



Chubb European Group SE  
Solvency and Financial Condition Report  
31 December 2021

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# Introduction and Summary

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## Introduction

This report (“the Solvency and Financial Condition Report”, or “SFCR”) sets out the solvency and financial condition of Chubb European Group SE (“CEG” or “the Company”) as at 31 December 2021.

The Board of CEG has prepared this report in accordance with Article 51 of Directive 2009/138/EC (“The Solvency II Directive”), Commission Delegated Regulation (EU) 2015/35 and the European Insurance and Occupational Pensions Authority (“EIOPA”) guidelines on Reporting and Disclosure.

The regulations prescribe the structure of this report and indicate the nature of the information that must be reported under a series of sections and sub-sections. Where information is not applicable to CEG, the report still includes the section, but with an appropriate note.

In addition to the statutory requirements, this report also addresses other aspects of the Company’s business which the Board believes will be of benefit to interested parties.

Figures are stated to the nearest €000 in SFCR Quantitative Reporting Templates (“QRTs”).

## Business and Performance Summary

CEG is one of Europe’s leading commercial insurance companies and operates a successful underwriting network throughout Continental Europe, the UK and Ireland. The Company offers its clients a broad range of insurance and risk solutions encompassing property & casualty (“P&C”), accident & health (“A&H”) and personal lines classes, and underwrote business in 12 out of the 16 Solvency II non-life insurance lines of business, including all of the non-proportional reinsurance classes.

Policies are primarily written under the trading names “Chubb Europe”, “Chubb Global Markets” and “Chubb Tempest Re”, which capitalise on the distinctiveness and strength of the Chubb brand and acknowledge the company’s strong insurance platforms, reputation, skill sets, financial strength ratings and consistent management philosophy. Chubb Europe refers to all European managed business, with the exception of Chubb Global Markets (“CGM”) which is Chubb’s London market wholesale business and Chubb Tempest Re which is the reinsurance operation.

CEG was initially incorporated in the UK. On 1 January 2019 CEG successfully redomiciled from the UK to France as part of its Brexit preparations. CEG has its headquarters in Paris, France, with branch offices across Europe and in the UK, and holds cross-border permissions throughout the European Economic Area (“EEA”). The Company also benefits from the UK’s Temporary Permissions Regime which commenced on 1 January 2021 to operate its UK business. CEG operates under the supervision of the Autorité de Contrôle Prudentiel et de Résolution (“ACPR”). The Company can be found in the ACPR’s published register of insurers and has its registered offices at La Tour Carpe Diem, 31 Place des Corolles, Esplanade Nord, 92400 Courbevoie, France, company number 450 327 374 RCS Nanterre. The UK branch of the Company continues to be subject to limited regulation by the Financial Conduct Authority (“FCA”) and it is based at 100 Leadenhall Street, London EC3A 3BP. Additional Brexit related information can be found at [www.Chubb.com/Brexit](http://www.Chubb.com/Brexit)

CEG is also a ‘white listed’ surplus lines insurance and reinsurance company in the United States, entitling it to write surplus lines in all US states and US territories. Business is accessed by a variety of distribution channels and the Company has strong relationships with the broker community, its corporate partners and direct markets.

CEG is a major contributor to the Chubb Group, generating approximately 13.5% of the group’s overall gross written premium in 2021.

CEG reported gross and net written premiums for 2021 of €5,462 million and €3,228 million respectively. Gross and net written premiums were up 17% and 16% respectively in comparison to the prior year. Whilst the economic repercussions of the Covid-19 pandemic on CEG’s client base have generally abated throughout 2021,

top line growth in some business lines, notably Accident & Health (including Travel) and Personal Risk Services has been adversely impacted, in line with reductions in exposure. In addition, the company continues to adopt a cautious approach to underwriting, reflective of the widespread uncertainty that the pandemic has created. Despite this difficult economic environment, the Company underwrote gross premiums of 5,462 million and produced an underwriting profit, on a French GAAP basis, of €579 million with an associated combined ratio of 81,2%.

Investment performance generated a net French GAAP investment income of €164 million. Total French GAAP pre-tax operating profits amounted to €859 million.

Information on Coronavirus (“Covid-19”) is provided in section A.1.4.

## Capital Management Summary

The Company’s regulatory and solvency position is as follows:

As at 31 December	2021	2020
Eligible Own Funds (€’000)	3,083,064	2 647 534
Solvency Capital Requirement SCR (€’000)	1,369,274	1 613 487
Solvency ratio %	225%	164%

As well as benefitting from the support of Chubb Limited, the Company has substantial financial resources in its own right. The Company has a large surplus of some €1,714 million above the Solvency Capital Requirement. The solvency ratio also rose in the period from 164% to 225%.

The Company’s own funds are comprised of Tier 1 capital of €3,083 million as at 31 December 2021. There were no changes to the nature of the items of the Company’s own funds during the year. The Company’s total eligible own funds of €3,083 million was available to meet the Solvency Capital Requirement “SCR” and the total eligible Tier 1 capital of €3,083 million was available to meet Minimum Capital Requirement (“MCR”) of €603 million, which has a coverage ratio of 511% (2020: 425%). Other than €46.3 million in ring-fenced funds, all Tier 1 capital is permanently available to cover losses. The primary objectives of CEG in managing capital can be summarised as follows:

- to satisfy the requirements of its policyholders, regulators and rating agencies;
- to match the profile of its assets and liabilities, taking account of the risks inherent in the business;
- to manage exposures to key risks;
- to maintain financial strength to support new business growth;
- to generate a return to shareholders; and
- to retain financial flexibility by maintaining strong liquidity.

## System of Governance Summary

CEG has a documented corporate governance framework, the purpose of which is to exercise oversight and control over the management of the business in all its geographical locations and to disseminate key information effectively to the necessary recipients.

The Company has a number of formal committees and sub-committees, described in section B1 of this document. The heads of the functions and business units report to the Regional President, Europe (“President”) (except for the Actuarial function, which reports via the Regional Chief Financial Officer (CFO)).

CEG has identified persons that effectively run the Company and holders of key functions in accordance with the ACPR’s Fit & Proper requirements. The Company also complies with other governance requirements applicable to it, for instance the UK Branch is subject to Senior Managers and Certification Regime (“SMCR”).

The Board has approved a number of policies, under which responsibilities which govern how certain key areas of the business, and the risks inherent to them, are controlled and reported.

Additional oversight and control is obtained via a “three lines of defence” model whereby the Compliance and Risk Management (“Second Line”) monitor key activities independently of the controls and indicators employed by the (“First Line”) business and other functions e.g Finance, HR. Internal Audit (“Third Line”) carries out further independent testing and reports outside the First Line and Second Line structures.

CEG has a formal Own Risk and Solvency Assessment (“ORSA”) process which sets out the list of activities that CEG undertakes in order to conduct a risk and solvency assessment. ORSA activities includes business planning, strategy, risk profile, risk mitigation & tolerance, stress & scenario analysis, forward capital assessment, monitoring and tracking, and governance.

The ORSA is an integral part of the overall risk management framework and is a process which is conducted throughout the year to support the normal running of business within the Company.

The Risk Management function co-ordinates each element of the ORSA with subject matter experts across the business. The results of the analysis were reported to the Management Committee, Audit and Risk committee, and Board throughout the year.

The Board believes these governance arrangements to be appropriate to and effective for the operations that CEG carries out.

### **Risk Profile Summary**

CEG is exposed to risks from several sources and classifies individual risk sources across its landscape into six major categories: underwriting, market, credit, liquidity, operational and other. Insurance is Chubb’s primary risk category; the other risk categories present an exposure primarily from that assumption of insurance risk. Other risks, including group risk and emerging risk are also considered.

There were no changes to the Company’s risk sources and areas during the year. Each of these risk categories is described in more detail in section C below.

### **Valuation for Solvency Purposes Summary**

Major differences between the bases, methods and main assumptions used in valuing assets and liabilities for Solvency II purposes compared to the French and previously UK GAAP valuation bases are in relation to reclassification and valuation adjustments required to determine technical provisions and insurance related assets such as reinsurance recoverable.

Under French GAAP, the provision for claims outstanding is calculated using the Management Best Estimate of Ultimate Loss (“MBE”) which is based on the estimated ultimate cost of all claims notified but not settled by the balance sheet date, together with the provision for related claims handling costs. The provision also includes the estimated cost of claims incurred but not reported (“IBNR”) at the balance sheet date based on statistical methods. In addition, a separate unearned premium reserve (“UPR”) is maintained for portion of premiums written that relates to unexpired terms of policies in force at the balance sheet date. The reinsurers’ share of the provisions (reinsurance recoverable) is based on the amounts of outstanding claims and projection for claims incurred but not reported that are expected to be recovered from reinsurers net of estimated irrecoverable amounts.

The technical provisions valued for Solvency II purposes are calculated as a best estimate and a risk margin. The best estimate is based on probability-weighted cashflows with consideration for the time value of money, and considers all cash inflows and outflows including both claims and premium provisions. The risk margin is assumed to be the amount required for a third party to take over and meet the (re)insurance obligations and represents the cost of providing eligible own funds equal to the SCR necessary to support these obligations.

The main differences between the Solvency II and French GAAP technical provisions arise from:

- The Solvency II best estimate uses the Actuarial Central Estimate (“ActCE”) for all line of business while the French GAAP TPs use the MBE;
- Additionally Solvency II best estimates uses a discounted cash flow basis with inclusion of events not in data (“ENIDs”), future expenses and legally obliged business; and
- Solvency II technical provisions include the risk margin; and
- Solvency II considers the full cost or benefit associated with all legally bound (re)insurance contracts, whereas French GAAP focuses on the earned portion of the contracts only. As a result, Solvency II recognises profits or losses on business that is considered unearned under French GAAP

There have been no changes in the bases, methods and main assumptions for the valuation for Solvency II purposes of assets and liabilities in the period. As set out above however, there are larger differences between CEG’s statutory position and Solvency II arising from the transition for statutory accounting from UK GAAP to French GAAP.

# Directors' Report

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## Directors

The following have been Directors from 1 January 2019 to the date of this report unless otherwise indicated:

### *Executive Directors:*

V M J M Brionne

A P Clifford (resigned 28 June 2021)

N M C Cote (resigned 1 March 2021)

S Mitchell (appointed 1 March 2021)

D M W Roberts (appointed 9 July 2021)

### *Non-Executive Directors:*

J A Turner (Chairperson)

D M A Furby

M A Connole

M A McCausland

K Richards

K Koreyva

## Statement of Directors' Responsibilities

The Directors are responsible for preparing the SFCR, including the attached public quantitative reporting templates, in all material respects in accordance with ACPR rules and regulations.

The Solvency II Directive, the Delegated Acts, related Implementation Rules, Technical Standards and Guidelines, as well as ACPR rules provide the Regulatory Framework in which the Company operates. The rules and regulations include, but are not limited to, the recognition and measurement of its assets and liabilities including Technical Provisions and Risk Margin, the calculation of its capital requirement and the reporting and disclosures of the Solvency II results.

## Approval of the Solvency and Financial Condition Report

We acknowledge our responsibility for preparing the SFCR in all material respects in accordance with the Solvency II Regulatory Framework.

We are satisfied that:

- a) throughout the financial year in question, CEG has complied in all material respects with the requirements of the Regulatory Framework applicable to the company; and
- b) it is reasonable to believe that CEG has continued so to comply subsequently and will continue so to comply in future.

On Behalf of the Board

**Sara Mitchell**

**Managing Director**

**6 April 2022**

## **A. Business and Performance**

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### **A.1 Business**

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#### **Name and Legal Form**

CEG is one of Europe's leading commercial insurance and reinsurance companies and operates a successful underwriting network throughout the UK, Ireland and Continental Europe. The Company has its headquarters in Paris, France, with branch offices in the UK and Europe and holds cross-border permissions throughout the European Economic Area ("EEA"). The Company also benefits from the UK's Temporary Permissions Regime which commenced on 1 January 2021 to operate its UK business.

CEG was initially incorporated in the UK. On 1 January 2019, CEG successfully redomiciled from the UK to France as part of its Brexit preparations and the Company's registered office address is La Tour Carpe Diem, 31 Place des Corolles, Esplanade Nord, 92400 Courbevoie, France.

The Company offers its customers a broad range of insurance and risk solutions encompassing property & casualty, accident & health and personal lines classes and participated in 12 out of the 16 Solvency II non-life insurance lines of business, and in all of the non-proportional reinsurance classes with the exception of Health in 2020. Policies are written under the brand names "Chubb Europe", "Chubb Global Markets" and "Chubb Tempest Re".

CEG is also a 'white listed' surplus lines insurance and reinsurance company in the United States, entitling it to write surplus lines in all US states and US territories. Business is accessed by a variety of distribution channels and the company has strong relationships with the broker community, its corporate partners and direct markets.

#### **Supervisory Authority**

From 1 January 2019, CEG is supervised by the Autorité de contrôle prudentiel et de résolution i.e. French Prudential Supervision and Resolution Authority ("ACPR"), with its UK operations run through a UK branch which remains subject to limited regulation by the Financial Conduct Authority ("FCA"). Prior to 1 January 2019, CEG was authorised by the UK's Prudential Regulation Authority ("PRA") and regulated by both the FCA and the PRA.

#### **Group Supervisory Authority**

Chubb Limited is supervised at the group level by the Chubb Group Supervisory College, comprised of regulators from a number of jurisdictions around the world. The Chubb Group Supervisory College is led by Chubb's group-wide supervisor, the Pennsylvania Department of Insurance. The ACPR is a member of the Chubb Group Supervisory College.

As at 31 December 2021, CEG was 99.99% owned by Chubb European Holdings Limited with one share held by Chubb EU Holdings Limited. The ultimate parent of CEG is Chubb Limited.

Chubb Limited, headquartered at Bärengasse 32, CH-8001 Zurich, Switzerland, is the Swiss-incorporated holding company of the Chubb Group of Companies. Chubb Limited and its direct and indirect subsidiaries (collectively the "Chubb Group of Companies" or ("The Chubb Group")) are together a global insurance and reinsurance organisation.

The address of the Group Supervisor is The Deputy Insurance Commissioner, Pennsylvania Department of Insurance, 1326 Strawberry Square, Harrisburg, PA 17120, USA.

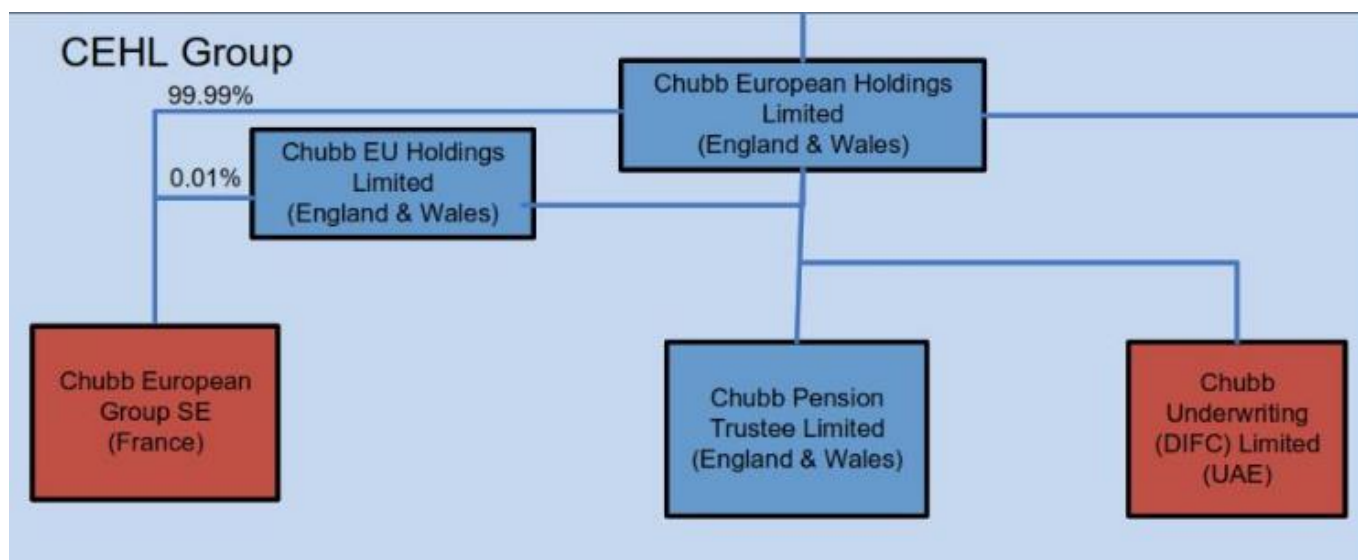


## External Auditor

The Company's Auditor is PricewaterhouseCoopers Audit, Chartered Accountants and Statutory Auditors with registered office at 63 rue de Villiers, 92208 Neuilly-sur-Seine Cedex.

### ***A.1.1 Position within the Legal Structure of the European Group***

The group structure as at 31 December 2021 (excluding dormant entities) is summarised in the simplified chart below. There were two changes to the group structure during 2021; ACE European Holdings No 2 Limited and Chubb Insurance Investment Holdings Ltd, which were put in liquidation in 2018, were dissolved 2 May 2021 and 3 May 2021 respectively. No further changes have been made up to the date of this report.



### ***A.1.2 Material Related Undertakings***

The company has no material related undertakings.

### ***A.1.3 Material Lines of Business and Geographical Areas***

The Company writes 12 out of the 16 classes of Solvency II non-life insurance lines of business with a focus on fire and other damage to property, general liability, miscellaneous financial loss and marine, aviation and transport. Together, these classes of business accounted for 93% of CEG's total gross written premiums in 2021. CEG also underwrites a relatively small amount (1% of total GWP) of non-proportional reinsurance business within the Solvency II casualty, marine, aviation and transport and property categories. The majority of business is written in the UK, France, Germany, Italy, the Netherlands and Spain. A small proportion is written in other countries. Further detail of business written by Solvency II lines of business and geographical area is disclosed in section A.2.1.

#### ***A.1.4 Significant Business Events***

##### **Russia-Ukraine crisis**

At the time of writing this report, the Russia/Ukraine crisis has taken a dramatic turn with the launch of an offensive attack by Russia on the entire territory of Ukraine as from 24 February 2022. This situation is causing instability in the region and potentially across Europe. Escalation of the situation has resulted in US, UK & EU severe economic sanctions being imposed on Russia, including SDN (Specially Designated Nationals), the wholesale embargo of Russian importations and on the international banking system, restricting the movement of capital. The crisis will also have implications on underwriting exposures, with supply chain disruptions and resultant inflation impacting economic assumptions. Whilst Russia and Ukraine are not major territories for CEG, underwriting exposures are currently hard to quantify to any degree of certainty; however, the war is expected to lead to potential claims across the marine, political risk/violence, trade credit, aviation, war and terror classes. Significant reinsurance protection is anticipated to reduce aggregate gross losses for CEG. CEG has no exposure to Russian or Ukrainian bonds.

##### **Coronavirus**

During 2020, worldwide social and economic activity became severely impacted by the spread and threat of the novel coronavirus (COVID-19). The Company took swift actions to minimize risk to its employees, including restricting travel and instituting extensive work from home protocols. At the same time, the company sought to minimize any disruption to its clients and business partners, and was able to continue to operate effectively throughout the pandemic and region-wide lockdown restrictions. The Company has continued to implement measures and protocols throughout 2021 to keep employees safe whilst ensuring effective business continuity with clients and partners.

Whilst the economic repercussions of the Covid-19 pandemic on CEG's client base have generally abated throughout 2021, top line growth in some business lines, notably Accident & Health (including Travel) and Personal Risk Services has been adversely impacted, in line with reductions in exposure. In addition, the company continues to adopt a cautious approach to underwriting, reflective of the widespread uncertainty that the pandemic has created.

##### **Brexit**

Chubb has been working to offer certainty and continuity of service for all of its customers and business partners regardless of their location since the UK EU membership referendum in 2016 was announced. Chubb's Brexit plans, including the decision to redomicile from the UK to France on 1 January 2019, enabled the company to continue to carry out insurance business in the UK, Ireland and across Continental Europe with minimum disruption to its operating and servicing model.

CEG benefits from the UK's temporary permissions regime ("TPR") which enables EEA firms to continue to operate under the same conditions until the end of the TPR which is expected to end 31 December 2023. During this time, the Company will seek full UK authorisation from the UK regulators for its UK business.

Chubb will continue to review the company structure, regulatory and tax requirements and governance arrangements to ensure the company operates an effective and compliant operating model across the region.

Additional information can be found on the Brexit pages of the Chubb UK website. [www.Chubb.com/Brexit](http://www.Chubb.com/Brexit)

## A.2 Underwriting Performance

### A.2.1 Key Performance Indicators and Summary by Solvency II Line of Business and Countries

The following financial key performance indicators (“KPIs”) have been deemed relevant to the Company’s business. These KPIs are reviewed regularly by the CEG Audit and Risk Committee and Board.

KPIs	2021 €'000	2020 €'000
Gross premiums written	5,462,482	4,509,483
Net premiums written	3,228,931	2,723,808
Underwriting profit	579,139	244,498
Combined ratio %*	81.2%	90.9%

\*Ratio of net claims incurred, commission and expenses to net premiums earned

Management also use a variety of other performance indicators, including production volumes, retention ratios, price monitoring, loss and expense analyses, and operating metrics in assessing the performance of each of the business segments. All financial results are monitored against plan, forecast and prior year on a regular basis.

The company’s KPI summary by Solvency II line of business, for the year ended 31 December 2021 is summarised in the table below:

SII Line of Business for 31 December 2021	Gross premiums written €'000	Net premiums written €'000	Underwriting profit €'000	Combined ratio %
Income protection	56,688	36,631	31,849	11.8%
Motor vehicle liability *	77,016	21,229	9,114	74.2%
Other motor	42,763	38,995	15,624	59.0%
Marine, aviation and transport *	644,457	454,149	87,332	78.7%
Fire and other damage to property *	2,138,022	1,214,086	117,134	89.1%
General liability *	1,800,447	1,084,894	227,014	77.1%
Credit and suretyship *	176,592	52,955	44,047	6.7%
Miscellaneous financial loss *	495,003	310,546	60,391	81.3%
Non-proportional casualty	5,479	937	(9,643)	960.7%
Non-proportional marine, aviation and transport	4,602	2,778	1,614	32.2%
Non-proportional property	21,413	11,734	(5,339)	170.7%
<b>Total</b>	<b>5,462,482</b>	<b>3,228,933</b>	<b>579,139</b>	<b>81.2%</b>

Each of the Solvency II classes of business marked with an asterisk have net written premiums in excess of €40,000k and in total, account for over 99,4% of CEG's 2021 net written premiums (97.1% in 2020). For the purposes of this report, these classes can be considered to be “core” to CEG. The remaining classes of business can be considered “non-core”.

CEG's 2021 gross written premiums were up by 21,3% in comparison to prior year, generating a strong underwriting profit of €579,139k. This growth is primarily organic reflecting the mature markets which CEG operates in.

