the flows considered in the valuation of technical provisions include all expenses associated with the insurance contracts evaluated, including those derived from acquisition costs, while for accounting purposes this heading includes the commissions and acquisition expenses of the Life and Non-Life lines of business.

#### Intangible assets.

The following assets are included in the financial statements under "Intangible assets":

- The Group has incorporated the fair value of the insurance portfolio of MedVida Partners at the acquisition date. In applying the acquisition method, this value was adjusted for the shortfall between the amount of the consideration for the acquisition of MedVida Partners and the fair value of the net assets acquired in the business combination.
  - Subsequent to initial recognition, the business portfolio is measured at acquisition cost less accumulated amortisation and, where applicable, accumulated impairment losses.
  - Amortisation of this portfolio will be based on the pattern of portfolio declines, with amortisation decreasing progressively as the portfolio declines and the corresponding reduction in profits.
  - The net book value at year-end 2022 is 5,925 thousand euros.
- Computer software: this corresponds to the acquisition cost, which includes all
  additional expenses incurred until it is brought into operation, less the related
  accumulated amortisation. They are amortised on a straight-line basis over the
  expected period of use, with a maximum of five years. The net book value at yearend 2022 is 8,427 thousand euros.
- Other intangible assets: these relate mainly to the final price paid for the agreement
  to transfer the insurance policy portfolio of the Italian Branch of Barclays Vida y
  Pensiones S.A.U. plus other expenses inherent to the transaction. Amortisation of
  this intangible asset is based on the expected future results of the transferred
  portfolio. These values are determined using the cash flow projection methodology
  under the following assumptions:
  - The projection period for future cash flows coincides with the duration of the contracts in force at the effective date of the transfer (financial year 2065).
  - Future inflows are based on the best estimate of the evolution of the number of policies in a less favourable environment than the historical experience of the portfolio.
  - Flow projections reflect past experience and are consistent with external sources of information.
  - All direct and indirect costs incurred have been taken into account in the cost projection by means of a cost analysis.

The net book value at year-end 2022 is 0 euros.

For Solvency II purposes, the Group's intangible assets are valued at zero because no separately marketable intangible assets are identified and therefore no quoted price in active markets can be obtained for these assets.

### Deferred tax assets.

Deferred tax assets recognised in the financial statements of the Group mainly relate to:

- the amount of capital losses on its financial assets, which, if realised, would generate a lower tax payable,
- the tax on deferred tax assets relating to items not deductible for tax purposes (e.g. impairment of financial investments),



• the amount corresponding to the lower tax that would be paid as a result of accounting mismatches in the insurance group's liabilities.

Deferred tax assets are recognised by applying the tax rate at which they are expected to be recovered to the relevant temporary difference or credit:

- Spain: 25%.
- United Kingdom: 19%.
- Italy: 24% for IRES (l'Imposta sul Reddito delle Società) and 6.82% as a variable maximum for IRAP (Imposta Regionale sulle Attività Produttive).

The deferred tax assets under Solvency II include the differences between the balance sheet valuation for Solvency II and tax purposes, which has resulted in an increase of 34,570 thousand euros.

The Group has a net deferred asset on its balance sheet, i.e. the deferred asset figure exceeds the deferred liability figure, amounting to 7,541 thousand euros.

#### Financial assets.

Under the Solvency II regime, the main difference in the valuation of financial assets in the 2022 financial year relates to:

 valuation of the mortgage loan portfolios. In this case, the Solvency II value is considered to be the fair value of each underlying of the aforementioned assets, whereas in the accounting statements they are valued at amortised cost, which represents an increase in value of 15,162 thousand euros.

### Amounts recoverable from reinsurance.

They will be dealt with in section D.2 of this document.

#### **D.2 Technical Provisions**

The table under Technical Provisions shows Solvency I Technical Provisions and Solvency II Technical Provisions.

Biometric assumptions used by Group companies are as follows:

The technical surcharges of the Order 1 tables used by the Group in the calculation of accounting mathematical provisions at year-end are those set out in the Resolution of 17 December 2020, of the DGSFP, on the mortality and survival tables to be used by insurance and reinsurance companies, and approving the technical guide on the supervisory criteria relating to biometric tables, and on certain recommendations to encourage the development of sectoral biometric statistics (Resolution of 17.12.2020 of the DGSFP, hereinafter).

From the loss experience studies carried out by the institution, it appears that the 1st Order biometric tables used in the calculation of accounting mathematical provisions, as well as the Order 2 biometric tables used in the calculation of Solvency II technical provisions, are sufficient.

The Group has not changed the mortality assumptions used in the calculation of the Solvency II technical provisions for 2022 compared to 2021, so there is no impact on technical provisions due to changes in biometric mortality assumptions, with 100% of the Order 2 tables set out in the Resolution of 17.12.2020 being maintained, depending on the product.

The following table lists the biometric tables/rates applied in the calculation of accounting mathematical provisions as well as in the calculation of Solvency II technical provisions.



Modality	Coverage	Tables / Rates used calculation of accounting mathematical provisions	Tables used to calculate technical provisions Solvency II (**)
Savings insurance	Survival-Death	PER2020_Ind_1st.order / GK70 (*)/ GK80 (*) / GK95(*) / PASEM 2010 (*)	PASEM2020_General_2nd.order
Life Annuities	Survival-Death	PER2020_Ind_1st.order/ PER2020_Col_1st.order/ GR95(*)	PER2020_Ind_2ndo.orden PER2020_Col_2ndo.orden
Risk life insurance	Death	GK95 (*) / PASEM 2010(*) /PASEM2020_1st.order	PASEM2020_General_2nd.order
Unit linked	Death	PER2020_Ind_1st.order / GK95 (*) / PASEM 2010 (*)	PASEM2020_General_2nd.order
Savings insurance Italy	Survival - Death	0.03%-0.05% s/ PM	70% SIM2012/SIF2012
Life insurance risk Italy	Death	66.40%-102.50% SIM02/SIF02	25% SIM91/SIF91
PPI risk insurance	Unemployment / IT / Hospitalisation	Frequency/Intensity	Loss Ratio

- (\*) These are the biometric tables included in the technical note of the product and applied for the pricing of the product and used in the calculation of the mathematical accounting provision for death cover, as they are more prudent than the biometric tables for death risk applied for related or unrelated life insurance, included in the Resolution of 17 December 2020 of the DGSFP (PASEM 2020 \_1st order).
- (\*\*) These are the biometric tables published in the Resolution of 17 December 2020 of the DGSFP of application for the calculation of Solvency II technical provisions, which respond to the realistic assumptions required by the solvency framework, being:

PER2020\_Ind\_2ndo.orden: Generational biometric tables for survival risk applicable for the calculation of technical provisions under Solvency II in individual life-savings insurance policies with payment of the benefit in the form of capital or annuity. Survival risk is considered to be those insurances with significant exposure to longevity risk, not including within this group of insurances those in which the survival and mortality benefits (in the form of income, capital or both) mean that throughout the duration of the contract the Company's exposure to biometric deviations is not significant.

PER2020\_Col\_2ndo.orden: Generational biometric tables for survival risk applicable for the calculation of technical provisions under Solvency II in group life-savings insurance with payment of the benefit in the form of capital or annuity. Survival risk is considered to be those insurances with significant exposure to longevity risk, not including within this group of insurances those in which the survival and mortality benefits (in the form of income, capital or both) mean that throughout the duration of the contract the Company's exposure to biometric deviations is not significant.PASEM2020\_General\_2ndo.order: biometric tables for death risk applicable for the calculation of technical provisions under Solvency II in individual or group life-risk insurance with payment of benefit in the form of capital, as well as in savings insurance during the deferral period in which in the event of death an additional capital is paid in addition to the mathematical provision.

The Italian Survivorship/Death SIM/SIF tables: biometric tables applicable for the calculation of technical provisions in life insurance commonly acceptable in the Italian market.

Ratios for non-life products are derived by taking, as historical accounting data, the period 2016-09/2022, by product, comparing the amounts of claims payments and the change in claims reserves divided by the amounts of pure risk premiums and the change in unearned premiums.

The value of the Technical Provisions at year-end 2022 including the best estimate amount and the risk margin separately for each significant business line is as follows:



2022	Technic	cal provisions Solver	ncy II
in thousands of euros	BEL	Risk margin	Total
Business line			
Profit-sharing insurance	2,012,773	34,145	2,046,919
Index-linked and mutual fund insurance	681,898	570	682,468
Other life insurance	592,108	14,806	606,914
Accepted reinsurance	3,074	445	3,520
Non-Life	5,205	1,593	6,798
Grand total	3,295,058	51,559	3,346,617

The Group's Technical Provisions have been calculated as the best estimate at present value of all future flows for the calculation of financial guarantees and the risk margin calculated by method 2 in LifeVision of the hierarchy of risk margin calculation methods, as set out in the guidelines on the valuation of technical provisions.

At Group level, the percentage of business that has been modelled for this calculation is above 99% of total provisions. As regards the business not modelled, although immaterial (<0.58% of total provisions), its best estimate has been approximated and incorporated in a simplified manner, without any significant impact.

The assumptions considered for the calculation of the best estimate of the commitments assumed have been derived realistically and assuming ongoing management of the business. They are based on the Group's operating experience, as well as market data and taking into account that this is a mature business.

### **Technical Provisions**

The table shows the Technical Provisions from Solvency I to Solvency II for 2022:

2022		7	Technical provisi	ons Solvency II	
in thousands of euros	Technical provisions Solvency I	BEL	Risk margin	Total	Difference
Business line					
Profit-sharing insurance	2,261,009	2,012,773	34,145	2,046,919	-214,090
Index-linked and mutual fund insurance	693,220	681,898	570	682,468	-10,753
Other life insurance	607,728	592,108	14,806	606,914	-814
Accepted reinsurance	3,074	3,074	445	3,520	445
Non-Life	12,618	5,205	1,593	6,798	-5,820
Grand total	3,577,650	3,295,058	51,559	3,346,617	-231,033

The difference between the value of the Technical Provisions in the Annual Accounts (Solvency I Technical Provisions) and Solvency II Technical Provisions is due to the methodological differences between the two valuation criteria for the liabilities faced by the Group. In general terms:

- Technical provisions under Solvency II consider projected future cash flows using the best estimate of actuarial and financial assumptions, probable future payments in terms of profit



sharing, the time value of options and guarantees, among others, using as a discount rate the rates of the risk-free curve, and include a risk margin.

