SOLVENCY AND FINANCIAL CONDITION REPORT 2024

Irish Life Health dac

April 2025

Contents

SUMMARY

ABOUT US

Irish Life Health dac ("Irish Life Health" or "the Company") is part of Irish Life Group ("Irish Life").

Irish Life is one of Ireland's leading financial services companies and has been helping people in Ireland to look after their protection, pension and investment needs for over 85 years.

Irish Life is proud to be a part of the Great-West Lifeco group of companies, one of the world's leading and most secure financial services organisations. Great-West Lifeco and its subsidiaries - including the Great-West Life Assurance Company which was founded in Winnipeg, Canada, more than a century ago - have around $3.2 trillion Canadian dollars in consolidated assets under administration. They are members of the Power Financial Corporation group of companies.

At Irish Life Health, we don't just offer comprehensive health insurance; we prioritise keeping our customers healthy with an array of preventative benefits many of which are unique to us. Our customers enjoy unlimited access to our Digital Doctor service, which includes instant messaging with a doctor, online prescriptions, and the option for face-to-face consultations if necessary. We also provide nationwide access to Female Health specialists, mental health services, specialist back and neck physiotherapy and 23 Minor Injury Clinics across the country.

In 2024, we expanded our services by launching the Irish Life Health Expresscare Clinics in Dublin and Cork, designed to see customers with minor injuries within 60 minutes. We've also partnered with Hertility, an innovative at-home hormone and fertility test, to offer our customers preferential access to their services on all plans. Additionally, we are the only health insurer to provide full cover for Female Physio on selected plans. Our customers also benefit from fast access to consultants, specialists, and hospitals nationwide.

By the end of 2024, Irish Life Health had nearly 21% of the Irish health insurance market, serving 515k customers.

WHAT WE DO

Irish Life's purpose is to help people build better futures and the organisation has a vision to be the driving force behind people's financial, physical, and mental wellbeing.

Irish Life Health is an integral part of this delivering progressive, relevant, affordable and easy to access healthcare for our customers.

OUR CUSTOMERS

During 2024 customer numbers have increased from 510,220 in 2023 to 515,130. Irish Life Health paid out €530 million (2023: €500 million) in hospital and day-to-day claims and benefits for our customers over 2024. This increase in claims underscores our commitment to supporting our customers when they need us most. We've observed significant growth in customers benefiting from day-to-day claims, which have doubled over the past four years, indicating that customers are deriving substantial value from their health insurance to maintain their well-being.

We remain dedicated to delivering exceptional service and making it easy for our customers to engage with us. In 2024, we continued to invest in new technologies to enhance our service offerings. With a customer base exceeding half a million individuals, including both personal and corporate clients, we take pride in our excellent customer satisfaction scores. These scores are continuously measured and externally benchmarked against a sample of 1,500 other companies by The Leadership Factor Customer Satisfaction Index. We consistently rank in the top quartile for overall customer satisfaction, ease, and Net Promoter Score (NPS).

Our focus on simplifying access to health insurance benefits and promoting the value of preventative health has led to just under 2 million proactive benefits being utilised by our customers in 2024. Proactive benefits are benefits that fall outside of hospital care and are health & wellbeing interactions we provide to help our customers live healthier lives. Additionally, 95.2% of our member claims are submitted online, with policyholders frequently logging into our Digital Member Area to check their cover, make claims, or use our MyClinic service, among other features.

Irish Life Health has maintained operational resilience and continues to deliver outstanding service for our customers.

OUR STRATEGY

At Irish Life Health, our strategy is focussed on providing the most progressive, relevant, affordable, and easily accessible healthcare for our customers, enabling them to lead healthier lives.

We deliver health insurance solutions for two primary audiences: Individuals & Families and Corporate Customers. Our priorities include:

> Advancing access to healthcare at the right time in the right location for our customers.
> Exploring new opportunities in related and complementary areas.
> Leveraging opportunities with other Irish Life businesses to offer enhanced services for our combined customers.

We also prioritise:

> Enhancing automation and digitisation of our services to improve efficiency and customer experience.
> Continuously improving all customer service touchpoints to make it easy for customers to engage with us.
> Managing claims costs and expenses to maximise value for our customers.
> Fostering a positive work environment that facilitates our employees to develop and grow.

Our strategic initiatives are driven by insights into our customers' needs through research and data. We actively review and adjust our strategy to accelerate developments that benefit our customers, considering the current climate and challenges they face.

In 2024, we further developed our care pathways for customers with chronic conditions such as heart failure and respiratory conditions. We introduced a fast diagnosis route through an in-home test for customers with Sleep Apnoea, enabling quick diagnosis and treatment.

Our Health in the Home service has grown significantly, expanding into the Munster region and extending access to additional in-home treatment services, reducing the need for long hospital stays for many of our customers.

In 2024, we also expanded our services by launching the Irish Life Health Expresscare Clinics in Dublin and Cork, designed to see customers with minor injuries within 60 minutes.

Irish Life health

OUR VALUES

Our purpose and vision are supported by our five Irish Life Group values that were updated in 2024:

- We work best together
- We do the right thing
- We put customers at the heart of everything
- We find better ways
- We aim high.

These values drive how we approach our strategy to deliver on our key performance indicators. We celebrate examples of our values across our business.

OUR PEOPLE

We work hard to attract and retain the most talented people, and to support and develop them throughout their careers. We look for creative, original thinkers who will challenge us to be the best we can be. As a result, we have built a skilled and enthusiastic workforce with exceptional knowledge and expertise. Our selection process is designed to be fair, transparent, and eliminate bias. Salaries are reviewed annually and benchmarked against the industry.

Having the right people, with the right skillsets, placed in the right roles, supports us to achieve our goals. Our employee proposition is reviewed often, to ensure we provide a comprehensive, attractive offering and employee experience.

We consider our employee experience with a holistic lens capturing wellbeing, diversity, equity and inclusion (DEI), along with agile and new ways of working.

In 2024 we continued to embed and adapt our hybrid working model, where employees split their time between the office and home locations. We have supports and tools in place to help our employees transition to new ways of working and we have set up working groups and processes through which the change impact is assessed. We identified Connection, Collaboration and Community as being key to underpinning the value of why we come together.

Continuous development and growth are key for our people. Our Learning & Development programmes offer employees a range of rich development and learning options across a range of strategically aligned topics, including our successful mentoring programme. Training and development is provided in-person and online through workshops, conferences, webinars and briefings, and supported by an online self-service learning portal which provides access to a wide variety of courses and topics.

OUR ENVIRONMENT

We operate from the Irish Life campus (“the Campus”). Irish Life has developed an approach designed to reduce the potential impacts of its activities, products and services on the environment.

The ISO 14001 is an international standard that specifies requirements for an effective environmental management system. In 2018, Irish Life successfully transitioned to ISO14001:2015 which is audited annually, for its buildings on the Campus. This certification sets out the criteria and framework that Irish Life follows for an effective environmental management system. Irish Life is required to consider all environmental issues, including power usage, waste management, and the effective use of resources.

As part of the environmental management system, we have introduced electric car charging points, LED lighting, recycling stations, the Government supported bike to work scheme and the Government travel pass scheme.

As part of a drive to reduce the reliance on single use plastic throughout the Campus, reusable cups have been supplied to staff. Irish Life will continue to look for further opportunities to reduce reliance on single use plastic on the Campus.

The electricity supply to the main Abbey Street buildings is from a renewable energy supplier.

INITIATIVES FOR IRELAND

Irish Life are actively engaged within our community and are involved in a number of initiatives.

As title sponsors of the Irish Life GAA Healthy Clubs programme, we are proud of this long-standing relationship that brings health awareness, support and opportunities to communities around Ireland through their local GAA club.

An independent Social Return on Investment (SROI) evaluation by Just Economics launched in December 2023, found that the Irish Life GAA Healthy Clubs delivered health and wellbeing benefits worth €50 million to Ireland. The report highlighted that €19 of value is generated for every €1 of financial, volunteer, and in-kind investment in the Irish Life GAA Healthy Club Programme (or a return ratio of 19:1). It also showed significant health and wellbeing gains for participants, including increases in physical activity, adoption of healthier behaviours, starting new hobbies and friendships, as well as improvements in life satisfaction, connectedness to other people and the community.

To date, there are over 600 GAA clubs engaged in the programme nationwide.

We supported several nationwide step challenge initiatives through our MyLife app which were hugely successful in recognising and rewarding the importance of physical activity and the wellbeing of communities. 40.2K people joined over 970 GAA clubs to participate in the Irish Life GAA Healthy Clubs ‘Every Step Counts’ challenge on MyLife in January 2024, and every county in Ireland was represented. Participants tracked steps equivalent to 6.6 million kilometres, improved their health scores and increased their sense of connection to the community.

Our title sponsorship of the Irish Life Dublin Marathon and Race Series shows how we support people to live a better life, demonstrating Irish Life as a 'force for good' in our community. The Irish Life Dublin Marathon is a firm fixture in the Irish sporting and social calendar every October bank holiday weekend. This year saw almost 18,000 runners achieve the incredible goal of completing a marathon, cheered on by hundreds of thousands of proud family members and friends along the streets of Dublin.

Each year, the Irish Life Dublin Marathon contributes millions to charity, as well as to Dublin city.

Irish Life employees that ran or volunteered at the event raised almost €55,000 this year for our 2024 staff charity partners Irish Motor Neuron Disease Association and Down Syndrome Centre North East. A €10,000 donation was also made by Irish Life to Debra Ireland.

The Race Series and Marathon were supported through the 'MyLife' app, with over 14,000 walkers and runners participating in distance challenges, a 38% increase on 2023.

The total donated to our 2024 charity partners Irish Motor Neurone Disease Association and The Down Syndrome Centre North East was €560,000. €280,000 was raised by Irish Life employees and a matching €280,000 donation by Irish Life.

PURPOSE OF THE SOLVENCY AND FINANCIAL CONDITION REPORT

The Solvency and Financial Condition Report ('SFCR') helps customers and key stakeholders understand the Company's regulatory capital and financial position. The report also covers how the Company is run, how the business has performed and the governance and risk management systems in place.

This report complies with the requirements of the European-wide Solvency II regulations which came into force on 1 January 2016. These regulations require that the SFCR is produced on an annual basis.

The Solvency II regulations also aim to ensure that insurance companies stay financially sound and can survive difficult periods, in order to protect policyholders.

This report is based on results and methodology used by the Company as at 31 December 2024. All numbers in this report are in €'000 unless otherwise stated.

BUSINESS AND PERFORMANCE SUMMARY

The business has performed well in 2024 despite a significant increase in the level and cost of care provided to our customers over the year. The Company remains operationally and financially robust.

Customer numbers have grown from 510,220 in 2023 to 515,130 in 2024. Financial performance has been strong in 2024 in the context of the significant increase in claims costs, building on the results from 2022 and 2023. In 2024, we achieved a top quartile Customer satisfaction score.