Equivalent data for the year ended 31 December 2020 is summarised in the table below:

<b>SII Line of Business for 31 December 2020</b>	<b>Gross premiums written €'000</b>	<b>Net premiums written €'000</b>	<b>Underwriting profit €'000</b>	<b>Combined ratio %</b>
Income protection	57,510	36,228	27,862	23,1%
Motor vehicle liability *	86,370	49,556	(6,919)	111,4%
Other motor	39,503	36,352	8,235	78,4%
Marine, aviation and transport *	507,177	353,367	61,309	80,4%
Fire and other damage to property *	1 789,021	1,006,488	32,880	95,9%
General liability *	1,385,390	883,777	38,565	94,9%
Credit and suretyship *	141,364	42,967	20,569	55,5%
Miscellaneous financial loss *	475,032	309,442	60,393	81,7%
Non-proportional casualty	7,862	1,516	419	67,7%
Non-proportional marine, aviation and transport	6,376	1,106	1,583	-36,6%
Non-proportional property	13,911	3,053	2,640	8,3%
<b>Total</b>	<b>4,509,483</b>	<b>2,723,810</b>	<b>244,498</b>	<b>90,6%</b>

The company's KPI summary by top six (6) countries, for the year ended 31 December 2021 is summarised in the table below:

<b>For year ended 31 December 2021</b>	<b>Gross premiums written</b>	<b>Net premiums written</b>	<b>Underwriting profit</b>	<b>Combined ratio</b>
<b>Region</b>	<b>€'000</b>	<b>€'000</b>	<b>€'000</b>	<b>%</b>
United Kingdom	2,135,982	1,348,524	258,826	81.0%
France	718,926	419,876	60,776	84.7%
Germany	462,940	221,202	36,909	83.0%
Italy	300,847	202,717	60,505	70.2%
Netherlands	369,863	247,658	77,035	60.6%
Spain	281,730	179,488	8,075	95%

Germany and Spain's combined ratios have both increased over prior year.

Equivalent data for the year ended 31 December 2020 is summarised in the table below:

<b>For year ended 31 December 2020</b>	<b>Gross premiums written</b>	<b>Net premiums written</b>	<b>Underwriting profit</b>	<b>Combined ratio</b>
<b>Region</b>	<b>€'000</b>	<b>€'000</b>	<b>€'000</b>	<b>%</b>
United Kingdom	1,784,792	1,153,390	138,335	87,6%
France	606,239	363,564	6,675	98,2%
Germany	391,412	186,605	36,984	80,1%
Italy	257,094	181,863	42,984	77,5%
Netherlands	292,727	192,151	22,013	88,1%
Spain	250,448	171,810	15,099	91,0%

CEG's gross written premiums for 2021 totalled €5,462,482k. The most significant lines of business underwritten by the Company were fire and other damage to property, general liability, marine, transport and aviation and miscellaneous finance loss, with gross written premiums for these lines in 2021 amounting to €5,077,929k.

64% of gross written premiums are sourced from the UK, with France and Germany providing 21% and 14% respectively. The Netherlands, Italy and Spain complete the top 6, with 11%, 9% and 8% of the 2021 premiums respectively. The remaining business is generated in other countries throughout Europe.

CEG purchases reinsurance to mitigate the impact of major events and an undue frequency of smaller losses. A number of the reinsurance programmes operated by CEG during 2021 were with a Chubb company, Chubb Tempest Reinsurance Ltd. CEG also has the benefit, particularly for US and worldwide catastrophe exposures, of reinsurance programmes shared with other Chubb entities, including Syndicate 2488 at Lloyd's. These arrangements result in an increase in the reinsurance purchasing power of Chubb, which ultimately benefits all subsidiaries, including CEG. There were no significant changes to the company's reinsurance purchasing strategy in 2021.

CEG's exposure to large losses is managed by adherence to clear risk management and underwriting guidelines and the use of reinsurance protection and sophisticated modelling and analysis. Profitability was adversely impacted by catastrophe losses of € 62.9 million net of reinsurance recoveries (2020: €98,5 million) however these were more than offset by prior period reserve releases of €335,925 million (2020: €74million) primarily within retail P&C classes. The 2021 current accident year loss ratio, excluding catastrophe losses and prior period development, was 45.7% (2020: 47.5%) demonstrating the quality of CEG's underlying business, our adherence to underwriting discipline and the positive impact of the portfolio review process.

Prior period reserve releases were €335,925million (2020: €74million) with favourable developments within almost all classes, most notably, Casualty, Fire, Marine, A&H and and Personal Lines. Excluding catastrophe losses and prior period development, the accident year loss ratio for the year was 45.7% (2020: 47.5%), demonstrating the adherence to underwriting discipline and the positive impact of the portfolio review process.

Operating expenses constitute commissions and general administrative expenses. The expense ratio of 35.4% compares to the 38.4% reported in 2020 reflecting the continued strict management of both components. Total reinsurance spend amounted to €2,233 million, resulting in net written premiums for the year of €3,228 million.

Core lines of business generated net written premiums of €5,430,988k with non-core lines generating just €31,494k less than 1% of the total. Incurred losses, net of reinsurance recoveries, amounted to €1,416million, generating an overall loss ratio for the company of 81,2%.

CEG produced an underwriting profit of €579 million for 2021.

### **A.3 Investment Performance**

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CEG operates a conservative investment strategy and has established highly liquid, diversified, high quality portfolios managed by expert external managers. Detailed Chubb group investment guidelines are established for each managed portfolio including Chubb customised benchmarks against which the manager performance is measured.

CEG maintains five active investment grade fixed income portfolios, the core currencies of which are sterling, euro and US dollars. Further passive portfolios are maintained in Switzerland and Turkey to meet local solvency requirements. CEG also allocates a limited proportion of funds available for investment to alternative strategies. These alternative strategies include high-yield bonds, syndicated bank loans, private equity loans and global equities.

At year end 2021 funds allocated to alternative strategies made up 19% of CEG's investment portfolios, falling within the established limits. The majority of CEG's investments continue to be allocated to high quality, diversified, actively managed portfolios with exposure to a broad range of sectors. Consistent with previous years, CEG's investment guidelines and external manager positioning restrict exposure to peripheral Eurozone countries.

The approximate currency split of CEG's investment portfolios is sterling 28%, euro 34% and US dollars 36%. Other currency investments comprise approximately 2% of the total.

The company's investment income by Solvency II assets class and investment expenses for the year ended 31 December 2021 is summarised in the table below:

<b>For year ended 31 December 2021</b>	<b>Income</b>	<b>Realised Gain/(Loss)</b>	<b>Unrealised Gain/(Loss)</b>	<b>Other</b>	<b>Total Return</b>
<b>Investment income by asset class</b>	<b>€'000</b>	<b>€'000</b>	<b>€'000</b>	<b>€'000</b>	<b>€'000</b>
1 Government bonds	24,344	(459)	(42,381)		(18,495)
2 Corporate bonds	110,738	(902)	(153,650)		(43,814)
3 Equity securities	11,952	3998	63,469		79,419
4 Collective investments undertakings	0	0	0		0
6 Collateralised securities	14,034	0	(11,067)		2,966
7 Cash and desposits	4,297	0	0		4,297
8 Mortgages and loans	34,837	528	(220,55)		12,255
O Other		67	6,763		6,697
A Futures		27,765	(13,468)		14,298
E Forwards		397	(7)		390
<b>Investment expenses</b>				(19,726)	(19,729)
<b>Total investment return</b>	<b>200,201</b>	<b>30,205</b>	<b>(172,393)</b>	<b>(19,726)</b>	<b>(38,287)</b>

The investment expenses are shown in total as they all relate to investment management fees, similar to 2020.

Equivalent data for the year ended 31 December 2020 is summarised in the table below:

<b>For year ended 31 December 2020</b>	<b>Income</b>	<b>Realised Gain/(Loss)</b>	<b>Unrealised Gain/(Loss)</b>	<b>Other</b>	<b>Total Return</b>
<b>Investment income by asset class</b>	<b>€'000</b>	<b>€'000</b>	<b>€'000</b>	<b>€'000</b>	<b>€'000</b>
1 Government bonds	27,379	116	14,072		41,567
2 Corporate bonds	110,570	(3)	62,230		169,244
3 Equity securities	8,615	6,143	38,855		53,613
4 Collective investment undertakings	0	0	(6,268)		(6,268)
6 Collateralised securities	9,680	1	6,100		15,780
7 Cash and deposits	3,840	0	0		3,840
8 Mortgage and loans	29,208	(1,239)	(7,058)		20,911
Other	0	(3,358)	0		(3,358)
A Futures	0	(994)	3,618		2,624
E Forwards	0	3,767	142		3,909
Investment expenses				(17,777)	(17,777)
<b>Total investment return</b>	<b>189,292</b>	<b>881</b>	<b>111,691</b>	<b>(17,777)</b>	<b>284,086</b>

Despite mixed trends in COVID infection rates across regions, optimism for a global recovery built in Q1 against a backdrop of generally improving economic data, increasing vaccinations, and sustained fiscal and monetary support. Global economic data continued to improve in most regions, labour markets improved, and manufacturing rebounded strongly despite continuing supply chain disruptions. Yields in developed markets rose sharply reflecting market expectations for higher growth and inflation, along with the potential for central banks to tighten policy rates earlier than anticipated. Meanwhile, global equities generally rallied, credit spreads tightened and oil prices rose as investor optimism increased around the global recovery.

Many of these themes persisted into Q2, consumer sentiment rose further and an uptick in demand helped drive a resurgence in COVID-sensitive sectors. Vaccinations continued to advance globally and infection rates moved lower, although the spread of the more infectious delta variant underscored the risks to economic recovery. Developed sovereign yields broadly fell and curves flattened despite lingering inflation concerns over Q2. Meanwhile, global equities rallied – with the S&P 500 rising 8.5% – as strong momentum in economic growth data, along with positive earnings outlook, supported risk sentiment.

Rising COVID-19 delta variant cases and supply chain disruptions slowed economic momentum across developed markets, while inflation remained elevated over Q3. As a result, most assets experienced volatility over the quarter. The global economic recovery continued at a slower pace and remained uneven across sectors. Over the quarter, an uptick in COVID-19 delta variant cases slowed U.S. services activity and dented job growth in the leisure and hospitality industries. Meanwhile, similar COVID-19 outbreaks in emerging markets prolonged supply chain bottlenecks, particularly in the auto industry. In the US, the Federal Reserve (Fed) pivoted to a more hawkish stance, indicating that it would begin tapering its asset purchases within the calendar



year and could even raise rates as early as 2022. Other developed markets central banks also shifted sentiment in response to increasing inflation.

The global economic recovery continued, though momentum slowed alongside the spread of the Omicron variant during Q4. Elevated inflation remained a key theme globally throughout the quarter. In the U.S., Consumer Price Index reached almost 7% year-over-year in November, its highest level in 39 years. In response to inflationary pressure, Central banks shifted policy focus toward normalisation. The Fed increased the pace of tapering its monthly asset purchases and adjusted its median expectations for three hikes in 2022. Meanwhile, the Bank of England raised interest rates by 0.15% to 0.25% in December. Credit spreads widened, while global equities rallied bolstered by strong corporate earnings together with indications of less severe disease and hospitalisation from Omicron. Meanwhile, sustained supply chain issues, depleted energy inventories and strong global energy demand drove up energy prices.

Investment grade fixed income returns were negative in 2021 as both sovereign and corporate yields rose. However, returns for alternative assets including high yield bonds, bank loans, private loans and equities produced good returns for the full year.

Overall CEG generated a total return of 0.7% in 2021 on balances available for investment. For investment grade portfolios, performance varied by individual manager, ranging from -2.1% to -1.9% for sterling and -1.9% to -1.3% for Euros. The US dollar investment grade portfolio generated a total return of -0.5% in the year.

CEG's alternative investment assets which constitute around 19% of the total portfolio produced strong results. The allocation to US dollar upper tier high yield bonds generated returns of 4.0% for the year, allocations to bank loans produced a total return of 4.5% and the private loans and private equity holdings generated total returns of EUR 10.5% and GBP 11.3%. CEG's allocation to Global equities generated a strong return of 19.1% for the year.

Overall, strong investment performance generated net investment income of €38,827k, compared to investment income of €284,086k in 2020, as from alternative assets including high yield bonds, loans and equities were partly offset by losses on the company's investment grade fixed income portfolios.

#### **A.4 Performance of Other Activities**

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All of CEG's activities are connected with the provision of contracts of insurance or reinsurance.

#### **A.5 Other Information**

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All material information regarding CEG's Solvency II business and performance by Solvency II lines of business is disclosed in Sections A2 – A4 above.

## B. System of Governance

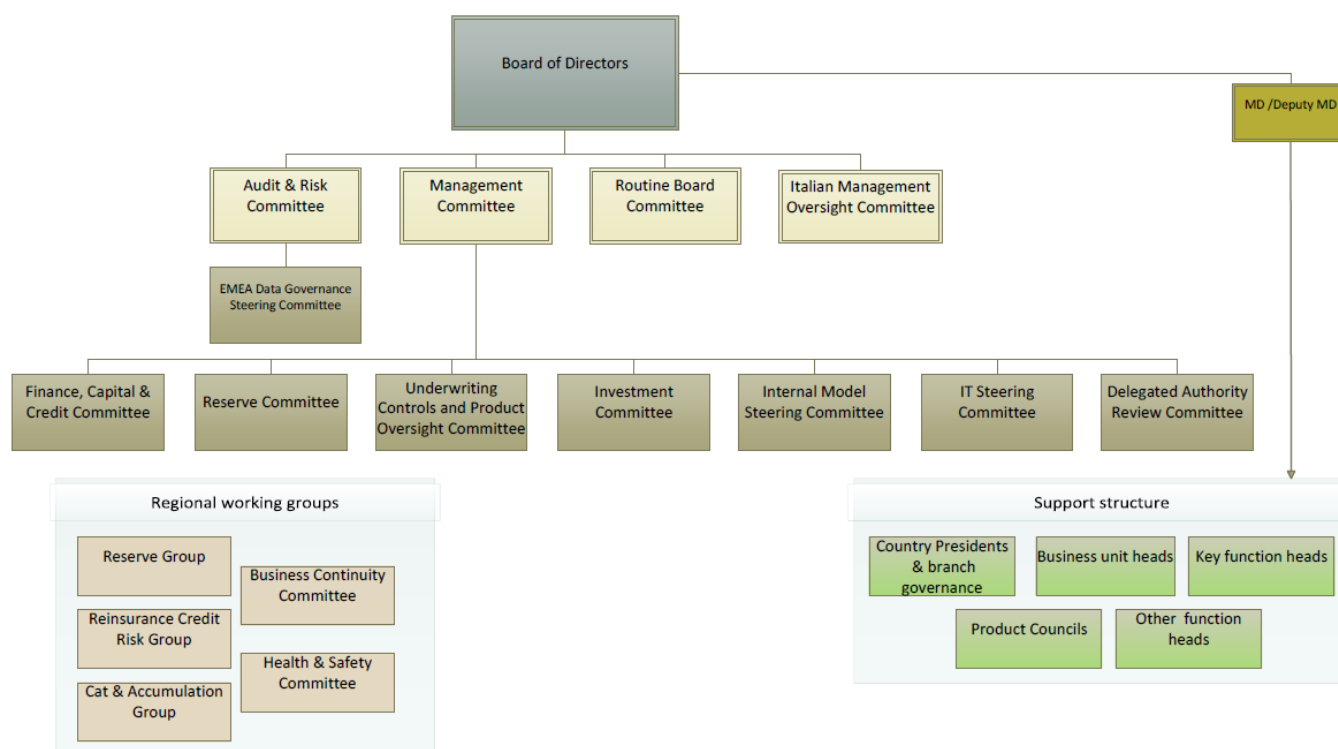
### B.1 General Information on the System of Governance

#### B.1.1 Board and Committees

The Board of Directors (“the Board”) has reserved responsibility for decisions in connection with a number of matters. These include those of a significant strategic, structural, capital, financial reporting, internal control, risk, policy or compliance nature. As at 31 December 2021, the Board membership comprised six independent Non-Executive Directors (“NEDs”) and three Executive Directors.

The Board has delegated a number of matters to committees, including the Audit and Risk Committee which is composed of NEDs and reports to the Board regularly in respect of its activities.

As at 31 December 2021, CEG’s governance structure was as follows:



The remainder of this section describes those committees which operated in 2021:

## ***Management Committee***

The Management Committee comprises the Managing Director (“MD”) of CEG and other members of the Company’s senior management team. The primary role of the Committee is to oversee the day-to-day management of business operations and their performance, to assist the MD in implementing and overseeing operational strategies and decisions determined by the Board. The Management Committee is responsible for the embedding of risk management and monitoring control of risk; prioritising the allocation of resources; monitoring competitive forces and measuring management effectiveness.

The following regional committees support and report to the Management Committee:

- Underwriting Controls and Product Oversight Committee;
- Reserve Committee;
- Finance, Capital and Credit Committee;
- Internal Model Steering Committee;
- Investment Committee;
- Information Technology (“IT”) Steering Committee; and
- Delegated Authority Review Committee.

In addition there are a number of branch management committees and regional working groups, providing a comprehensive level of insight and reporting on matters impacting the Company.

## ***Audit and Risk Committee***

The Audit and Risk Committee comprises Non-Executive Directors. It considers and makes recommendations to the Board on areas including internal controls, financial reporting, whistleblowing, validation of solvency calculations, actuarial matters and the external audit. It receives reports from the Compliance, Risk Management, Actuarial and Finance functions and from Internal Audit on a quarterly basis. From a risk perspective the Committee also considers risk exposures; future risk strategy; the design and implementation of the framework into the business; and on solvency and capital matters, the ORSA and internal controls. Where appropriate, the Audit and Risk Committee makes recommendations to the Board.

In relation to the external audit process, the Committee monitors the nature and scope of work in the audit of the statutory financial statements and other external reporting requirements.

In the case of the Internal Audit function, the Committee’s role involves agreeing and monitoring, in conjunction with the Group audit function, the nature and scope of work to be carried out by the Internal Audit team and the availability of sufficient resources.

The Committee provides assurance to the Board and Group management that the internal control systems, agreed by management as being appropriate for the prudent management of the business, are operating as designed.

At all times the Audit and Risk Committee is expected to challenge any aspect of these processes which it considers weak or poor practice.

The following regional committee supports and reports to the Audit and Risk Committee:

- EMEA Data Governance Steering Committee

## ***Routine Board Committee***

The Routine Board Committee meets on an ad hoc basis between formal Board meetings to consider business issues of an administrative or routine nature where documentation of approval is required in between quarterly Board and Audit and Risk Committee meetings. It has various duties and responsibilities including the approval of powers of attorney, authorisation of company signatories, and such other duties or responsibilities as may be delegated by the Board.

### ***Italian Management Oversight Committee***

The Board established the Italian Management Oversight Committee in 2006 to oversee specific financial crime risks in Italy (e.g. corruption, bribery, money laundering, manslaughter arising from breaches of the Safety at Work Act and computer fraud) to comply with Legislative Decree no 231 of 8 June 2001. The Italian Management Oversight Committee is to be renewed every three years and in December 2019 the Board approved the updated terms of reference for this committee until 2022.

## ***B.1.2 Roles and Responsibilities of Key Functions***

### ***Internal Audit Function***

Internal Audit is a ‘Third Line of defence’ function, which operates independently of regional management, reporting to CEG’s ultimate shareholding company via the Group Audit function. Its role is to carry out testing of financial and non-financial controls so as to identify control weaknesses and to recommend improvements, for i) the better protection of CEG’s assets and ii) conformity to agreed policies, procedures and guidelines. It provides reports to the Management and Audit and Risk Committees and Board, which review and have oversight of its annual planning and resourcing.

### ***Compliance Function***

Compliance is a ‘Second Line of defence’ function which, via the provision of advice, training and monitoring of First Line activity, seeks to ensure that CEG’s commercial business, wherever operated, is carried out in accordance with agreed policies, procedures and frameworks. It liaises with regulators, keeping them advised of key developments and informed of the company’s compliance with regulatory standards. The function provides reports to the Management Committee and Audit and Risk Committee which reviews and has oversight of its annual activity plan and resourcing.

### ***Risk Management Function***

Risk Management is a ‘Second Line of defence’ function. Independent of business line management, the function is responsible for assisting the Board, Boards committees, general management and employees in developing, implementing and maintaining the Risk Management Framework (“RMF”). The RMF comprises the strategies used to identify, assess, manage, monitor and report on its significant risk exposures and the policies, processes and procedures in place that are designed to underpin continuous risk management and support the risk-based decision-making processes of the business.

Risk Management continuously measures business and functional activity against KPIs derived from agreed statements of risk appetite, conducts one-off reviews of specific issues and provides advice to the business on mitigation of risk. Capital Modelling is part of the Risk Management function.

The function provides reporting to the Management, Audit and Risk Committee, and Board, and undertakes reviews at the direction of the Audit and Risk Committee or Board.

### ***Actuarial Function***

The Actuarial function includes Catastrophe risk management and a separate Pricing team. The function seeks accurately to assess the reserves required to satisfy known and estimated claims and claim expenses, providing a view of reserves adequacy independent of business line management. The function contributes to portfolio assessment, provision of rating information, and business intelligence. It provides reports to the Audit and Risk Committee, to enable that Committee to have adequate insight into reserving activity, given reserves represent a significant element of the company’s financial status.

### ***B.1.3 Roles and Responsibilities of Other Important Functions***

All function management heads are responsible for CEG's operations wherever geographically located. Risks, performance and controls are assessed centrally and functions' standards and procedures apply to branch operations in all countries of operation. Significant information is provided to the Management Committee via the Managing Director, who chairs the Management Committee.

#### ***Finance and Investment Function***

The Finance function encompasses financial accounting and reporting, financial planning, analysis and communications, taxation, treasury and credit control. A shared operations centre in Glasgow carries out bulk and routine finance operations.

Investment management is carried out by specialist external managers operating under detailed Chubb guidelines. The activity is overseen by the Treasury function and the Investment Committee, a part of the Finance department. The function ensures that assets representing regulatory and internal capital requirements are securely maintained under the management of external fund managers, and that asset currencies and liquidity follow agreed guidelines.

A high degree of liaison with the business and with other functions, including the Actuarial function and the capital team within Risk Management, takes place, enabling the Finance function to maintain a current overview of the financial, capital and performance indicators required to manage the business prudently and effectively.

#### ***Claims Function***

The Claims function is responsible for validating and processing directly-received claims and overseeing the services provided by agents to whom claims processing is outsourced, in line with agreed standards. The function is managed separately from the business lines. It contributes to the analysis of the adequacy of reserves and advises the business on claims trends and customer treatment with respect to claims payment. The function incorporates a unit for the detection of claims-related fraud.

#### ***IT Function***

IT advises on, purchases, maintains and supports operational, functional and administrative technical systems in support of business objectives and ongoing operational and functional needs. It acts in an advisory and support capacity in respect of external systems and has oversight of data security (including the identification and management of cyber incidents) and IT asset management in line with agreed policy and procedures. IT governance operates via the IT Steering Committee, which includes senior management amongst its membership.