- The Technical Provisions in the annual accounts are calculated taking into account local regulatory accounting standards, i.e. with the technical interest rates of the regulatory standards, technical management fees and using biometric assumptions set out in the technical bases of the products, as well as the relevant regulations in force at any given time, without taking into account future profit participations or portfolio decline rates, among others.

The main areas of valuation differences are as follows:

- Interest rates: under Solvency II the flows used for the calculation of technical provisions are discounted using the risk-free curve (including Volatility Adjustment), and under the financial statement reserve rules the flows are discounted taking into consideration the technical interest rate applicable according to the regulatory accounting rules.
- Contractual options, under Solvency II options such as reductions, surrender optionality in the contractual documentation, conversion to annuity (only for MedVida) are taken into account and under the financial statement reserving rules this optionality is not considered for the calculation of technical provisions.
- Expenses, under Solvency II, include the best estimate of the company's future expenses to meet all contractual obligations, but not for the calculation of financial statement reserves which take into account the management cost surcharges provided for in the technical bases of the products.
- Risk margin, under Solvency II, includes an adjustment for possible deviations in the underwriting assumptions used for the calculation of technical provisions, which is not taken into account in the calculation of the reserves in the financial statements.

From the calculation of the best estimate liabilities, differentiated by lines of business, and the total decrease due to the changeover from Solvency I to Solvency II (decrease of -231,033 thousand euros), the line of business with the greatest impact is "profit-sharing insurance".

In addition, the Group uses the Volatility Adjustment of the risk-free interest rate term structure, as referred to in Article 77d of Directive 2009/138/EC, as a new market interest rate curve.

Of the assumptions used, the assumption of the use of the market interest rate curve, in the "profit-sharing insurance" business line, is the one with the most material impact.

Main assumptions:

The assumptions used to calculate the best estimate of the commitments assumed have been derived realistically, using the business data of the Group companies and assuming ongoing management of the business in force.

They are based on the Group's operational experience as well as market data, taking into account that this is a mature business.



Actuarial

Mortality rate
Disability rate
Supplementary cover
Total redemption rate
Partial redemption rate
Premium suspension rate
Conversion to income (only MedVida)

% of reference table

% policies lapsing per year
Surrender % of reserve
% of premiums
% reserve going to annuity





#### Expenses

Loan interest rate Inflation Portfolio yield for profit sharing Portfolio yield for non-profit sharing products

**Distribution commissions** 

%reserve)
MedVida Partners: %reserve (except for risk, euros per policy)
Market data
ECB target
Estimated curve
Estimated curve

MedVida: euros per policy (investment →

% indicated by contract

For non-life business, claims assumptions are derived based on historical information for the last 5 years.

The level of uncertainty associated with the calculation of the best estimate liabilities is mainly provided by the degree of robustness of the estimates made on the model assumptions. To mitigate this uncertainty, the estimates have been based on the Group's actual experience, adjusted over a time horizon and with atypical data filtering to allow for estimates that are as unbiased as possible with respect to the expected reality.

### **Total redemption rate**

It encompasses the insured's option not to renew the policy and the insured's option to cancel the contract altogether (surrenders or withdrawals as it is called in some countries).

For MedVida, the methodology for the derivation of lapses is based on the analysis of the number of policies exposed and the number of lapses, classifying both according to the year of issue of each policy, with statistical information for 5 years and performing the highest possible segmentation on policies.

MedVida Partners derives lapse rates based on the analysis of exposed mathematical provisions and mathematical provision surrender outflows (including both full and partial).

### Partial redemption rate

Defined as the option of the insured to partially redeem the fund or provision constituted.

For MedVida, the derivation methodology is based on the surrendered amounts considering the company's own experience, with statistical information of at least 5 years and with the highest possible segmentation on policies.

For MedVida Partners this assumption is implicit in the full redemption assumption.

# Suspension rate

The amount of contractual regular contributions that will be suspended in the future, from the savings policies currently in the portfolio.

The methodology for the derivation is based on obtaining a single weighted average suspension rate over the last 5 years, using the record of premium movements suspended annually over the last 5 years net of premiums reactivated in the same period by the average annual premiums in force in the last 5 years.

The regular premium amount is the amount that the policyholder would pay in case of reactivation of the policy, therefore, it incorporates possible increases and revaluations.

The suspension rate is adjusted with the rehabilitation rate, performing the analysis with the highest possible segmentation on policies.



The assumption of premium suspension at MedVida Partners was constructed by product by comparing suspended policies versus full regular premium policies taking into account the duration in force of each product.

# Conversion to income (only for MedVida)

For savings products, in the Company's experience there is a very low propensity to convert to actuarial income, however, for reasons of being as conservative as possible, such conversion is considered.

The growth of the fund evolves according to the assumptions defined for these products. At maturity, a percentage converts to income and the remainder tis paid as a lump sum benefit.

Two types of assumptions can be distinguished:

- Conversion to actuarial life annuity (a lifetime annuity)
- ☐ Conversion to financial income (a drawdown annuity)

# Simplified calculation of the risk margin

In accordance with Article 58 of Commission Delegated Regulation (EU) 2015/35 insurance and reinsurance undertakings may use simplified methods when calculating the risk margin, therefore Mediterráneo Vida has decided to use one of the simplifications proposed by EIOPA, namely simplification 2 within the hierarchy of simplifications specified in the guidelines on valuation of technical provisions.

### Quantification of the volatility adjustment

The quantification of the effect of a change to zero of the volatility adjustment on the company's financial position at year-end 2022 is presented below.

amounts in thousands of euros	Volatility-adjusted	Volatility Adjustment set to zero
Technical Provisions (SII)	3,346,617	3,381,663
SCR	145,564	138,751
MCR	63,674,897	62,438
Basic Own Funds	249,206,818	223,134
Eligible Own Funds to cover the SCR	249,206,818	223,134
Solvency Ratio	171%	161%

#### D.3 Other liabilities

The other significant items of the remaining liabilities and their valuation at 31 December 2022 are as follows:



	Value	
IABILITIES	Solvency II (thousands of euros)	Solvency II assessment
Other non-technical provisions	2,734	Amortised cost
Deferred tax liabilities	111,775	They are recognised when differences arise tween the balance sheet valuation for SII and tax purposes.
Derivatives	51,701	Fair value
Debts from insurance and coinsurance operations	7,893	Amortised cost
Other payables	20,978	Amortised cost
Subordinated liabilities included in Original Own Funds	49,999	Fair value

Deferred tax liabilities mainly relate to capital gains on the Group's financial assets which, if realised, would generate a tax payable (depending on the tax rate applicable in each case).

The main difference between the other liability items and the financial statements is that under Solvency II the amount of the correction of accounting mismatches is not shown. The best estimate of the technical provisions under Solvency II includes the valuation of all potential future flows that could be incurred by the insurance group in order to meet the obligations acquired with policyholders over the entire time horizon in which these obligations extend. The liabilities for accounting asymmetries under PCEA (14,324 thousand euros at 31 December 2022), take zero value in Solvency II.

### Other non-technical provisions

This item is a present legal or constructive obligation as a result of a past event and where an outflow of future resources is probable.

The Group recognises in the annual accounts a provision to cover potential future risks of the certificates in force at year-end, arising from the replacement of the reference index in collective individual pension insurance contracts indexed to the Bank of Spain's base rate, which no longer exists, or indexed to the CECA index, which has also disappeared. This is calculated as the difference between the provisions calculated at the technical interest rate and the interest rate of the defunct index, which could give rise to claims, applying the historical percentage of claims in the case of the CECA risk.

In Solvency II, the Group only computes within the Best Estimate the provision corresponding to the probable risk, which is composed of the future BBE provision (basic interest rate published by the Bank of Spain) calculated in the annual accounts corrected by the actual claims rate.

The amount in the financial statements of the heading "Other non-technical provisions" is 5,721 thousand euros; whereas in the Solvency II balance sheet the amount of this heading is 2,734 thousand euros.

#### Debts from insurance and coinsurance operations

This item includes amounts payable to intermediaries, commissions on unwritten earned premiums, debts with other insurers, unpaid claims and accepted coinsurance debts, among others. The amount in the financial statements of this item is 8,876 thousand euros.

There is a difference in this item due to the fact that under Solvency II commissions on unwritten earned premiums are not included (983 thousand euros), as they are included in the modelling of technical provisions.



#### Subordinated liabilities

Mediterráneo Vida issued two subordinated debt securities in the Irish Global Exchange Market in 2022 (28 July and 20 December 2022 for a nominal amount of 30,000 thousand euros and 21,000 thousand euros, respectively). On 28 January 2023 both bonds were merged into a single debt issue; the resulting total nominal amount is 51,000 thousand euros; the first redemption option date is 28 January 2028 and the maturity date is 28 January 2033. The interest rate is 8.875% per annum payable semi-annually.

These subordinated liabilities are included in Basic Own Funds; and are eligible to cover the SCR, having a Tier 2 classification. The value of the debt issue in Solvency II is determined by discounted cash flows to the risk-free curve at the valuation date; increased by the initial spread (spread to the risk-free curve that equates the initial cost of the debt to the discounted cash flow value until the first call).

#### D.4. Alternative valuation methods

When the prices available in the market for an asset are not of sufficient quality to calculate its fair value, the Group uses alternative valuation techniques (mark to model).

The Parent Company at the end of 2022 uses mark-to-model techniques for the valuation of its mortgage loan portfolios.



# E. Capital management

#### E.1 Own funds

The Group, through its parent company, has a Capital Management Policy approved by the Board of Directors, the main objective of which is to establish the general framework for capital management, monitoring, reporting and control, and in particular to maintain the level of capital within the limits set by the risk appetite framework, in addition to the SCR and MCR.

Also considered as objectives of this policy are to:

- Contribute to the existence of an effective system of governance that promotes sound and prudent management of the business.
- Ensure the correct classification and quality of the Parent Company's own funds, in accordance with SCR and MCR coverage.

The main procedures associated with this policy are

#### 1. Classification of Own Funds items

The responsibility for implementing this policy lies with the Parent Company's Finance Department, which shall be in charge of classifying Own Funds and shall ensure and document, prior to their classification by levels, that:

- a) The characteristics that determine the classification of Own Funds on the basis of the following articles of the Delegated Regulation are met:
  - Level 1: Art 71Level 2: Art 73
  - Tier 2 (Supplementary Own Funds): Art 75
  - Level 3: Art. 77
- b) The component items are not encumbered by the existence of any agreement or related transaction or as a result of a group structure that would affect their capital effectiveness.
- c) The contractual terms are clear and unambiguous as to their classification criteria.