The Company's profits vary from year to year. Total comprehensive income after tax has been as follows: 2024: €17.7m and 2023: €25.6m.

Over the year significant increases in medical claims costs were largely offset by increases in premium rates to reflect the increased demand for healthcare. The Company aims to mitigate the impact of premium increases driven by medical inflation for its customers through its continued focus on wellbeing and preventative care, in addition to claims cost management and ensuring that customers get access to the care they need in the right setting. We continue to focus on returning value to our customers through providing additional benefits and services while aiming to minimise premium increases.

More details on the Company's financial performance can be found in Section A.

SYSTEM OF GOVERNANCE SUMMARY

The Board of Directors of the Company are responsible for setting the Company's strategy and for ensuring that the Company is governed properly and manages risk adequately. The Board, therefore, sets the Company's business plan, risk appetite and risk management framework. This means it outlines the types and level of risk that the Company can expose itself to.

It also ensures that qualified, experienced and trustworthy people are appointed to manage and oversee the Company.

In the year to 31 December 2024, there were no material changes to how the Company is governed.

More details on the Company's system of governance can be found in Section B.

RISK PROFILE SUMMARY

The principal risks and uncertainties that the Company faces include insurance risk, market risk, credit risk and operational risk. The Directors manage these risks appropriately.

In the year to 31 December 2024, there were no material changes to the risk profile of the Company.

There was a heightened level of demand for healthcare services over 2024 compared to 2023, driven by continuing increases in demand for care in private facilities resulting in increased claims uncertainty and insurance risk during the year. This led to increased pricing and reserving risk, with heightened strategic and business environment risk.

The Company operates a series of risk limits which measures underwriting exposure and monitors these exposures to identify trends in the risk profile over time. The Company seeks to manage strategic and business risk through proactive engagement with customers, industry representation, a rigorous strategic planning process and ensuring execution of business strategies in alignment with the Company's Risk Appetite. Irish Life Health is mindful of emerging changes in the Irish Healthcare system and the broader Sláintecare agenda.

The Company's regulatory environment and regulators' expectations of regulated entities continues to evolve. The Company's governance structure and policy set is regularly reviewed to reflect the changing regulatory requirements and its own organisational development.

Change in the operating environment is actively monitored and considered by the Company in its strategic planning process, pricing decisions and reserving processes as well as through the ORSA.

Section C outlines the risks that the Company is exposed to. It also explains how the Company follows the risk policy approved by the Board and how this policy matches the Company's business strategy.

VALUATION FOR SOLVENCY PURPOSES SUMMARY

Section D analyses how we have valued our assets and liabilities on our Solvency II balance sheet. It also highlights where there are differences between this Solvency II valuation and the figures reported in our annual audited financial statements, which are prepared under International Financial Reporting Standards (‘IFRS’) as adopted by the European Union.

Section D.2 outlines the way we have calculated the amount required to meet our contractual obligations under our health insurance policies, using the Solvency II regulations (our “technical provisions”). The main valuation difference between the Solvency II balance sheet and the financial statements relates to the valuation of technical provisions.

CAPITAL MANAGEMENT SUMMARY

Section E explains how the Company manages and measures the capital it holds so we can ensure the Company remains solvent and can meet it obligations when they fall due.

The Directors are satisfied that the Company has sufficient capital to meet its requirements under the Solvency II regime.

The following table sets out the company’s solvency position:

€000s	31.12.2024	31.12.2023
Eligible own funds to meet SCR	110,000	101,185
Solvency Capital Requirement (SCR)	73,002	67,414
Solvency ratio	150.7%	150.1%
Minimum Capital Requirement (MCR)	18,250	16,854
Eligible own funds as a percentage of MCR	602.7%	600.4%

Irish Life Health does not use the volatility adjustment, the matching adjustment or transitional arrangements permitted under the Solvency II regulatory regime.

The Company has robust governance structures and processes in place which support continuous monitoring of the Company’s solvency position, operational and financial performance. The Company’s solvency cover at the financial year end was 150.7% after dividends (2023: 150.1%). As at the date of approval of this SFCR, the Company continues to operate within Solvency II regulatory capital guidelines.

ANY OTHER INFORMATION

No other information.

REVIEW

This report was reviewed and approved by the Board on 26 March 2025.

A

BUSINESS AND PERFORMANCE

This section describes our organisational structure and financial performance over the last financial year.

A.1 BUSINESS

A.1.1 COMPANY INFORMATION:

Company Name: Irish Life Health dac

Name and contact details of the supervisory authority which is responsible for financial supervision of the undertaking:

Central Bank of Ireland
New Wapping Street
Spencer Dock
North Wall Quay
Dublin 1

We are a wholly owned subsidiary of Irish Life Group Limited ("ILGL"), an insurance holding company subject to Solvency II group supervision by the Central Bank of Ireland. Canada Life Limited ("CLL") is the immediate parent of ILG. The supervisory authority of CLL is the Prudential Regulation Authority in the UK.

The contact details for the PRA are:

20 Moorgate,
London EC2R 6DA

Name and contact details of the external auditor of the Company is:

Deloitte Ireland LLP
Chartered Accountants & Statutory Audit Firm
Deloitte & Touche House
Earlsfort Terrace
Dublin 2

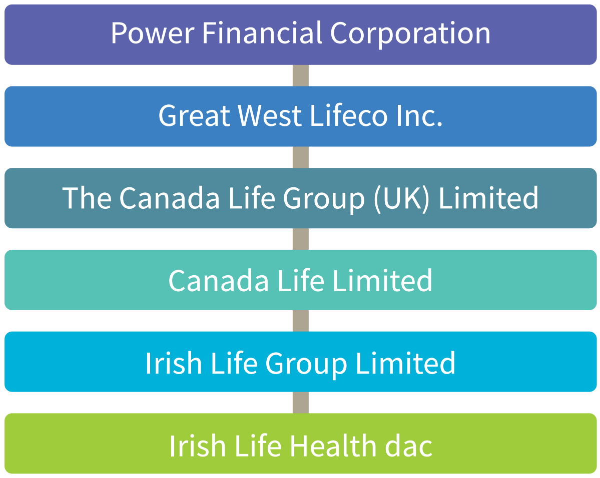
Irish Life Health is a member of the Great-West Lifeco group of companies, one of the world's leading life assurance organisations.

Great-West Lifeco (Lifeco) and its subsidiaries, including The Great-West Life Assurance Company (GWL), have approximately $3.2 trillion Canadian dollars in consolidated assets under administration and at the end of 2024 had approximately 33,500 employees worldwide and are members of the Power Financial Corporation Group of companies. GWL is a wholly owned subsidiary of Lifeco which is incorporated in Canada and listed on the Toronto Stock Exchange.

Lifeco is the indirect parent company of The Canada Life Group (U.K.) Limited (CLG). CLG is the parent company of Canada Life Limited (CLL) which is a U.K. based insurance company.

CLL acquired Irish Life Group Limited in 2013. The Irish Life Group has a number of subsidiaries, and is subject to Solvency II group supervision as the insurance holding company for Irish Life Health.

Below is a simplified diagram of how our ultimate parent Company, Power Financial Corporation, is organised:



Irish Life Health's principal activity is the transaction of health insurance business within the Republic of Ireland. The Company's aim is to give customers an innovative, compelling and easy access proposition compared to the other health insurance offerings in the marketplace.

A.2 UNDERWRITING PERFORMANCE

The table below shows the Company's reported underwriting performance for 2024 and 2023, as reported in the Company's financial statements.

The Company's business is reported as medical expenses insurance under Solvency II.

€000s	2024	2023
Insurance Service Result		
Insurance Revenue	593,955	541,187
Insurance Service expenses	-562,502	-500,247
Net expenses from reinsurance held contracts	-6,465	-4,568
	24,988	36,372
Net investment result		
Fee and other income	4,953	4,562
	4,953	4,562
Other income and expenses		
Operating and administrative expenses	-10,546	-13,337
Profit before tax	**19,395**	**27,597**
Tax expense	-2,491	-3,481
Profit for the year attributable to equity holders	**16,904**	**24,116**
Net change in fair value of investment debt securities at FVOCI, net of tax	789	1,447
Total Comprehensive Income after tax	**17,693**	**25,563**

OVERALL UNDERWRITING PERFORMANCE

Irish Life Health's profits vary from year to year. Total comprehensive income for 2024 was €17.7m, compared to total comprehensive income after tax of €25.6m in 2023.

Claims experience and the number of customers insured are two key drivers of financial performance which have impacted the profitability of the Company over the last number of years. The number of customers insured has continued to grow, increasing to 515,130 at the end of 2024.

Overall higher claims experience over 2024 is reflected in the profit after tax result. This was driven by increases in claims from private hospitals, which were somewhat offset by lower claims from public hospitals, as Sláintecare initiatives start to take effect.

Irish Life Health continued to support our customers and employees, looking after their well-being and providing new and enhanced benefits during the year.

The key drivers for the variation in the components of profits reported in the table are as follows:

Insurance Revenue

Premium income has been growing in recent years due to growth in the number of customers (which has increased by 1% between the end of 2023 and the end of 2024) and increases in average premium.

Insurance Service Expenses

Insurance service expenses have increased due to increased claims costs during the year.

Claims can vary significantly from year to year. Claims in 2024 were higher than in 2023 and previous years. This reflects the strong demand for healthcare services in Ireland over the year, increase in volumes of services provided by the hospitals and increases in the cost of claims particularly related to drug costs.

Irish Life Health aims to mitigate the impact of increases in claims costs for its customers through its continued focus on claims cost management. Premium levels have reflected claims experience and the Company's claims cost containment activity.

Operating and Administrative Expenses

Operating and Administrative Expenses have decreased due to lower investment in strategic projects during the year.

A.3 INVESTMENT PERFORMANCE

Management of the Company's investments is done by Canada Life Asset Management Limited ("CLAM"), a Company owned by CLG. The Company's investment policy is monitored and controlled by senior management of Irish Life Health with oversight from the Board of Directors.

The Company's portfolio of assets consists of short-term investments. Based on current market conditions and especially recent interest rates, this lead to a positive investment return in 2024.

In 2024, the Company's investments returned a profit of €6.0m compared to a profit of €6.2m in 2023.

Irish Life Health does not invest in securitisations.

A.4 PERFORMANCE OF OTHER ACTIVITIES

There has been no other material income or expenses incurred by the Company which haven't been included above.

Irish Life Health have no material leasing requirements.

A.5 ANY OTHER INFORMATION

No other information.

B

SYSTEM OF GOVERNANCE

B.1 GENERAL INFORMATION ON THE SYSTEMS OF GOVERNANCE

The governance structure facilitates reporting and escalation of risk issues from the bottom up and communication and guidance relating to risk policy and risk decisions from the top down.