#### ***Operations Function***

The Operations function supports business and functional objectives via the design and operation of underwriting, customer service, financial, business continuity and other operating systems throughout the region in which the company operates. The function incorporates a project management team.

#### ***Human Resources Function***

Human Resources advises and supports the business in planning for, staffing, training, remunerating and retaining a high-quality employee base. The function contributes to the assessment of senior staff for fitness and propriety and has oversight of the implementation of personnel-related Policies.

#### ***Reinsurance***

The Ceded Reinsurance team operates under Group management, and liaises with the business, negotiating shared and one-off treaty arrangements in line with agreed guidelines and business plans. The team provides advice on the cost-effectiveness and operation of reinsurance arrangements, and the suitability of external reinsurance providers.

#### ***B.1.4 Any Material Changes in the System of Governance during the Reporting Period***

During 2021 a new Data Governance Steering Committee was established in order to strengthen the company's data governance arrangements. The purpose of the committee is: to own the data governance operating model and to set the strategic direction for the governance of data; to drive a culture of practical and effective governance of data and raise awareness of it; to foster best practice in data governance and improve data skills and expertise in the organisation. The committee reports to the Audit and Risk Committee and is chaired by the Regional Chief Finance Officer.

#### ***B.1.5 Remuneration Policies and Practices***

##### ***Principles of the Remuneration Policy***

For the purpose of the following analysis "employees" includes both staff directly employed by CEG and staff employed by an affiliated service company, Chubb Services UK Limited ("CSUK").

CEG has a remuneration policy which is applicable to all employees including NEDs. However, NEDs have no entitlement to variable or equity-based remuneration, nor to pension contributions.

The policy requires the following principles to be applied to all remuneration decisions:

- Remuneration must be consistent with and promote sound and effective risk management in accordance with Chubb's Risk Management Framework and not encourage risk-taking that exceeds the level of tolerated risk of Chubb;
- Remuneration must be in line with the business strategy, objectives, values, long term interests and competitive strength of Chubb and the Chubb Group of Companies;
- Remuneration awards must not threaten Chubb's ability to maintain an adequate capital base;
- Remuneration must be sustainable according to the financial situation of Chubb as a whole, and justified on the basis of the performance of Chubb, the business unit and the individual concerned;
- Remuneration must avoid conflicts of interest in accordance with Chubb's conflict of interest policies;
- Remuneration decisions must not be made and/or approved by a beneficiary of that decision; and
- The remuneration of employees engaged in control functions must be in accordance with the achievement of objectives linked to their function, independent from the performance of the business areas they control.

### ***Fixed Remuneration***

The policy requires that fixed remuneration must be appropriate to the role performed, taking into account factors such as:

- Role complexity;
- Level of responsibility and seniority;
- Local market value of the role;
- Experience and expertise of the individual.

### ***Variable Remuneration***

Variable remuneration may comprise cash performance bonus and equity-based awards (options or restricted share awards).

Where an employee may be eligible to receive variable remuneration, the assessment of variable remuneration must take into account the following factors:

- Remuneration schemes which include fixed and variable components shall be appropriately balanced so that the fixed (or guaranteed) component represents a high proportion of the total remuneration;
- The payment of equity-based variable remuneration should vest over a period of time which will help prevent employees taking excessive risks that could have negative effect upon Chubb and/or customers. This period is to be decided during the approval process to consider all of the relevant factors and risks related to the specific situation;
- Performance-related variable remuneration should be based upon a combination of performance measures including, but not limited to, the following:
  - Financial benefit to the company;
  - Quality of employee performance (in terms of how things are achieved as well as what is achieved), Board adopted policies and procedures and protocols including adherence to Chubb's risk management arrangements.

### ***Termination Payments***

Termination payments are related to performance and designed in a way that does not reward failure.

### ***Pensions***

Employees may belong to one of a number of defined-benefit or defined-contribution pension schemes, to which the company contributes according to standardised formula.



#### ***B.1.5.1 Performance Criteria***

The award of variable remuneration is discretionary and usually occurs on an annual cycle. Cash bonuses and equity-based awards, if any, are allocated to individuals within limits attaching to the individual's employment grade and as recommended by line management based on assessment of individual performance criteria. The pool of awards available for allocation is set by the Group's ultimate holding company, as determined by a Global Compensation Committee which comprises independent Group directors and takes account of the expected profitability of the Group.

The estimated value of equity awards at grant is generally composed 25% of options, which vest incrementally over a four-year period, and 75% of restricted share awards, which vest incrementally over three years.

Performance criteria are set and measured on an individual basis. The performance measurement plans ("PMPs") of all individuals in roles requiring regulatory approval or notification measure performance against criteria including 'Fit and Proper' behaviours, risk management and leadership.

#### ***B.1.5.2 Pension or Early Retirement Schemes***

There are no supplementary pensions or early retirement schemes operated for the benefit of Board members or key function holders.

#### ***B.1.6 Material Transactions with Shareholders, Persons who Exercise a Significant Influence, and With Members of the AMSB***

##### ***Shareholders***

There were no transactions with shareholders who were not members of key management (Executive Committee, Executive Directors and NEDs) in 2021.

##### ***Key Management***

Key management personnel comprise members of the Board of Directors. A number of directors received emoluments directly through CEG. However, the other directors received their emoluments through CSUKL in respect of their services to all Chubb group companies. The cost of these emoluments is incorporated within the management recharges from CSUKL. For disclosure purposes, it is not practical to allocate these amounts to the underlying entities to which the directors provide services. Consequently, the following amounts represent the total emoluments paid by either CEG or CSUKL to the directors of CEG:

<b>Material transactions</b>	<b>2021</b>	<b>2020</b>
	<b>€'000</b>	<b>€'000</b>
Aggregate emoluments and benefits	4,460	4,873
Company pension contributions to money purchase pension schemes	49	118
<b>Total</b>	<b>4,501</b>	<b>4,991</b>

The aggregate emoluments above do not include share based remuneration. All executive directors are entitled to receive shares in Chubb Limited under long-term incentive plans. During the year, 9 directors received shares in Chubb Limited under long-term incentive plans and 5 directors exercised options over the shares of Chubb Limited. The highest paid director exercised share options during the year.

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

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### ***B.2.1 Fit and Proper Policies and Processes***

Persons who effectively run the firm or have other key functions are required to have the competency, capability and capacity to undertake the role, including relevant professional and formal qualifications, as well as knowledge and experience that is relevant to their specific duties.

In line with Article 42 of Solvency II Directive, CEG has a Fit and Proper Policy and supporting procedures which ensure that senior management and individuals performing key functions are aware of their allocated duties and, by reference to their individual qualifications, knowledge and relevant experience, honesty and financial soundness, that they are fit and proper.

Collectively CEG's senior management possesses appropriate qualification, experience and knowledge of:

- a) insurance and financial markets;
- b) business strategy and business model;
- c) system of governance;
- d) financial and actuarial analysis; and
- e) regulatory framework and requirements.

### ***B.2.2 Assessment Process***

An individual's Fitness and Propriety is defined as equating to their competency and suitability to perform their regulated role (fitness) and their honesty, integrity and reputation (propriety). In determining a person's fitness and propriety, CEG has regard to all relevant matters, including, but not limited to:

- An individual's competence and capability to undertake the role, including professional and formal qualifications, as well as knowledge and relevant experience in the context of the respective duties allocated to that individual.
- Whether the person has sufficient qualifications and/or industry experience to carry out the intended functions; for example the financial, accounting, actuarial and management qualifications and skills;
- Whether the person satisfies the relevant regulator's training and competence requirements;
- Whether the person has demonstrated, by experience and training, that they are suitable to perform the role and possess the necessary skills, knowledge, expertise, diligence and soundness of judgment to undertake and fulfil the particular duties and responsibilities of the role;
- Whether the person has demonstrated the appropriate competence and integrity in fulfilling occupational, managerial or professional responsibilities previously or in their current role;
- Whether an individual acts with honesty, integrity and is of good repute; has been convicted of, dismissed or suspended from employment for drug or alcohol abuses or other acts that would constitute a breach of regulatory expectations or Chubb's Code of Conduct, and whether this would impact a person's continuing ability to perform the particular role for which the person is or is to be employed.

The specific checks undertaken on individuals that are subject to fitness and propriety assessments may include, but are not limited to, the following:

#### Pre-appointment:

- Competency-based interviews;
- Qualification checks;
- CV reviews;
- Criminal records checks;
- Credit reference checks;
- Previous employment checks;
- Regulatory references (where permitted);
- Previous employment / qualification / gap investigations;
- Sanctions checks;
- Directorship disqualification checks;
- Conflicts of interest checks; and
- Involvement in insolvency, bankruptcy or winding-up proceedings.

In addition to pre-appointment checks, the following are considered on an ongoing basis:

- Annual attestation to confirm fitness and propriety, as part of the annual performance management process;
- Role profile and responsibilities review;
- Event and breach monitoring;
- Learning and development training plan reviews; and
- Chubb Code of Conduct attestation.

### **B.3 Risk Management System including ORSA**

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The Chubb Group is a global underwriting franchise whose risk management obligation to stakeholders is simple: ensure sufficient financial strength over the long term in order to pay policyholder claims while simultaneously building and sustaining shareholder value.

The Chubb Enterprise Risk Management (“ERM”) strategy helps achieve the goal of building shareholder value by systematically identifying, assessing and then monitoring and managing, the various risks to the achievement of corporate business objectives and thereby minimising potential disruptions that could otherwise diminish shareholder value or balance sheet strength.

### B.3.1 Risk Management Framework at CEG

As an insurer, CEG manages risk for its policyholders and shareholders. Hence, risk management is intrinsic within its product offerings and fundamental to its business. ERM is not a separate service function but rather is embedded in critical decision-making. ERM does not strive to eliminate risk but rather manage and profit from risk where possible and prudent. ERM addresses the full spectrum of exposure categories:

- Insurance (e.g. reserving, pricing)
- Financial (e.g. credit, liquidity)
- Operational (e.g. IT, business continuity)
- Strategic (e.g. mergers & acquisitions)

Insurance is the company's primary risk category; the three other risk categories present the remaining exposures. These risk reporting categories cover all risk types to which the company is exposed.

To ensure that its ERM efforts are focused in terms of time horizon and business materiality, CEG adheres to the enterprise-wide ERM mission statement as follows:

*"ERM is the process to identify, assess, and mitigate those risks that, if manifested mainly over the next 36 months, might impact CEG's exposure footprint (investments, operations and short / long-tail liabilities) such that the firm's ability to achieve its strategic business objectives might be impaired."*

The achievement of CEG's overall high-level business goals requires adherence to a structured ERM programme and strategy. The above ERM mission statement outlines the goals which CEG seeks to accomplish through ERM; CEG's strategic risk management targets its key risk priorities to accomplish its high-level business goals.

Chubb's Global ERM framework has the following components:

- **Internal and External Risks:** identify, analyse, quantify, and where possible, mitigate significant internal and external risks that could materially hamper financial conditions and/or the achievement of corporate business objectives over the next 36 months.
- **Exposure Accumulations:** identify and quantify the accumulation of exposure to individual counterparties, products or industry sectors, particularly those that materially extend across or correlate between business units or divisions and/or the balance-sheet.
- **Risk Modelling:** develop and use various data-sets, analytical tools, metrics and processes (including economic capital models and advanced analytics) that help CEG make informed underwriting, portfolio management and risk management decisions within a consistent risk/reward framework.
- **Risk Mitigation:** internal controls operated at all levels of the business to mitigate risks within accepted levels, expressed through corporate policies, processes and procedures.
- **Governance:** establish and coordinate risk guidelines that reflect the corporate appetite for risk, monitor exposure accumulations relative to established guidelines, and ensure effective internal risk management communication up to management and the Board, down to the various business units and legal entities, and across the firm.
- **Disclosure and Reporting:** develop protocols and processes for risk-related disclosure and reporting internally as well as externally to rating agencies, regulators and shareholders.

The Risk & Control Register that is maintained on an on-going basis sets out the risks facing CEG, with details on the causes of the risks, consequences of the risks, risk owner, alongside the inherent and residual risk rating. Each risk included within the Risk & Control Register sets out the controls which are in place to mitigate the risk, including how the control is expected to impact the risk (i.e. reducing likelihood of the risk occurring, reducing the severity if the risk materialised or any combination) and the control owner, including a rating on the design and operational effectiveness of the control. Risk and control owners are required to conduct assessments on a regular basis.

### B.3.2 Risk Culture

Sound risk culture and risk governance are the critical foundation for effective ERM. However, risk culture cannot be reviewed in isolation but instead drawn from the overall corporate culture of Chubb. This

corporate culture is based on the values of transparency, trust and communication and is embodied by CEG's dedication to provide:

- Superior client value by committing and ensuring substantial capital resources and creativity to the assumption and management of client risk.
- Superior shareholder value by managing capital and risks expertly, efficiently and profitably.
- Superior employee value by creating a rewarding and ethical environment.

Risk culture represents the shared understanding and behavioural attitudes of Chubb's employees towards risk taking. Risk culture is the foundation of the many components of CEG's ERM process that are essential to the daily execution of the risk strategy for CEG. A strong internal control ethic and environment contribute to a favourable risk culture. CEG's risk culture is developed and reinforced through a number of fundamental pillars: ethics and values, training, governance, risk aligned performance/remuneration, underwriter best practices and business conduct.

### **B.3.3 Risk Governance**

Governance and oversight exercised by CEG covers three distinct forms: day-to-day risk management and controls, risk management oversight, and independent assurance. This approach, also known as the Three Lines of Defence Model, operates as follows:

- **1<sup>st</sup> Line:** Management and staff in the first line of defence have direct responsibility for the management and control of risk (i.e. staff and management working within or managing operational business units and functions).
- **2<sup>nd</sup> Line:** The coordination, facilitation, oversight and challenge of the effectiveness and integrity of the risk management framework (i.e. the Audit and Risk Committee and Risk Management division); and its implementation, conducting its own independent analysis and risk monitoring.

The ERM approach has additionally built on the commonly accepted governance structure to recognise the responsibility of the 2nd line to act in both an advisory capacity and in the oversight and independent challenge of 1st line activities.

- **3<sup>rd</sup> Line:** Independent assurance and challenge is applied across all business functions in respect of the integrity and effectiveness of the Risk Management Framework (i.e. internal and external audit).

Risk management is an active and continuous process within CEG. ERM is embraced by colleagues at all levels of management, starting with the Board of Directors and cascading through to the business units. Management provides the "tone from the top" on risk management and establishes accountability (e.g. risk ownership) and sponsors key initiatives (e.g. underwriting best practices). Effective risk governance requires close and dynamic collaboration as well as focus on communication flow and risk identification.

One of the key mechanisms by which ERM is put into practice for CEG is through the role of executive and senior management. The associated collaboration and communication by senior executives ensure transparency and consistency in the application of ERM across the organisation while expediting the flow of relevant information necessary for effective risk management. In this structure, business unit and functional leaders are expected to manage risks, maintain effective controls and rapidly elevate to management where necessary with ERM providing the mechanism to analyse and aggregate risks across the business units and functions.

The Risk Management Key Function Holder reports to the Management Committee, Audit and Risk Committee and Board with sufficient oversight of the ERM framework and risk exposures, focusing on key risks which are evolving and those which are approaching risk appetite.

### B.3.4 ORSA Process, Documentation and Review

Solvency II regulation defines the ORSA as ‘the entirety of the processes and procedures employed to identify, assess, monitor, manage, and report the short and long term risks a firm faces or may face and to determine the own funds necessary to ensure that overall solvency needs are met’. In order to comply with Solvency II regulation, CEG has established a formal ORSA process which sets out the list of activities that CEG undertakes in order to conduct a risk and solvency assessment.

The ORSA is an integral part of the overall Risk Management Framework and is a process which is conducted throughout the year to support the normal running of business within CEG. An overview of the key elements which make up the ORSA is shown below:

#### Summary of the ORSA process



*NTR: Net To Region i.e. excluding the effects of internal reinsurance programs.*

*LE/Stat.: Statutory Net i.e. including the effects of internal reinsurance*

The ORSA is an integral part of the overall Risk Management Framework and is a process which is conducted throughout the year to support the normal running of business within CEG. An overview of the key elements which make up the ORSA is shown below. The Risk Management Function co-ordinates each element of the ORSA shown above with subject matter experts across the business. The results of the analysis are reported to the Management Committee, Audit and Risk Committee and Board throughout the year.

The outcomes of the ORSA process are documented within the ORSA report. An ORSA Report is produced at least annually and is approved by the Board. In addition to standard annual ORSA reports, additional ad-hoc ORSA related reports may be produced. Examples of ad-hoc ORSA reports that may be produced include but are not limited to: change in risk profile; substantial changes in business structure or strategy; request from the Board; and responses to external events.

Quarterly risk management activities also complement the annual ORSA Report through reporting of the risk profile, assessment of solvency, review of metrics against defined risk tolerances and exposure monitoring.

One of the key elements of the ORSA is determining an appropriate level of capital to hold the CEG's Capital Management that ensure there is sufficient capital to meet current and prospective strategic objectives, statutory and regulatory requirements; and appropriate consideration given to the potential for the distribution of capital, where CEG risk appetite for solvency coverage is expressed as a percentage of the Solvency Capital Requirement (SCR) is summarised as:

- Preferred Operating Capital ("POC"): greater than the maximum of (A) 120% of the SCR; and (B) 100% of the SCR excluding its offset to allow for expected profit
- Preferred Minimum Capital ("PMC"): greater than 110% of the SCR
- Regulatory Minimum Capital: greater than 100% of the SCR

### **B.3.5 Significant Risks captured in the ORSA Capital as at 31 December 2021**

Analysis as at 31 December 2021 is ongoing at the time of writing this report. Latest analysis as at 31 December 2020 concluded that it was appropriate to set ORSA Capital based on the Baseline Management Capital that was in line with the Capital Management Policy. The ORSA capital assessment as at 31 December 2020 was €1,755m.

## **B.4 Internal Control System**

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### ***B.4.1 Internal Control System***

CEG maintains extensive systems of controls over financial and other risks. An Internal Control Framework sets out the responsibilities and standards required to facilitate an effective system of internal control and to monitor its effectiveness. There are five key components within the Internal Control Framework:

1. **Control Environment** – Sets the tone of the organisation, influencing the control consciousness of its people.
2. **Risk Assessment** – The identification and analysis of relevant risks to the achievement of CEG's objectives.
3. **Control Activities** – Proper governance and documented Board approved policies help ensure management directives are carried out and necessary actions are taken to address CEG's risks.
4. **Information & Communication** – An efficient flow of information throughout the organisation is necessary for informed business decision making and external reporting.
5. **Monitoring & Assurance** – The assessment of the quality of the Internal Control system's performance over time.

Financial controls are designed to protect assets and identify liabilities, ensure accurate and timely reporting, support planning and analysis and meet the requirements of Group, statutory and regulatory reporting. They include controls designed to meet the Sarbanes Oxley reporting requirements.

Other controls include those contained within the Underwriting Framework, Risk Management Framework, Business Compliance Framework, Conduct Risk Framework and Information Security Framework. Where activities are outsourced to external agents, prior due diligence and ongoing audit processes are carried out to ensure that agents are able to meet control standards.

Controls are designed to align with the standards and guidance produced by CEG's ultimate holding company as well as local requirements and good practice. Each business unit head and key function's head of management is responsible for the satisfactory design and operation of controls over risks applicable to that business unit or function. All employees have a role in maintaining the appropriate culture of internal control and are required to be knowledgeable of and comply with the Internal Control Framework and any related group or local Policies and Procedures.



Internal controls are tested by the Internal Audit function according to a cycle agreed by the Audit and Risk Committee, and by the External Auditor in the course of the Auditor's reviews of statutory and other financial reporting. Weaknesses and misstatements are identified to the Audit and Risk Committee, together with a programme for remediation.

#### ***B.4.2 Compliance Function***

The Compliance function is a second line of defence function (see section B.1.2 for details), operating separately from the commercial units of the business. The Head of Compliance, with defined responsibilities as Key Function Holder, reports to the General Counsel, who oversees the Legal & Compliance function.

The function also has a reporting line to the Audit and Risk Committee, providing it with regular reports of activity, outcomes and progress against plan. The Committee has oversight of the resourcing of the Compliance plan.

The Compliance function comprises 33 FTE, who operate via a "hub and spoke" model supporting Chubb's activities across the Europe, the Middle East and Africa (EMEA) region. There are specialists in the regional team who have region-wide responsibilities. There are also dedicated local Compliance staff based in offices throughout EMEA who are responsible for compliance activities in a given territory. The local Compliance staff support the delivery of the Compliance Plan and perform core compliance activities such as transactional monitoring, providing advice, and delivering training to staff in their countries or country clusters.

The regional team is organised into the following groups:

- **Compliance Monitoring Team**, which is responsible for monitoring and assessing the adequacy and effectiveness of the measures and procedures in place to comply with regulatory obligations and internal policies at both local and regional levels.
- **Financial Crime Team**, which is responsible for assessing the financial crime risk to Chubb and maintaining a robust financial crime control framework across EMEA, in line with applicable legal and regulatory requirements and Chubb Group standards. Areas covered include sanctions, anti-money laundering & counter terrorist financing, anti-bribery & corruption, non-claims fraud and market abuse.
- **Compliance Policy team**, which is responsible for managing the review process for Compliance frameworks, policies and procedural guidelines. The Policy team also monitors trends and developments in the legal and regulatory environment, undertakes impact assessments and communicates legal and regulatory changes to the business.
- **Compliance Operations Team**, which is responsible for developing and overseeing regional compliance training solutions and works closely with the business and other staff to develop e-learning, topical face-to-face learning modules and briefing sessions. It also co-ordinates the management of Breaches & Incidents across the region.
- **Regulatory Services Team**, which oversees regulatory interactions across the region. It manages all applications and notifications required under fit and proper regimes. It is also responsible for regulatory reporting to UK and French regulators and for managing or overseeing licence applications and renewals.

The Head of Compliance develops and maintains an annual Compliance Plan, which is developed alongside the work of the other assurance functions and agreed with the Audit and Risk Committee. The Plan aligns Compliance function activities with the identified aims of the regulators of the insurance business in the areas in which CEG operates, and seeks to ensure all significant activities and related risks are identified, managed and controlled in line with Board-approved compliance risk appetite and strategic intention. Resources are deployed according to the needs of the plan.

As a component of the Global Compliance function, the CEG Compliance team operates under the Global Compliance Charter, which sets out the fundamental principles, roles and responsibilities of the Compliance function (and its global, regional and local personnel) within the organisation as well as its relationship with executive management, the Board of Directors and the business and operational functions.

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

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### ***B.5.1 Internal Audit Function***

The Internal Audit function is a ‘third line of defence’ assurance function (see section B.1.2 for details) which is independent of commercial business units and other assurance functions. The Head of Internal Audit reports to the Chubb Group Chief Auditor and has a further reporting line to the Audit and Risk Committee.