### 2. Oversight of the issuance of own resources

Before a new issue of any equity item, the Parent Company's finance department shall analyse the characteristics of the item so that it can be classified by level prior to its presentation to the Board.

### 3. Dividend distribution

The Parent Company's dividend policy is to distribute annually the profit obtained during the year. The Board shall propose the dividend to be distributed, which may be higher than the profit for the year if the Parent Company has unrestricted voluntary reserves. Prior to this distribution, the Parent Company's financial management shall verify that, following the distribution, there is sufficient regulatory and statutory capital in the medium term, and that it complies with the limits set in the Parent Company's risk appetite.

### 4. Possibility for discretionary cancellation of Tier 1 Own Resources

At the request of the Board of Directors of the Parent Company, the Finance Department of the Parent Company, once the Equity has been classified by tier, shall identify and document



the cases in which distributions from Tier 1 items may be cancelled on a discretionary basis on the basis of article 71 of the Delegated Regulation.

# Deferral or cancellation of distributions of Own Funds represented by the share capital and the corresponding share premium, whether they have been classified as Tier 1 or Tier 2

Prior to any decision to reduce capital or share premium, the Parent Company's Financial Management shall prepare a document stating that such distribution will not result in a breach of the Solvency Capital Requirement and shall be discussed in the fora defined in point 3 of the Capital Management Policy.

Even if the above requirement is met, before the distribution is actually made, a further check will be carried out and if this reveals a breach of the Solvency Capital Requirement, the distribution will be cancelled or postponed.

### 6. Aspects related to Transitional Measures and long-term savings measures

Since the regulations allow the use of a volatility adjustment to the risk-free curve to obtain the best estimate, the Parent Company uses this measure of long-term savings. In this way, the Parent Company improves its equity and consequently increases its solvency ratio, thus benefiting from a healthier coverage of the new requirements.

If the Parent Company decides to avail itself of the Transitional Measure on Risk-Free Interest Rates or the Transitional Measure on Technical Provisions:

- The Finance Department of the Parent Company shall prepare a financial and solvency projection plan (to be reported to the Risk Committee and the Board) covering the transitional period, showing the forecast of sufficient Own Funds to cover both the Solvency Capital Requirement and the Minimum Capital Requirement, including the profit distribution policy. The expected performance of these Transitional Measures shall also be included in the own risk and solvency assessment (ORSA) in order to ensure that they fulfil the purpose for which they have been adopted, in particular loss absorption.
- In the event that the Parent Company does not comply with the regulatory capital requirements without the application of the Transitional Measures, the Financial Management of the Parent Company shall draw up a plan for the introduction of progressive measures to establish the level of Own Funds eligible to cover the regulatory capital requirements, or a plan for the reduction of the risk profile in order to comply with the capital requirements at the end of the transitional period.

### 7. Capital management plan

Annually the CFO of the Parent Company shall prepare a capital plan, to be included in the three-year ORSA report based on:

- The budget for the next three years
- The business plan for the next three years
- Expected capital requirements for the next three years
- Expected capital movements over the next three years



The annual business plan and any business decision shall take into account the corresponding impact on capital (capital consumption) and shall include the analysis performed by the second line of defence of the plan. In the case of a new product launch or modification of an existing product, the Parent Company shall estimate its marginal contribution to capital consumption as a whole.

We can observe the Own Funds of the Group in the QRT S.23.01 reported to the DGSFP:

Clave de la entidad... GRC0677 NOMBRE... MEDITERRANEO VIDA, S.A. DE SEGUROS Y REASEGUROS (S.A.U.) Modelo S.23.01.04 Página 1 A 31/12/2022

#### FONDOS PROPIOS

Fondos propios bâsicos		Total	Nivel 1 No restringido	Nivel 1 Restringido	Nivel 2	Nivel 3
	1	C0010	C0020	C0030	C0040	C0050
Capital social ordinario (incluidas las acciones propias)	R0010	102.044.180,70	102.044.180,70		0,00	
Capital social exigido, pero no desembolso, no disponible a nivel de grupo	R0020	0,00	0,00		0,00	
Prima de emisión correspondientes al capital social ordinario	R0030	1.717,30	1.717,30		0,00	
Fondo mutual inicial	R0040	0,00	0,00		0,00	
Cuentas mutuales subordinadas	R0050	0,00		0,00	0,00	0,00
Cuentas mutuales subordinadas no disponibles a nivel de grupo	R0060	0,00		0,00	0,00	0,00
Fondos excedentarios	R0070	0,00	0,00			
Fondos excedentarios no disponibles a nivel de grupo	R0080	0,00	0,00			
Acciones preferentes	R0090	0,00		0,00	0,00	0,00
Acciones preferentes no disponibles a nivel de grupo	R0100	0,00		0,00	0,00	0,00
Primas de emisión de acciones y participaciones preferentes	R0110	0,00		0,00	0,00	0,00
Primas de emisión de acciones y participaciones preferentes no disponibles a nivel de grupo	R0120	0,00		0,00	0,00	0,00
Reserva de conciliación (grupo)	R0130	91.142.070,76	91.142.070,76			
Pasivos subordinados	R0140	49.999.056,47		0,00	49.999.056,47	0,00
Pasivos subordinados no disponibles a nivel de grupo	R0150	0,00		0,00	0,00	0,00
Importe equivalente al valor de los activos por impuestos diferidos netos	R0160	7.540.761,72				7.540.761,72
Activos por impuestos diferidos no disponibles a nivel de grupo	R0170	0,00				0,00
Otros elementos aprobados por la autoridad supervisora como fondos propios básicos no especificados anteriormente	R0180	0,00	0,00	0,00	0,00	0,00
Fondos propios no disponibles asociados a entidades no pertenecientes al EEE, debido a restricciones locales, reglamentarias o de otra índole a nivel de grupo	R0190	0,00	0,00	0,00	0,00	0,00
Intereses minoritarios a nivel de grupo	R0200	0,00	0,00	0,00	0,00	0,00
Intereses minoritarios no disponibles a nivel de grupo	R0210	0,00	0,00	0,00	0,00	0,00

Clave de la entidad... GRC0677 NOMBRE... MEDITERRANEO VIDA, S.A. DE SEGUROS Y REASEGUROS (S.A.U.)

Modelo S.23.01.04 Página 2 A 31/12/2022

#### FONDOS PROPIOS

Fondos propios básicos

Fondos propios de los estados financieros que no deban estar representados mediante la res conciliación y no cumplan los criterios para su clasificación como fondos propios de Solven		Total C0010
Fondos propios de los estados financieros que no deban estar representados mediante la reserva de conciliación y no cumplan los criterios para su clasificación como fondos propios de Solvencia II	R0220	1.520.969,45

Deducciones no incluidas en la reserva de conciliación		Total	Nivel 1 No restringido	Nivel 1 Restringido	Nivel 2	Nivel 3
		C0010	C0020	C0030	C0040	C0050
Deducciones por participaciones en otras empresas financieras incluidas las empresas no reguladas que desarrollan actividades financieras	R0230	0,00	0,00	0,00	0,00	0,00
De las cuales: deducciones de conformidad con el artículo 228 de la Directiva 2009/138/CE	R0240	0,00	0,00	0,00	0,00	
Deducciones por participaciones en caso de indisponibilidad de información (Artículo 229)	R0250	0,00	0,00	0,00	0,00	0,00
Deducción por participaciones incluídas por el método de deducción y agregación cuando se utiliza una combinación de métodos	R0260	0,00	0,00	0,00	0,00	0,00
Total de elementos de los fondos propios no disponibles a nivel de grupo	R0270	0,00	0,00	0,00	0,00	0,00
Total de deducciones	R0280	0,00	0,00	0,00	0,00	0,00

Total fondos propios básicos después de deducciones (Grupo)		Total	Nivel 1 No restringido	Nivel 1 Restringido	Nivel 2	Nivel 3
		C0010	C0020	C0030	C0040	C0050
Total fondos propios básicos después de deducciones (grupo)	R0290	249.206.817,50	191.666.999,31	0,00	49.999.056,47	7.540.761,72



Clave de la entidad... GRC0677 NOMBRE... MEDITERRANEO VIDA, S.A. DE SEGUROS Y REASEGUROS (S.A.U.) Modelo 5.23.01.04 Página 3 A 31/12/2022

#### FONDOS PROPIOS

Fond	los prop	ios complementa	arios			
Fondos propios complementarios		Total	Nivel 1 No restringido	Nivel 1 Restringido	Nivel 2	Nivel 3
		C0010	C0020	C0030	C0040	C0050
Capital social ordinario no desembolsado ni exigido	R0300	0,00			0,00	
Fondo mutual inicial no desembolsado ni exigido	R0310	0,00			0,00	
Capital social de acciones preferentes no desembolsado ni exigido	R0320	0,00			0,00	0,00
Compromiso jurídicamente vinculante de suscribir y pagar pasivos subordinados a la vista	R0330	0,00			0,00	0,00
Cartas de crédito y garantías establecidas en el artículo 96.2 de la Directiva	R0340	0,00			0,00	
Cartas de crédito y garantías distintas de las previstas en el artículo 96.2 de la Directiva	R0350	0,00			0,00	0,00
Derramas adicionales exigidas a los miembros previstas en el artículo 96, apartado 3, párrafo primero, de la Directiva 2009/138/CE	R0360	0,00			0,00	
Derramas adicionales exigidas a los miembros distintas de las previstas en el artículo 96, apartado 3, párrafo primero, de la Directiva 2009/138/CE	R0370	0,00			0,00	0,00
Fondos propios complementarios no disponibles, a nivel de grupo	R0380	0,00			0,00	0,00
Otros fondos propios complementarios	R0390	0,00			0,00	0,00
Total de fondos propios complementarios	R0400	0,00			0,00	0,00

#### Fondos propios de otros sistemas financieros

Fondos propios de otros sectores financieros		Total	Nivel 1 No restringido	Nivel 1 Restringido	Nivel 2	Nivel 3
		C0010	C0020	C0030	C0040	C0050
Empresas de inversión y entidades de crédito	R0410	0,00	0,00	0,00	0,00	
Fondos de pensiones de empleo	R0420	0,00	0,00	0,00	0,00	0,00
Entidades no reguladas que desarrollan actividades financieras	R0430	0,00	0,00	0,00	0,00	90. 90
Total de fondos propios de otros sectores financieros	R0440	0,00	0,00	0,00	0,00	0,00