Irish Life Health's Board of Directors ("the Board") is in place to lead, manage and control the Company. The objective of the Board is to maximise risk-adjusted returns and profitability while safeguarding Irish Life Health's financial strength, and ensuring fair treatment of customers. To support this objective, the Board is responsible for ensuring that there are systems of governance and control in place that operate effectively at all levels of the organisation.

The Board is responsible for making key decisions for Irish Life Health, including all material strategic decisions. Documented rules on management authority levels and on matters to be notified to the Board are in place, supported by an organisational structure with clearly defined authority levels and reporting responsibilities.

The Board considers its current size and structure to be appropriate to meet the requirements of the business. The Board keeps its membership, range of qualifications, skills and experience under review.

There were no resignations from the ILH Board during 2024.

The Board considers all of the INEDs to be independent of management and free of any business or other relationships which would interfere with the exercise of their independent judgement.

Directors, in delivering their duties, may take independent professional advice, at the Company's expense. Training resources and professionals are made available to directors to ensure they remain briefed on all aspects required to fulfil their duties.

The Company Secretary is responsible for advising the Board through the Chairman on all governance matters. All directors have direct access to the Company Secretary.

The members of the ILH Board as at 31st December 2024 were as listed below.

Members	Position	Date
Brenda Dunne	INED and Chair of Board	Appointed 01/04/2020
Gerard Davis	ILH Managing Director	Appointed 13/10/2020
Ann Marie Nestor	Executive Director	Appointed 01/01/2024
David Killeen	NED	Appointed 01/08/2016
Killian Colleran	INED	Appointed 01/07/2020
Elaine Lynch	INED	Appointed 27/11/2019
Stefan Kristjanson	NED	Appointed 07/07/2020
Cecil Hayes	INED	Appointed 01/08/2016
Deborah Mintern	INED	Appointed 22/10/2021

The Company's system of governance is adequately designed to prevent or detect material misstatements in the financial statements and disclosures in accordance with the nature, scale and complexity of the risks inherent in its business.

B.1.1.1 COMMITTEES

The Board assigns responsibility for control and reporting, delegating authority as appropriate to Risk, Audit and Executive Committees so that the Board can be effectively advised and supported in its decision making and oversight responsibilities.

These committees are responsible for ensuring that the Company has an appropriate governance structure in place which operates effectively. Furthermore, the Company has two Executive Risk Committees for managing risk across the business including the Management Risk Forum and a Compliance and Operational Risk Committee. The Company is also subject to oversight from ILGL's Executive Committees for risk and compliance activities.

The ILGL Board Remuneration Committee and Board Nomination and Governance Committee are constituted at the level of the Irish Life Group, the Company's parent company, and their membership includes some ILH directors. ILH relies on these committees, as permitted under the Corporate Governance Code.

The Board Remuneration committee develops, decides, implements and operates ILH's remuneration policies.

The Board Nomination and Governance Committee:

- Recommends Board and Board Committee appointments to ILH's Board.
- Keeps the governance arrangements for ILH under review.
- Maintains succession plans for the Board.
- Makes sure the Board and sub-committees have the right skills and resources.
- Arranges training for new directors and ongoing training for all directors.
- Oversees ILH's Corporate Governance.

The purpose, membership, duties and responsibilities of the committees are defined within their respective charters. Sub-committees of the Board are required by their charters to act within the powers and authority delegated to them by the Board. Where appropriate, the Board Committees have a Risk, Compliance, Actuarial or Finance control function member present at their meetings.

B.1.1.2 BOARD RISK COMMITTEE

The Board Risk Committee ("BRC") provides the business with direction and oversight in relation to the design and operation of the overall risk management framework, risk appetite and risk limits. The BRC also provides oversight of the Risk Function and the Compliance Function.

The BRC provides the Board with support and advice on all matters relating to risk management. The BRC advises the Board in respect of its oversight responsibilities of Irish Life Health's principal risks including, but not limited to, insurance, market, credit, liquidity, operational, conduct and reputational risks. In line with its charter and risk limit framework, the BRC is required to escalate any breaches of risk policies or of the limit framework to the Board.

The BRC is responsible for ensuring regular reviews are performed of the respective risk policies and frameworks and for reporting the level of compliance to the Board. The BRC will review and recommend any changes to risk policies and frameworks to the Board for approval.

The BRC is advised and supported by Irish Life Health's Management Risk Forum, Compliance and Operational Risk Committee, Chief Risk Officer and Head of Compliance.

B.1.1.3 BOARD AUDIT COMMITTEE

The Board Audit Committee ("BAC") provides oversight of the Finance, Actuarial and Internal Audit functions. The committee manages risks inherent in the financial reporting process by reviewing significant financial reporting results and monitoring the adequacy and effectiveness of internal controls. The BAC is also responsible for reviewing the Company's Solvency II balance sheet and the capital requirements calculated in line with Solvency II requirements. The BAC is responsible for the external statutory audit and, in coordination with the parent Company, advises on the appointment of the external auditors. The BAC is also responsible for monitoring the effectiveness and objectivity of internal and external audit, as defined in the BAC charter.

The BAC is required to advise the Board in relation to its duty to confirm the integrity of disclosed financial statements, as well as meeting its responsibilities in terms of its obligations under applicable laws and regulations. The BAC also advises the Board in relation to confirming the effectiveness of the design and operation of the Company's internal controls.

B.1.1.4 MANAGEMENT RISK FORUM

The Management Risk Forum ("MRF") is chaired by the Irish Life Health Chief Risk Officer ("CRO"). It is responsible for managing all material risks arising for Irish Life Health, and in doing so identifies and implements appropriate mitigation strategies.

The MRF is an executive sub-committee of the BRC. Through the CRO, the BRC is advised and supported by the MRF.

B. 1.1.5 COMPLIANCE AND OPERATIONAL RISK COMMITTEE

The Compliance and Operational Risk Committee ("CORC") is chaired by the CRO. It is responsible for managing operational risks arising for the Company, and in doing so, identifies and implements appropriate mitigation strategies.

The CORC is a sub-committee of the BRC. Through the CRO, the BRC is advised and supported by the CORC.

B.1.2 ADEQUACY OF AND REVIEW OF SYSTEMS OF GOVERNANCE

The adequacy and operation of the systems and governance in Irish Life Health are assessed on at least an annual basis. This includes an annual review of the performance of the governance committees listed above, as well as a review of their responsibilities. Independent reviews of the governance arrangements are also commissioned periodically. The Board is satisfied that the governance arrangements are appropriate, but refinements will be made in the future as appropriate including responding to any future regulatory guidelines.

B.1.3 REMUNERATION PRACTICES

The Company's Remuneration Policy is intended to attract, retain and reward qualified and experienced employees who will contribute to the Company's success. Irish Life Health uses the Remuneration Policy to:

- help generate long-term value for shareholders and customers;
- motivate employees to meet annual corporate, divisional and individual performance goals;
- encourage employees to achieve goals in line with our Code of Conduct and
- align with sound risk management practices and regulatory requirements.

The Remuneration Policy is supported by the Company's performance management process. This helps to develop a risk-aware performance culture that reflects the Company's vision and values. The process is based on three core principles:

- quality feedback and open conversations;
- shared responsibility for the process and
- treating staff fairly and recognising their positive contribution.

The umbrella policy for operational risk and the Great-West Lifeco 'Code of Conduct' sets out the principles behind our approach to managing the risks associated with our Remuneration Policy.

The principles state that remuneration programmes should:

- promote sound and effective risk management and align with the risk strategy and preferences approved by the Board;
- be consistent with business and risk strategy and shareholders' long-term interests;
- be communicated to all staff;
- be competitive and fair;
- attract, reward and motivate staff to deliver on objectives and achieve success and
- be underpinned by clear, effective and transparent remuneration governance.

The Remuneration Policy is also designed to meet the Company's regulatory requirements. The applicable Solvency II principles around remuneration were identified and assessed. The Company has set up and documented the following compliance arrangements:

- relying on ILGL's Board Remuneration Committee to help the Board carry out its remuneration-related roles and responsibilities; the Remuneration Committee, based on data provided, makes sure we comply with the Remuneration Policy each year;
- making sure there are specific remuneration arrangements (programmes) for the Board, senior leaders and the key control functions;
- benchmarking base salaries against market rate for the role as defined in independent salary surveys;
- assessing all bonus schemes against both personal and financial targets (the financial targets for senior oversight roles are not significantly linked to Company performance);
- auditing and risk assessing the Remuneration Policy and
- publishing the Remuneration Policy on the employee intranet site.

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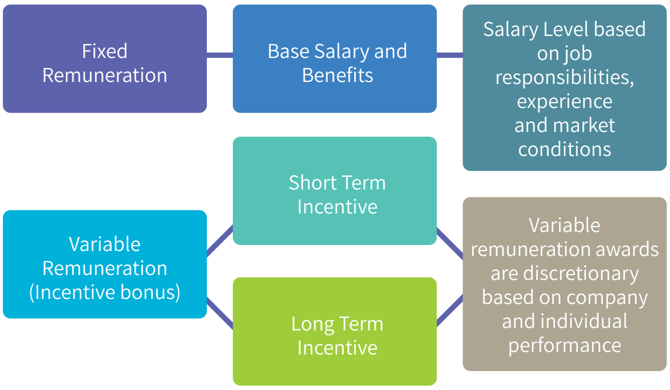
B.1.3.1 SHARE OPTIONS, SHARES OR VARIABLE COMPONENTS OF REMUNERATION

All remuneration packages consist of:

> a base salary
> annual incentive bonus
> retirement benefits
> benefits during employment.

Senior positions may also include a long-term incentive.

The proportion of each element in the overall package will vary based on the role.



The base salary reflects the skills, competencies, experience and performance level of the individual. Base salaries are based on market rates for each role as defined by independent salary surveys.

Irish Life Health has an annual incentive bonus scheme that links an individual's overall remuneration to the performance of the Company, the wider group and the performance of the individual. The bonus depends on key business units meeting objectives that are high impact and closely aligned to our critical priorities. However, this does not apply to those in senior oversight roles. Their bonuses are not significantly linked to Company performance.

In addition, the Company has a number of incentive schemes linked to the level of the role (each level attracts different payments for hitting specific targets, and has its own maximum bonus) and where appropriate, the type of role (for example sales roles). Each staff member has a number of operational and bonus objectives for the year, including an accountability heading of Risk and Management Control. The Company sets base salaries high enough to prevent employees being overly dependent on their bonuses.

Long-term incentives are mainly made up of performance share units, issued by Lifeco.

B.1.3.2 SUPPLEMENTARY PENSION OR EARLY RETIREMENT SCHEMES FOR THE MEMBERS OF THE MANAGEMENT BODY AND OTHER KEY FUNCTIONS

Irish Life Health's remuneration policy does not include any supplementary pension or early retirement schemes for Board members or other key function holders.