The team is based principally in London, but carries out audits throughout the geographical areas in which CEG operates. Operational and Information Technology teams perform audits and control walkthroughs of CEG’s operations, identifying key risk exposures and assessing the design and effectiveness of risk management, controls, and governance processes. Audits encompass the reliability and integrity of management and financial information processes; compliance with significant policies, plans and regulations; governance processes and risk management.

In addition to the head office based team described above, the function has access to the following Group resources:

- Global Financial Compliance Team, which coordinates global reporting of the status of internal controls over financial reporting including Sarbanes Oxley compliance. This team reports into the Chief Auditor of Chubb.
- Global Fraud Unit, which investigates potential frauds involving employees and business partners. The Unit also monitors anti-fraud programmes and increases fraud risk awareness among management and employees and performs proactive fraud audits. This team reports into the General Counsel of Chubb Limited.

Internal Audit is entitled to request and receive any information and/or explanations required to achieve its objectives. The function will have full access to all records, personnel or physical property and, without limitation, information and data held within any systems or databases.

An annual risk assessment is carried out in preparation of an Annual Audit Plan (aligning activity in conjunction with the external auditors and other assurance functions, where relevant) taking account of strategic objectives, risk exposures, and the Company’s risk appetites. The Plan is reviewed by the Audit and Risk Committee and approved by the Board. The Audit and Risk Committee has oversight of the resources needed to complete the plan and regularly reviews progress against plan and management’s implementation of Internal Audit’s recommended remediations.

### ***B.5.2 Independence and Objectivity***

CEG’s Internal Audit function performs work in accordance with International Standards for the Professional Practice of Internal Auditing, the code of ethics, and the definitions of internal auditing such as those mandated by the Institute of Internal Auditors. It also operates within the scope of a Group Internal Audit charter that mandates independence from management’s responsibilities and includes a Group level process for review of standards. Internal Audit staff are subject to all ethical principles outlined in the Chubb Code of Conduct.

Internal Audit has unrestricted access to the Board and its committees and regularly meets with the Audit and Risk Committee without management being present.

CEG’s executive management is held directly responsible for maintaining an effective system of governance, risk management, and internal controls, including proper accounting records and appropriate management information, for devising and implementing action plans required to improve governance, risk management,

and controls. In addition, management is responsible for monitoring and reporting on outstanding management action plans agreed in response to Internal Audit reports.

Internal Audit is not responsible for managing the operations subject to audit and will not assume responsibility for the design, implementation, operation or control over any part of business processes or systems.

The Group Chief Auditor is responsible for periodically providing a self-assessment on internal audit activity consistent with the Audit Charter (including purpose, authority, responsibility, IIA Standards and performance relative to its plan. In addition, the Group Chief Auditor will communicate to senior management and the Audit and Risk Committee on Internal Audit quality assurance and improvement programme, including results of ongoing internal assessments and external assessments conducted at least every five years.

## **B.6 Actuarial Function**

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The Chief Actuary, as head of the Actuarial Function, is responsible to the Board, reports functionally and administratively to the Chief Financial Officer, and has an additional reporting line to the Audit and Risk Committee. The function does not make underwriting or reinsurance purchase decisions and is operationally independent from the Risk Management, Compliance and Internal Audit functions. It has unfettered access to information from any part of the business that impacts the risk profile of the Company.

The function supports the business in achieving its overall strategic and risk objectives, by carrying out a number of inter-related activities (Reserving, Pricing, Catastrophe Risk Management, Planning, Portfolio Management, Ceded Reinsurance Analysis, Business Intelligence and Regulatory Reporting) described below. Involvement in this wide range of activities enables the function to provide its required reports on technical provisions, overall underwriting policy, reinsurance adequacy and its contribution to risk management.

**Risk Management:** Given the skill set of the Actuarial Function and its knowledge of the business it is well positioned to work with and support the Risk Management function at Chubb. The Actuarial function plays a key role in contributing to the effective implementation of the risk management system, in particular with respect to the risk modelling underlying the calculation of the capital requirements.

**Reserving:** The reserving process is owned by the Actuarial function and conducted in accordance with agreed terms of reference. The reserves booked for the purposes of financial statements are the responsibility of the Board. The function provides information to the Reserve Committee, an Executive sub-committee, which meets quarterly and arrives at a view of reserves, which is then discussed with management, the Audit and Risk Committee and the Board.

The Actuarial function's role in reserving includes: coordinating the calculation of Technical Provisions as a whole; selecting appropriate methods and assumptions for each element of the reserve calculation; ensuring the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of technical provisions; assessing the sufficiency and quality of the data used in the calculation of technical provisions; comparing best estimate against experience; reviewing sufficiency of reserves; calculation of a range of reasonable estimates; arranging appropriately independent external review and peer review of assumptions and calculations.

**Pricing:** The role of pricing and planning is kept separate from reserving and supports underwriters in the management and segmentation of their portfolios and the implementation and maintenance of a pricing framework appropriate to each line of business.

**Catastrophe Risk Management:** The Catastrophe Risk Management function provides management with information and tools to empower them to understand, quantify and manage their catastrophe exposures. It monitors natural and man-made insurance risk concentration against benchmark risk appetite.

**Portfolio Management:** Members of the Actuarial Function work with the underwriters to understand the drivers of the performance of the book.

**Ceded Reinsurance Analysis:** The Actuarial Function supports the business by assisting with the analysis and pricing of ceded reinsurance.

**Business Intelligence:** The function supports a number of bespoke financial systems and develops systems for data management and reporting.

## **B.7 Outsourcing**

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CEG outsources certain internal administrative functions and the administration of a number of customer service operations for many of its books of business in many of the countries in which it operates. A formal policy has been adopted for control of the risks associated with outsourcing.

### ***B.7.1 Outsourcing Policy***

Outsourcing of all regulated activities is carried out in accordance with an Outsourcing policy. This policy identifies the executive accountable for each stage of completion and approval of the processes connected with outsourcing arrangements, as set out in the policy. These are:

- The completion of a cost benefit analysis
- The completion of a risk assessment that considers financial, operational, conduct and other risks
- The conduct of a due diligence exercise that establishes the performance capabilities of the service provider, and that a satisfactory control environment exists in that provider's operation
- The completion of an appropriate contract, to include performance standards and information requirements
- Ongoing monitoring, in accordance with risk assessments, against contractual terms and continuing risks
- Resolution of any identified adverse incidents
- Periodic reconsideration of the arrangement, using the above criteria
- Consideration of the aggregate risks from outsourcing

The business lines and Claims functions carry out periodic risk-based performance audits of the services provided, and manage any necessary remediation activity arising from those audits.

Compliance by the business with this policy is continuously monitored by the Compliance function.

Aggregated outsourcing risk is monitored by the Risk Management function.

The Internal Audit functions may include periodic assessments of outsourcing arrangements in its activities as part of its risk-based audit plans, as approved by the Audit and Risk Committee.

### ***B.7.2 Activities that Represents Important Outsourcing Agreements***

During 2020, as part of a decision to have a preferred Global partner for transformation and BPO services, the provision of business process outsourced services were successfully transferred from EXL to Genpact, resulting in 2021 being the first full year of service.

Genpact provide business process outsourced services, which is back office in nature, does not involve direct customer interaction and relates to activities that would otherwise be performed in Underwriting, Operations, Claims and Finance.

Genpact provide the following activities for these areas.

#### *Finance*

- Treasury operations: daily cash management
- Reinsurance: raising payments
- Tax: tax return submission and payments
- Finance operations:
  - o Invoice entry
  - o Payment runs
  - o New supplier / bank setup
  - o Query resolution (email and phone)
  - o Indexing
  - o Invoice bookings
  - o Journal uploads
- Credit Control:
  - o Payment raising
  - o Statement reconciliations and remittance management
  - o Statement issuance
  - o Payment approval

#### *Underwriting Operations*

- Account creation/amendment
- Underwriting support processes
- User administration to support Chubb online services
- Multinational & Indigenous new business and renewal bookings
  - Support services for Multinational Inwards business
- New business submissions
- General administration
- Pre-renewal processing
- Provision of French language First Notification of Loss and Indexing services

#### *Claims*

- Registration of new claims

The table below shows the various providers for important activities and the jurisdiction in which the service providers of such functions or activities are located with the exception of Genpact which is describe above :

Outsourced Function	Provider	Nature of Service	Jurisdiction
Treasury	Western Asset Management Company	Provision of investment management services	All Europe
Treasury	PIMCO Deutschland GmbH	Provision of investment management services	All Europe
Treasury	Blackrock (Netherlands)BV	Provision of investment management services	All Europe
Treasury	Goldman Sachs Asset Management LP	Provision of investment management services	All Europe
Treasury	Wellington Management International Ltd (Germany)	Provision of investment management services	All Europe
Treasury	Ares Management Limited (UK	Provision of investment management services	All Europe
Treasury	State Street Bank Intl GmbH	Provision of investment custody services	All Europe

## B.8 Adequacy of System of Governance

CEG has a documented corporate governance framework, the purpose of which is to exercise oversight and control over the management of the business in all its geographical locations and to disseminate key information effectively to the necessary recipients.

The Company has a number of formal committees and sub-committees, described in section B1.1 of this report, which provide oversight over the Company's diverse business units and functions. The heads of the functions and business units report to the Regional President (except for the Actuarial and Internal Audit functions, the former which report via the Regional Chief Financial Officer and the latter reporting to the Chubb Group Chief Auditor and the Audit and Risk Committee).

The Board has approved a number of policies that govern how certain key areas of the business, and the risks inherent to them, are controlled and reported.

Additional oversight and control is obtained via a "three lines of defence" model whereby the Compliance and Risk Management (Second Line) functions monitor key activities independently of the controls and indicators employed by the (First Line) business and functions. Internal Audit (Third Line) carries out further independent testing and reports outside of the First and Second Line structures.

The Board includes as members several non-executive directors to help provide alternative experience and viewpoints and to challenge executive management decisions and the basis on which those decisions are made.

The Board believes these governance arrangements to be appropriate to and effective for the operations that CEG carries out. The Company operates under the supervision of the French regulator, *Autorité de contrôle prudentiel et de résolution*, ( "ACPR"), with its UK operations run through a UK branch which is subject to limited regulation by the Financial Conduct Authority ("FCA").

## **B.9 Any Other Information**

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All material information regarding CEG's system of governance has been described in sections B1 – B7 above.



## C. Risk Profile

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The Risk Management Framework classifies individual risk sources across its landscape into four major categories: insurance, financial, operational and strategic. Insurance is Chubb's primary risk category; the three other risk categories present an exposure primarily from that assumption of insurance risk. Other risks, including group risk and emerging risk are also considered.

Overall, the risk profile has fundamentally remained unchanged with the key aspects of current and forward-looking risk profiles as follows:

- Implication of topical risks emerging in 2021 and beginning 2022 on CEG's activities are carefully monitored and assessed, including economic and social inflation and interest rate, Environmental and Social Governance regulatory requirements (including Climate Changes), and more recently the Russia/Ukraine crisis.

- Insurance Risks: CEG's insurance risk profile continues to be dominated by reserve risk driven by the large reserve exposures from long-tailed business. CEG's underwriting risk is focused on attritional and large loss event activity because of the low net retention business model adopted by CEG where the diverse product lines provide diversification of risk.

Despite challenging macro-economic conditions arising from Covid-19 (decreasing), both underwriting and reserving experience continued to be generally favourable owing to current hard market conditions which is expected to continue throughout 2022 but to plateau from 2023 and onwards. where product performance is continuously monitored to be able to adapt the underwriting approach on a timely basis if needed. Although to a lesser extent than in 2020. Consumer and Personal Lines business segments were impacted by Covid-19 which has disrupted normal customer activities, reflected in lower production targets compared to plan.

- Investment Risk: US and UK government and corporate bond yields rose throughout 2021. Total returns remain positive for the year and whilst increasing yields can result in unrealised losses, the strategy of holding fixed interest securities until maturity mitigates this in the longer term. Increasing yields is viewed as positive as there will be an opportunity to reinvest at a higher rate of return.

Investment markets may see continued volatility due to higher inflation and the response of markets and central banks. The conflict between Russia and Ukraine could also impact markets.

- Operational Risks: CEG is exposed to a range of operational risks which are managed and assessed regularly via the Risk & Control Register and monitored using risk management information. Such risks include premium and reinsurance processing, claims and complaints handling and compliance. No significant issues have been identified or reported to date. Other current operational risk priorities include oversight on continued changes to the CEG operating model, Third and Party Risk, resourcing challenges, and UK Third Country Branch oversight.

From a capital perspective, the breakdown of the SCR by the Internal Model as at 31 December 2021, with a comparison to the Internal Model (IM) SCR as at 31 December 2020 is shown in the below table, where underwriting risk (insurance risk) and market risk continue to be the largest risk sources facing CEG followed by operational risk. Credit risk is a significantly smaller contributor to the total capital requirement. This is predominantly due to the high credit quality of CEG's reinsurers.

<b>Risk Category</b>	<b>As at 31 December 2021 (€000s)</b>	<b>As at 31 December 2020 (€000s)</b>	<b>Movement (€000s)</b>
Insurance Risk	861,776	1,110,854	(249,077)
Market Risk	946,239	869,837	76,403
Credit Risk	177,254	175,841	1,413
Operational Risk (incl. group risk)	236,017	227,876	8,140
Other Risk (incl. pension risk and liquidity risk)	47,568	179,166	(131,599)
Diversification	(921,687)	(959,877)	38,189
<b>Total Solvency Capital Requirement excluding capital add-on</b>	<b>1,347,166</b>	<b>1,603,697</b>	<b>(256,531)</b>
Capital add-on	22,108	9,790	12,318
<b>Total Solvency Capital Requirement including capital add-on</b>	<b>1,369,274</b>	<b>1,613,487</b>	<b>(244,213)</b>

## C.1 Underwriting Risk

### C.1.1 Risk Description

The principal risks from the company's insurance and reinsurance businesses arise from its underwriting activities, both prospective and retrospective. Key risks include unexpected losses arising from inaccurate pricing, fluctuations in the timing, frequency and severity of claims compared to expectations, inadequate reinsurance protection and inadequate reserving.

### C.1.2 Risk Measures and Mitigation

A number of measures are in place to measure, mitigate and monitor underwriting risk. Examples include, but are not limited to, the following:

- Underwriting risks and line sizes are continually monitored. Each underwriter is given an authority based on technical expertise and experience to bind risks that fall within specified classes of insurance and specified maximum limits.
- Formal price monitoring procedures are in place and form part of the standard management statistics. These procedures contribute to the quarterly actuarial review whereby the loss outcome of the underwriting activity is continually re-assessed and considered by the Reserve Committee.
- With such a large and diverse book, it is vital that the aggregate exposures be continually monitored, and adjustments made to the underwriting profile as appropriate. Chubb operates a dedicated catastrophe management function independent of underwriting management, whose responsibility is to model aggregate risk and assist with the pricing of this risk, providing a key control to the underwriting process.
- Reinsurance is used to help mitigate some of the above insurance risk. However, the possibility of reinsurance risk itself arises when reinsurance purchasing either proves inadequate in amount, fails to protect the underlying coverage, or falls short when the reinsurer fails to pay. Refer to section c.3.2.1 for internal reinsurance credit risk mitigation technique.

- The SCR as calculated by the Internal Model includes an assessment and quantification of the underwriting risk exposure.
- Risk and control assessments are carried out throughout the year by management and staff which are subject to review and challenge by Risk Management for the on-going monitoring of the risk profile of the company.
- Specific targeted risk assessments are carried out throughout the year by Risk Management focused on particular areas as initiated by the Risk Management Function, the Audit and Risk Committee, the Board or the business.

As at 31 December 2021, there are no material risk exposures or changes required to the risk mitigation techniques anticipated over the business planning period as those currently in place remain appropriate.

The company has no material exposure to off-balance sheet items.

Insurance risk represents 38% of the undiversified IM SCR as at 31 December 2021 (compared to 43% as at 31 December 2020), where this continues to be driven by non-catastrophe reserving and premium risk and catastrophe risk where applicable.

#### ***C.1.2.1 Reinsurance***

As part of Chubb risk management strategy, the Company purchases reinsurance protection to mitigate its exposure to losses, including certain catastrophies to a level consistent with the risk appetite. Chubb maintains a strict authorised reinsurer list that stratifies authorised reinsurers by classes of business and acceptable limits. This list is maintained by our Global Reinsurance Security Committee. In addition, to the authorised list, there is a formal exception process that allows authorised reinsurance buyers to use reinsurers already on the authorised list for higher limits or other non approved reinsurers for specific purposes.

Reinsurance is purchased on an excess of loss or proportional basis. Excess of loss reinsurance provides coverage to a reinsured where it experiences a loss in excess of its retention level on a single risk or event basis, risk being defined as an insurance coverage. Proportional treaty reinsurance provides proportional coverage to the reinsured, meaning that, subject to event limits where applicable and ceding commissions, the same share of the covered original losses are proportionally shared with the reinsurer as CEG pay in premiums for the covered risks.

CEG regularly review the appropriateness of its reinsurance protections. This may or may not lead to the purchase of additional reinsurance prior to a programs renewal date. In addition, prior to each renewal date, CEG considers how much, if any, coverage it intends to buy and may make material changes to the current structure in light of various factors, including modeled probable maximum loss assessment at various return periods, reinsurance pricing, our risk tolerance and exposures and various other structuring considerations. CEG evaluates the financial condition of our reinsurers and potential reinsurers on a regular basis and also monitors concentrations of credit risk with reinsurers.

#### ***C.1.2.2 Transfer of Risks to Special Purpose Vehicles (“SPVs”) and Fully Funded Principle***

The Global Catastrophe reinsurance programme accesses capacity from traditional reinsurers on an excess of loss basis as well as collateralized reinsurers. The collateralized reinsurers are subject to regulatory oversight from their local regulatory authority, being either the Bermuda Monetary Authority or Guernsey Financial Services Commission.

Each of the collateralized reinsurers are collateralised by a separate Trust Account with Chubb being the sole beneficiary.

### C.1.3 Risk Concentration

The tables below outline the gross written premium based on Solvency II line of business and region, as at 31 December 2021. As the company writes a diverse book of business across a number of underwriting classes and regions, there continues to be no material concentrations of risk as at 31 December 2021.

#### Gross Written Premium based on SII Line of Business as at 31 December 2021 and 2020

SII Line of Business	Gross premiums written €'000	Percentage of total gross written premium	Gross premiums written €'000	Percentage of total gross written premium
	2021		2020	
Income protection	56,688	1%	57,510	1%
Motor vehicle liability	77,016	1%	86,370	2%
Other motor	42,763	1%	39,503	1%
Marine, aviation and transport	644,457	12%	507,177	11%
Fire and other damage to property	2,138,022	39%	1,789,021	40%
General liability	1,800,447	33%	1,385,390	31%
Credit and suretyship	176,592	3%	141,364	3%
Miscellaneous financial loss	495,003	9%	475,032	11%
Non-proportional casualty	5,479	0%	7,862	0%
Non-proportional marine, aviation and transport	4,602	0%	6,376	0%
Non-proportional property	21,413	0%	13,911	0%
<b>Total</b>	<b>5,462,482</b>	<b>100%</b>	<b>4,509,483</b>	<b>100%</b>

## Gross Written Premium based on Geographical Regions as at 31 December 2021 and 2020

Region	Gross premiums written €'000	Percentage of total gross written premium	Gross premiums written €'000	Percentage of total gross written premium
2021			2020	
United Kingdom	2,135,982	39.1%	1,784,792	40%
France	718,926	13.2%	606,239	13%
Germany	462,940	8.5%	391,412	9%
Italy	300,847	5.5%	257,094	6%
Netherlands	369,863	6.8%	292,727	6%
Spain	281,730	5%	250,448	6%
Other countries	1,192,195	22%	926,772	21%
<b>Total</b>	<b>5,462,482</b>	<b>100%</b>	<b>4,509,483</b>	<b>100%</b>

### Gross Technical Provisions based on SII Line of Business as at 31 December 2021 and 2020

SII Line of Business	Gross technical provisions €'000	Percentage of total technical provisions	Gross technical provisions €'000	Percentage of total technical provisions
	2021		2020	
Income protection	34,937	0.5%	35,110	0.5%
Motor vehicle liability	149,160	2.1%	153,769	2.2%
Other motor	(1,465)	0.0%	(741)	0.0%
Marine, aviation and transport	520,040	7.2%	494,993	7.0%
Fire and other damage to property	1,373,616	19.1%	1,027,946	14.6%
General liability	4,345,225	60.3%	4,418,675	62.7%
Credit and suretyship	165,859	2.3%	195,874	2.8%
Miscellaneous financial loss	301,018	4.2%	421,565	6.0%
Non-proportional health	2,304	0.0%	2,213	0.0%
Non-proportional casualty	264,248	3.7%	240,904	3.4%
Non-proportional marine, aviation and transport	31,084	0.4%	30,010	0.4%
Non-proportional property	18,282	0.3%	31,617	0.4%
<b>Total</b>	<b>7,204,308</b>	<b>100%</b>	<b>7,051,935</b>	<b>100%</b>

#### C.1.4 Risk Sensitivity

There is inherent uncertainty in the ultimate cost of claims for which the company uses a variety of different actuarial techniques to estimate the provision for claims outstanding. If the net claims ratio for the year had been higher by 1%, then the profit for the financial year would have been lower by €36 million and the Solvency Capital Requirement would have been higher by €11 million.

## **C.2 Market Risk**

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### **C.2.1 Description**

Financial risk includes a wide range of risks associated with activities such as investments, credit, liquidity, and the impact of foreign exchange fluctuations. Market risk, a type of financial risk is the potential losses from adverse movements in market prices such as interest rates and foreign exchange rates. Other financial risks particularly, credit and liquidity risks are covered below in sections C.3 and C.4 respectively.

### **C.2.2 Risk Measures and Risk Mitigation**

A number of measures are in place to measure, mitigate and monitor market risk. Examples include, but are not limited to, the following:

- The company's Investment Committee functions under terms of reference determined by the Management Committee of the Board and is charged with establishing and effecting an appropriate investment policy. In addition the Committee has the responsibility for recommending the appointment and removal of investment managers, reviewing the managers' performance and reporting on all other material aspects of the investment function.

The Investment Committee has established a broad asset allocation policy which defines the limits for different asset types. The asset allocation cites two major asset classes: investment grade fixed income securities and alternative assets. Alternative assets can include equities, high-yield and emerging market instruments.