#### Fondos propios cuando se utiliza el método de deducción y agregación, exclusivamente o en combinación con el método 1

Fondos propios cuando se utiliza el método de deducción y agregación, exclusivamen	ite o en	Total	Nivel 1 No restringido	Nivel 1 Restringido	Nivel 2	Nivel 3
combination con et metodo 1		C0010	C0020	C0030	C0040	C0050
Fondos propios agregados cuando se utiliza el método de deducción y agregación y una combinación de métodos	R0450	0,00	0,00	0,00	0,00	0,00
Fondos propios agregados cuando se utiliza el método de deducción y agregación y una combinación de métodos sin operaciones intragrupo	R0460	0,00	0,00	0,00	0,00	0,00

Clave de la entidad... GRC0677 NOMBRE... MEDITERRANEO VIDA, S.A. DE SEGUROS Y REASEGUROS (S.A.U.) Modelo S.23.01.01 Página 4 A 31/12/2022

#### FONDOS PROPIOS

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Fondos propios disponibles y admisibles		Total	Nivel 1 No restringido	Nivel 1 Restringido	Nivel 2	Nivel 3
TO THE TAXABLE TO THE TAXABLE TO TAXABLE TA		C0010	C0020	C0030	C0040	C005
Total de fondos propios disponibles para cubrir el CSO del grupo consolidado	R0520	249.206.817,50	191.666.999,31	0,00	49.999.056,47	7,540,761,73
l'otal de fondos propios disponibles para cubrir el CSO del grupo consolidado mínimo	R0530	241.666.055,78	191.666.999,31	0,00	49.999.056,47	
Total de fondos propios admisibles para cubrir el CSO del grupo consolidado	R0560	249.206.817,50	191.666.999,31	0,00	49.999.056,47	7.540.761,7
Total de fondos propios admisibles para cubrir el CSO del grupo consolidado mínimo	R0570	204.401.978,77	191.666.999,31	0,00	12.734.979,46	
CSO consolidado del grupo	R0590	145.563.579,44	_		-	
CSO del grupo consolidado mínimo	R0610	63.674.897,30				
Ratio entre fondos propios admisibles y CSO del grupo consolidado (excluidos otros sectores financieros y las empresas incluidas por el método de deducción y agregación)	R0630	1,7120				
Ratio entre fondos propios admisibles y CSO del grupo consolidado Total de fondos propios admisibles para cubrir el CSO del grupo consolidado (incluidos	R0650	3,21				
los fondos propios de otros sectores financieros y de las empresas incluidas por el método de deducción y agregación)	R0660	249.206.817,50	191.666.999,31	0,00	49.999.056,47	7.540.761,7
CSO de las entidades incluidas por el método de deducción y agregación	R0670	0,00				
CSO del grupo	R0680	145.563.579,44				
Ratio entre fondos propios admisibles y CSO del grupo (incluidos otros sectores financieros y las empresas incluidas por el método de deducción y agregación)	R0690	1,71				

#### Reserva de reconciliación

Reserva de reconciliación		Total	
		C0060	
Exceso de los activos respecto a los pasivos	R0700	240.728.730,48	
Acciones propias (poseídas directa e indirectamente)	R0710	0,00	
Dividendos y distribuciones previsibles	R0720	40.000.000,00	
Otros elementos de los fondos propios básicos	R0730	109.586.659,72	
Ajuste de elementos de fondos propios restringidos respecto a fondos de disponibilidad limitada Total Reserva de reconciliación		0,00	
		91.142.070,76	

### Beneficios esperados incluidos en primas futuras

Beneficios esperados		Total	
Beneficios previstos incluidos en primas futuras (BPIPF) - Actividades de seguros de vida	R0770	-29.960.676,78	
Beneficios previstos incluidos en primas futuras (BPIPF) - Actividades de seguros distintos del seguro de vida <b>Total BPIPF</b>		0,00	
		-29.960.676,78	

As can be seen in the above models, the ordinary share capital and the share premium corresponding to the ordinary share capital are fully classified as unrestricted Tier 1 Basic Shareholders' Equity. Subordinated liabilities form part of Basic Own Funds; and are fully classified as Tier 2 Basic Own Funds. The Group has classified as Tier 3 Basic Own Funds the amount equivalent to the value of the net deferred tax assets.



The capital assigned to the pension fund management activity is considered in Solvency II as "Own funds of the financial statements which do not have to be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds".

After applying the limits on original own funds to obtain the eligible own funds to cover the SCR and the MCR we obtain:

(Amounts in thousands of euros)	2022
Available Own Funds	249,207
Eligible Own Funds for SCR	249,207
Tier 1:	191,667
Tier 2:	49,999
Tier 3:	7,541
Eligible Own Funds for MCR	204,402
Tier 1:	191,667
Tier 2:	12,735

The composition of the Group's shareholders' equity is as follows:

Basic own funds (in thousands of euros)	2022
Ordinary Share Capital	102,044
Share premium corresponding to the ordinary share capital	2
Reconciliation reserve	91,142
Subordinated liabilities	49,999
Net deferred tax assets	7,541
Capital assigned to the pension fund management activity	1,521
Total basic own funds	249,207

The composition of the reconciliation reserve is as follows:

Reconciliation reserve (data in '000 €)	2022
Excess of assets over liabilities	240,729
Dividends, distributions and foreseeable costs	40,000
Other basic own fund items	109,587
Total Reconciliation reserve	91,142

The Company has no additional own funds.

Tier 1 and Tier 2 Basic Own Funds are fully available to cover both the Minimum Capital Requirement and the Solvency Capital Requirement (applying the limits that apply to Tier 2 Basic Own Funds). Tier 3 Basic Own Funds, however, are not available to cover the Minimum Capital Requirement.



Under the Chart of Accounts for Insurance Entities (PCEA), Equity in the financial statements of the Group is composed as follows:



Under Solvency II, the excess of assets over liabilities is:

(in thousands of euros)	2022
Excess of assets over liabilities	240,729

The main difference in valuation under PCEA and Solvency II comes from the valuation of Technical Provisions, both for direct insurance and ceded reinsurance. The amount of Technical Provisions under Solvency II reflects the best estimate at present value of all future flows plus a risk margin.

On the other hand, under Solvency II both the amount of deferred acquisition costs and liabilities for accounting mismatches and intangible assets are 0 euros.

#### Deferred taxes

The amounts of deferred tax assets and liabilities arise from the recognition of a difference between the book or Solvency II value of each balance sheet item with respect to the tax value of that item. The above analysis has taken into consideration the specifications of the DGSFP's Guideline 2/2019.

As indicated above, the deferred tax assets recognised in the financial statements of the Group mainly correspond to the amount of losses on its financial assets which, if realised, would generate a lower tax payable. Also included in the deferred tax assets figure are both the tax on prepaid profit corresponding to items not deductible for tax purposes and the amount corresponding to the lower tax that would be payable as a result of the accounting asymmetries in the Group's liabilities.

The deferred tax liabilities recognised in the financial statements relate mainly to the amount of capital gains on the Group's financial assets which, if realised, would generate a tax payable.

Deferred tax assets and liabilities under Solvency II include the differences between the balance sheet valuation for Solvency II and tax purposes, which has led to an increase in deferred tax assets for accounting purposes of 34,570 thousand euros, and an increase in deferred tax liabilities for accounting purposes of 84,678 thousand euros.

For the year ended 31 December 2022 the Group has a net deferred tax asset of 7.5 million euros in the Solvency II balance sheet, i.e. the deferred tax asset figure exceeds the deferred tax liability figure. As discussed above, the Group has net deferred tax assets, and therefore has Tier 3 basic own funds.



# E.2 Solvency Capital Requirement and Minimum Capital Requirement

The amounts of the Solvency Capital Requirement and the Minimum Capital Requirement at the end of the financial year 2022 are as follows:

in thousands of euros	2022
SCR Global	145,564
MCR	63,675

The amount of the Group's Solvency Capital Requirement broken down by risk module is as follows:

Breakdown of SCR by risk category (in thousands of euros)	2022
Market risk	88,522
Interest Rate risk	14,528
Equity risk	31,469
Property risk	4,322
Spread risk	50,460
Concentration risk	208
Currency risk	253
Market risk diversification	12,718
Counterparty risk	14,018
Underwriting risk	112,616
Mortality risk	2,384
Longevity risk	19,096
Disability risk	62
Lapse risk	95,896
Expense risk	17,352
Catastrophe risk	1,196
Underwriting risk diversification	23,369
SCR Health	394
SCR Non-Life	2,719
Global risk diversification	52,988
Basic SCR	165,280
Operational risk	13,046
Adjustment for the loss-absorbing capacity of deferred taxes	-21,955
Adjustment for the loss-absorbing capacity of technical provisions	-10,808
Global SCR	145,564

The Group has not used simplified calculations or company-specific parameters in the Solvency Capital Requirement Standard Formula for the purpose of calculating the underwriting, market and counterparty risk modules.

As a consequence of the instantaneous loss produced by the SCR, an adjustment is generated by the loss absorption capacity of deferred taxes. Current regulations allow the Group to reduce the Solvency Capital Requirement (SCR) by the loss-absorbing capacity of deferred taxes (LACDT).

In order for the LACDT adjustment to be applied, the recoverability of deferred tax assets must be demonstrated. For this demonstration, the Company has developed, taking into account the



applicable regulations and with advice from a third party, a methodology in which the instantaneous pre-tax loss is assumed, future taxable profits are projected until maturity of the liabilities (assuming no new business as the Company's portfolios are in Run Off) and taking into account the restrictions reflected in the regulations on the annual utilisation of profits for the recoverability of tax losses.

Based on the results obtained using this methodology, the applicability of Mediterráneo Vida's deferred tax loss absorbency at year-end 2022 is demonstrated.