B.1.3.3 MATERIAL TRANSACTIONS DURING THE REPORTING PERIOD

Material transactions with shareholders:

> Dividends totalling €11m were paid to the shareholder in 2024. A final dividend of €3m is proposed for 2024.

Material transactions with senior management and members of the Board:

> There were no material transactions with the senior management of Irish Life Health or the members of the Board in the period, apart from transactions linked to their remuneration and transactions relating to insurance policies conducted under normal commercial terms.

B.1.4 CONTROL FUNCTIONS

In line with the European Regulator's Guidelines on System of Governance, (EIOPA-BoS-14/253), Irish Life Health consider key functions to be Risk Management, Compliance, Actuarial, Internal Audit and Finance. Collectively, we refer to these five functions as 'control functions'.

The control functions assist the Board in meeting its responsibilities to ensure proper management of Irish Life Health.

The relevant Board Committee approves the mandate, resources and plans for the control functions annually.

The control functions report to each meeting of the Board Committees. The head of each control function has a direct line of communication with the relevant committee Chair.

Each control function is staffed by professionals with appropriate skills and experience, plus a deep knowledge of our business.

Risk Function

The Risk Function is established as an independent second line function separate from business operations. The function is staffed and resourced by appropriately skilled and experienced risk professionals, with a deep knowledge of the Irish Life Health business.

The Risk Function's key responsibilities are set out in the Risk Function Mandate, which is set by the BRC. The mandate is reviewed on an annual basis. Compliance with the mandate and an assessment of the performance of the Risk Function is also carried out each year. Key responsibilities of the Risk Function include:

> Developing, implementing and maintaining ILH's Enterprise Risk Management Framework by ensuring continued monitoring of compliance with the Framework through:

a. The Risk Appetite Framework;
b. Risk Policies;
c. Risk Processes and Infrastructure;
d. Own Risk and Solvency Assessment (ORSA);
e. Recovery Planning.

The Chief Risk Officer ("CRO") is the pre-approved controlled function ("PCF") holder for the department. The mandate conveys authority on the CRO and Risk Function to have access to all the Company records, information and personnel required to carry out the responsibilities and to follow up on issues raised. The CRO also has the right of access to the Board, BRC and the BAC.

The CRO and Risk Function are established as independent from the operating divisions and are required to remain objective in their work. The CRO reports to the BRC, to the ILGL CRO for functional matters and to Irish Life Health Management for operating matters and day to day management.

Actuarial Function

The Actuarial Function is led by the Head of the Actuarial Function, and is staffed by appropriately skilled and experienced actuarial professionals. The Head of Actuarial Function is the PCF holder for the department.

The responsibilities of the Actuarial Function are set out in the Actuarial Function Mandate which is set by the BAC and reviewed on an annual basis. The key responsibilities of the Actuarial Function include:

- Technical provisions: calculation of technical provisions and reporting to the Board on technical provisions in line with regulatory requirements;
- Risk management: contributing to the effective implementation of the Company's risk management system;
- Oversight of pricing and reinsurance activities.

The Head of Actuarial Function has a reporting line to the Chief Actuary of ILGL, to the BAC and to the Irish Life Health Director of Finance, Planning and Risk for operating matters and day to day management.

Compliance Function

The Compliance Function is established as an independent second line function separate from business operations and comprises of the compliance unit in the Company together with ILGL's Group Compliance Function.

The function is staffed by appropriately skilled and experienced compliance professionals. The Irish Life Health Head of Compliance is the PCF holder for the function. The Irish Life Health Head of Compliance has dual reporting lines to the ILGL Chief Compliance Officer and Irish Life Health Director of Finance, Planning and Risk.

Irish Life Health's Head of Compliance also has a direct reporting line and responsibility to the BRC for oversight matters.

The Compliance Function's key responsibilities are set out in the Compliance Function Mandate which is reviewed annually by the BRC.

The Compliance Function's key responsibilities include:

- Establishing and maintaining a sound compliance framework for the independent oversight and management of Irish Life Health's regulatory compliance risks;
- Providing independent advice and guidance to Irish Life Health in relation to regulatory developments and other compliance matters including advice and oversight on new and changing regulatory requirements;
- Conducting compliance monitoring to assess the adequacy of and adherence to compliance requirements and procedures;
- Co-ordinating the Company's relationships with its prudential and conduct regulators;
- Reporting on a quarterly basis to the BRC and on a regular basis to Senior Management of the Company on the key regulatory matters for the Company; and
- Providing training as required to the Company's staff and directors on relevant compliance matters.

Internal Audit Function

Overview

The Internal Audit function is provided by Group Internal Audit and is independent of our business management activities. Internal auditors have no operational responsibility or authority over any of the activities audited.

The Head of Internal Audit reports functionally to the Chair of the Board Audit Committee and the Chief Internal Auditor for Ireland and Germany. Internal Audit reports to the ILH Senior Leadership Team on a regular basis on the status of the audit plan, and on any audit findings arising. Internal Audit also provides quarterly reports to the Audit Committee of ILH's Board.

Main responsibilities

The Head of Internal Audit is required to:

- Submit, at least annually, a risk-based internal audit plan to the Board Audit Committee for review and approval;
- Review and adjust the internal audit plan, as necessary, in response to changes in the company's business, risks, operations, programmes, systems, and controls, or requests by the Board Audit Committee or a regulator;
- Communicate to the Board Audit Committee any changes to the internal audit plan, for approval;
- Ensure all internal audit engagements are appropriately executed and results (with applicable conclusions and recommendations) are communicated to appropriate parties;
- Follow up on audit findings and corrective actions, and report periodically to senior management and the Board Audit Committee on progress;
- Ensure internal audit activity remains free from interference by any element in the company, including in matters of audit selection, scope, procedures, frequency, timing, or report content to enable a necessary independent and objective approach and
- Provide, based on sufficient and appropriate work, an overall opinion on Governance, Risk Management and Control to the Board Audit Committee on a regular basis. Include as part of that opinion, whether the organisation's risk appetite framework is being adhered to, together with an analysis of themes and trends emerging from Internal Audit work and their impact on the organisation's risk profile.

Governance

The Board Audit Committee:

- Reviews and approves the mandate of the Head of Internal Audit;
- Reviews and recommends the appointment/removal of the Head of Internal Audit to the Board;

- Annually assesses the performance of the Head of Internal Audit and the effectiveness of the Internal Audit function;
- Annually reviews and approves the function's organisational and reporting structure, budget and resources;
- The Head of Internal Audit maintains direct and unrestricted access to the Board Audit Committee, and meets regularly with the Chair of the Board Audit Committee, without other managers present;
- The Head of Internal Audit is responsible for ensuring a quality assurance and improvement programme is in place to drive continuous improvement and ensure conformance with the Institute of Internal Auditor's (IIA) Standards and Code of Ethics. The Head of Internal Audit reports the results of this work to the Board Audit Committee annually.

Finance

This function is led by the Irish Life Health Head of Finance ("HOF") who reports to the BAC on oversight matters and is a PCF for the Finance Function. The HOF is responsible to Irish Life Health Management for operational and day-to-day management.

The Irish Life Health Finance team report to the HOF and manage the regulatory reporting and performance management needs of the business.

Group Finance led by the Group Financial Controller, provides finance activities through a shared service model to the company. The HOF continues to maintain oversight and overall responsibility for these tasks.

Through the HOF, the Board and BAC are given periodic financial and performance updates. The HOF also provides detail that helps the Board assess and approve the annual statutory financial statements and regulatory returns.

Main responsibilities

These include:

- financial control and governance;
- reporting statutory and regulatory financial information, including preparing the financial statements;
- budgetary, cost and financial management.

Governance

The responsibilities of the HOF are set out in the HOF Mandate which is set by the BAC and reviewed on an annual basis.

B.2 FIT AND PROPER REQUIREMENTS/ INDIVIDUAL ACCOUNTABILITY FRAMEWORK

B.2.1 POLICIES AND PROCESSES IN PLACE TO MEET FIT AND PROPER REQUIREMENTS

Irish Life Health is committed to ensuring that all of the fit and proper requirements are met and in this regard, ensures that all persons who effectively run the undertaking or have other key functions have the requisite qualifications, knowledge, skills and experience required to carry out their role (fitness assessment) and are honest, ethical, act with integrity and are financially sound (probity assessment).

There are documented HR processes in place for recruitment into roles subject to Fitness and Probity requirements.

Irish Life Health also has in place a Fit and Proper Policy (the "F&P Policy") which is reviewed and approved annually by the Board.

The F&P Policy sets out the process for fit and proper assessments to be conducted to determine a person's fitness, probity and financial soundness.

Before an appointment is made in respect of persons who effectively run Irish Life Health or have other key functions within the Company, a due diligence process is undertaken to ensure that the person is fit and proper for the role. The due diligence checks for assessing whether a person is fit and proper and is financially sound are set out in the F&P Policy. These checks align to the Central Bank of Ireland's Guidance on Fitness and Probity Standards as follows:

- Evidence of compliance with Minimum Competency Code (where relevant);
- Evidence of professional qualifications where relevant;
- Evidence of Continuing Professional Development where relevant;
- Record of interview and application;
- Reference checks;
- Record of previous experience;
- Record of experience gained outside Ireland;
- Confirmation of directorships held and
- Record of other employments.

In relation to the probity and financial soundness checks, the due diligence is largely by way of self-certification with proposed appointees being requested to complete a questionnaire inquiring as to their probity and financial soundness. The Company then conducts independent directorship and judgements searches.

Most of the roles applicable to persons who effectively run the undertaking or have other key functions are pre-approval controlled functions as defined in the Central Bank Reform Act 2010 (sections 20 and 22) Regulations and subsequent amendments. In addition to the internal due diligence conducted by the Company in advance of appointments into these functions, there is also a requirement that they are pre-approved by the Central Bank of Ireland.

Adherence to the Fitness and Probity standards and requirements is subject to annual reconfirmation by persons occupying roles which are subject to these requirements. If the Company becomes aware that there may be concerns regarding the fitness and probity of a person in a role subject to the F&P Policy, the Company will investigate such concerns and take appropriate action without delay. Irish Life Health will notify the Central Bank of Ireland of any such action taken where there has been a negative conclusion reached with regard to persons holding a role subject to fitness and probity.