- Investment management agreements have been established. The agreements include specific guidelines for each individual portfolio to limit risks arising from duration, currency, liquidity, credit and counterparty exposures. The managers provide quarterly affirmation of compliance with the guidelines. The investment guidelines include specific limits on exposure to individuals to minimise any concentration risk.
- The investment guidelines include restrictions relating to the maximum weighted average duration of the portfolio. The restriction is stated by reference to the permissible duration variance compared to the customised benchmark index by which the external investment managers' performance is assessed. The benchmarks have been established to provide comparable duration to the insurance liabilities.
- Additionally, investment guidelines allow managers to invest a portion of the individual portfolios in securities not denominated in the designated core currency of the portfolio. The investment management agreements stipulate that the majority of any exposure to non-core currencies must be hedged to reduce mismatching risk, and these allocations are reviewed by the Investment Committee.
- The company's exposure to equity price risk is moderated through the asset allocation policy, which limits this category of asset and the investment guidelines. The investment guidelines restrict individual equity holdings relative to the size of the portfolio and the benchmark constituents. No equities were held by the company during the year.
- The Solvency Capital Requirement as calculated by the Internal Model includes an assessment and quantification of the market risk exposure.
- Risk and control assessments are carried out throughout the year by management and staff which are subject to review and challenge by Risk Management for the on-going monitoring of the risk profile of the company.
- Specific targeted risk assessments are carried out throughout the year by Risk Management focused on particular areas as initiated by the Risk Management Function, the Audit and Risk Committee, the Board or the business.

As at 31 December 2021, there are no material risk exposures or changes required to the risk mitigation techniques anticipated over the business planning period as those currently in place remain appropriate.

Market risk comprises of 42% of the undiversified IM SCR as at 31 December 2021 (compared to 34% as at 31 December 2020).

### **C.2.3 Prudent Person Principle**

The assets held by the company are compliant with the Solvency II Directive, specifically, the prudent person principle as applied to market risks. The assets held are appropriately understood and the associated risks have been identified, measured, and taken into account in the company's overall solvency needs assessment. The assets held to meet the MCR and SCR meet the required security, quality, liquidity, and availability. The duration of the assets is closely matched to the liabilities. The company invests in some derivative instruments. All other assets are held by counterparties through vehicles that are subject to a regulated financial market.

### **C.2.4 Risk Concentration**

The table below outlines the Solvency II value of the financial investments as at 31 December 2021 and 2020.

<b>Financial investments</b>	<b>Solvency II value €'000</b>	<b>Solvency II value €'000</b>
	<b>2021</b>	<b>2020</b>
Equities	372,827	284,020
Government bonds	924,998	1,180,217
Corporate bonds and other loans and mortgages	4,544,320	4,276,920
Collateralised securities	559,359	323,243
Collective investment undertakings	50,824	57,309
Derivatives	(9,274)	2,747
Deposits other than cash equivalents	26,612	0
<b>Total investments</b>	<b>6,469,666</b>	<b>6,124,456</b>

Future concentrations of risk anticipated over the business planning period are identified through Market and Liquidity Risk management information which includes information on asset allocations, the year to date performance of asset types and any concerns regarding the investment portfolio.

As the company remains in line with the asset allocation policy and investment guidelines, and no additional concerns have been raised through the Risk management information process, there are no material concentrations of risk anticipated over the business planning period.



### ***C.2.5 Risk Sensitivity***

Sensitivity analysis for interest rate risk illustrates how changes in the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates at the reporting date. To illustrate the downside risk within the fixed income portfolio to at external managers as at 31 December 2021, an increase of 100 basis points in interest yields across all portfolios consecutively (principally Sterling, Euro and US dollars) has been calculated. Such an increase would decrease the market value of the investment portfolio by €320 million and the Solvency Capital Requirement would have decreased by €23million based on impact on investment reduction.

Equity holdings of €373 million represent only a small proportion of the total investment portfolio. If the value of all equity markets in which the company invests decreased by 10%, with all other variables held constant, the total investment return would decrease by €37 million and the Solvency Capital Requirement would have decreased by €8 million.

Sensitivity analysis for currency risk illustrates how a change in the value of Euro against other currencies impacts the balance sheet and SCR. CEG SE balance sheet is dominated in Euro, GBP and USD major currencies. If Euro is weakened by 10% against other currencies and all other variables remained constant, the balance sheet would be strengthened by €230m which reflects the offsetting effect from both assets and liabilities. The Solvency Capital Requirement would have increased by €80 million.

## **C.3 Credit Risk**

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### **C.3.1 Risk Description**

The company is exposed to credit risk, where material sources of this risk arise from investment in asset portfolios, use of reinsurance and involvement with other counterparties. The company relies on both external reinsurance providers and internal reinsurance providers within the Chubb group. Risks associated with internal reinsurance are discussed further within Section C.3.2.1.

### **C.3.2 Risk Measures and Risk Mitigation**

A number of measures are in place to measure, mitigate and monitor credit risk. Examples include, but are not limited to, the following:

- The investment guidelines seek to limit the credit risk of each of the portfolios through specifying eligible/ineligible investments, setting maximum counterparty exposures and setting minimum weighted credit and individual issuer credit quality.
- Reinsurance guidelines are in place to seek to limit the credit risk associated with reinsurance through specifying approved / unapproved reinsurers, setting minimum individual issuer credit quality and setting maximum counterparty exposures by credit quality.
- The Solvency Capital Requirement as calculated by the Internal Model includes an assessment and quantification of the credit risk exposure within the market risk and counterparty default risk calculations.
- Risk and control assessments are carried out throughout the year by management and staff which are subject to review and challenge by Risk Management for the on-going monitoring of the risk profile of the company.
- Specific targeted risk assessments are carried out throughout the year by Risk Management focused on particular areas as initiated by the Risk Management Function, the Audit and Risk Committee, the Board or the business.

As at 31 December 2021, there are no material risk exposures or changes required to the risk mitigation techniques anticipated over the business planning period as those currently in place remain appropriate.

#### **C.3.2.1 Intra Group Reinsurance Credit Risk Mitigation**

The use of intra-group reinsurance, a risk mitigation technique used to mitigate its exposure to losses, is considered a Group risk. Internal reinsurance within Chubb in particular leads to the risk of reinsurance concentration and exhaustion. The main three internal reinsurers are Chubb Tempest Re (CTRe), and ACE INA Overseas Insurance Company Limited (“AIOIC”), and Chubb Bermuda Insurance Limited (CBIL). The latest exposure information is monitored quarterly within the Intra Group Credit Risk Management Information against the Intra Group Risk Appetite statement within Chubb.

A Trust Fund has been set up on behalf of CEG to mitigate the Intra Group credit risk. The Trust Fund is in addition to the existing floating charge arrangement. In accordance with the Trust agreement, the Trust Fund amount can only be reduced either by CEG’s capital going up or CEG’s exposure to Chubb Group entities going down.

Whilst there is technically no current requirement to maintain an amount in the Trust Fund (due to the capital position of CEG), the Trust was valued €771 m as per end of 2021.

### C.3.3 Risk Concentration

The assets bearing credit risk are:

Asset category	Solvency II value €'000	Percentage of total Solvency II value	Solvency II value €'000	Percentage of total Solvency II value
2021			2010	
Investments	6,469,666	59%	6,124,456	58%
Reinsurance recoverables	4,059,254	37%	3,978,156	37%
Insurance and intermediaries receivables	180,007	2%	217,829	2%
Reinsurance receivables	352,115	3%	112,621	1%
Receivables (trade, not insurance)	(131,672)	-1%	181,579	2%
<b>Total assets bearing credit risk</b>	<b>10,929,370</b>	<b>100%</b>	<b>10,614,641</b>	<b>100%</b>

The Standard and Poor's credit ratings for the investments net of accrued interest of €58,086k are shown below:

<b>Asset Category</b>	<b>Investments €'000</b>	<b>Investments €'000</b>
	<b>2021</b>	<b>2020</b>
AAA	351,281	406,340
AA	1,402,501	1,409,918
A	1,528,355	1,503,125
BBB	1,841,148	1,686,801
Below BBB or unrated	1,250,271	1,018,348
<b>Total investments</b>	<b>6,373,556</b>	<b>6,024,532</b>

The average credit quality of investment portfolios using Standard and Poor's ratings remained high throughout the year and at year end was "A". This is comparable to the previous year ("A"). CEG had €372 million equity holdings at 2021 year end (2020: €288 million).

Where appropriate the company seeks to obtain collateral from counterparties to mitigate the credit risk exposure from insurance and reinsurance receivables. At 31 December 2021 the collateral provided to the company totalled €362 million (2020: €299 million).

The maximum exposure of receivables to credit risk at the balance sheet date is the carrying value less any collateral obtained from counterparties. For the purpose of this disclosure 'receivables' comprises 'Reinsurers' share of technical provisions', 'Debtors arising out of direct insurance operations' and 'Debtors arising from reinsurance operations'. At the balance sheet date the maximum exposure of receivables to credit risk was €4,228 million.

The company is exposed to credit risk concentration from internal reinsurance.

### **C.3.4 Collateral Arrangements**

#### **C.3.4.1 Collateral Provided**

##### **Details of collateral arrangements**

<b>Collateral Arrangement</b>	<b>Nature of Collateral</b>	<b>Value of Assets provided €'</b>	<b>Actual and Contingent Liabilities created by Collateral €'</b>	<b>Material Terms and Conditions</b>
Citibank NA Letter of credit facility ("LOC")	Cash and	47.7m	Nil	LOCs to cover Trust Fund and US cedant liability requirements relating to Surplus Lines business written by CEG as an "Alien non-admitted insurer".

#### **C.3.4.2 Collateral Held**

As at 31 December 2021, collateral provided to the company comprised of:

##### **Details of collateral arrangements**

<b>Collateral Arrangement</b>	<b>Value of collateral held €</b>	<b>Material Terms and Conditions</b>
Letter of credit	309 835 318	Clean, irrevocable and evergreen
Trust fund	27 062 369	Ring-fenced for beneficial ownership of CEG
Cash	3 317 166	Held in separately identifiable Chubb bank account
Surety	22 254 194	The surety can be claimed on the occurrence of any one of a list of default events
<b>Total</b>	<b>362 469 047</b>	

CEG does not sell or re-pledge collaterals.

### **C.3.5 Risk Sensitivity**

There are no sensitivity tests in respect to credit risk and this risk is predominantly impacted by concentrations of risk. Sensitivity in respect to credit spread risk is covered in section c.2.5 Risk Sensitivity.

## C.4 Liquidity Risk

### C.4.1 Risk Description

Liquidity risk is the potential that the company is unable to meet its payment obligations as they fall due.

### C.4.2 Risk Measures and Risk Mitigation

A number of measures are in place to measure, mitigate, and monitor liquidity risk in addition to those described above for market risk. Examples include, but are not limited to, the following:

- The company maintains funds in the form of cash or cash equivalents to meet known cash flow needs.
- The asset allocation policy and the investment guidelines are structured in order to ensure that funds are predominantly held in readily realisable investments.
- The company also benefits from Chubb Limited Group letter of credit facilities which are available to meet certain funding needs if required, although no such facilities are currently utilised by the company.
- The company participates in a notional pooling programme with other Chubb Limited Group companies enabling the company to access immediate short term liquidity.
- Risk and control assessments are carried out throughout the year by management and staff which are subject to review and challenge by Risk Management for the on-going monitoring of the risk profile of the company.
- Specific targeted risk assessments are carried out throughout the year by Risk Management focused on particular areas as initiated by the Risk Management Function, the Audit and Risk Committee, the Board or the business.

As at 31 December 2021, there are no material risk exposures or changes required to the risk mitigation techniques anticipated over the business planning period as those currently in place remain appropriate.

### C.4.3 Risk Concentration

The bulk of CEG's investment portfolio is held in highly liquid instruments. As at 31 December 2021, a significant portion of the company's investment portfolio is held in cash, cash equivalent or highly rated sovereign and corporate fixed income securities which provides a material margin over and above planned operating cash flows.

Actual concentrations of risk anticipated over the business planning period are identified through the quarterly Market and Liquidity Risk management information which includes the following as at 31 December 2021:

Liquidity Risk Management Information	2021	2020
Available "free funds" €	6.6b	6.3b
Percentage of unencumbered assets within total investment portfolio	98.7%	98.2%
Liquidity concentration: percentage of alternatives within existing "free funds"	17.8	16.3%

As the company remains in line with the asset allocation policy and investment guidelines, and no additional concerns have been raised through the Risk Management Information process, there are no material concentrations of risk anticipated over the business planning period..

#### ***C.4.4 Risk Sensitivity***

Liquidity is assessed through the stress and scenario testing framework. The liquidity test measures the potential impact on liquidity in the aftermath of an event. The stress testing carried out throughout the year supports the adequacy of the liquidity positions adopted by the company.

#### ***C.4.5 Expected Profit Included in Future Premium (“EPIFP”)***

The EPIFP as at 31 December 2012<sup>1</sup> is €582,593k.

## **C.5 Operational Risk**

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### **C.5.1 Risk Description**

Operational risk is the possibility of loss resulting from inadequate or failed internal processes, people or systems, or from external events other than those falling within strategic risk as defined below. Significant operational risk sources include claims processing, IT security, outsourcing and vendor management, business continuity, fraud, and regulatory compliance (including conduct risk).

### **C.5.2 Risk Measures and Risk Mitigation**

A number of measures are in place to measure, mitigate and monitor operational risk. Examples include, but are not limited to, the following:

- A number of company-wide frameworks have been established and implemented to identify, measure, mitigate, and monitor operational risks across the company. The frameworks range from information security risk and business continuity risk to conduct risk.
- Operating guidelines established for each business function across the company seek to minimise operational risks arising from internal processes or systems.
- Corporate policies established including the Code of Conduct, recruitment, learning and development, disciplinary and grievance, diversity and equal opportunities seek to minimise people-related operational risks. These policies are supported through a company-wide performance management process and on-going company-wide training.
- The SCR as calculated by the Internal Model includes an assessment and quantification of the operational risk exposure.
- Risk and control assessments are carried out throughout the year by management and staff which are subject to review and challenge by Risk Management for the on-going monitoring of the risk profile of the company.
- Specific targeted risk assessments are carried out throughout the year by Risk Management focused on particular areas as initiated by the Risk Management Function, the Audit and Risk Committee, the Board or the business.

As at 31 December 2021, there are no material risk exposures or changes required to the risk mitigation techniques anticipated over the business planning period as those currently in place remain appropriate.

### **C.5.3 Risk Concentration**

There are no risk concentrations in respect of operational risk.

### **C.5.4 Risk Sensitivity**

Operational risk is assessed through the stress and scenario testing framework. The stress testing carried, which includes a number of operational risk events, supports the adequacy of the current capital and liquidity positions adopted by the company in the event of adverse operational events.



## **C.6 Other Risks**

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The company's risk profile also considers strategic and group risks.

Strategic risk refers to the outcome from sub-optimal decisions that may be made or not made in respect of strategic planning, execution of strategy or responsiveness to changes in industry or competitive landscapes.

The Board is responsible for the management of strategic risks by approving the strategic and annual plans. The Board also receives updates on the execution of the plan with reports produced to monitor and track business performance against the approved plan.

Group risk is the potential impact on the company of risks arising in other parts of the Chubb Limited Group. This could include direct or indirect financial loss and operational, reputational or regulatory issues. As a strategically important member of the Chubb Limited Group, the company uses Group resources in a number of areas, including IT and asset management, as well as reinsurance and capital support.

Group risk is assessed, monitored and reported as part of the company's risk management processes. Additionally, contractual intra-group arrangements are governed in an appropriate arms-length manner. They involve formal contracts, equitable and transparent transfer pricing, and full respect for the integrity thereof, as well as all laws and regulations facing the legal entities in question.

## **C.7 Any Other Information on Risk Profile**

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No other risks over and above those discussed above have been identified for CEG.

## **C.8 Material Risk Exposures**

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Material risk exposures are monitored continuously by CEG. Exposures are reviewed in the following areas:

- Investment exposures, by sector, asset type, country and top 10 corporate investment holdings;
- Underwriting exposures, by product line, region, external reinsurers and top 10 intermediaries;
- Underwriting Catastrophe exposures;
- Reserve exposures.

As at 31 December 2021, there were no material risk exposures anticipated over the business planning horizon over and above the risks described in Sections B.3.5 and C.1 to C.7. Covid 19 pandemic continues to be monitored but is not deemed to be material for CEG given the developments in 2021.

At the time of writing this report, the Russia/Ukraine crisis has taken a dramatic turn with the launch of an offensive attack by Russia on the entire territory of Ukraine as from 24 February 2022. This situation is causing instability in the region and potentially across Europe. Escalation of the situation has resulted in US, UK & EU severe economic sanctions being imposed on Russia, including SDN (Specially Designated Nationals), the wholesale embargo of Russian importations and on the international banking system, restricting the movement of capital. The crisis will also have implications on underwriting exposures, with supply chain disruptions and resultant inflation impacting economic assumptions. CEG has limited exposure as direct Russian domiciled business is not written, and has no exposure to Russian or Ukrainian bonds. At this stage, underwriting exposures are hard to quantify to any degree of certainty; however, the war is expected to lead to potential claims across marine, political risk and trade credit insurance, aviation, political violence, war and terror. Significant reinsurance protection is anticipated to reduce aggregate losses for CEG.

## D. Valuation for Solvency Purposes

### D.1 Assets

The valuation of the assets on the Solvency II balance sheet is as follows:

As at 31 December 2021	Solvency II €'000	FR GAAP €'000	Variance €'000
	2021	2021	2021
Deferred acquisition costs	0	323,292	(323,292)
Intangible asset – software	0	130,818	(130,818)
Deferred tax assets	22,200	0	22,200
Property, plant & equipment held for own use	18,682	18,682	(0)
Investments (other than assets held for index-linked and unit-linked contracts)	5,970,304	5,673,474	296,830
Loans and mortgages	512,833	487,537	25,296
Reinsurance recoverables	4,059,254	5,159,424	(1,100,170)
Insurance and intermediaries receivables	180,555	1,184,390	(1,003,835)
Reinsurance receivables	352,115	702,513	(350,399)
Receivables (trade, not insurance)	(150,354)	(128,168)	(22,186)
Cash and cash equivalents	539,406	333,425	205,982
Other assets	42,858	101,001	(58,143)
<b>Total assets</b>	<b>11,547,853</b>	<b>13,986,388</b>	<b>(2,438,535)</b>

The valuation for Solvency II purposes by material class of assets is as follows:

#### D.1.1 Deferred Acquisition Costs (“DAC”)

Acquisition costs are deferred under FR GAAP and expensed in line with the earning of the corresponding premiums. However under SII, intangible insurance assets such as DAC are ascribed a value only when they can be sold separately and when there are quoted prices in an active market for the same or similar assets. The company has no intangible assets which meet these criteria and so all potential intangible assets (including DAC) are valued at nil.

### ***D.1.2 Deferred Tax Assets and Liabilities***

Under Solvency II, provision is made for deferred tax liabilities, or credit taken for deferred tax assets, using the liability method, on all material temporary differences between the tax bases of assets and liabilities and their carrying amounts at the reporting date. Under French GAAP, no allowances are made for deferred tax assets at all. The commentary below however is focussed on the deferred tax impact of Solvency II adjustments, since these are significant.

The rates enacted, or substantively enacted, at the reporting date are used to value the deferred tax assets (“DTAs”) and liabilities. DTAs are recognised to the extent that it is probable that future taxable profit will be available against which the temporary difference can be utilised.

The principal temporary differences arise from valuation differences arising under the Solvency II regime for the technical provisions. As the company used French GAAP accounting principles in 2019, differences between Solvency II and French GAAP valuation bases are subject to deferred tax. Other temporary differences arise from the depreciation of property and equipment.

### ***D.1.3 Intangible Assets - Software***

Intangible assets are software costs that are amortised under French GAAP and written-off on a straight line basis over their estimated useful lives. However, under Solvency II, intangible assets are ascribed a value only when they can be sold separately and when there are quoted prices in an active market for the same or similar assets. The company has no intangible assets which meet these criteria and so all intangible assets are valued at nil.

### ***D.1.4 Property, Plant and Equipment held for Own Use***

Under Solvency II basis, where it is found that an active market exists, amounts are presented at fair value, which is the independently assessed market value, or a suitable proxy. In the unlikely event that no market value or suitable proxy exists, a value of nil is ascribed. This differs from French GAAP which follows a depreciated cost model. Given the materiality of the amounts involved for land & buildings, a prudent basis option has been taken from the two options available under Solvency II, to assume a nil value for land & buildings.

Excluding land & buildings and software, the carrying value of the other fixed assets is not considered to be materially different to their fair value. No automated valuation model method for PPE needs to be disclosed.

### D.1.5 Investments

Investments comprise the following:

<b>As at 31 December 2021</b>	<b>Solvency II €'000</b>	<b>FR GAAP €'000</b>	<b>Variance €'000</b>
	<b>2021</b>	<b>2021</b>	<b>2021</b>
Equities	372,827	354,437	18,390
Government bonds	924,998	879,372	45,627
Corporate bonds and other loans and mortgages	4,544,320	4,320,165	224,155
Collateralised securities	559,359	531,768	27,591
Collective investment undertakings	50,824	48,317	2,507
Derivatives	(9,274)	(8,773)	(501)
Deposits other than cash equivalents	26,612	25,299	1,313
<b>Total investments</b>	<b>6,469,666</b>	<b>6,150,585</b>	<b>319,082</b>

#### Investments (excluding derivatives)

Investments are recognised at fair value with any transaction costs being expensed as incurred. The fair value is inclusive of any interest accrued thereon.

For quoted investments where there is an active market, the fair value is their quoted bid price at the balance sheet date. For quoted investments where there is no active market, the fair value is determined by reference to prices for similar assets in active markets.

In relation to investments for which pricing is unobservable, the fair value is obtained from models and / or third parties. Valuation models are approved prior to use by the Chubb Group's specialist asset management function and are reviewed on a quarterly basis for ongoing appropriateness.

Within this account line, assets such as Government Bonds have an active market and therefore the fair value is based on the quoted market prices.

For investments that trade in less active markets, including corporate securities, prices are sought from independent specialist third parties (e.g. IDC and Bloomberg). The significant inputs to pricing used by these third parties include, but are not limited to, yield curves, credit risks and spreads, measures of volatility, and prepayment speeds.

Significant uncertainty would be considered to exist in relation to pricing based on unobservable inputs. However, for CEG this uncertainty is considered to be immaterial as the exposure to these types of assets is insignificant – typically less than 0.5% of the investment portfolio.

Deposits (non-cash equivalent) are deposits that cannot be used to make payments at any time without any kind of significant restriction or penalty. Deposits are valued using the effective interest rate method. These are typically deposits which are not redeemable on demand, but within a period of less than 3 months, with only an insignificant change in fair value.

In addition, certain parts of CEG's investment portfolio are restricted in that they can only be used to settle specific liabilities. An example of this is where CEG writes inwards assumed business and cedant requires some form of collateral as credit risk mitigation. This collateral is issued through facilities with partner banks. Where there are excess assets in these facilities which may not be immediately available back to CEG they are deducted from CEG's balance sheet. This amounted to € 46.4k at 31 December 2021 and is discussed within section E.1.5.