The data used by the Group to calculate the Minimum Capital Requirement are as follows:

## MCR = max (combined MCR; AMCR)

o Combined MCR = Combined Minimum Capital Requirement

AMCR = Absolute minimum Art. 129.1d Directive 2009/138/EC and Art. 253 Regulation = 4,000,000 for life and 2,700,000 for non-life

Combined MCR = min (max (linear MCR;0,25\*SCR);0,45\*SCR)

 Linear MCR = Linear Minimum Capital Requirement (Art. 249 to Art. 251 Regulation)

Linear MCR = (Linear non-life MCR + Linear life MCR) (Art. 249 Regulation)

MCR linear life = 0.037 \* PT life 1 - 0.052 \* PT life 2 + 0.007 \* PT life 3 + 0.021 \* PT life 4 + 0.0007 \* CAR (Art. 251 Regulation)

- PT life 1: Technical provisions without risk margin, in relation to guaranteed benefits, linked to products with PB; with a floor equal to 0.
- PT life 2: Technical provisions without risk margin, related to future discretionary benefits, linked to PB products; with a floor equal to 0.
- PT life 3: Technical provisions without risk margin, for Unit Linked products; with a floor equal to 0.
- PT life 4: Technical provisions without risk margin, for all other liabilities; with a floor equal to 0.
- CAR = Total Capital at Risk: is the sum of the capital at risk of each contract; and is the max(0;value of the Company's liabilities in the event of death or disability best estimate of the liabilities).

Linear non-life MCR =  $\sum \alpha s^*PT(nv;s) + \beta s^*Ps$  (Art. 250 Regulation)

- s = non-life segments
- PT(nv;s) = technical provisions without risk margin for NV, segment s, after deduction of amounts recoverable from reinsurance; with a floor equal to 0.
- Ps = premiums written/earned in segment s during the last 12 months, after deduction of premiums from reinsurance contracts; with a floor equal to 0.



- αs = as laid down in Annex XIX
- $\beta s = those set out in Annex XIX$

Amounts in thousands of euros	2022
MCR	63,675
Combined MCR	63,675
Linear MCR	63,675
AMCR	6,700
MCR linear life	62,323
Non-life linear MCR	1,351
SCR	145,564
TP (life, 1)	1,668,052
TP (life, 2)	344,622
TP (life, 3)	681,898
TP (life, 4)	596,113
CAR	1,763,194
n	
PT(nv;s)	5,132
Ps	3,960

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

The Group does not apply the duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement.

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

The Group applies the Standard Formula for the calculation of the Solvency Capital Requirement to assess Economic Capital and does not plan to use full or partial internal models for the calculation of Economic Capital.

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

The Group complies with the Minimum Capital Requirement.



#### **Annex**

Annual quantitative reporting templates for individual companies according to Article 5 of the Implementing Regulation (EU) 2015/2452

Insurance and reinsurance undertakings shall publish as part of their solvency and financial condition report at least the following templates:

## S.32.01.22 - Undertakings in the scope of the group

Clave de la entidad... GRC0677

NOMBRE... MEDITERRANEO VIDA, S.A. DE SEGUROS Y REASEGUROS (S.A.U.)

ENTIDADES EN EL ÁMBITO DEL GRUPO (Cuadro resumen)

Razón social de la empresa

Código de identificación
País
Tipo de la empresa
Forma jurídica
empresa

C0040

C0050
C0070

MEDITERRANEO VIDA, S.A. DE SEGUROS Y REASEGUROS (S.A.U.) [EI/95980020140005705232
España
Empresa mixta
SOCIEDAD ANONIMA
No mutua
MEDIVIDA PARTNERS DE SEGUROS Y REASEGUROS S.A. [LEI/95980020140005248944]
España
Empresa mixta
SOCIEDAD ANONIMA
No mutua

Clave de la entidad... GRC0677

NOMBRE... MEDITERRANEO VIDA, S.A. DE SEGUROS Y REASEGUROS (S.A.U.)

ENTIDADES EN EL ÁMBITO DEL GRUPO (Cuadro resumen)

Total del balance (para empresas de (re)seguros)

reguladas)

Total del balance (para empresas no reguladas)

CO040

CO040

CO050

Clave de la entidad... GRC0677

NOMBRE... MEDITERRANEO VIDA, S.A. DE SEGUROS Y REASEGUROS (S.A.U.)

ENTIDADES EN EL ÁMBITO DEL GRUPO (Cuadro resumen)

		Criterios de influencia							Método
Razón social de la empresa	% de capital social	% utilizado para la elaboración de cuentas consolidadas	% derechos de voto	Otros criterios	Nivel de influencia	Cuota proporcional utilizada para el cálculo de la solvencia del grupo	Inclusión en el ámbito de supervisión del grupo (S/N)	artículo 214	utilizado y,
C0040	C0180	C0190	C0200	C0210	C0220	C0230	C0240	C0250	C0260
MEDITERANDO VIDA, S.A. DE SEGUROS Y REASESUROS (S.A.U.)	0,0000	0,0000	0,0000			0,0000	Incluido en el perimetro de supervisitio del grupo		Método 1; Integración global
MEDICIDA PARTINERIS DE SEGURDOS Y REAGEGUROS S.A.	1,0000	1,0000	1,0000		Dominante	1,0000	Incluido en el perknietro de supervisitio del grupo		Método I; integración global



Modelo 5.32.01.04 A 31/12/2022

## Para cada cada una de las empresas incluidas en el ámbito del grupo deberá reflejar los siguientes datos:

Identificación de la empresa:		
País	C0010	España
Código de identificación de la empresa	Y0019	95980020140005705232
Tipo de código de identificación de la empresa	Y0018	LEI
		MEDITERRANEO VIDA, S.A. DE SEGUROS Y REASEGUROS
Razón social de la empresa	C0040	(S.A.U.)
Tipo de empresa	C0050	Empresa mixta
Forma juridica	C0060	SOCIEDAD ANONIMA
Categoria (mutua/ no mutua)	C0070	No mutua
Autoridad de supervisión	C0080	DIRECCION GENERAL DE SEGUROS Y FONDOS DE PENSIONES
Criterios de clasificación (en la moneda del grupo):		
Total del balance (para las empresas de (rea)seguros)	C0090	1,972,869,950,3
Total del balance (para otras empresas reguladas)	C0100	0,0
Total del balance (para las empresas no reguladas)	C0110	0,00
Primas devengadas netas de reaseguro cedido, de acuerdo con las NIIF o los PCGA locales, de las empresas de (rea)seguros Volumen de negocios definido como los ingresos ordinarios brutos, de acuerdo con las NIIF o los PCGA locales, de otros tipos de	C0120	74.928.703,63
empresas o sociedades de cartera de seguros	C0130	0,00
Resultados de suscripción	C0140	-42.336.234,23
Resultados de las inversiones	C0150	56.840.296,43
Resultados totales	C0160	1.575.925,78
Norma contable	C0170	PGCEA: La Entidad utiliza el PGCEA
Criterios de influencia:		
% de capital social	C0180	0,000
% utilizado para la elaboración de cuentas consolidadas	C0190	0,000,0
% de los derechos de voto	C0200	0,000
Otros criterios	C0210	
Nivel de influencia	C0220	
Cuota proporcional utilizada para el cálculo de la solvencia del grupo	C0230	0,000
Inclusión en el ámbito de la supervisión del grupo:		
SI/NO	C0240	Incluído en el perímetro de supervisión del grupo
Fecha de la decisión, si se aplica el artículo 214	C0250	
Cálculo de la solvencia del grupo:		
Método utilizado y, con arreglo al método 1, tratamiento de la empresa	C0260	Método 1: integración global

Clave de la entidad... GRC0677 NOMBRE... MEDITERRANEO VIDA, S.A. DE SEGUROS Y REASEGUROS (S.A.U.) Modelo S.32.01.04 A 31/12/2022

## Para cada cada una de las empresas incluidas en el ámbito del grupo deberá reflejar los siguientes datos:

Razón social de la empresa	C0040	MEDVIDA PARTNERS DE SEGUROS Y REASEGUROS S.A.
Tipo de código de identificación de la empresa	Y0018	LEI
Razón social de la empresa	C0040	MEDVIDA PARTNERS DE SEGUROS Y REASEGUROS S.A.
Tipo de empresa	C0050	Empresa mixta
Forma jurídica	C0060	SOCIEDAD ANONIMA
Categoría (mutua/ no mutua)	C0070	No mutua
Autoridad de supervisión	C0080	DIRECCION GENERAL DE SEGUROS Y FONDOS DE PENSION
Criterios de clasificación (en la moneda del grupo):		
Total del balance (para las empresas de (rea)seguros)	C0090	2.025.078.481
Total del balance (para otras empresas reguladas)	C0100	0
Total del balance (para las empresas no reguladas)	C0110	0
Primas devengadas netas de reaseguro cedido, de acuerdo con las NIIF o los PCGA locales, de las empresas de (rea)seguros /olumen de negocios definido como los ingresos ordinarios brutos, de acuerdo con las NIIF o los PCGA locales, de otros tipos de	C0120	141.638.318
empresas o sociedades de cartera de seguros	C0130	0
Resultados de suscripción	C0140	74,748,550
Resultados de las inversiones	C0150	-89.402.384
Resultados totales	C0160	-16.365,059
Norma contable	C0170	PGCEA: La Entidad utiliza el PGCEA
Criterios de influencia:		
% de capital social	C0180	1,00
% utilizado para la elaboración de cuentas consolidadas	C0190	1,00
% de los derechos de voto	C0200	1,00
Otros criterios	C0210	
Nivel de influencia	C0220	Dominante
Cuota proporcional utilizada para el cálculo de la solvencia del grupo	C0230	1,00
Inclusión en el ámbito de la supervisión del grupo:		
SI/NO	C0240	Incluído en el perimetro de supervisión del grupo
Fecha de la decisión, si se aplica el artículo 214	C0250	
Cálculo de la solvencia del grupo:		
	250000	
Método utilizado y, con arreglo al método 1, tratamiento de la empresa	C0260	Método 1: integración global



## S.02.01.02 - Balance sheet

Clave de la entidad... GRC0677 NOMBRE... MEDITERRANEO VIDA, S.A. DE SEGUROS Y REASEGUROS (S.A.U.) Modelo SE.02.01 Página 1 A 31/12/2022

Fondo de disponibilidad limitada o parte restante	Z0020	Entidad GRC0677
Número del fondo/cartera	Z0030	GRC0677