B.2.2 POLICIES AND PROCESSES IN PLACE TO MEET THE INDIVIDUAL ACCOUNTABILITY FRAMEWORK

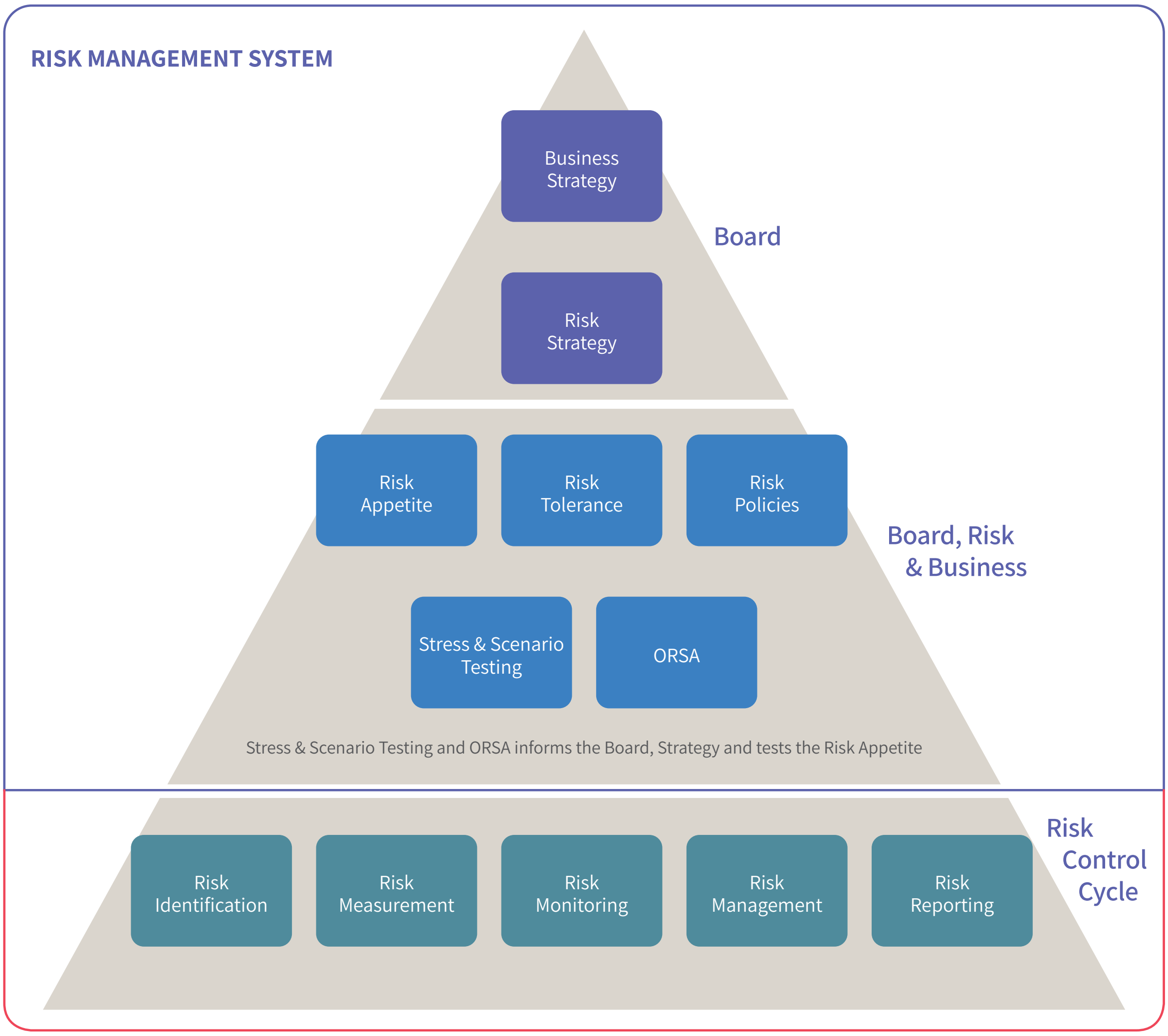
As required by the Central Bank (Individual Accountability Framework) Act, 2023 and the associated Senior Executive Accountability Regime, all relevant regulated firms are required to set out the responsibilities applicable to that firm which have been allocated to a pre-approved controlled function (PCF) role holder. Allocated responsibilities refer to and are comprised of both responsibilities prescribed by the Central Bank in regulations or any other responsibilities identified by the firm and allocated to a PCF role holder. Irish Life Health have developed a Management Responsibility Map which sets out ILH's key management and governance arrangements, in line with the Individual Accountability Framework requirements.

In addition to this and from 29th December 2023, this Act imposes a requirement on individuals performing controlled functions to be fully aware of the expected standards of conduct ('Common Conduct Standards' and for PCFs/CF1s, 'Additional Conduct Standards') and to take reasonable steps to ensure that these Standards are met. Irish Life Health has arrangements in place to ensure that all relevant Conduct Standards are clearly communicated to and acknowledged by all relevant controlled function role holders.

B.3 RISK MANAGEMENT SYSTEM INCLUDING THE OWN RISK AND SOLVENCY ASSESSMENT

The Board is responsible for the overall management of risk within the organisation. The objective of risk management is to ensure that there is a clear understanding of the risks facing Irish Life Health, to understand how much risk is acceptable to the Company and to manage these risks in accordance with Irish Life Health's risk appetite.

As per the diagram below, Irish Life Health's Risk Management System is articulated through its Enterprise Risk Management ("ERM") framework. This framework allows the Board and management to establish the risk strategy, to communicate and monitor adherence to the risk appetite and risk limits, and to identify, measure, monitor, manage and report on risks.



The following table explains how the Company is able to effectively carry out these tasks:

Identify	Risk identification is the structured analysis of any current and emerging risks which the Company faces so that risks can be understood and appropriately controlled. The key elements of the ERM framework which are relevant to risk identification are the formation and regular review of the risk classifications as well as the Emerging Risk and Risk Events processes.
Measure	Risk measurement relates to the quantification of the Company's risk profile. Measuring risk allows a comparison of the size of risk compared to agreed limits and appetite.
Monitor	Risk monitoring relates to overseeing and tracking the Company's risk profile on an ongoing basis. The key elements of the ERM framework relevant to risk monitoring are the risk function's oversight and assurance activities, as well as the Risk and Control Self-Assessment and Key Risk Indicator processes.
Manage	Risk management relates to the selection and implementation of approaches to accept, reject, transfer, avoid or control risk. It includes risk mitigation, such as reinsurance. The key elements of the ERM framework which are relevant to management of risks are the risk mitigation strategies, the Policy and Internal Control frameworks as well as the governance and risk functions.
Report	Risk reporting gives an accurate and timely picture of any existing and emerging risk issues and exposures together with their potential impact on business activities. Risk reporting evidences that Irish Life Health manages its risks. The key elements of the ERM framework which are relevant to the reporting of risks are the annual Own Risk and Solvency Assessment ("ORSA") report and the quarterly risk management reports.

B.3.1 IMPLEMENTATION OF RISK MANAGEMENT SYSTEM

The Risk Management System is underpinned by the Three Lines of Defence Model in Irish Life Health. This approach helps the Company to perform its risk activities on an integrated basis. Each "line of defence" has responsibility for the management of risk assigned to it as follows:

1. **The First Line of Defence** is the business within Irish Life Health. The business is responsible for:
    > the day to day management of risk within their function in line with risk appetite, limits and policies;
    > the consideration of material risks and risk appetite in all decision making;
    > monitoring and reporting against Irish Life Health's risk profile and
    > reporting of any risk incidents on a timely basis.
2. **The Second Line of Defence** is the Risk, Compliance, Actuarial and Finance Functions. These functions are responsible for the oversight of the Risk Management System. In particular, these functions undertake the independent review of risk identification, measurement, management, monitoring and reporting.
3. **The Third Line of Defence** is Internal Audit. The Internal Audit Function is responsible for performing the independent review of the design and operation of the Risk Management System.

Under the Irish Life Health governance structure, committees are set up to provide efficient and appropriate risk management and decision making. One of the key purposes of the risk committees is to review elements of the ERM framework for Board approval and regularly assess the implementation and compliance with the ERM framework.

The CRO, as the head of the Risk Function, is a member of several committees. This allows the CRO to keep abreast of developments across the business, enabling steer, contribution and challenge on a wide variety of risk related matters.

B.3.2 RISK APPETITE

Irish Life Health's Risk Appetite Framework identifies risk strategy as a key driver in the development of business strategy. The Company achieves this by:

> Establishing a risk awareness culture that is ingrained in all business activities:
  – Based on a system of values and a strategy which reflects the Company's collective sense of responsibility to fulfil customer promises and safeguard its financial strength and reputation while growing shareholder value;
  – Consistent tone from the top from the Board and senior management;
  – Embedded in a three lines of defence model and
  – Full accountability for all risk taking decisions.

> Employing a prudent approach to taking and managing risk with emphasis on:
  – Disciplined application of product and pricing standards and extensive testing of the risks involved in new products and offerings;
  – Conducting business to high standards of integrity based on the employee Code of Business Conduct and Ethics and sound sales and marketing practices to safeguard the group's reputation;
  – Diversification of suppliers and distribution channels and
  – Generating returns to maximise shareholder value and growing operations whilst maintaining a strong balance sheet.

The key objectives constituting the Company's Risk Appetite Statement are:

> Strong capital position: Irish Life Health maintains a strong balance sheet and does not take risks that would jeopardise its solvency;

> Strong liquidity: Irish Life Health will maintain sufficient liquidity to pay claims and meet its financing obligations under normal and stressed conditions;
> Maintaining reputation: In all business activities, the potential impact on Irish Life Health's reputation is considered;
> Customers: Meeting customer needs and expectations is a core consideration in the design, distribution and administration of the the Company's products.

B.3.3 OWN RISK AND SOLVENCY ASSESSMENT

B.3.3.1 OWN RISK AND SOLVENCY ASSESSMENT METHODOLOGY

Irish Life Health embraces the ORSA process as a key part of the risk management system.

The ORSA is a forward looking evaluation of the risk profile and solvency position of the Company in the context of its business operations, strategy and plan:

Own: Reflects the business model and corporate structure; integrated with business plan and strategy.

Risk: Evaluates risks, including emerging risks, relative to appetite and outlines the risk management techniques employed and risk governance structures.

Solvency: Forward looking review of solvency needs under normal and stressed conditions; evaluates capital available relative to requirements.

Assessment: Assessment of current and projected risk position and solvency needs.

The ORSA is a year-round collection of processes, integrating Irish Life Health's Enterprise Risk Management (ERM) Framework with capital management and business planning.

A regular ORSA is carried out each year. A non-regular ORSA may be performed following the occurrence of a material event at an interim date between annual ORSA reports or following a significant change in the Company's risk profile or appetite.

B.3.3.2 USE OF OWN RISK AND SOLVENCY ASSESSMENT IN DECISION MAKING

The annual ORSA process is an integral part of the Company's business planning process. The business plan sets out how the strategy will be delivered, the risks inherent in the business plan and their impact on the solvency position of the Company.

The ORSA, in particular the forward looking solvency assessment, feeds into the assessment of business plans, taking into account any present or future management actions and risk mitigation techniques. The assessments are supported by stresses, scenarios and reverse stress testing and assessed against the risk appetite framework (where applicable). The qualitative assessment of the non-quantifiable risks, including strategic risks is also captured.

Any recommendations from the ORSA process are adequately documented, monitored and addressed by the business in a timely fashion. Some of these recommendations may include improvements to the risk management and decision-making processes at the Company.