The difference between SII value and French GAAP value for investments is as a result of the following:

Variance	2021 €'000
Accrued interest included in "Other Assets under FR GAAP (see section D.1.10)	58,143
Unrealised gains on investments – FRGAAP recorded at Book Value	260,939
<b>Total</b>	<b>319,082</b>

#### ***D.1.5.1 Derivatives***

Derivative financial instruments are used to hedge the company's exposure to foreign exchange risk and interest rate risk arising from investing activities.

For both French GAAP and Solvency II purposes, derivative financial instruments are measured on initial recognition, and subsequently, at fair value. Fair values are obtained from quoted market prices in active markets, including recent market transactions, and valuation techniques as appropriate. Derivatives are presented as assets when the fair value is positive and as liabilities when the fair value is negative.

The fair value of interest rate swaps is the estimated amount that the company would receive or pay to terminate the swap at the balance sheet date, taking into account current interest rates and the creditworthiness of the swap counterparties.

The fair value of forward exchange contracts is their quoted market price at the balance sheet date.

#### ***D.1.6 Loans and mortgages***

This balance classifies a bank loan portfolio measured at fair value.

#### ***D.1.7 Reinsurance Recoverables***

For Solvency II, this balance includes the reinsurers' share of the claims provisions and the reinsurers' share of the premium provision.

The Solvency II basis for the valuation of technical provisions is fundamentally different to that for French GAAP purposes. Refer to section D.2 for further details on Technical Provisions.

#### ***D.1.8 Insurance, Reinsurance and Intermediaries Receivables***

The French GAAP valuation basis recognises all receivables due under insurance contracts. However, for Solvency II, where receivables are considered to be not yet due they are included within the technical provisions for Solvency II purposes. Refer to section D.2 for further details on Technical Provisions.

#### ***D.1.9 Receivables (Trade, not Insurance)***

These balances largely represent amounts receivable from fellow group companies. The amounts presented are considered to be representative of fair value as these are the amounts which must be received in order to settle the obligation.

#### ***D.1.10 Cash and Cash Equivalents***

Cash at bank and in hand are repayable on demand and as such their carrying values are equivalent to fair values. However, the difference of €205,982 k represents cash overdraft gross up as cash overdraft is not netted under Solvency II basis (see section D.3.5 for cash overdraft).

#### ***D.1.11 Any other assets, not elsewhere shown***

These balances largely represent prepayments and are therefore representative of services paid for but not supplied. The valuation is considered to be representative of fair value. The difference between Solvency II value and French GAAP value is as a result of accrued interest on investments that were included in other assets under French GAAP. However under Solvency II regime this is reclassified to investments (refer to section D.1.5.1).

#### ***D.1.12 Changes to Valuation of Assets in the Period***

There have been no changes to CEG's methodology for recognition and valuation of assets during the reporting period.

#### ***D.1.13 Major Sources of Estimation Uncertainty***

Major sources of estimation uncertainty are related to the recognition of deferred tax assets (refer to section D.1.2 for details) and reinsurance recoverables (refer to sections D.1.6 and D.2.4).

## **D.2 Technical Provisions**

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The value of technical provisions for solvency purposes, as at 31 December 2021, based on Solvency lines of business was as follows:

SII Line of Business	Gross premium provision	Gross claims provision	Gross best estimate	Ceded premium provision	Ceded claims provision	Net best estimate	Risk margin	Total Gross + Net Risk Margin	Total Net
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Income protection	76	34,861	34,937	492	13,232	21,213	1,233	36,170	22,446
Motor vehicle liability	14,911	134,249	149,160	3,874	67,650	77,636	7,928	157,089	85,565
Other motor	(6,050)	4,584	(1,465)	(13)	3,314	(4,766)	451	(1,014)	(4,315)
Marine, aviation and transport	76,972	443,069	520,040	8,521	195,057	316,463	30,591	550,632	347,054
Fire and other damage to property	(199,364)	1,572,980	1,373,616	(51,275)	1,131,116	293,776	54,925	1,428,542	348,701
General liability	79,692	4,265,532	4,345,225	61,710	1,852,814	2,430,700	181,673	4,526,898	2,612,373
Credit and suretyship	17,807	148,052	165,859	10,929	118,614	36,315	23,346	189,205	59,662
Miscellaneous financial loss	(43,733)	344,751	301,018	228	390,814	(90,024)	8,335	309,354	(81,688)
Non-proportional health	0	2,304	2,304	0	1,735	569	8,335	2,336	601
Non-proportional casualty	13,494	250,754	264,248	6,960	217,132	40,156	3,410	267,658	43,566
Non-proportional marine, aviation and transport	2,199	28,884	31,084	224	13,189	17,670	546	31,629	18,216
Non-proportional property	1,840	16,442	18,282	546	12,391	5,345	363	18,645	5,708
<b>Total</b>	<b>(42,155)</b>	<b>7,246,463</b>	<b>7,204,308</b>	<b>42,197</b>	<b>4,017,058</b>	<b>3,145,053</b>	<b>312,836</b>	<b>7,517,144</b>	<b>3,457,890</b>



### ***D.2.1 Summary***

The technical provisions are calculated as a best estimate and a risk margin. The best estimate is based on probability-weighted cashflows with consideration for the time value of money and considers all cash inflows and outflows. The risk margin is assumed to be the amount required for a commercial external party to take over and meet the (re)insurance obligations and represents the cost of providing eligible own funds equal to the SCR necessary to support these obligations.

The technical provisions are calculated gross of reinsurance with appropriate allowance for reinsurance recoveries.

- Consideration is given to the time delay between recoveries and direct payments.
- An allowance is made for potential default of counterparties.

The technical provisions calculations do not apply the matching adjustment, volatility adjustment, or transitional measures referred to in Articles 77b, d and 308c, d of Directive 2009/138/EC.

### ***D.2.2 Best Estimate Liabilities (“BEL”)***

The technical provisions calculation considers all future cashflows relating to all in force policies as well as bound but not yet incepted policies, including:

- All expenses, inflation and claim payments in line with policy terms and conditions, including reported but not paid claims from the GAAP balance sheet.
- All premiums from policyholders and all premiums to reinsurers, including reported but not received or not yet due premiums from the GAAP balance sheet.
- Financial guarantees and contractual options; however, these are considered to be immaterial in the context of CEG’s overall technical provisions and so no additional allowance is held in respect of this.

The claim payment estimates, including the cost of claims handling costs, which are used in the claims and premium provision calculations, are based on the latest Actuarial Central Estimates (“ActCE”) of ultimate claim cost. ActCE are a core part of Chubb’s GAAP reserving process. The intended purpose of the ActCE is to provide management with an actuarial assessment of liabilities. Management may book a different value to the ActCE liability for GAAP purposes, taking into account further information to supplement the ActCE in forming their best estimate view for the booked reserves.

ActCE are adjusted upwards for Solvency II technical provisions purposes in recognition that Events Not in Data may not be captured within the core ActCE actuarial analysis. This acknowledges that the best estimate of claim costs may be from a distribution of claim outcomes that is wider than allowed for in the ActCE calculation, particularly in respect of adverse outcomes. The statistical calculation of this adjustment is underpinned by the assumption that events beyond 1 in 100 return periods are not allowed for in the initial analysis.

The reinsurers’ share of the Claims and Premium Provisions is based on the current and historic reinsurance programmes in place for each class of business. It reflects recoveries for reported loss events, either recorded on Chubb’s systems or estimated, plus statistical recovery estimates for not yet reported loss events. The reinsurers’ share further allows for the estimated irrecoverable amounts, estimated using a transition matrix between S&P ratings to project the closing rating of each reinsurer and associated probability of default at each future time point. This methodology is applied to reinsurance counterparty default risk only, as premium creditors are not considered to be material.

The cashflow projections take account of all cash inflows and outflows that comprise the claims and premium provisions. Where deemed appropriate the cashflows take account of delays in reinsurance cashflows relative to the outwards cashflows. Cashflow analyses are performed at a granular class of business level so that different cashflow timing characteristics for each class are recognised. The analyses are based on statistical methods applied to the past data for each item, or data for closely related items.

Discounting of the projected Solvency II cashflows is performed at a currency level using the European Insurance and Occupational Pensions Authority (“EIOPA”) provided yield curves which represents a further difference to the GAAP reserves which are not discounted.

### ***D.2.3 Risk Margin***

The risk margin is calculated using the cost-of-capital approach. This means that the risk margin is calculated as the present value, at a risk free rate of interest, of the expected cost incurred in raising capital to fund the SCR relating to the transferred liabilities until such time as they are fully run-off.

The SCR at time zero for use in the risk margin calculation is derived using the internal model consistent with a run-off scenario, excluding any allowance for future business not currently included within the Technical Provisions. Non-reinsurance counterparty default risk and all market risk are excluded as a matching asset portfolio is assumed. Future period SCRs are then calculated using a simplified proportional method applied to the SCR at time zero. Under this method the SCR reduces in line with the reduction in the technical provisions. Future SCRs are discounted at the prescribed EIOPA rate. The assumed cost of capital is 6% pa as prescribed by EIOPA.

### ***D.2.4 Actuarial Methodologies and Assumptions***

The methods and assumptions described below are consistent across all lines of business unless explicitly stated otherwise.

#### ***Gross Ultimate Claims***

The gross ultimate claims are projected using a combination of:

- Paid and Reported Chain ladder (“CL”)
- Initial Expected Loss Ratio “IELR”
- Reported Bornhuetter-Ferguson Method (“BF”)
- Average Cost Per Claim
- Cape Cod Method
- Frequency/Severity Approach
- Expert Judgement.

The actual selected method may vary by origin year and line of business. For example, for long-tailed classes a lack of data in the most recent origin years may require significant weight to be given to the IELR. For the maturing origin years where loss experience has begun to emerge a BF approach may be taken. Mature origin years may be heavily weighted towards the experience and based on the CL. In addition, expert judgement is applied across these methods in the selection of assumptions, selection of the ultimate loss and the selection of the results based on one or more of these reserving methods.

The projection is carried out in converted US dollar across all reserving lines. The projection is undertaken by origin year cohort and carried out separately for attritional, large and catastrophe claims.

For each of the claims identified as Major Issues claims (typically claims/events with significant uncertainty in the gross loss amount), the claims department provides a best estimate view of the ultimate loss for booking purposes. Any costs of claims incurred but not reported reserve (“IBNR”) generated as part of this process may be allowed for in addition to that generated by the methods listed above.

There may also be occasions where a large loss is not booked in time for the data capture of the analysis or it occurs during the period of the analysis. In this case consideration is given as to whether to include an explicit estimate for the loss as additional IBNR.

## ***Net Ultimate Claims***

This is covered in the 'Reinsurance' section below.

## ***Salvage and Subrogation***

The claims data used for estimating the gross ultimate claims are net of salvage and subrogation recoveries. There is therefore no explicit allowance for these recoveries in the estimation of gross ultimate claims for any claim type but there is an implicit allowance for salvage and subrogation recoveries in the projection methods used for estimating the gross reserves.

## ***Premium Projection***

For Chubb Europe the ultimate premium assessments are performed by the actuarial function typically using an actuarial method from the Gross Ultimate section above. The ultimate premium for the current year may alternatively be set by reference to the latest Financial Planning/Forecasting analysis.

For CGM the ultimate premium for the latest three underwriting years is obtained from the underwriters who set it by reference to the Expected Premium Income ("EPI"). For earlier underwriting years, EPI is taken to be the ultimate premium.

Expert judgement is applied across these methods in the selection of assumptions, selection of the ultimate premium and the selection of the results based on one or more of these projection methods.

## ***Options and Guarantees***

CEG consider the financial impact of options and guarantees to be immaterial. Hence no impact from options and guarantees has been allowed for in the technical provision valuation. Essentially, CEG is not aware of any policyholder options in the business written. The guarantees within the contracts written are mainly in respect of profit sharing via profit commission, return of premium and no claims bonuses upon renewal, the cost of which are implicitly included in the BEL.

## ***Events Not in Data ("ENIDs")***

A truncated distribution approach has been used to estimate the uplift factor for each reserving class to allow for ENIDs. The same factor is applied to the claims and premium provision.

## ***Expenses***

CEG has identified and allowed for expenses in accordance with the EIOPA and other regulatory guidelines. These expenses are considered to be incurred in servicing existing policies during their lifetime. The main expense categories include:

- Administrative expenses including overhead costs
- Acquisition expenses
- Claims management expenses including claims handling expenses
- Investment management expenses.

Inflation is implicitly included in expense assumptions in so much as the premiums and claims to which the calculated expense ratios are applied contain an inflationary allowance.

### ***Bad Debt***

This is estimated using a methodology which takes the S&P rating as the starting point. A transition matrix between S&P ratings is used to project the closing rating of each reinsurer and associated probability of default at each future time point. Expected default rates are applied to the best estimate of ceded claims reserves to estimate the bad debt provision for inclusion in Solvency II technical provisions. This methodology is applied to reinsurance counterparty default risk only as premium creditors are not considered to be material.

### ***Discounting***

Discounting of cashflows is performed at a currency level using yield curves provided by EIOPA.

### ***Contract Boundaries***

The following are considered to be the main sources of inwards bound but not incepted (legally obliged) business:

- Pipeline business – relates to policies where there is a delay between the written date and the date of inception that crosses over the balance sheet valuation date.
- Quota Share reinsurance – relates to policies where the quota share treaty (typically for a 1 year term) has been written but the underlying policies to be written by the insured during the term have not yet either been written or incepted .
- Tacit renewals – annual policies that renew automatically unless the Insured or CEG have given notice of cancellation as required 2 or 3 months before the anniversary date.

There is also an allowance for contractual obligations relating to outwards reinsurance contracts. Where a reinsurance contract has a minimum premium (typically excess of loss) and is contractually bound (whether or not it has incepted) then the full contractual minimum premium cost is allowed for, even where this exceeds the reinsurance cost in relation to the corresponding inwards policies included within the technical provisions.

### ***Risk Margin***

Refer to section D.2.3 for details.

### ***Reinsurance***

Net ultimate claim and premium amounts are calculated using a deterministic approach, based on applying netting down factors to gross ultimates. This approach is justifiable since:

- It is commonly used by other participants in the market;
- The netting down factors are supported by detailed modelling of the reinsurance programme; and
- The reinsurance data is considered appropriate, complete and accurate.

Reinsurance recoverables are calculated as part of the core reserving and technical provisions calculation exercises. The core reserving exercise uses a netting down approach applied to the best estimate ultimate gross claim and premium amounts to determine the reinsurance amounts for each component. These calculated reinsurance components flow into the technical provisions alongside the gross components.

Reinsurance recoveries on specific individual claims are based on detailed review of the underlying reinsurance programmes. In respect of general reserves, the assessment of recoveries may be performed separately for each type of reinsurance (facultative, quota share, excess of loss risks attaching during basis, excess of losses occurring during basis, whole account) or else at an aggregate level for the granular reserve portfolio being considered. Reinsurance recoveries are assessed using a combination of expert judgment, emerging experience and initial expected recovery ratios from the pricing/planning team.

### ***D.2.5 Level of Uncertainty associated with the Value of the Technical Provisions***

The estimates of ultimate premiums and claims relate to an uncertain future process. The actual outcome could differ materially from the estimates presented in this report, in particular the ultimate claim amounts.

To project the ultimate level of claims, assumptions are made about the future, including claims events which have not yet occurred, future economic conditions and court awards yet to be made. One of the key assumptions underlying the standard actuarial techniques referred to in this report is that the past experience is stable and provides a good indication of future claims experience.

There are a variety of reasons why this may not hold, for example:

- Past changes in:
  - the nature of the business written within a class;
  - policy coverages; and
  - claims handling procedures, which have not been explicitly factored into our assumptions.
- Future changes in:
  - socio-economic conditions;
  - underlying claims frequency and/or severity;
  - underlying legislation;
  - court interpretation of policy wordings or coverages; and
  - claims payment and reporting patterns.

As of 2021 year end, the uncertainty around future socio-economic conditions is particularly relevant given the on-going uncertainty relating to the global impacts of Covid-19 and the more local impacts for Continental Europe and the UK of Brexit. No explicit changes to the assumptions underlying the calculation of the technical provisions have been made for the potential impacts of these events but implicit allowances are included in the selected future loss ratio assumptions used in estimating the unearned technical provisions.

As a result, the actual outcome of the ultimate claims or premiums could differ substantially from the assumptions made. The reserve risk charge provides a measure of the amount of uncertainty in relation to reserves. Notwithstanding this, given the diverse nature of the book and size of CEG's business, there is no notable uncertainty in the gross reserves beyond that expected for a large P&C insurer. Further, the extensive external and intra-group reinsurance protections in place reduce gross uncertainty materially.

Whilst claims reserves (earned and unearned) are the most significant element of SII technical provisions, there are other areas of uncertainty such as future expenses and risk margin.

The allowance for future administrative expenses (including overhead costs), acquisition expenses and claims management expenses (including claims handling expenses) on a SII basis introduces an element of uncertainty as there are many factors which could influence the size of each.

In addition, a key assumption in the calculation of the risk margin is the assumed run off of the SCR over future time periods. A change in this assumption could have a material impact on the quantum of the risk margin.

Sensitivity tests have been performed on a range of assumptions and expert judgements underlying the technical provision calculations to identify the key areas of risk and the material elements of the technical provisions. The tests and their resulting percentage change to the total technical provisions are summarised below:

Assumption Tested	Description of Test	Impact - % Increase/(Decrease) of CEGSE TPs
Yield Curve	Increase all spot rates by 1%	-3.0%
Yield Curve	Decrease all spot rates by 1%	3.2%
ENID	Assumed distribution truncation point of 1 in 40 for all classes	1.3%
Inflation	Increase cashflows in future years by 2% pa compounded	5.2%
Inflation	Decrease cashflows in future years by 2% pa compounded	-4.7%
Claim Reserve (CP & PP)	Booked reserves instead of ActCE included	8.5%
Claim Reserve (CP & PP)	Current Year Loss Ratio - realistic low alternatives (material classes only tested) - 20% reduction*	-9.5%
Claim Reserve (CP & PP)	Current Year Loss Ratio - realistic high alternatives (material classes only tested) - 20% increase*	9.5%
Claim Reserve (CP)	10% additional Attritional Tail Development for Casualty and Financial Lines*	8.4%
Claim Reserve (CP)	12 month Attritional Development Pattern Lag for Casualty and Financial Lines*	3.9%
Claim Reserve (CP)	Reduction (-25% of difference between best and low estimate) in Major Issue IBNR*	-2.0%
Claim Reserve (CP)	Increase (+25% of difference between best and high estimate) in Major Issue IBNR*	3.8%
Admin Expense	Increase Admin Expense assumption by 20%*	1.1%
UCER	Increase UCER assumption by 20%*	1.0%
Commission	Increase Gross Commission Expense assumption by 20%*	2.0%
Acquisition	Increase Non Commission Acq Expense assumption by 20%*	0.0%
Legally Obligated	Double Legally Obligated Premium*	-1.2%
Legally Obligated	Assume 0 Legally Obligated Premium*	1.2%

\* Test performed on partial portfolio

\*Test performed on partial portfolio

The tests show that the technical provisions are most sensitive to changes in assumptions relating to both the earned and unearned claims reserves. This is in line with expectations since these comprise the largest part of the technical provisions and are subject to considerable uncertainty with a large amount of expert judgement applied in their estimation.

### ***D.2.6 Solvency II and GAAP Valuation Differences of the Technical Provisions by Material Line of Business***

The table below shows a reconciliation of the French GAAP valuation of insurance contract liabilities to the Solvency II technical provisions, split by line of business, as at 31 December 2021:

<b>SII Line of Business</b>	<b>Gross French GAAP TPs</b>	<b>Solvency II adjusts</b>	<b>Gross Best estimate</b>	<b>Add risk margin</b>	<b>Total Gross TPs</b>	<b>Reins. Recover.</b>	<b>Net TPs</b>
	<b>€'000</b>	<b>€'000</b>	<b>€'000</b>	<b>€'000</b>	<b>€'000</b>	<b>€'000</b>	<b>€'000</b>
Income protection	29,072	(5,865)	34,937	1,233	36,170	13,724	22,446
Motor vehicle liability	407,211	258,051	149,160	7,929	157,089	71,524	85,565
Other motor	14,448	15,913	(1,465)	451	(1,014)	3,301	(4,315)
Marine, aviation and transport	777,560	257,520	520,040	30,591	550,632	203,578	347,054
Fire and other damage to property	1,765,653	392,037	1,373,616	54,925	1,428,542	1,079,840	348,701
General liability	5,015,348	670,124	4,345,225	181,673	4,526,898	1,914,525	2,612,373
Credit and suretyship	288,207	122,348	165,859	23,347	189,205	129,543	59,662
Miscellaneous financial loss	841,287	540,269	301,018	8,336	309,354	391,042	(81,688)
Non-proportional health	0	(2,304)	2,304	32	2,336	1,735	601
Non-proportional casualty	43,462	(220,786)	264,248	3,410	267,658	224,092	43,566
Non-proportional marine, aviation and transport	16,825	(14,258)	31,084	546	31,629	13,413	18,216
Non-proportional property	37,783	19,501	18,282	363	18,645	12,937	5,708
<b>Total</b>	<b>9,236,897</b>	<b>2,032,589</b>	<b>7,204,308</b>	<b>312,836</b>	<b>7,517,144</b>	<b>4,059,254</b>	<b>3,457,890</b>

The main differences between the Solvency II and French GAAP liabilities arise from:

- The Solvency II best estimate uses the Actuarial Central Estimate (“ActCE”) for all line of business while the GAAP TPs use the Management Best Estimate of Ultimate Loss (“MBE”). Under French GAAP, the provision for claims outstanding is calculated using the Management Best Estimate of Ultimate Loss (“MBE”) which is based on the estimated ultimate cost of all claims notified but not settled by the balance sheet date, together with the provision for related claims handling costs. The provision also includes the IBNR at the balance sheet date based on statistical methods. In addition, a separate unearned premium reserve (“UPR”) is maintained for a portion of premiums written in the year that relates to unexpired terms of policies in force at the balance sheet date. The reinsurers’ share of the provisions (reinsurance recoverables) is based on the amounts of outstanding claims and projection for claims incurred but not reported, net of estimated irrecoverable amounts.
- The technical provisions valued for Solvency II purposes are calculated as a best estimate and a risk margin. The best estimate is based on probability-weighted cashflows with consideration for the time value of money and considers all cash inflows and outflows including both claims and premium provisions. The risk margin is assumed to be the amount required for a third party to take over and meet the (re)insurance obligations and represents the cost of providing eligible own funds equal to the Solvency Capital Requirement (“SCR”) necessary to support these obligations.

- Additionally, the SII best estimates uses a discounted cash flow basis with inclusion of events not in data (ENIDs), future expenses and legally obliged business
- Solvency II technical provisions include the risk margin.

#### ***D.2.7 Recoverables from Reinsurance Contracts and SPVs***

Refer to “Reinsurance” in Section D.2.4 Methods and assumptions.

#### ***D.2.8 Material Changes to Methods and Assumptions from Previous Reporting Period***

There have been no material changes to the methods, including simplified methods, used to calculate the technical provisions from those used in the previous reporting period.