ACTIVO		Valor Solvencia II	Valor contable
		C0010	C0020
Fondo de comercio	R0010		0,0
Comisiones anticipadas y otros costes de adquisición	R0020		8.396.215,1
Inmovilizado intangible	R0030	0,00	14.352.193,0
Activos por impuesto diferido	R0040	119.316.127,64	84.746.097,2
Activos y derechos de reembolso por retribuciones a largo plazo al personal	R0050	0,00	0,0
Inmovilizado material para uso propio	R0060	11.724,400,68	11.724,400,6
Inversiones (distintas de los activos que se posean para contratos "index-linked" y "unit-linked")	R0070	2,373,462,695,04	2.389.547,635,4
Inmuebles (ajenos a los destinados al uso propio)	R0080	6,739,037,56	6.612.085,5
Participaciones	R0090	209,492,08	209,492,0
Acciones	R0100	14.684.431,65	14.684.431,6
Acciones - cotizadas	R0110	14.684.431,65	14.684.431,6
Acciones - no cotizadas	R0120	0,00	0,0
Bonos	R0130	2.248.965.924,13	2.219.605.688,2
Deuda Pública	R0140	1.628.437.432,72	1.603.507.009,5
Deuda privada	R0150	577.860.036,11	569.177.121,3
Activos financieros estructurados	R0160	42.668.455,30	46.921.557,2
Titulaciones de activos	R0170	0,00	0,0
Fondos de inversión	R0180	82,418,831,71	82,418,831,7
Derivados	R0190	15.788.193,41	15.788.193,4
Depósitos distintos de los activos equivalentes al efectivo	R0200	4,656,784,50	50,110,953,84
Otras inversiones	R0210	0,00	117,959,0
Activos poseídos para contratos "índex-linked" y "unit-linked"	R0220	695,811,147,14	693,219,348,9
Préstamos con v sin garantía hipotecaria	R0230	329,002,212,98	343,859,420,8
Anticipos sobre pólizas	R0240	0,00	0,0
A personas físicas	R0250	0.00	0.0
Otros	R0260	329,002,212,98	343,859,420,8
Importes recuperables del reaseguro	R0270	47,686,431,33	58,519,308,4
Seguros distintos del seguro de vida, y de salud similares a los seguros distintos del seguro de vida.	R0280	73,312,07	130,120,2
Seguros distintos del seguro de vida, excluidos los de salud	R0290	62,769,36	116,953,8
Seguros de salud similares a los seguros distintos del seguro de vida	R0300	10.542.71	13,166,4
Seguros de vida, y de salud similares a los de vida, excluidos los de salud y los "index-linked" y "unit-linked"	R0310	47,613,119,26	58,389,188,2
Seguros de salud similares a los seguros de vida	R0320	0,00	0,0
Seguros de vida, excluidos los de salud y los "index-linked" y "unit-linked"	R0330	47.613.119.26	58,389,188,2
Seguros de vida "index-linked" y "unit-linked"	R0340	0.00	0.0
Depósitos constituidos por reaseguro aceptado	R0350	3,752,378,80	3.752.378.8
Créditos por operaciones de seguro directo y coaseguro	R0360	502,757,18	502,757,1
Créditos por operaciones de reaseguro	R0370	445,356,27	445,356,2
Otros créditos	R0380	68,947,129,56	29.865,963,2
Acciones propias	R0390	0,00	0,0
Acciones propias Accionistas y mutualistas por desembolsos exigidos	R0400	00,00	0,0
Efectivo y otros activos líquidos equivalentes	R0410	171,777.083,45	123.904.710,6
	R0410	1/1.///.083,45	123.904.710,6 53.560.592,6
Otros activos, no consignados en otras partidas			THE RESERVE THE PERSON NAMED IN COLUMN 2 IS NOT THE PERSON NAMED I
TOTAL ACTIVO	R0500	3.834.066.949,72	3.816.396.378,5



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PASIVO		Valor Solvencia II	Valor contable
		C0010	C0020
Provisiones técnicas - seguros distintos del seguro de vida	R0510	6,797,651,72	12,420,127,4
Provisiones técnicas - seguros distintos del seguro de vida (Excluidos los de enfermedad)	R0520	5,494,195,41	10,927,448,3
PT calculadas en su conjunto	R0530	0,00	
Mejor estimación (ME)	R0540	4.198.595,85	
Margen de riesgo (MR)	R0550	1.295.599,56	
Provisiones técnicas - seguros de salud (similares a los seguros distintos del seguro de vida)	R0560	1,303,456,31	1,492,679,1
PT calculadas en su conjunto	R0570	0,00	3
Mejor estimación (ME)	R0580	1.006.378,23	
Margen de riesgo (MR)	R0590	297.078,08	
Provisiones técnicas - seguros de vida (excluidos "index-linked" y "unit-linked")	R0600	2,657,352,106,82	2,862,220,669,9
Provisiones técnicas - seguros de salud (similares a los seguros de vida)	R0610	0,00	0.0
PT calculadas en su conjunto	R0620	0,00	
Mejor estimación (ME)	R0630	0,00	
Margen de riesgo (MR)	R0640	0,00	
Provisiones técnicas - seguros de vida (excluidos los de salud y los "index-linked" y "unit-linked")	R0650	2.657.352.106,82	2,862,220,669,9
PT calculadas en su conjunto	R0660	0.00	
Mejor estimación (ME)	R0670	2.607.955.205,74	
Margen de riesgo (MR)	R0680	49.396.901,08	
Provisiones técnicas - "index-linked" y "unit-linked"	R0690	682,467,673,65	693,220,618,7
PT calculadas en su conjunto	R0700	0,00	
Mejor estimación (ME)	R0710	681.897.567,42	
Margen de riesgo (MR)	R0720	570,106,23	
Otras provisiones técnicas	R0730		6.344.685,7
Pasivo contingente	R0740	0.00	0.0
Otras provisiones no técnicas	R0750	2,733,637,74	5,720,671,1
Provisión para pensiones y obligaciones similares	R0760	403,682,38	403,682,3
Depósitos recibidos por reaseguro cedido	R0770	0.00	0.0
Pasivos por impuesto diferidos	R0780	111,775,365,92	27,097,211,3
Derivados	R0790	51,701,209,19	12,548,590,0
Deudas con entidades de crédito	R0800	0.00	0.0
Pasivos financieros distintos de las deudas con entidades de crédito	R0810	0.00	0.0
Deudas por operaciones de seguro y coaseguro	R0820	7.892.933.63	8,876,228,2
Deudas por operaciones de reaseguro	R0830	1,215,394,01	1,215,394,0
Otras deudas y partidas a pagar	R0840	20.978.028,51	20,978,028,5
Pasivos subordinados	R0850	49.999.056,47	50,952,365,9
Pasivos subordinados no incluidos en los fondos propios básicos (FPB)	R0860	0,00	0.0
Pasivos subordinados incluidos en los fondos propios básicos FPB	R0870	49.999.056,47	50,952,365,9
Otros pasivos, no consignados en otras partidas	R0880	21,479,20	14.515.072,1
TOTAL PASIVO	R0900	3.593.338.219.24	3,716,513,345,8
EXCESO DE LOS ACTIVOS RESPECTO A LOS PASIVOS	R1000	240,728,730,48	3,/16,513,345,8



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

Clave de la entidad... GRC0677 NOMBRE... MEDITERRANEO VIDA, S.A. DE SEGUROS Y REASEGUROS (S.A.U.) Modelo S.05.01.02 Página 1 Ejercicio 31/12/2022

### PRIMAS, SINIESTROS Y GASTOS POR LINEA DE NEGOCIO

				Obligaciones de	seguro de vida		
		Seguro de enfermedad	Seguro con participación en beneficios	Seguro vinculado a índices y a fondos de inversión	Otro seguro de vida	Rentas derivadas de contratos de seguro distinto del de vida y correspondientes a obligaciones de seguro de enfermedad	Rentas derivadas de contratos de seguro distinto del de vida y correspondientes a obligaciones de seguro distintas de las obligaciones de seguro de enfermedad
		C0210	C0220	C0230	C0240	C0250	C0260
Primas devengadas		á.	1				
Importe bruto	R1410	0,00	74.366.600,98	0,00	14.301.620,08	0,00	0,00
Reaseguro cedido (Participación del reaseguro)	R1420	0,00	0,00	0,00	13.739.517,45	0,00	111807
Importe neto	R1500	0,00	74.366.600,98	0,00	562.102,63	0,00	0,00
Primas imputadas				3			
Importe bruto	R1510	0,00	74.366.600,98	0,00	14.392.359,86	0,00	
Reaseguro cedido (Participación del reaseguro)	R1520	0,00	0,00	0,00	13.821.460,32	0,00	77.7
Importe neto	R1600	0,00	74.366.600,98	0,00	570.899,54	0,00	0,00
Siniestralidad (Siniestros incurridos)							
Importe bruto	R1610	0,00	148.954.161,13	966.329,23	30.783.043,41	0,00	0,00
Reaseguro cedido (Participación del reaseguro)	R1620	0,00	0,00	0,00	2.949.475,17	0,00	0,00
Importe neto	R1700	0,00	148.954.161,13	966.329,23	27.833.568,24	0,00	0,00
Variación de otras provisiones técnicas	10	Y		i i			
Importe bruto	R1710	0,00	0,00	0,00	0,00	0,00	0,00
Reaseguro cedido (Participación del reaseguro)	R1720	0,00	0,00	0,00	0,00	0,00	0,00
Importe neto	R1800	0,00	0,00	0,00	0,00	0,00	0,00
Gastos técnicos	R1900	0,00	5.315.740,04	29.446,65	1.186.443,69	0,00	0,00
Gastos administrativos				3			
Importe bruto	R1910	0,00	1.061.657,08	3.997,07	564.504,97	0,00	0,00
Cuota de los reaseguradores	R1920	0,00	0,00	0,00	327.215,72	0,00	0,00
Importe neto	R2000	0,00	1.061.657,08	3.997,07	237.289,25	0,00	0,00
Gastos de gestión de inversiones	48			*	*		
Importe bruto	R2010	0,00	724.655,70	2.642,88	147.438,59	0,00	0,00
Cuota de los reaseguradores	R2020	0,00	0,00	0,00	0,00	0,00	0,00
Importe neto	R2100	0,00	724.655,70	2.642,88	147.438,59	0,00	0,00
Gastos de gestión de siniestros	10	4	7				-
Importe bruto	R2110	0,00	354.008,16	18.992,59	273.704,99	0,00	0,00
Cuota de los reaseguradores	R2120	0,00	0,00	0,00	0,00	0,00	0,00
Importe neto	R2200	0,00	354.008,16	18.992,59	273.704,99	0,00	0,00
Gastos de adquisición		C STATE				n/ is	
Importe bruto	R2210	0,00	2.060.484,29	297,81	2.062.699,97	0,00	0,00
Cuota de los reaseguradores	R2220	0,00	0.00	0,00	1,825,468,08	0,00	0,00
Importe neto	R2300	0,00	2.060,484,29	297,81	237,231,89	0,00	0,00
Gastos generales		2 2 0 0 0				7,55	3,727
Importe bruto	R2310	0,00	1.114.934,81	3.516,30	290.778,97	0,00	0,00
Cuota de los reaseguradores	R2320	0,00	0,00	0,00	0,00	0,00	0,00
Importe neto	R2400	0,00	1.114,934,81	3.516,30	290.778,97	0,00	25.77
Importe total de los rescates	R2700	0.00	76.249.336.14	423.895,12	3,545,925,45	0.00	