B.3.3.3 OWN RISK AND SOLVENCY ASSESSMENT GOVERNANCE

The Board has put in place an ORSA Policy, which establishes roles and responsibilities in relation to completion of the ORSA. The Board, with significant support from the BRC, owns and directs the ORSA, and reviews and approves the ORSA Policy annually. The CRO conducts the ORSA process, producing the ORSA report and maintaining the ORSA record. The Board and the BRC steer this process.

The Actuarial Function supports the Risk Function in producing various aspects of the ORSA, in particular in producing capital projections and stress testing. The Head of Actuarial Function also provides an Opinion on the ORSA to the Board.

B.3.4 KEY STEPS IN THE ORSA PROCESS

B.3.4.1 DEVELOP THE BUSINESS STRATEGY

Irish Life Health Management present the business strategy to the Board to be challenged and approved. The business plans are informed by the findings of the ORSA. This presentation includes a review of the key assumptions underlying the plan, including projected sales and expenses. The Board considers the risks associated with the business strategy. Where the proposals include changes that may materially impact the risk profile of the business, those will be reviewed and analysed through an ORSA lens.

B.3.4.2 ASSESS THE APPROPRIATENESS OF THE STANDARD FORMULA

Irish Life Health uses the Standard Formula to calculate the Solvency Capital Requirement ("SCR"), which is the amount of capital the Company must hold under Solvency II regulations. As part of the annual ORSA process the Board evaluates the risk profile of the business compared to the risk profile assumed by EIOPA when calibrating the Standard Formula. This tests whether the use of the Standard Formula is appropriate for the Company's business. The assessment carried out in 2024 indicated that the Standard Formula is appropriate for the Company.

B.3.4.3 OWN SOLVENCY NEEDS ASSESSMENT

The Own Solvency Needs Assessment ("OSNA") is a quantitative assessment of the Company's solvency position on a forward-looking basis, using both the Solvency II regulations and using Irish Life Health's own view.

B.3.4.4 SELECT STRESS TESTS

The Board, supported by the Risk Function, sets the stress and scenario tests to be considered as part of the ORSA. The stress tests are forward looking while also taking relevant past experience into account. Irish Life Health considers the impact of the stress tests on the business strategy.

B.3.4.5 PRODUCE THE ORSA REPORT

The Risk Function produces an ORSA report each year under the direction of the Board. The CRO presents it to the BRC, who review and recommend the report to the Board for approval. The report includes a solvency projection under the base assumptions as well as the result of the stress tests and an analysis of the results. The base assumptions are consistent with the Board-approved business plans. The report notes any material changes in the Company's risk profile since the previous ORSA and analyses the projected changes in the Company's risk profile over the projection period. The Board reviews and challenges the report. Irish Life Health submits the final report, once approved by the Board, to the Central Bank of Ireland.

B.3.4.6 CAPITAL MANAGEMENT

After considering the insights of the Company's risk profile gained from each of the key steps above, along with other relevant matters, the Board reviews what level of capital the Company should hold.

B.3.4.7 ADDRESSING ORSA FINDINGS

The ORSA may generate recommendations such as risk mitigation initiatives or adjustments to business plans. Irish Life Health assign these actions as appropriate and the Risk Function reports to the BRC and Board regularly on our progress in addressing them.

B.3.4.8 COMMUNICATING ORSA RESULTS

The Risk Function communicates the results from the ORSA to the business as appropriate.

B.3.4.9 EMBEDDING THE ORSA WITHIN DECISION MAKING

Any significant new initiatives planned by the Company, such as product development or acquisitions, must be brought to the Board for approval. As part of the assessment of significant new initiatives, Irish Life Health Management analyses the impact of these on the ORSA and presents their findings to the Board for consideration as part of the approval process.

B.3.4.10 REVIEWING RISK POLICIES

The Board reviews and approves all risk policies each year. The review considers any relevant outcomes from the ORSA process.

B.4 INTERNAL CONTROL SYSTEM

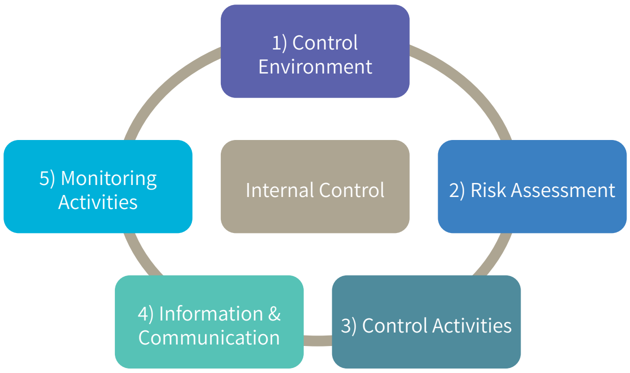
B.4.1 INTERNAL CONTROLS SYSTEM

Irish Life Health maintains an internal control framework which is a set of processes defined by the Board, management and other personnel, designed to provide reasonable assurance regarding the achievement of objectives with regard to:

- effectiveness and efficiency of operations;
- reliability of financial and management reporting and
- compliance with applicable laws and regulations.

The Company's system of internal control has a key role in the management of risks that are significant to the fulfillment of its business objectives.

The five components of internal control that underpin the internal control system are set out as follows:



1) **Control environment.** This is the set of standards, processes and structures that provide the basis for carrying out internal control within Irish Life Health. It sets the tone of an organisation, influencing the integrity, ethical values and control consciousness of its people. It is the foundation for all other components of internal control, providing discipline and structure.
2) **Risk Assessment.** This is the dynamic and iterative process for identifying and assessing relevant risks to the achievement of the Company's objectives, and forming a basis for determining how the risks should be managed.
3) **Control activities.** These are actions established through policies and procedures that help ensure we mitigate risks whilst meeting management's objectives.
4) **Information and communications.** This supports the identification, capture and exchange of internal and external information in a form and time frame that enables people to carry out their responsibilities.
5) **Monitoring Activities.** This is the ongoing evaluation to ascertain whether all components of the internal control system are present and functioning. This process assesses the quality of internal control performance over time.

In relation to the Company's internal control system, it is a requirement to have a combination of preventive, detective, directive and corrective control processes in place.

The Irish Life Health internal controls and financial management policy is subject to annual review and approval by the Head of Finance before it goes forward for Board approval. Board approval is required on an annual basis.

B.4.2 COMPLIANCE FUNCTION

Information regarding the Compliance Function is described in Section B.1.4 above.

B.5 INTERNAL AUDIT FUNCTION

Information regarding the Internal Audit Function is described in Section B.1.4 above.

B.6 ACTUARIAL FUNCTION

The activities of the Actuarial Function in the reporting period included completion of its core tasks as described in Section B.1.4 above.

Additional activities include supporting the implementation of the Risk Management System by providing support to the Risk Function on the ORSA process.

B.7 OUTSOURCING

Irish Life Health outsources some activities and services in a controlled manner. Services outsourced include customer services, I.T. solutions and investment management. Outsourcing allows the Company to increase, and decrease operational capacity based on cyclical business cycles when needed. Where functions and activities of the Company are outsourced, the Board and its senior management retain ultimate responsibility for such outsourced functions and activities. The Board and senior management retain the necessary expertise to manage outsourcing risks and provide oversight of outsourcing arrangements.

The Company's Outsourcing Policy is a Board-approved policy that sets out the principles and requirements for managing outsourcing arrangements.

The Outsourcing Policy sets out the following general principles for identifying and managing outsourcing risks:

> outsourcing arrangements must be identified and assessed based on their materiality;

> outsourcing arrangements must be appropriately approved;

> the capability of proposed service providers for material outsourcing must be thoroughly evaluated;

> outsourcing contracts for material outsourcing must contain certain mandatory terms and conditions;

> material outsourcing arrangements must be effectively monitored and controlled by senior management and the Compliance and Operational Risk Committee, with oversight from the BRC and the ILGL Group Operational Risk Committee ("GORC") and

> material outsourcing arrangements must have documented exit plans in place, which are regularly reviewed.

B.7.1 DETAILS OF OUTSOURCED CRITICAL OR IMPORTANT OPERATIONAL FUNCTIONS AND ACTIVITIES

Irish Life Health has thirteen material outsourcing arrangements in place. Nine of these are external to the wider Irish Life Group.

Service Provided	Internal / External	Jurisdiction
Customer management solutions	External	Ireland
Customer management solutions	External	Ireland
Customer management solutions	External	Ireland
Printing Services	External	Ireland
Customer management solutions	External	Ireland
Customer management software	External	Ireland
Software Solutions	External	UK
Software Solutions	External	Ireland
Software Solutions	External	Ireland
I.T. Solutions	Internal	Ireland
Internal Audit	Internal	Ireland
Investment Management Services	Internal	UK
Administration & Support Services; Development & Maintenance of Web Applications	Internal	Ireland

B.7.2 OVERSIGHT AND RISK MANAGEMENT OF OUTSOURCING

The Outsourcing Policy sets out the oversight and risk management requirements applicable to outsourcing arrangements. The Risk Function and ILGL GORC monitor compliance with this policy, with additional oversight provided by the BRC.

The Outsourcing Policy requires that outsourcing arrangements must not be undertaken in such a way as to lead to any of the following:

> Material impairment of the quality of the system of governance of the Company or the wider group;

> An undue increase in the operational risk for the Company or the wider group;

> Impairment of the ability of relevant supervisory authorities to monitor the compliance of the Company or the group with its obligations;

> Impairment of continuous and satisfactory service to customers and

> Undue risk to the personal data of customers or employees.

Prior to entering into any outsourcing arrangement for critical or important functions, proposed service providers are subject to due diligence procedures to ensure that the potential service provider has the ability, the capacity and any authorisation required by law to deliver the required functions or activities satisfactorily, taking into account the Company's objectives and needs. All new material outsourcing arrangements must be approved by the ILH's CORC. Following approval, a recommendation is shared with the BRC before approval by the Board of all critical outsourcing arrangements. The ILGL CORC is also notified of all critical outsourcing arrangements.

Contract renewals for critical outsourcing arrangements must be notified to ILH CORC and thereafter, to the BRC prior to renewal.

Written outsourcing agreements are established for all outsourcing arrangements. A dedicated member of management is identified as the 'owner' for each arrangement, and has specific responsibilities for the review and monitoring of the arrangement, in line with the requirements of the Outsourcing Policy.

The risks associated with outsourcing are identified and managed. All arrangements undergo an annual risk assessment. All outsourcing arrangements for critical or important operational services are deemed to be 'material'.

The materiality assessment for all outsourcing arrangements is reviewed annually. Irish Life Health maintains a register of outsourcing arrangements.

The ILGL GORC reviews material arrangements and compliance with the Outsourcing Policy annually.

The Risk Function presents an Outsourcing Report to the BRC annually.

All new critical outsourcing arrangements are pre-notified to the Central Bank of Ireland in line with Regulatory requirements.