While many assumptions included in the calculation of technical provisions will often change between reporting periods due to natural development of the data used, there have been no material changes to assumptions compared to the prior reporting period.



### D.3 Other Liabilities

The valuation of liabilities in the Solvency II balance sheet is as follows:

<b>As at 31 December 2021</b>	<b>Solvency II €'000</b>	<b>FR GAAP €'000</b>	<b>Variance €'000</b>
	<b>2021</b>	<b>2021</b>	<b>2021</b>
Pension benefit obligations	(10,039)	(254)	(9,785)
Deposits from reinsurers	9,556	9,556	0
Deferred tax liabilities	147,259	0	147,259
Derivatives	13,471	10,426	3,044
Debts owed to credit institutions	205,982	0	205,982
Insurance & intermediaries payables	78,407	101,426	(23,019)
Reinsurance payables	190,395	581,895	(391,500)
Payables (trade, not insurance)	155,688	155,688	0
Other liabilities	110,538	214,238	(103,700)
<b>Total other liabilities</b>	<b>901,257</b>	<b>1,072,976</b>	<b>(171,720)</b>

The valuation for Solvency II purposes by material class of other liabilities is as follows :

#### D.3.1 Pension Benefit Obligations

Consistent with both FRS 17 and IAS 19, the defined benefit pension surplus / liability is the fair value of the scheme assets less the fair value of the scheme liabilities.

In the absence of an appropriate fair value for the scheme liabilities, the present value, based on discounted future cash flows, is considered to be a suitable proxy.

The present value of the scheme liabilities is calculated by independent actuaries using the projected unit credit method. The obligation is measured as the present value of future cash outflows, using a discount rate based on market yields for high-quality corporate bonds that are denominated in the same currency in which the benefits will be paid and that have terms to maturity approximating to the terms of the relation pension liability.

If the fair value of the plan assets exceeds the present value of the pension liabilities, the resultant asset is limited to a ceiling defined as the present value of economic benefits available in the form of reductions in contributions to the plan or future refunds from the plan.

Pension Benefit Obligations are not recognised in the balance sheet under French GAAP

### ***D.3.2 Deposits from Reinsurers***

The French GAAP balance sheet value represents the amount that would be due back to the reinsurer 'on demand'. This is considered to be representative of the fair value of the liability and therefore the same value is attributed for Solvency II purposes.

### ***D.3.3 Deferred Tax Liabilities***

See 'deferred taxation' in section D.1.2 for details.

### ***D.3.4 Derivatives***

See 'Derivatives' in section D.1.5.2 for details.

### ***D.3.5 Debts owed to Credit Institutions***

The French GAAP balance sheet value represents the 'immediate' liability in relation to overdrawn balances. This is considered equivalent to a fair value i.e. Solvency II value. However, the difference between the French GAAP and SII value represents cash overdraft gross up of €205,982k (see section D.1.10 for details).

### ***D.3.6 Insurance and Intermediaries Payables***

The French GAAP valuation basis recognises all payables due under insurance contracts. However, for Solvency II, where payables are considered to be not yet due they are included within the technical provisions for Solvency II purposes.

As at 31 December 2021, all insurance and intermediaries payables were deemed as not yet due and therefore included within technical provisions under the Solvency II valuation basis.

### ***D.3.7 Reinsurance Payables***

Similar to the above, reinsurance payables which are due or overdue continue to be presented separately on the SII balance sheet as a liability. Amounts not yet due are considered a future cash flow and are included as part of technical provisions.

### ***D.3.8 Payables (Trade, not Insurance)***

The balance predominantly relates to general accounts payable and current tax liabilities. As these are the amounts required to be paid to settle the obligations they are considered consistent with a fair value.

### ***D.3.9 Any Other Liabilities, not elsewhere shown***

The balance predominantly relates to expense accruals. As this is the amount required to be paid to settle the obligations it is considered consistent with a fair value.

#### ***D.3.10 Changes to Valuation of Other Liabilities in the Reporting Period***

There have been no changes to CEG's methodology for valuing other liabilities in the period.

#### ***D.3.11 Major Sources of Estimation Uncertainty Associated with the Value of Other Liabilities***

Major sources of estimation uncertainty are related to the valuation of pension benefit obligations (refer to section D.3.1 for details) and reinsurance payables (refer to sections D.3.7 and D.2 for details).

### **D.4 Alternative Methods of Valuation**

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Certain financial investments are valued using alternative methods for valuation. Refer to section D.1.5 for details.

### **D.5 Any Other Information**

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All material information regarding the valuation of assets and liabilities for solvency purposes has been disclosed in sections D1-D3 above.

## **E. Capital Management**

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### **E.1 Own Funds**

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#### ***E.1.1 Capital Management Objectives (including Own Funds)***

CEG assesses its capital needs on a risk management basis and maintains an efficient capital structure consistent with the company's risk profile and business requirements, and to meet regulatory requirements. The company seeks to maintain financial strength and capital adequacy to support business growth and meet the requirements of policyholders, rating agencies and regulators, whilst retaining financial flexibility by ensuring substantial levels of liquidity. Once the capital needs have been met, it is the practice of the company to consider the distribution of any surplus capital through dividends to its ultimate parent company.

From a prudential perspective, CEG is regulated by the ACPR and is subjected to insurance solvency regulations that specify the minimum amount and type of capital that must be held. Accordingly CEG's regulatory capital requirement will be set according to the Solvency II internal model validated by control authority (unless the ORSA capital is higher).

The primary objectives of the company in managing capital can be summarised as follows:

- to satisfy the requirements of its policyholders, regulators and rating agencies;
- to match the profile of its assets and liabilities, taking account of the risks inherent in the business;
- to manage exposures to key risks;
- to maintain financial strength to support new business growth;
- to generate a return to shareholders; and
- to retain financial flexibility by maintaining strong liquidity.

There has been no material change to the objectives for managing own funds over the reporting period.

#### ***E.1.2 Policies and Processes***

The Company holds own funds in Tier 1 (except for DTA that is classified as Tier 3, however this is a net liability as at 31 December 2021). The calculation process is therefore straightforward as own funds are valued based on the Solvency II valuation principles for assets and liabilities documented above. The Company will restrict any small amounts of own funds that are not available to policyholders generally. Larger amounts will be recognised as a ring-fenced fund.

There has been no material change to the policies and processes for managing own funds over the reporting period.

### E.1.3 Summary of Own Funds

The company's own funds represent net assets valued on a Solvency II basis and comprised of:

Own funds category	Tier 1 unrestricted €'000	Tier 1 unrestricted €'000
	2021	2020
Ordinary share capital	896,177	896,177
Share premium	0	0
Reconciliation reserve	2,186,887	1,737,579
<b>Total basic own funds</b>	<b>3,083,064</b>	<b>2,633,755</b>

Ordinary share capital comprises allocated, called up and fully paid ordinary shares of as at 31 December 2021. Dividends on ordinary shares are cancellable at any time prior to payment and therefore are classified as Tier 1 under Solvency II regime.

The key elements of the reconciliation reserve are as follows:

Reconciliation reserve as at 31 December 2021	Tier 1 unrestricted €'000	Tier 1 unrestricted €'000
	2021	2020
Total assets (section D.1)	11,547,853	11 515 084
Less total liabilities (sections D2 and D3)	(8,418,400)	(8 493 710)
Excess of assets over liabilities	3,129,453	3 021 374
Share capital	(896,177)	(896 177)
Share premium	0	0
Foreseeable dividend	0	(350 000)
Ring-fenced funds	(46,389)	(23 840)
<b>Total basic own funds</b>	<b>2,186,887</b>	<b>1 737 579</b>

The company's own funds are wholly eligible to meet the Solvency Capital Requirements and Minimum Capital Requirement. Other than €46,4 million in restricted assets, all Tier 1 capital is permanently available to cover losses.

#### ***E.1.4 Eligible Own Funds to cover SCR by Tier***

The total Tier 1 own funds of €3,083,064k are eligible to cover the SCR. CEG has sufficient eligible own funds to cover SCR as the coverage ratio for the SCR is 225% (2020: 164%).

#### ***E.1.5 Eligible Own Funds to cover MCR by Tier***

The total Tier 1 own funds of €3,083,064k are eligible to cover the MCR. CEG has sufficient eligible own funds to cover MCR as the coverage ratio for the MCR is 511% (2020: 425%).

#### **Reconciliation of the French GAAP Equity to Solvency II eligible Own Funds**

Solvency II own funds represent the excess of Solvency II assets over liabilities, adjusted for ‘non-available’ own funds (where applicable). The reconciliation of the French GAAP valuation of shareholders’ equity to the Solvency II valuation of own funds is shown here:

<b>Reconciliation of FR GAAP to Solvency II Own Funds</b>		<b>2021 €'000</b>
FR GAAP shareholders' funds		2,615,037
Revaluation of insurance contracts		521,758
Adjustments to intangible and fixed assets		(121,035)
Adjustments on the investments		260,939
Others adjustments		(147,245)
Deferred tax adjustments		0
SII Excess of assets over liabilities		3,129,455
Restricted assets		(46,389)
Foreseeable dividend		0
<b>Total basic own funds</b>		<b>3,083,064</b>

## Revaluation of Insurance Contracts

The valuation basis for insurance contract assets and liabilities differs between French GAAP and Solvency II. The main individual drivers of the difference of the movement are the change from a management best estimate to an actuarial central estimate, the impact of discounting and the inclusion of a risk margin.

The changes to convert from French to Solvency II are as follows:

FR GAAP to Solvency II	2021	2020
	€'000	€'000
Changed in earned reserves	(381,243)	(232,772)
Change in earned bad debts	(7,713)	(1,474)
Allowance for UPR and UANR, removal of DAC	(323,579)	(219,020)
RI Premium for contractual minimums	26,432	20,246
Profit on unaccepted business	(67,659)	(55,928)
Total discounting credit	(73,362)	3,747
Risk Margin	312,836	288,332
<b>Total basic own funds</b>	<b>(514,287)</b>	<b>(196,869)</b>

For further details on the treatment of insurance contracts under Solvency II, refer to section D.2.

## Adjustments to Intangible and Fixed Assets

Refer to sections D.1.3 and D.1.4 for details.

## Deferred Tax Adjustment

On the Solvency II basis, provision is made for deferred tax liabilities, or credit taken for deferred tax assets, using the liability method, on all material temporary differences between the tax bases of assets and liabilities and their carrying amounts at the reporting date.

## Restricted Assets

A total of €46,389,488 within investment portfolio relates to restricted assets, deducted from total available own funds. Refer to section E.1.5 for details.

#### ***E.1.6 Restrictions Affecting Availability and Transferability of Owns Funds***

Management has identified restrictions manifesting in two ways; assets which are only available to settle a discrete population of liabilities and assets which are supporting the underwriting of a particular block of business. Such assets are identified through an established process as part of current GAAP reporting by the treasury team.

Management has identified restricted assets relate to collateral placed explicitly or to back letters of credit which are required by certain reinsurance cedants to mitigate credit risk. Such assets can be recognised within Own Funds to the extent that they are matching liabilities.

Management has also identified that in certain jurisdictions that CEG operates in there is a local requirement to hold or 'tie' assets either for the benefit of a particular group of policyholders or to meet local regulatory requirements (and therefore be for the benefit of all policyholders (re)insured through a local operation). Such restrictions have been identified as relating to operations in Switzerland and Turkey. These assets have been classified as being ring-fenced funds and, on the grounds of materiality, have been excluded from the determination of Own Funds. These amounts total €37,600k and represent investment assets that are pledged to the local regulatory body as a fund against liabilities. This must be held to allow business to transact in that country.

In addition, an amount of €8,789k relating to collateral issued through partner banks are restricted as they can only be used to settle specific liabilities. Further details can be found in section D.1.5.



## E.2 Solvency Capital Requirement and Minimum Capital Requirement

### E.2.1 Solvency Capital Requirement

On 04 November 2020, CEG received approval from the ACPR to calculate its Solvency Capital Requirement (“SCR”) using the internal Model in place of the standard formula.

The CEG’s SCR at 31 December 2021 was €1,369,274k. The table below shows a breakdown of the SCR by risk category and diversification benefit:

#### As at 31 December 2021

<b>Risk Category</b>	<b>€'000</b>
Insurance Risk	861,776
Market Risk	946,239
Credit Risk	177,254
Operational Risk (incl. group risk)	236,017
Other Risk (incl. pension risk and liquidity risk)	47,568
Diversification	(921,687)
<b>Total Solvency Capital Requirement excluding capital add-on</b>	<b>1,347,166</b>
Capital add-on	22,108
<b>Total Solvency Capital Requirement including capital add-on</b>	<b>1,369,274</b>

The capital add-on (SCR loadings) of €22,108k have been included in respect of control exceptions related to known model limitations. These loadings, which are individually assessed and included on a standalone basis, are included to ensure no limitation results in model imprudence.

### ***E.2.2 Minimum Capital Requirement***

The table below shows the input information to the minimum capital requirement (“MCR”). The figures are the net best estimate TPs and net written premiums in the last 12 months, split by Solvency II lines of business.

<b>As at 31 December 2021</b>	<b>Net (of reinsurance/ SP) best estimate and TP calculated as a whole</b>	<b>Net (of reinsurance) written premiums in the last 12 months</b>
	<b>€'000</b>	<b>€'000</b>
Medical expense	0	0
Income protection	21,213	28,310
Motor vehicle liability	77,636	19,559
Other motor	0	29,893
Marine, aviation and transport	316,463	340,412
Fire and other damage to property	293,776	916,854
General liability	2,430,700	817,568
Credit and suretyship	36,315	39,888
Miscellaneous financial loss	0	240,252
Non-proportional health	569	0
Non-proportional casualty	40,156	789
Non-proportional marine, aviation and transport	17,670	1,966
Non-proportional property	5,345	8,123

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

The following table shows the MCR calculation:

Overall MCR calculation	2021 €'000	2020 €'000
<b>Linear MCR</b>	<b>603,792</b>	<b>619,845</b>
SCR	1,369,274	1,613,487
MCR cap	616,173	726,069
MCR floor	342,319	403,372
Combined MCR	603,792	619,845
Absolute floor of the MCR	3,700	0
<b>Minimum Capital Requirement</b>	<b>603,792</b>	<b>619,845</b>

CEG uses the Internal Model to calculate its MCR. The resulting MCR based on the above inputs is €620k.

### ***E.2.3 Material changes over the reporting period***

As at 31 December 2021, the CEG SCR is measured at €1,369,274k, which is around a 15% decrease from the SCR as at 31 December 2020, which was measured at €1,613,487k.

There were three key drivers of change, two of which acted to increase the SCR, with the third offsetting these and reducing the SCR at an overall level. The SCR increased due to 1) a weakening of the Euro exchange rate compared to the previous year, and 2) an overall increase to risk, that is, the movement of each risk type from its expected position. In particular, the movement of insurance risk from its expected position has increased in line with exposure growth. However, growth in the business planned over the next 12 months combined with loss ratio improvements have resulted in a higher expected profit position and resulted in an overall decrease to insurance risk as well as the SCR.

Comparisons at the risk category level on the internal model basis are listed below.

- **Insurance Risk:** There have been notable increases in the net earned premium levels and an overall increase in net claims provisions. Premium growth has stemmed from multiple lines in Chubb Europe and Chubb Global Markets. An increase to Property business is reflected in the higher catastrophe risk. The increased premium volumes should also not be expected to drive an overall increase to premium risk plus profit, as positive rate change forecasts means receiving more premiums for the same level of risk.
- **Market Risk:** Market risk has increased both due to a reduction in forecasted investment income as well as an increase to risk from a larger investment portfolio. The portfolio mix has seen a decrease in government bonds, offset with more investment in mortgage backed securities.
- **Credit Risk:** Credit risk has been stable in size and also as a proportion of recoverables.
- **Operational Risk (incl. Group Risk):** Operational risk and group risk have increased, mostly due to exposure increases which includes reserves, premiums and underwriting profit.
- **Other Risk (incl. Pension Risk and Liquidity Risk):** Pension risk has decreased driven by a large increase to the surplus position of the pension schemes, which acts to reduce the overall risk position.
- **Diversification:** Decrease to diversification between major risks mainly driven by less insurance and other risk.

<b>Risk Category</b>	<b>As at 31 December 2021 (€000s)</b>	<b>As at 31 December 2020 (€000s)</b>	<b>Movement (€000s)</b>
Insurance Risk	861,776	1,110,854	(249,077)
Market Risk	946,239	869,837	76,403
Credit Risk	177,254	175,841	1,413
Operational Risk (incl. Group Risk)	236,017	227,876	8,140
Other Risk (incl. Pension Risk and Liquidity Risk)	47,568	179,166	(131,599)
Diversification	(921,687)	(959,877)	38,189
<b>Total Solvency Capital Requirement excluding capital add-on</b>	<b>1,347,166</b>	<b>1,603,697</b>	<b>(256,531)</b>
Capital add-on	22,108	9,790	12,318
<b>Total Solvency Capital Requirement including capital add-on</b>	<b>1,369,274</b>	<b>1,613,487</b>	<b>(244,213)</b>

The MCR has changed from €619,845k as at 1 January 2021 to €603,792k as at 31 December 2021.

### **E.3 Use of Duration-based Equity Risk Sub-module in the Calculation of the SCR**

The duration-based equity risk sub-module option set out in Article 304 of Directive is not used in the CEGSE internal model SCR calculation.

### **E.4 Differences between the Standard Formula and the Internal Model**

CEG applies the internal model approach to the Solvency Capital Requirement (SCR). The internal model SCR is the capital requirement that is in force for CEG under Solvency II from 31 December 2020 following the approval from the ACPR on 04 November 2020.

#### ***E.4.1 Purposes for which the internal model is used***

The primary purpose of the internal model is to calculate the Solvency Capital Requirement (SCR) under Solvency II. The internal model is also used to support the regulatory reporting requirements, where the use of output of the model is used to satisfy Solvency II Pillar 3 requirements (supervisory reporting and disclosure).

In addition, the internal model in its current form (with the aim of complying with Solvency II tests and standards) has been in place since 2012. In that period, it has seen extensive business uses across the organisation. We have drawn out some key uses below as an illustration.

- **Setting of “hurdle combined ratios”.** Individual underwriters are cascaded a long-term expectation of the target level of combined ratio they should meet. The underwriting strategy is determined around the ability to meet these ratios. The ratios are derived directly from model output, based on allocation of model capital. This process demonstrates our willingness to run our business based on the internal model. It also has provided us with dispersed and highly challenging feedback at a detailed level over many years’ worth of cycle, allowing us to identify areas of continuous improvement.
- **Treasury uses, including setting of currency and asset allocation policies, investment decisions and use of notional pool.** A key stakeholder of the model over the last few years has been the Treasury function. New currency and asset allocation policies were written as a result of the modelled currency breakdown at different risk levels and probabilities of capital strain as a result of market value losses. Investment decisions, including those regarding corporate bond credit ratings and the possible investment in different types of equity, have been made after considering the impact on risk predicted by the model. Limits on the use of the notional pool (which allows us to avoid the need to immediately rebalance currencies on a daily basis) have been set with reference to modelled risk. As well as demonstrating our faith in our model output, repeated real-world use in this way has meant scrutiny of the output (and the reason for that output) at a very detailed level.
- **Setting and monitoring risk appetite statements.** A number of risk appetite statements have been formed that directly use the model. These work by noting the probability that a given threshold is breached assuming the business plan has been followed. If the actual probability is greater than the risk appetite, such a breach is therefore escalated. The use of the model in this way has led to close scrutiny around the output for the metrics used and encouraged wider business feedback. The use demonstrates our faith that the model produces realistic assessments of the risks associated with the plan.
- **Strategic developments.** Where new strategies are considered, the model is consulted to understand the impact on both risk and capital. One example was during the acquisition of Chubb by ACE. During this time, extensive analysis was performed to understand the impact on risk profile derived from combining CICE and AEGL. Another example was the establishment and use by CEG of the joint venture reinsurance entity with BlackRock. Before deciding on the form that reinsurance transformation would take, a number of scenarios were run through the internal model to understand the impact. A further example was the company’s response to the British referendum of 23 June 2016 that resulted in a decision to leave the EU. In the immediate aftermath, the model was used to interrogate the impact of economic scenarios and understand any constraints on capital that might arise. These uses show that we have sufficient faith in the model to only make major strategic decisions once we have included consideration of its output.

#### ***E.4.2 Business units and risk categories within the internal model scope***

The Chubb internal model allows for all calculable risk. In particular, this includes:

- Insurance risk
  - Reserve risk
  - Non-Cat premium risk
  - Catastrophe risk
- Market risk
  - Interest rate risk
  - Equity risk
  - Spread risk
  - Currency risk
  - Transition and default risk
- Credit risk C1.4
  - RI credit risk
  - Broker credit risk
- Operational/group risk
- Other risks
  - Pension risk
  - Liquidity risk

CEG is a large and well-diversified insurance undertaking, covering a large range of Property & Casualty business. The Chubb regional management cluster headquartered in London, which comprises business units, product lines and specialised corporate functions.

Chubb comprises the operations of the following business units:

- **Property and Casualty (P&C):** this business unit specialises in client-focused solutions for a diverse range of UK and European commercial clients. Its product range includes property, primary and excess casualty, financial lines (D&O and crime), surety, marine cargo and construction-related risks.
- **Speciality Personal Lines (SPL):** this business unit is focussed on Chubb Mobilassurance solutions i.e. partnerships that encompass multi-line and multi-distribution initiatives with Mobile Network Operators.
- **Personal Risk Services (PRS):** this business unit offers insurance solutions to High Net Worth individuals by predominantly providing cover for their property and valuable possessions.
- **Accident and Health (A&H):** this business unit primarily offers personal accident and supplemental medical coverages including accidental death, business/holiday travel, specified disease, disability, medical and hospital indemnity, and income protection.
- **Chubb Global Markets (CGM):** CGM is the Chubb Group's specialty international underwriting business with a product range including aviation, energy, financial lines, marine, property, political risks and Excess and Surplus business.
- **Chubb Tempest Re (Europe) (Tempest Europe):** Tempest Europe is Chubb's European reinsurance arm, underwriting a wide-ranging portfolio of property and liability reinsurance classes, including casualty, property, marine and aviation.
- **Chubb Bermuda International Insurance (CBII)** provides commercial insurance products to a global client base targeting large companies and covering exposures that are generally low in frequency and high in severity. CBII writes Excess Liability, Excess Property and Professional Lines (including D&O) business.
- **Combined Insurance:** Combined Insurance provides a wide range of personal accident and sickness insurance products including short-term disability, critical condition and hospitalisation/recovery.

All business units are in scope of the internal model. The internal model is sufficiently granular so as to be able to maintain a distinction between and report on risk segmented by business units.