Modelo S.05.01.02 Página 2 Ejercicio 31/12/2022

# PRIMAS, SINIESTROS Y GASTOS POR LINEA DE NEGOCIO

		Obligaciones de re	easeguro de vida	
		Reaseguro de enfermedad C0270	Reaseguro de vida C0280	TOTAL C0300
Primas devengadas				
Importe bruto	R1410	0,00	0,00	88.668.221,06
Reaseguro cedido (Participación del reaseguro)	R1420	0,00	0,00	13.739.517,45
Importe neto	R1500	0,00	0,00	74.928.703,61
Primas imputadas				
Importe bruto	R1510	0,00	0,00	88.758,960,84
Reaseguro cedido (Participación del reaseguro)	R1520	0,00	0,00	13.821,460,32
Importe neto	R1600	0,00	0,00	74.937.500,52
Siniestralidad (Siniestros incurridos)			7.00	
Importe bruto	R1610	0,00	0,00	180.703.533,77
Reaseguro cedido (Participación del reaseguro)	R1620	0,00	0,00	2.949.475,17
Importe neto	R1700	0,00	0,00	177.754.058,60
Variación de otras provisiones técnicas	8 3			
Importe bruto	R1710	0,00	0,00	0,00
Reaseguro cedido (Participación del reaseguro)	R1720	0,00	0,00	0,00
Importe neto	R1800	0,00	0,00	0,00
Gastos técnicos	R1900	0,00	0,00	6.531,630,38
Gastos administrativos	0 2			
Importe bruto	R1910	0,00	0,00	1.630.159,12
Cuota de los reaseguradores	R1920	0,00	0,00	327.215,72
Importe neto	R2000	0,00	0,00	1.302.943,40
Gastos de gestión de inversiones	8 - 8			
Importe bruto	R2010	0,00	0,00	874.737,17
Cuota de los reaseguradores	R2020	0,00	0,00	0,00
Importe neto	R2100	0,00	0,00	874.737,17
Gastos de gestión de siniestros		07-22-2		
Importe bruto	R2110	0,00	0,00	646.705,74
Cuota de los reaseguradores	R2120	0,00	0,00	0,00
Importe neto	R2200	0,00	0,00	646.705,74
Gastos de adquisición	0 0	220000		
Importe bruto	R2210	0,00	0,00	4.123.482,07
Cuota de los reaseguradores	R2220	0,00	0,00	1.825.468,08
Importe neto	R2300	0,00	0,00	2.298.013,99
Gastos generales				
Importe bruto	R2310	0,00	0,00	1,409,230,08
Cuota de los reaseguradores	R2320	0,00	0,00	0,00
Importe neto	R2400	0,00	0,00	1.409.230,08
Otros gastos	R2500			0,00
Total gastos	R2600			6.531.630,38
Importe total de los rescates	R2700	0.00	0,00	80,219,156,71



# S.22.01.22 - Impact of long term guarantees and transitional measures

Clave de la entidad... GRC0677

NOMBRE... MEDITERRANEO VIDA, S.A. DE SEGUROS Y REASEGUROS (S.A.U.)

Modelo S.22.01

Ejercicio 31/12/2022

			IMPA	CTO DE LAS MEDID	AS DE GARANTÍAS	A LARGO PLAZO Y I	AS MEDIDAS TRAN	SITORIAS			
			a largo plazo y las medidas transitorias (enfoque gradual)								
		Importe con medidas de garantías a largo plazo y medidas transitorias	Sin medida transitoria sobre las provisiones técnicas	Impacto de la medida transitoria sobre las provisiones técnicas	Sin medida transitoria sobre el tipo de interés	Impacto de la medida transitoria sobre el tipo de interés	Sin ajuste por volatilidad y sin otras medidas transitorias	Impacto del ajuste por volatilidad fijado en cero	Sin ajuste por casamiento ni todas las demás medidas transitorias	Impacto del ajuste por casamiento fijado en cero	Impacto de todas las medidas de garantías a largo plazo y las medidas transitorias
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100
Provisiones técnicas	R0010	3.346.617.432,19	3.346.617.432,19	0,00	3.346.617.432,19	0,00	3.381.662.513,30	35.045.081,11	3.381.662.513,30	0,00	35.045.081,11
Fondos propios básicos	R0020	249.206.817,50	249.206.817,50	0,00	249.206.817,50	0,00	223.134.099,51	-26.072.717,99	223.134.099,51	0,00	-26.072.717,99
Excedente de los activos respecto a los pasivos	R0030	240.728.730,48	240.728.730,48	0,00	240.728.730,48	0,00	214.656.012,49	-26.072.717,99	214.656.012,49	0,00	-26.072.717,99
Fondos propios restringidos debido a fondos de disponibilidad limitada y carteras sujetas a ajuste por casamiento	R0040	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
Fondos propios admisibles para cubrir el capital de					100000000000000000000000000000000000000	100001	595 Au - 10 10 10 10 10 10 10 10 10 10 10 10 10	May reference and conserve	0.000		584704727300000000000
	R0050	249,206,817,50	249,206,817,50	0,00		0,00		-26.072,717,99			
	R0060	191.666.999,31	191.666.999,31	0,00		0,00			156.762.858,44		
	R0070	49.999.056,47	49.999.056,47	0,00							
Nivel 3	R0080	7.540.761,72	7.540.761,72	0,00	7.540.761,72	0,00	16.372.184,60	8.831.422,88	16.372.184,60	0,00	8.831.422,88
Capital de solvencia obligatorio	R0090	145.563.579,44	145.563.579,44	0,00	145.563.579,44	0,00	138.750.568,48	-6.813.010,96	138.750.568,48	0,00	-6.813.010,96

## S.23.01.22 - Own funds

Clave de la entidad... GRC0677 NOMBRE... MEDITERRANEO VIDA, S.A. DE SEGUROS Y REASEGUROS (S.A.U.) Modelo S.23.01.04 Página 1 A 31/12/2022

### FONDOS PROPIOS

Fondos propios básicos		Total	Nivel 1 No restringido	Nivel 1 Restringido	Nivel 2	Nivel 3
		C0010	C0020	C0030	C0040	C0050
Capital social ordinario (incluidas las acciones propias)	R0010	102.044.180,70	102.044.180,70		0,00	
Capital social exigido, pero no desembolso, no disponible a nivel de grupo	R0020	0,00	0,00		0,00	
Prima de emisión correspondientes al capital social ordinario	R0030	1.717,30	1.717,30		0,00	
Fondo mutual inicial	R0040	0,00	0,00		0,00	
Cuentas mutuales subordinadas	R0050	0,00		0,00	0,00	0,00
Cuentas mutuales subordinadas no disponibles a nivel de grupo	R0060	0,00		0,00	0,00	0,00
Fondos excedentarios	R0070	0,00	0,00		****	
Fondos excedentarios no disponibles a nivel de grupo	R0080	0,00	0,00			
Acciones preferentes	R0090	0,00		0,00	0,00	0,00
Acciones preferentes no disponibles a nivel de grupo	R0100	0,00		0,00	0,00	0,00
Primas de emisión de acciones y participaciones preferentes	R0110	0,00	-	0,00	0,00	0,00
Primas de emisión de acciones y participaciones preferentes no disponibles a nivel de grupo	R0120	0,00		0,00	0,00	0,00
Reserva de conciliación (grupo)	R0130	91.142.070,76	91.142.070,76			
Pasivos subordinados	R0140	49.999.056,47		0,00	49.999.056,47	0,00
Pasivos subordinados no disponibles a nivel de grupo	R0150	0,00		0,00	0,00	0,00
Importe equivalente al valor de los activos por impuestos diferidos netos	R0160	7.540.761,72				7.540.761,72
Activos por impuestos diferidos no disponibles a nivel de grupo Otros elementos aprobados por la autoridad supervisora como fondos propios básicos no	R0170	0,00			-	0,00
Specificados anteriormente  Fondos propios no disponibles asociados a entidades no pertenecientes al EEE, debido a	R0180	0,00	0,00	0,00	0,00	0,00
restricciones locales, reglamentarias o de otra índole a nivel de grupo	R0190	0,00	0,00	0,00	0,00	0,00
Intereses minoritarios a nivel de grupo	R0200	0,00	0,00	0,00	0,00	0,00
Intereses minoritarios no disponibles a nivel de grupo	R0210	0,00	0,00	0,00	0,00	0,00

Clave de la entidad... GRC0677 NOMBRE... MEDITERRANEO VIDA, S.A. DE SEGUROS Y REASEGUROS (S.A.U.) Modelo S.23.01.04 Página 2 A 31/12/2022

# FONDOS PROPIOS

## Fondos propios básicos

Fondos propios de los estados financieros que no deban estar representados mediante la re- conciliación y no cumplan los criterios para su clasificación como fondos propios de Solver		Total
		C0010
Fondos propios de los estados financieros que no deban estar representados mediante la reserva de conciliación y no cumplan los criterios para su clasificación como fondos propios de Solvencia II	R0220	1.520.969,45

Deducciones no incluidas en la reserva de conciliación		Total	Nivel 1 No restringido	Nivel 1 Restringido	Nivel 2	Nivel 3
		C0010	C0020	C0030	C0040	C0050
Deducciones por participaciones en otras empresas financieras incluidas las empresas no reguladas que desarrollan actividades financieras	R0230	0,00	0,00	0,00	0,00	0,00
De las cuales: deducciones de conformidad con el artículo 228 de la Directiva 2009/138/CE	R0240	0,00	0,00	0,00	0,00	
Deducciones por participaciones en caso de indisponibilidad de información (Artículo 229)	R0250	0,00	0,00	0,00	0,00	0,00
Deducción por participaciones incluídas por el método de deducción y agregación cuando se utiliza una combinación de métodos	R0260	0,00	0,00	0,00	0,00	0,00
Total de elementos de los fondos propios no disponibles a nivel de grupo	R0270	0,00	0,00	0,00	0,00	0,00
Total de deducciones	R0280	0,00	0,00	0,00	0,00	0.00