B.8 ANY OTHER INFORMATION

No items to note.

C

RISK PROFILE

As explained in section B.3.2, Irish Life Health has established a number of policies and standards focusing on the management of financial and non-financial risks.

Irish Life Health also monitors a set of specific risks on a regular basis through the risk monitoring framework. This enables the Company to assess its risks, to define which risks and what level risk it is prepared to accept and to assess the adequacy of planned mitigating actions.

Irish Life Health controls the way it accepts risks, using its expertise to manage its risks and create shareholder value from them. The Board approves the Company's risk appetite at least once a year.

C.1 UNDERWRITING RISK

Insurance (underwriting) risk arises from the Company's obligations to customers under their health insurance policies. The risk to the Company is the risk of loss due to higher than expected claims on health insurance policies.

As a registered undertaking under the Health Insurance Act 1994, the Company complies with Open Enrolment. This means that Irish Life Health must accept all applicants, regardless of their risk status, age or gender, subject to prescribed waiting periods. Due to this legislation, the Company does not have a policy governing the acceptance of risks.

Insurance risk also relates to policyholder behaviours which may arise as a result of policyholders lapsing their policy, mid-term cancellations and/or downgrades.

Irish Life Health assesses and mitigates its insurance risk using the following approaches:

> Irish Life Health has an Underwriting Policy which is approved by the Board and defines the Company's risk appetite for underwriting risk and the strategies it uses to monitor and mitigate this risk.

> Irish Life Health uses reinsurance to reduce its exposure to insurance risk. The Reinsurance Strategy is agreed with the Board annually.

> The management of claims and adequacy of reserving. Irish Life Health has a Reserving Policy which is approved by the Board and defines the Company's risk appetite for reserving risk.

Irish Life Health operates a series of risk limits which measures the exposures outlined above. The Risk Function monitors these limits and reports on them each quarter through the relevant executive and Board risk committees. By monitoring exposures, we can identify trends in the risk profile over time and see material deviations from business plans or our risk appetite.

Irish Life Health does not use special purpose vehicles.

Reinsurance strategy

Irish Life Health uses reinsurance to manage and reduce its insurance risk.

An objective of the reinsurance strategy is to ensure that the level of risk retained by Irish Life Health is within its risk appetite. Reinsurance contracts are reviewed annually to verify that the levels of protection are commensurate with any developments in exposure and align to Irish Life Health's risk appetite. The basis of these arrangements is underpinned by financial modelling and actuarial analysis which considers the cost and risk management benefits of these arrangements. The reinsurance is placed with providers who meet Irish Life Health's counterparty security requirements.

Concentrations of insurance risk

Irish Life Health operates exclusively within Ireland, and a significant portion of the Irish population resides in the greater Dublin area. Therefore, Irish Life Health's insurance risk exposure is relatively concentrated in a global geographical sense.

Other than this geographical concentration, Irish Life Health's risks are not considered to be concentrated as the Company's exposure relates to 515.1k lives (at year-end 2024) requiring hospital treatment or incurring other medical expenses covered by their plans.

Overall, Irish Life Health does not consider concentration risk to be a significant risk.

Risk Sensitivities

Results of sensitivity testing are set out in section C.7.

C.2 MARKET RISK

Market risk is the risk of adverse financial impact due to changes in fair values of financial instruments from fluctuations in interest rates, property prices and equity prices. Market risk arises due to fluctuations in the value of liabilities and the value of investments held.

Investment of all assets is subject to the Company's Investment Policy which is designed to ensure that investment activity is carried out in a prudent and controlled manner, and in line with the Prudent Person Principle as required by Solvency II regulations. This policy addresses investment principles and strategy, asset liability matching, liquidity risk management and credit and currency risk management.

The Investment Policy details the governance arrangements in place and sets out the principles for the investment of the Company's assets. The Board retains overall responsibility for the policy, and the Finance Function and the Investment Manager are responsible for monitoring compliance with the policy and reporting to the Investment Committee, MRF and BRC.

Interest rate risk

Irish Life Health's investments are in cash, short-term bank deposits, short-term fixed interest assets and other short term investments. Of the market risks listed above, only interest rate risk is relevant to the business.

Risk concentration and risk mitigation

The short duration of Irish Life Health's assets and liabilities limits its exposure to interest rate risk.

Risk sensitivities

Results of sensitivity testing are set out in section C.7.

C.3 CREDIT RISK

Credit risk is the risk of loss in the value of financial assets due to counterparties failing to meet all or part of their obligations.

Irish Life Health is exposed to three main sources of credit risk: default of its bank and reinsurance counterparties, default of its customers where premiums are overdue, and default of issuers of fixed interest investments which it has invested in. These exposures are described further below.

Management of credit risk includes monitoring exposures and implementing credit risk standards.

Financial assets are graded according to current credit ratings issued. AAA is the highest possible rating. Investment grade financial assets are classified within the range of AAA to BBB ratings. Financial assets which fall outside of this range are classified as speculative grade. Credit limits for individual counterparties are established in the Company's Investment Policy and vary based on the credit rating of each counterparty.

The following table provides information regarding the Company's aggregated credit risk exposure to its largest counterparties at 31 December 2024 and 31 December 2023.

31 December 2024						
	AAA	AA	A	BBB	Not Rated	Total
Cash and Cash Equivalent	42,334	657	8,343	—	—	51,334
Debt Instruments	97,213	27,256	12,215	—	—	136,684

31 December 2023						
	AAA	AA	A	BBB	Not Rated	Total
Cash and Cash Equivalent	27,706	6,643	5,325	—	—	39,674
Debt Instruments	104,234	36,880	6,967	—	—	148,081

Risk Mitigation

Irish Life Health has a low appetite for credit risk.

Concentrations of credit risk

Irish Life Health is not exposed to significant concentrations of credit risk due to its Investment Policy which limits investments in individual assets and asset classes.

Reinsurance credit exposures

Irish Life Health cedes reinsurance in the normal course of business. The company operates on a funds withheld basis (i.e. any net balance owed to the reinsurer is held by the company) with its primary reinsurer which significantly reduces any potential credit exposure.

Counterparty exposures

The investment approach followed by Irish Life Health aims to:

> Mitigate investment risk by holding a diversified portfolio with holdings spread across multiple counterparties.

> Ensure the overall capital and governance benefits are sufficient to offset the additional cost of engaging an Investment Manager and Custodian.

Risk Sensitivities

Results of sensitivity testing are set out in section C.7.

C.4 LIQUIDITY RISK

Irish Life Health has a strong liquidity position and through the application of liquidity risk management seeks to ensure that it has sufficient financial resources available to meet its obligations as they fall due. An overdraft facility is available to Irish Life Health.

Maturity periods

The following table provides an analysis of assets into their relevant maturity groups based on the remaining period at 31 December 2024 (or 31 December 2023 for the second table) to their contractual maturities.

At 31 December 2024				
€'000	Total	Within 1 year	1-5 years	5-10 years
Cash and Cash Equivalent	51,334	51,334	—	—
Debt Instruments	136,684	70,732	65,952	—

At 31 December 2023				
€'000	Total	Within 1 year	1-5 years	5-10 years
Cash and Cash Equivalent	39,674	39,674	—	—
Debt Instruments	148,081	86,209	61,872	—

Expected Profit Included in Future Premiums

The expected profit included in future premiums (calculated on an earned basis) as at 31 December 2024 is €31.8m. The expected profit in future premiums is calculated in line with Solvency II requirements and does not allow for tax or reinsurance.

The expected profit included in future premiums contributes to the Company's own funds and therefore increases the amount of assets available to cover the Solvency Capital Requirement ("SCR"). The SCR also increases as a result of recognising these future profits, as the Standard Formula SCR calculation allows for the impact of stress events on the future profits.

The expected profit included in future premiums is not considered in the Company's assessment of its short term liquidity position as it is not a liquid asset. In assessing liquidity over the long term, the Company does allow for the expected profit in future premiums, with appropriate allowance for the uncertainty relating to those future profits.

C.5 OPERATIONAL RISK

Operational risk arises as a result of inadequate or failed internal processes, people or systems, or from external events. Operational risks relate to all business processes. This means that operational risks include, for example, IT, information security, project management, outsourcing, legal, fraud, conduct and compliance risks.

As with other risk categories, line management of business areas have primary responsibility for the effective identification, management, monitoring and reporting of risks to the Managing Director. This is in accordance with the Risk Management Framework. The Risk Function is responsible for implementing the Company's risk management methodologies and frameworks to assist line management in this work. They also provide support and independent challenge on the completeness, accuracy and consistency of risk assessments and the adequacy of mitigating action plans. In this way, the directors satisfy themselves that material risks are being mitigated and reported to an acceptable level.

Operational risks are assessed according to the potential impact and probability of the event concerned. These impact assessments are made against financial, operational and reputational criteria.

Material Operating Risks:

The Company's operational risk profile as of 31 December 2024 was dominated by:

- Outsourcing risk
- Supplier risk
- IT & Cyber risk
- Conduct risk
- Modelling risk
- Data integrity risk
- Data privacy risk
- Business Continuity Management including operational resilience

Risk Sensitivities

Results of sensitivity testing are set out in section C.7.

C.6 OTHER MATERIAL RISKS

Strategic and Business Environment Risk

This risk relates to the ability of Irish Life Health to achieve its strategic goals. Irish Life Health recognises the increased pace of change in the business environment and its impact on policyholder behaviour. It seeks to manage strategic and business risk through proactive engagement with customers, industry representation, a rigorous strategic planning process and ensuring execution of business strategies in alignment with the Company's Risk Appetite.

Regulatory Risk

Irish Life Health's regulatory environment and regulators' expectations of regulated entities continues to evolve. Irish Life Health's governance structure and policy set is regularly reviewed to reflect the changing regulatory requirements and its own organisational development.

Risk Equalisation System change is also considered under regulatory risk. Irish Life Health seeks to manage and mitigate this risk through proactive engagement and industry representation.

Sláintecare and healthcare system change

Irish Life Health is mindful of emerging changes in the Irish Healthcare system and the broader Sláintecare agenda.

Change in the operating environment is actively monitored and considered by Irish Life Health in its strategic planning process, pricing decisions and reserving processes as well as through the ORSA.

Reputational Risk

Irish Life Health recognises that its long-term sustainability depends on the protection of its brand and relationship with customers. Irish Life Health aims to always treat customers fairly and with integrity.

The Company seeks to maintain reputational risk at the lowest degree possible so it will not take action that will materially impair the reputation of the Irish Life Health brand in Ireland. Consideration of brand value is a key element of the decision making process.

C.7 ANY OTHER INFORMATION

Sensitivity analysis and capital management

Irish Life Health uses sensitivity testing to understand the volatility of earnings and the volatility of the Company's capital position.