#### ***E.4.3 Methods used in the internal model for the calculation of the probability distribution forecast and the SCR***

CEG internal model is a fully integrated Monte-Carlo simulation based stochastic model. The model is run with 100,000 simulations to ensure stability of results. It covers all material quantifiable risk types that CEG is exposed to. The modelling of those risks use suitably calibrated inputs and aggregate them to compute the SCR. The internal model produces an aggregate distribution of the change in basic own funds over a one year time horizon from which the SCR can be directly derived (i.e. the SCR is the 99.5th percentile) in line with Article 101 of Directive 2009/138/EC.

#### ***E.4.4 Main differences between the standard formula and the internal model***

As at 31 December 2021, the internal model (IM) SCR was calculated as €1,369,274k, while the standard formula (SF) SCR was calculated as €2,535,427k. The difference in figures reflects the differences in underlying methodologies and calibration data.

The breakdown of results by main risk category is as follows:

<b>Risk Category</b>	<b>IM as at 31 December 2021 (€000s)</b>	<b>SF as at 31 December 2021 (€000s)</b>	<b>Difference (€000s)</b>
Insurance Risk (IM)/Health Underwriting Risk + Non-Life Underwriting Risk (SF)	861,776	1,474,578	(612,802)
Market Risk	946,239	1,226,821	(280,582)
Credit Risk	177,254	345,494	(168,241)
Operational Risk (incl. group risk for IM)	236,017	216,129	19,887
Other Risk (incl. pension risk and liquidity risk)	47,568	-	47,568
Diversification	(921,687)	(727,596)	(194,092)
<b>Total Solvency Capital Requirement excluding capital add-on</b>	<b>1,347,166</b>	<b>2,535,427</b>	<b>(1,188,261)</b>
Capital add-on	22,108	-	22,108
<b>Total Solvency Capital Requirement including capital add-on</b>	<b>1,369,274</b>	<b>2,535,427</b>	<b>(1,166,153)</b>

The two methods for calculating capital have some important differences to note which can lead to variations in capital when looking at both the individual risk category capital and the aggregated results:

- **Risk coverage:** The IM and SF both cover the following risk categories: insurance risk (underwriting risk), market risk, credit risk (counterparty default risk) and operational risk. In addition, the IM also covers additional risks such as liquidity risk, group risk and pension risk associated with UK pension schemes which don't sit on the CEG balance sheet directly.

- **Risk Factor Calibration:** The SF calibration of risk is performed on data that covers a wide selection of insurers across the market, each with different portfolios of business and different reinsurance arrangements. The IM is calibrated using CEG specific data that reflects the underlying risks written by CEG and therefore the calibration is more aligned with the risk profile.
- **Expected Profit/Loss:** The SF has no allowance for the expected profit / loss generated by business written in the next 12 months from the valuation date. The IM generates an expected profit / loss in line with the business plan that underpins the projection as well as the projected investment returns generated by the investment portfolio. This expected profit / loss amount would act to offset the risk capital - an expected profit would reduce the capital requirement whereas an expected loss would increase the capital requirement.
- **Risk Margin:** There is no calculation of risk margin in the SF. The IM does allow for risk margin to change across a one-year time horizon and this will change the capital requirement in line with the movement in risk margin.
- **Capital add-on:** There is no capital add-on in the SF. The IM capital add-on is the SCR loadings that have been included in respect of control exceptions related to known model limitations. These loadings, which are individually assessed and included on a standalone basis, are included to ensure no limitation results in model imprudence.
- **Aggregation Techniques:** The SF uses a straightforward Gaussian approach to correlations applied to a tiered risk structure, whereas the IM uses heavy tail dependencies, which create a much larger impact at the 99.5th percentile (1 in 200 year return period).

#### ***E.4.5 Risk measure and time period used in the internal model***

As set out in Article 101(3) of Directive 2009/138/EC, the SCR calculated using the internal model corresponds to the 99.5 th Value-at-Risk over a one-year period.

#### ***E.4.6 Nature and appropriateness of the data used in the internal model***

The internal model uses various sources of data. This data is both internal and external. All datasets used in the model are listed within a data directory, which includes details of data vintage and ownership. Each dataset has an assigned owner who is charged with delivering the data to the model with appropriate governance to ensure it is accurate, appropriate and complete. The data directory is periodically updated to match model changes or governance changes.

Balance sheet data is subject to an annual audit of all controls and any associated risks arising from its use.



## **E.5 Non-compliance with the SCR and MCR**

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CEG has sufficient eligible own funds to cover both the SCR and MCR. The coverage ratios for the SCR and MCR are 225% and 511% respectively.

<b>As at 31 December 2021</b>	<b>SCR</b>	<b>MCR</b>
Eligible Own Funds (€'000)	3,083,064	3,083,064
Capital Requirements (€'000)	1,369,274	603,792
Coverage ratio	225%	511%

The coverage ratios for the SCR & MCR are monitored on an ongoing basis with final reporting on solvency positions included in the quarterly ORSAs.

## **E.6 Undertaking-Specific-Parameters (“USP”) and Matching Adjustments**

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Not applicable as USP and matching adjustments are not applied to the CEG SCR calculation.

**S.02.01.02**  
**Balance sheet**

		Solvency II value
		C0010
<b>Assets</b>		
Intangible assets	R0030	
Deferred tax assets	R0040	22 200
Pension benefit surplus	R0050	
Property, plant & equipment held for own use	R0060	18 682
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	5 970 304
Property (other than for own use)	R0080	
Holdings in related undertakings, including participations	R0090	
Equities	R0100	372 827
Equities - listed	R0110	361 779
Equities - unlisted	R0120	11 048
Bonds	R0130	5 515 844
Government Bonds	R0140	924 990
Corporate Bonds	R0150	4 031 487
Structured notes	R0160	
Collateralised securities	R0170	559 359
Collective Investments Undertakings	R0180	50 824
Derivatives	R0190	4 197
Deposits other than cash equivalents	R0200	26 612
Other investments	R0210	
Assets held for index-linked and unit-linked contracts	R0220	
Loans and mortgages	R0230	512 833
Loans on policies	R0240	
Loans and mortgages to individuals	R0250	
Other loans and mortgages	R0260	512 833
Reinsurance recoverables from:	R0270	4 059 254
Non-life and health similar to non-life	R0280	4 059 254
Non-life excluding health	R0290	4 043 795
Health similar to non-life	R0300	15 459
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	
Health similar to life	R0320	
Life excluding health and index-linked and unit-linked	R0330	
Life index-linked and unit-linked	R0340	
Deposits to cedants	R0350	
Insurance and intermediaries receivables	R0360	180 555
Reinsurance receivables	R0370	352 115
Receivables (trade, not insurance)	R0380	-150 354
Own shares (held directly)	R0390	
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	
Cash and cash equivalents	R0410	539 406
Any other assets, not elsewhere shown	R0420	42 858
Total assets	R0500	11 547 853
<b>Liabilities</b>		
Technical provisions - non-life	R0510	7 517 144
Technical provisions - non-life (excluding health)	R0520	7 478 638
TP calculated as a whole	R0530	0
Best Estimate	R0540	7 167 067
Risk margin	R0550	311 571
Technical provisions - health (similar to non-life)	R0560	38 506
TP calculated as a whole	R0570	0
Best Estimate	R0580	37 241
Risk margin	R0590	1 265
Technical provisions - life (excluding index-linked and unit-linked)	R0600	
Technical provisions - health (similar to life)	R0610	
TP calculated as a whole	R0620	
Best Estimate	R0630	
Risk margin	R0640	
Technical provisions - life (excluding health and index-linked and unit-linked)	R0650	
TP calculated as a whole	R0660	
Best Estimate	R0670	
Risk margin	R0680	
Technical provisions - index-linked and unit-linked	R0690	
TP calculated as a whole	R0700	
Best Estimate	R0710	
Risk margin	R0720	
Contingent liabilities	R0740	
Provisions other than technical provisions	R0750	
Pension benefit obligations	R0760	-10 039
Deposits from reinsurers	R0770	9 556
Deferred tax liabilities	R0780	147 259
Derivatives	R0790	13 471
Debts owed to credit institutions	R0800	205 982
Financial liabilities other than debts owed to credit institutions	R0810	
Insurance & intermediaries payables	R0820	78 407
Reinsurance payables	R0830	150 395
Payables (trade, not insurance)	R0840	155 688
Subordinated liabilities	R0850	
Subordinated liabilities not in BOF	R0860	
Subordinated liabilities in BOF	R0870	
Any other liabilities, not elsewhere shown	R0880	110 538
Total liabilities	R0900	8 418 400
Excess of assets over liabilities	R1000	3 129 453

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)											Line of business for: accepted non-proportional reinsurance				Total	
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Health	Casualty	Marine, aviation, transport		Property
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150		C0160
Premiums written																		
Gross - Direct Business	R0110		56 679		38 792	42 763	402 964	1 681 400	1 513 379	142 655			473 263					4 351 895
Gross - Proportional reinsurance accepted	R0120		9		38 225		241 493	456 621	287 068	33 937			21 739					1 079 093
Gross - Non-proportional reinsurance accepted	R0130														5 476	4 602	21 416	31 494
Reinsurers' share	R0140		20 057		55 788	3 768	190 308	923 935	715 554	123 637			184 457		4 539	1 824	9 684	2 233 551
Net	R0200		36 631		21 229	38 995	454 149	1 214 086	1 084 894	52 955			310 546		937	2 778	11 732	3 228 931
Premiums earned																		
Gross - Direct Business	R0210		56 444		39 234	42 237	367 462	1 623 793	1 391 411	130 034			489 180					4 139 795
Gross - Proportional reinsurance accepted	R0220		9		45 890		241 366	418 372	260 846	33 400			22 110					1 021 994
Gross - Non-proportional reinsurance accepted	R0230														6 389	4 484	16 869	27 742
Reinsurers' share	R0240		20 084		48 924	3 479	186 377	900 609	632 033	115 906			176 838		5 269	2 079	9 391	2 100 990
Net	R0300		36 368		36 200	38 758	422 451	1 141 557	1 020 224	47 529			334 452		1 119	2 404	7 478	3 088 540
Claims incurred																		
Gross - Direct Business	R0310		20 602		14 617	16 119	173 524	864 861	646 607	6 000			131 884					1 874 215
Gross - Proportional reinsurance accepted	R0320		-5		34 603	0	137 898	244 969	92 180	8 551			4 641					522 837
Gross - Non-proportional reinsurance accepted	R0330														7 904	1 454	-5 369	3 989
Reinsurers' share	R0340		7 516		38 279	2 692	90 642	594 881	319 486	6 457			53 953		-2 472	1 027	-7 755	1 104 707
Net	R0400		13 080		10 941	13 427	220 780	514 950	419 301	8 094			82 572		10 377	426	2 386	1 296 334
Changes in other technical provisions																		
Gross - Direct Business	R0410																	
Gross - Proportional reinsurance accepted	R0420																	
Gross - Non-proportional reinsurance accepted	R0430																	
Reinsurers'share	R0440																	
Net	R0500																	
Expenses incurred	R0550	0	-8 561	0	16 145	9 707	114 339	509 473	373 909	-4 612	0	0	191 488	0	386	364	10 431	1 213 068
Other expenses	R1200																	
Total expenses	R1300																	1 213 068

Legal name: Chubb European Group SE, Closing date: 2021-12-31  
Display currency: k EUR

**S.05.02.01 - 01**

**Premiums, claims and expenses by country**

		Home Country	Top 5 countries (by amount of gross premiums written) - non	Top 5 countries (by amount of gross premiums written) - non	Top 5 countries (by amount of gross premiums written) - non	Top 5 countries (by amount of gross premiums written) - non	Top 5 countries (by amount of gross premiums written) - non	Total Top 5 and home country
		C0080	C0020	C0030	C0040	C0050	C0060	C0140
	R0010		DE	ES	GB	IT	NL	
<b>Premiums written</b>								
Gross - Direct Business	R0110	657 093	419 140	245 883	1 636 516	274 169	334 182	3 566 983
Gross - Proportional reinsurance accepted	R0120	61 832	43 800	35 847	499 466	26 678	35 681	703 304
Gross - Non-proportional reinsurance accepted	R0130				31 508			31 508
Reinsurers' share	R0140	299 050	241 738	102 242	818 967	98 130	122 204	1 682 331
<b>Net</b>	R0200	419 876	221 202	179 488	1 348 524	202 717	247 658	2 619 464
<b>Premiums earned</b>								
Gross - Direct Business	R0210	618 572	411 635	234 898	1 620 396	268 159	276 947	3 430 606
Gross - Proportional reinsurance accepted	R0220	60 335	41 487	33 637	463 299	26 578	32 776	658 112
Gross - Non-proportional reinsurance accepted	R0230				27 756			27 756
Reinsurers' share	R0240	282 566	236 358	93 627	747 176	91 689	114 272	1 565 689
<b>Net</b>	R0300	396 340	216 764	174 908	1 364 275	203 048	195 450	2 550 785
<b>Claims incurred</b>								
Gross - Direct Business	R0310	308 831	186 110	119 987	813 805	71 874	105 139	1 605 747
Gross - Proportional reinsurance accepted	R0320	14 288	32 515	-6 501	314 137	1 255	34 310	390 004
Gross - Non-proportional reinsurance accepted	R0330				3 171			3 171
Reinsurers' share	R0340	210 404	118 160	29 913	425 531	15 252	93 242	892 502
<b>Net</b>	R0400	112 715	100 465	83 572	705 582	57 877	46 208	1 106 420
<b>Changes in other technical provisions</b>								
Gross - Direct Business	R0410							0
Gross - Proportional reinsurance accepted	R0420							0
Gross - Non- proportional reinsurance accepted	R0430							0
Reinsurers'share	R0440							0
<b>Net</b>	R0500		0	0	0	0	0	0
<b>Expenses incurred</b>	R0550	222 848	79 390	83 261	399 866	84 666	72 208	942 239
<b>Other expenses</b>	R1200							
<b>Total expenses</b>	R1300							942 239

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Display currency: k EUR

S.17.01.02

Non-life Technical Provisions

		Direct business and accepted proportional reinsurance									Direct business and accepted proportional reinsurance			Accepted non-proportional reinsurance					Total Non-Life obligation
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance		
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180	
Technical provisions calculated as a whole		R0010																	
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole		R0050																	
Technical provisions calculated as a sum of BE and RM																			
Best estimate																			
Premium provisions																			
Gross	R0060	0	76	0	14 911	-6 050	76 972	-199 364	79 692	17 807	0	0	-43 733	0	13 494	2 199	1 840	-42 155	
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	0	492	0	3 874	-13	8 521	-51 275	61 710	10 929	0	0	228	0	6 960	224	546	42 197	
Net Best Estimate of Premium Provisions	R0150	0	-416	0	11 037	-6 037	68 451	-148 088	17 982	6 878	0	0	-43 961	0	6 534	1 975	1 294	-84 352	
Claims provisions																			
Gross	R0160	0	34 861	0	134 249	4 584	443 069	1 572 980	4 265 532	148 052	0	0	344 751	2 304	250 754	28 884	16 442	7 246 463	
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	0	13 232	0	67 650	3 314	195 057	1 131 116	1 852 814	118 614	0	0	390 814	1 735	217 132	13 189	12 391	4 017 058	
Net Best Estimate of Claims Provisions	R0250	0	21 629	0	66 599	1 271	248 012	441 864	2 412 718	29 437	0	0	-46 063	569	33 622	15 695	4 050	3 229 405	
Total Best estimate - gross	R0260	0	34 937	0	149 160	-1 465	520 040	1 373 616	4 345 225	165 859	0	0	301 018	2 304	264 248	31 084	18 282	7 204 308	
Total Best estimate - net	R0270	0	21 213	0	77 636	-4 766	316 463	293 776	2 430 700	36 315	0	0	-90 024	569	40 156	17 670	5 345	3 145 053	
Risk margin	R0280	0	1 233	0	7 929	451	30 591	54 925	181 673	23 347	0	0	8 336	32	3 410	546	363	312 836	
Amount of the transitional on Technical Provisions																			
Technical Provisions calculated as a whole		R0290																	
Best estimate		R0300																	
Risk margin		R0310																	
Technical provisions - total																			
Technical provisions - total		R0320	0	36 170	0	157 089	-1 014	550 632	1 428 542	4 526 898	189 206	0	0	309 354	2 336	267 658	31 629	18 645	7 517 144
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total		R0330	0	13 724	0	71 524	3 301	203 578	1 079 840	1 914 525	129 543	0	0	391 042	1 735	224 092	13 413	12 937	4 059 254
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total		R0340	0	22 446	0	85 565	-4 315	347 054	348 701	2 612 373	59 662	0	0	-81 688	601	43 566	18 216	5 708	3 457 890

Legal name: Chubb European Group SE, Closing date: 2021-12-31  
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S.19.01.21 - 01                      Accident  
Non-life Insurance Claims Information

Accident year / Underwriting year                      Z0020                      1

Gross Claims Paid (non-cumulative)

Year	Development year										
	0	1	2	3	4	5	6	7	8	9	10 & +
	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110
Prior	R0100										939 721
N-9	R0160	497 154	583 374	378 878	200 280	106 604	115 243	79 890	56 381	31 287	47 213
N-8	R0170	548 273	528 078	250 867	111 153	111 186	87 082	56 652	31 108	16 965	
N-7	R0180	611 219	597 245	215 095	98 801	102 503	70 543	47 822	26 625		
N-6	R0190	692 866	531 782	255 063	189 557	168 792	65 359	91 151			
N-5	R0200	680 330	736 798	256 282	148 184	92 826	106 499				
N-4	R0210	591 552	542 922	259 687	150 549	139 662					
N-3	R0220	674 698	495 556	299 032	145 421						
N-2	R0230	682 048	418 868	213 075							
N-1	R0240	764 928	568 275								
N	R0250	647 880									

Total

	In Current year	Sum of years (cumulative)
	C0170	C0180
R0100	939 721	939 721
R0160	47 213	2 096 303
R0170	16 965	1 741 365
R0180	26 625	1 769 854
R0190	91 151	1 994 569
R0200	106 499	2 020 919
R0210	139 662	1 684 372
R0220	145 421	1 614 706
R0230	213 075	1 313 990
R0240	568 275	1 333 202
R0250	647 880	647 880
R0260	2 942 486	17 156 882

Gross undiscounted Best Estimate Claims Provisions

Year	Development year										
	0	1	2	3	4	5	6	7	8	9	10 & +
	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300
Prior	R0100										578 664
N-9	R0160	0	0	0	33 847	573 081	403 681	301 549	237 317	175 363	177 639
N-8	R0170	0	0	23 421	594 871	414 519	313 684	225 380	157 731	158 971	
N-7	R0180	0	48 215	779 271	598 306	416 472	328 781	230 151	213 329		
N-6	R0190	55 603	1 111 796	791 862	634 326	433 306	359 414	258 859			
N-5	R0200	1 621 735	1 028 032	756 941	559 108	436 904	359 002				
N-4	R0210	1 438 395	970 611	816 619	603 004	542 959					
N-3	R0220	1 273 551	1 169 971	872 923	817 186						
N-2	R0230	1 392 472	1 133 814	960 086							
N-1	R0240	1 969 038	1 453 865								
N	R0250	1 836 418									

Total

	Year end (discounted data)
	C0360
R0100	565 553
R0160	174 112
R0170	156 910
R0180	209 807
R0190	253 810
R0200	353 756
R0210	533 959
R0220	804 015
R0230	945 105
R0240	1 425 461
R0250	1 789 326
R0260	7 211 814

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**S.23.01.01 - 01**

**Own funds**

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
<b>Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation (EU) 2015/35</b>						
Ordinary share capital (gross of own shares)	R0010	896 177	896 177			
Share premium account related to ordinary share capital	R0030					
Initial funds, members' contributions or the equivalent basic own - fund item for m	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	2 186 887	2 186 887			
Subordinated liabilities	R0140					
An amount equal to the value of net deferred tax assets	R0160					
Other own fund items approved by the supervisory authority as basic own funds n	R0180					
<b>Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds</b>						
Own funds from the financial statements that should not be represented by the rec	R0220					
<b>Deductions</b>						
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	R0290	3 083 064	3 083 064			
<b>Ancillary own funds</b>						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic o	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on d	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 200	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Dire	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3	R0370					
Other ancillary own funds	R0390					
Total ancillary own funds	R0400					
<b>Available and eligible own funds</b>						
Total available own funds to meet the SCR	R0500	3 083 064	3 083 064			
Total available own funds to meet the MCR	R0510	3 083 064	3 083 064			
Total eligible own funds to meet the SCR	R0540	3 083 064	3 083 064	0	0	0
Total eligible own funds to meet the MCR	R0550	3 083 064	3 083 064	0	0	
SCR	R0580	1 369 274				
MCR	R0600	603 792				
Ratio of Eligible own funds to SCR	R0620	2,25				
Ratio of Eligible own funds to MCR	R0640	5,11				

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**S.23.01.01 - 02**

**Own funds**

		C0060
<b>Reconciliation reserve</b>		
Excess of assets over liabilities	R0700	3 129 453
Own shares (held directly and indirectly)	R0710	
Foreseeable dividends, distributions and charges	R0720	
Other basic own fund items	R0730	896 177
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	46 389
Reconciliation reserve	R0760	2 186 887
<b>Expected profits</b>		
Expected profits included in future premiums (EPIFP) - Life business	R0770	
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	582 594
<b>Total Expected profits included in future premiums (EPIFP)</b>	<b>R0790</b>	<b>582 594</b>



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S.25.03.21  
Solvency Capital Requirement (for undertakings on Full Internal Models)

- 1 Market risk
- 2 Counterparty default risk
- 3 Life underwriting risk
- 4 Health underwriting risk

Unique number of component	Components description	Calculation of the Solvency Capital Requirement
C0010	C0020	C0030
10300I	Interest rate risk	512 641
10400I	Equity risk	189 009
10700I	Spread risk	693 322
10900I	Currency risk	664 320
11000I	Other market risk (transition & default)	390 345
19900I	Diversification within market risk	-1 503 398
20100I	Counterparty risk (reinsurance credit)	166 821
20200I	2 counterparty risk (broker credit)	16 062
29900I	Diversification within counterparty risk	-5 629
50100I	Non Cat Premium risk	-166 354
50200I	Reserve risk	1 298 982
50300I	Non-life catastrophe risk	165 990
59900I	Diversification within non-life underwriting	-436 842
70100I	Operational risk (incl. group risk)	236 017
80100I	Other risks (pension & liquidity)	47 568

Calculation of Solvency Capital Requirement		C0100
Total undiversified components	R0110	2 268 854
Diversification	R0060	-921 687
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional)	R0160	
Solvency capital requirement excluding capital add-on	R0200	1 347 166
Capital add-ons already set	R0210	22 108
Solvency capital requirement	R0220	1 369 274
Other information on SCR		
Amount/estimate of the overall loss-absorbing capacity of technical provisions	R0300	
Amount/estimate of the overall loss-absorbing capacity of deferred taxes	R0310	
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced funds (other than those related to business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional))	R0420	
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

Approach to tax rate		C0109
Approach based on average tax rate	R0590	3

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