Total fondos propios básicos despuês de deducciones (Grupo)		Total	Nivel 1 No restringido	Nivel 1 Restringido	Nivel 2	Nivel 3
		C0010	C0020	C0030	C0040	C0050
Total fondos propios básicos después de deducciones (grupo)	R0290	249.206.817,50	191.666.999,31	0,00	49.999.056,47	7.540.761,72



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#### FONDOS PROPIOS

Fond	os pro	pios complement	arios			
Fondos propios complementarios		Total	Nivel 1 No restringido	Nivel 1 Restringido	Nivel 2	Nivel 3
		C0010	C0020	C0030	C0040	C0050
Capital social ordinario no desembolsado ni exigido	R0300	0,00			0,00	
Fondo mutual inicial no desembolsado ni exigido	R0310	0,00			0,00	
Capital social de acciones preferentes no desembolsado ni exigido	R0320	0,00			0,00	0,00
Compromiso jurídicamente vinculante de suscribir y pagar pasivos subordinados a la vista	R0330	0,00			0,00	0,00
Cartas de crédito y garantías establecidas en el artículo 96.2 de la Directiva	R0340	0,00			0,00	
Cartas de crédito y garantías distintas de las previstas en el artículo 96.2 de la Directiva	R0350	0,00			0,00	0,00
Derramas adicionales exigidas a los miembros previstas en el artículo 96, apartado 3, párrafo primero, de la Directiva 2009/138/CE	R0360	0,00			0,00	
Derramas adicionales exigidas a los miembros distintas de las previstas en el artículo 96, apartado 3, párrafo primero, de la Directiva 2009/138/CE	R0370	0,00			0,00	0,00
Fondos propios complementarios no disponibles, a nivel de grupo	R0380	0,00			0,00	0,00
Otros fondos propios complementarios	R0390	0,00			0,00	0,00
Total de fondos propios complementarios	R0400	0,00			0,00	0,00

### Fondos propios de otros sistemas financieros

Fondos propios de otros sectores financieros		Total	Nivel 1 No restringido	Nivel 1 Restringido	Nivel 2	Nivel 3
		C0010	C0020	C0030	C0040	C0050
Empresas de inversión y entidades de crédito	R0410	0,00	0,00	0,00	0,00	
Fondos de pensiones de empleo	R0420	0,00	0,00	0,00	0,00	0,00
Entidades no reguladas que desarrollan actividades financieras	R0430	0,00	0,00	0,00	0,00	55 - 50
Total de fondos propios de otros sectores financieros	R0440	0,00	0,00	0,00	0,00	0,00

### Fondos propios cuando se utiliza el método de deducción y agregación, exclusivamente o en combinación con el método 1

Fondos propios cuando se utiliza el método de deducción y agregación, exclusivamen combinación con el método 1	nte o en	Total	Nivel 1 No restringido	Nivel 1 Restringido	Nivel 2	Nivel 3
combination con crimecodo 1		C0010	C0020	C0030	C0040	C0050
Fondos propios agregados cuando se utiliza el método de deducción y agregación y una combinación de métodos	R0450	0,00	0,00	0,00	0,00	0,00
Fondos propios agregados cuando se utiliza el método de deducción y agregación y una combinación de métodos sin operaciones intragrupo	R0460	0,00	0,00	0,00	0,00	0,00

Clave de la entidad... GRC0677 NOMBRE... MEDITERRANEO VIDA, S.A. DE SEGUROS Y REASEGUROS (S.A.U.)

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# FONDOS PROPIOS

Fondos propios disponibles y admisibles		Total C0010	Nivel 1 No restringido	Nivel 1 Restringido	Nivel 2 C0040	Nivel 3
Total de fondos propios disponibles para cubrir el CSO del grupo consolidado	R0520	249.206.817,50	191.666.999,31	0,00	49.999.056,47	7,540,761,72
Total de fondos propios disponibles para cubrir el CSO del grupo consolidado mínimo	R0530	241.666.055,78	191.666.999,31	0,00	49.999.056,47	
Total de fondos propios admisibles para cubrir el CSO del grupo consolidado	R0560	249.206.817,50	191.666.999,31	0,00	49.999.056,47	7.540.761,72
Total de fondos propios admisibles para cubrir el CSO del grupo consolidado mínimo	R0570	204.401.978,77	191.666.999,31	0,00	12.734.979,46	
CSO consolidado del grupo	R0590	145.563.579,44				
CSO del grupo consolidado mínimo	R0610	63.674.897,30				
Ratio entre fondos propios admisibles y CSO del grupo consolidado (excluidos otros sectores financieros y las empresas incluidas por el método de deducción y agregación)	R0630	1,7120	1			
Ratio entre fondos propios admisibles y CSO del grupo consolidado	R0650	3,21				
Total de fondos propios admisibles para cubrir el CSO del grupo consolidado (incluidos los fondos propios de otros sectores financieros y de las empresas incluidas por el método de deducción y agregación)	R0660	249.206.817,50	191.666.999,31	0,00	49.999.056,47	7.540.761,72
CSO de las entidades incluidas por el método de deducción y agregación	R0670	0,00		2000	1.0000000000000000000000000000000000000	
CSO del grupo	R0680	145.563.579,44				
Ratio entre fondos propios admisibles y CSO del grupo (incluidos otros sectores financieros y las empresas incluidas por el método de deducción y agregación)	R0690	1,71				

## Reserva de reconciliación

Reserva de reconciliación		Total
		C0060
Exceso de los activos respecto a los pasivos	R0700	240.728.730,48
Acciones propias (poseídas directa e indirectamente)	R0710	0,00
Dividendos y distribuciones previsibles	R0720	40.000.000,00
Otros elementos de los fondos propios básicos	R0730	109.586.659,72
Ajuste de elementos de fondos propios restringidos respecto a fondos de disponibilidad limitada	R0740	0,00
Total Reserva de reconciliación	R0760	91.142.070,76

### Beneficios esperados incluidos en primas futuras

Beneficios esperados		Total C0060
Beneficios previstos incluidos en primas futuras (BPIPF) - Actividades de seguros de vida	R0770	-29.960.676,78
Beneficios previstos incluidos en primas futuras (BPIPF) - Actividades de seguros distintos del seguro de vida	R0780	0,00
Total BPIPF	R0790	-29.960.676,78



# S.25.01.22 - Solvency Capital Requirement — for groups on Standard Formula

Clave de la entidad... GRC0677 NOMBRE... MEDITERRANEO VIDA, S.A. DE SEGUROS Y REASEGUROS (S.A.U.) Modelo S.25.01.01 Ejercicio 31/12/2022

### CAPITAL DE SOLVENCIA OBLIGATORIO

Para empresas que emplean la fórmula estándar

Nombre del Fondo de disponibilidad limitada/Cartera sujeta a ajuste por casamiento o parte restante X0010C0050 Entidad GRC0677

Número del fondo/cartera NF GRC0677

Nombre del Fondo de disponibilidad limitada/Cartera sujeta a ajuste por casamiento o parte restante		Capital de solvencia obligatorio neto	Capital de solvencia obligatorio bruto	Asignación del ajuste por FDL y CSAC
		C0030	C0040	C0050
Riesgo de mercado	R0010	80.227.308,16	88.522.108,53	0,00
Riesgo de incumplimiento de contraparte	R0020	14.017.572,88	14.017.572,88	0,00
Riesgo de suscripción de seguro de vida	R0030	106.927.638,15	112.616.012,03	0,00
Riesgo de suscripción de seguros de salud	R0040	393.522,79	393,522,79	0,00
Riesgo de suscripción de seguros distintos del seguro de vida	R0050	2,719,035,64	2,719,035,64	0,00
Diversificación	R0060	-49.812.632,83	-52.987.872,57	
Riesgo del inmovilizado intangible	R0070	0,00	0,00	
Capital de solvencia obligatorio básico	R0100	154.472.444,79	165.280.379,30	

Capital de solvencia obligatorio basico	R0100	134.472.444,75
Cálculo del Capital de Solvencia Obligatorio		Importe
		C0100
Ajuste por la agregación del CSO nocional para FDL/CSAC	R0120	0.00
Riesgo operacional	R0120	13.045.925.16
Capacidad de absorción de pérdidas de las PPTT	R0140	-10.807.934,51
Capacidad de absorción de pérdidas de los impuestos diferidos	R0150	-21.954.790,51
Requerimiento de capital para actividades desarrolladas de acuerdo con el Artículo 4 de la Directiva 2003/41/EC	R0160	0,0
Capital de Solvencia Obligatorio excluida la adición de capital	R0200	145,563,579,44
Adición de capital	R0210	0,00
Capital de Solvencia Obligatorio	R0220	145.563.579,44
Otra información sobre el CSO:		C0100
		S. S
Requisito de capital para el riesgo del submódulo de renta variable por duraciones	R0400	0,0
Importe total CSO nocional para la parte restante	R0410	0,0
Importe total CSO nocional para los FDL	R0420	0,0
Importe total CSO nocional para las CSAC	R0430	0,0
Diversificación por la agregación de FDL y CSAC bajo el artículo 304	R0440	0,0
Método utilizado para calcular el ajuste por la agregación del CSO nocional para FDL y CSAC	R0450	Sin aluste
Beneficios discrecionales futuros netos	R0460	14.194.586,6
Capital de Solvencia Obligatorio mínimo del grupo consolidado mínimo	R0470	63,674,897,30
Información sobre otras entidades		
Capital obligatorio para otros sectores financieros (capital obligatorio para empresas no		C0100
de seguros)	R0500	0,00
Capital obligatorio para empresas no de seguros - Entidades de crédito, empresas de inversión y entidades financieras, gestores de fondos de inversión alternativos,	100000	
sociedades de oestión de OICVM	R0510	0.0
Capital obligatorio empresas no de seguros - Fondos de pensiones de empleo	R0520	0,0
Capital obligatorio para empresas no de seguros - Capital obligatorio para empresas no reguladas que desarrollen actividades financieras	R0530	0.00
Capital obligatorio para participaciones no de control	R0540	0,00
Capital obligatorio para las restantes empresas	R0550	0.00
CSO global		-
CSO para empresas incluidas por el método de deducción y agregación	R0560	0,00
Capital de solvencia obligatorio	80570	145,563,579,44