Some results of sensitivity testing are set out below. For each sensitivity test, the impact of a change in a single factor is shown, with other assumptions left unchanged. The sensitivity tests are set out below:

Sensitivity factor	Risk Type	Description of sensitivity factor applied
Interest rate and investment return	Market Risk	The impact of a change in market interest rates by ± 0.5% (e.g. if a current interest rate is 5%, it is the impact of an immediate change to 4.5% and 5.5%). The test allows for the impact on the value of Irish Life Health's assets and liabilities.
Policy Lapse Rate	Underwriting Risk	The impact of a change in mid-term cancellation rates by ± 10% (i.e. the sensitivity is assessed by stressing the mid-term cancellation rate to 90% and 110% of the best estimate rate).
Gross claims ratio	Underwriting Risk	The impact of an increase in gross claims ratio for health insurance business by 5% (i.e. the sensitivity is assessed by stressing the gross claims ratio to 105% of the best estimate rate).
Credit downgrade	Credit Risk	The impact of a one credit quality step downgrade to the largest deposit counterparty.
Operational Risk SCR	Operational Risk	The impact of a 10% increase to the operational risk SCR.
Credit spread risk	Market risk	The impact of a 0.5% increase in market credit spreads (e.g. if a current spread rate is 2%, it is the impact of an immediate change to 2.5%).
Property values	Property risk	The impact of a 10% decrease in property values.

The sensitivity results are calculated using Irish Life Health's financial models. The results of the sensitivity tests are shown below, compared to the results published in the 2023 SFCR.

	Sensitivity impacts on Solvency Ratio, Own Funds, and SCR as at 31 December 2024				Comparison to sensitivity as at 31 December 2023	
	Solvency Ratio	Impact on Solvency Ratio	Impact on Own Funds (€'000)	Impact on SCR (€'000)	Impact on Solvency Ratio 2024	Impact on Solvency Ratio 2023
Baseline (31 December position)	**150.7%**					
0.5% increase in interest rates	151.7%	1.0%	703	-18	1.0%	0.4%
0.5% fall in interest rates	149.6%	-1.0%	-713	35	-1.0%	-0.4%
10% increase in policy lapse rates	150.6%	-0.1%	-230	-102	-0.1%	-0.1%
10% reduction in policy lapse rates	150.8%	0.1%	233	95	0.1%	0.1%
5% deterioration in claims experience	139.9%	-10.7%	-10,537	-1,927	-10.7%	-11.1%
Credit downgrade	150.7%	0.0%	-	-	0.0%	-0.1%
10% increase in operational risk SCR	147.3%	-3.4%	-	1,685	-3.4%	-3.4%
0.5% increase in credit spreads	149.6%	-1.0%	-758	-	-1.0%	-1.1%
10% decrease in property values	150.5%	-0.2%	-175	-11	-0.2%	N/A

The Company's most significant risk exposure is to claims experience. Acceptance of this risk is in line with the Company's business strategy and risk appetite.

The Company's risk exposures have not changed materially over the last year. A sensitivity to the impact of a change in property values has been included at year-end 2024, this was not relevant in prior years.

Limitations of sensitivity analysis

The above tables demonstrate the effect of a change in a key assumption while other assumptions remain unaffected. In reality, such an occurrence is unlikely, due to correlation between the assumptions and other factors. It should also be noted that these sensitivities are non-linear, and larger or smaller impacts should not be interpolated or extrapolated from these results.

D

VALUATION FOR SOLVENCY PURPOSES

D.1 ASSETS

The Sections below include information regarding Irish Life Health's valuation of assets for Solvency II purposes including (for each material class of assets):

> A quantitative explanation of any material differences between the asset values for Solvency II purposes and those used for the financial statements.

> A description of the asset valuation bases, methods and main assumptions used for solvency purposes and those used for the financial statements.

D.1.1 VALUATION DIFFERENCES - SOLVENCY II v IFRS FINANCIAL STATEMENTS

The table below shows the value of the assets as reported in the Company's Solvency II balance sheet as at 31 December 2024 compared to the values reported in the Company's financial statements for each material class of asset.

Asset Description €000s	Notes (see Valuation bases, methods and main assumptions)	Solvency II basis 31 December 2024	Financial Statements 31 December 2024	Difference 31 December 2024
Property and Equipment	Note 1	2,375	2,645	-270
Intangible assets	Note 2	0	6,060	-6,060
Investments	Note 3	179,886	136,684	43,202
Reinsurance recoverable	Note 4	91,214	289	90,925
Insurance and intermediaries receivables	Note 5	3,141	—	3,141
Cash & Cash Equivalents	Note 6	9,000	51,334	-42,334
Any other assets, not elsewhere shown	Note 7	22,847	3,537	19,310
Total assets		308,462	200,549	107,913

The table below shows the equivalent values as at 31 December 2023.

Asset Description €000s	Solvency II basis 31 December 2023	Financial Statements 31 December 2023	Difference 31 December 2023
Property and Equipment	454	454	—
Intangible assets		5,640	-5,640
Investments	176,646	148,081	28,565
Deferred tax assets		62	-62
Reinsurance recoverable	87,502	276	87,226
Insurance and intermediaries receivables	3,081	—	3,081
Receivables (trade, not insurance)	454	454	—
Cash & Cash Equivalents	11,969	39,674	-27,706
Any other assets, not elsewhere shown	9,590	2,557	7,032
Total assets	289,696	197,198	92,498

D.1.2 VALUATION BASES, METHODS AND MAIN ASSUMPTIONS

For each material class of asset shown in Section D.1.1 further information is included in the notes below on the valuation basis for Solvency II purposes. Any material differences between the valuation bases, methods and main assumptions used for Solvency II and those used for the financial statements are also discussed below. There are no material assumptions or judgements used in the valuation of assets and no significant sources of estimation uncertainty which would affect the value of the assets.

Note 1: Property and Equipment

Solvency II purposes:	Financial Statements purposes:
Plant and Equipment There are no valuation differences between Solvency II and the financial statements.	**Plant and Equipment** Plant and equipment are stated at cost less accumulated depreciation. Where the carrying amount of an asset is greater than its estimated recoverable amount, it is written down immediately to its recoverable amount. This valuation is assumed to materially approximate the fair value of these assets. The Company calculates depreciation to write off the costs of such assets to their residual value over their estimated useful lives. The estimated useful lives are as follows: Computer equipment: Three to five years Motor vehicles: Three years Other assets: Three to five years
Lease assets The Company recognises right-of-use assets at the commencement date of the lease on a Solvency II basis.	**Lease assets** The Company recognises right-of-use assets at the commencement date of the lease. The Company measures its right-of-use assets at cost less accumulated depreciation and impairment losses. The Company adjusts its right-of-use assets for any remeasurement of lease liabilities where applicable. The Company depreciates its right-of-use assets from the commencement date to the earlier of the end of useful life or end of the lease term.

Note 2: Intangible Assets

Solvency II purposes:	Financial Statements purposes:
As per Article 12 of the Delegated Act, intangible assets are valued at nil for Solvency II purposes, unless the intangible asset can be sold separately, and the Company can demonstrate that there is a value for the same or similar assets derived in accordance with Article 10 of the Delegated Act. The intangible assets being held on the Irish Life Health Balance Sheet don't fall into this exception as described in Article 10 and are therefore valued at nil.	Computer software is carried at cost, less amortisation and provision for impairment, if any. The external costs and identifiable internal costs of acquiring and developing software are capitalised where it is probable that future economic benefits that exceed those costs will flow from the software's use over more than one year. Capitalised computer software is amortised on an asset by asset basis over three to fifteen years, but typically is no longer than 5 years. Intangible assets have increased year on year due to increased spend on strategy projects.

Note 3: Investments

Investments consist of a portfolio of government, corporate bonds and collateralised securities (78%, 146.5m) and holdings in money market funds (22%, 42.3m). As required under IFRS 13 (Fair Value Measurement), our annual audited statutory financial statements disclose how we value assets and liabilities across level 1, 2 and 3. This is the fair value hierarchy.

- Level 1: fair value measurements based on quoted market prices (unadjusted) in active markets for identical assets or liabilities that the entity can access at the measurement date.
- Level 2: fair value measurements based on inputs other than quoted prices included within level 1 that are observable for the asset or liability either directly (i.e. as prices) or indirectly (i.e. derived from prices).
- Level 3: fair value measurements based on valuation techniques that include inputs for the asset and liability that are based on unobservable market data.

Cash & Cash Equivalents are classified under level 1, with debt instruments classified under level 2. There are no level 3 assets held.

Solvency II purposes:	Financial Statements purposes:
Investments are valued at their face value plus accrued interest.	There are no valuation differences between Solvency II and the financial statements. However there are a number of reclassifications, which result in a difference between the Solvency II and the financial statements. The main classification differences are: > Accrued Interest is included in 'Investments' under Solvency II but 'prepayments and accrued income' in the financial statements. > Holdings in Money Market Funds is included in 'Investments' under Solvency II but 'Cash & Cash Equivalents' in the financial statements.

Note 4: Reinsurance Recoverable

The reinsurance recoverable consists of reinsurers' share of technical provisions. The valuation of the reinsurance recoverable is discussed in Section D.2.

Solvency II purposes:	Financial Statements purposes:
The reinsurance recoverable consists of reinsurers' share of technical provisions. The valuation of the reinsurance recoverable is discussed in Section D.2.	The measurement of reinsurance as a single bundle of rights and obligations, results in a single net balance in respect of the value recoverable from reinsurance arrangements under IFRS 17.

Note 5: Insurance & intermediaries receivables

Insurance and intermediaries receivables are made up of outstanding premiums due from policyholders.

Solvency II purposes:	Financial Statements purposes:
Insurance and intermediaries receivables relate to outstanding premiums which are overdue from policyholders.	Valued at nil. These amounts are included with the IFRS 17 Insurance Contract Liabilities.

Note 6: Cash & Cash Equivalents

Cash & Cash Equivalents includes cash at bank.

Solvency II purposes:	Financial Statements purposes:
Cash & Cash Equivalents are valued at their face value.	There are no differences to the Solvency II valuation basis. There is one difference in classification as follows: > Holdings in Money Market Funds are included in 'Investments' under Solvency II but 'Cash & Cash Equivalents' in the financial statements.

Note 7: Any other assets, not elsewhere shown

Any other assets, not shown elsewhere on the Statement of Financial Position.

Solvency II purposes:	Financial Statements purposes:
For Solvency II purposes, other assets includes: 1) Amounts due to be received from the risk equalisation fund 2) Amounts due to be received from other debtors	For IFRS 17 purposes, other assets includes: 1) Accrued income valued based on the amount expected to be received or earned in the future, included in Investments under Solvency II. 2) Prepayments valued at nil for Solvency II reporting.

D.1.3 ITEMS NOT IN SCOPE

The following requirements in the EIOPA Level 3 - Guidelines on reporting and public disclosure as outlined in 'Guideline 7 Content by material classes of assets' are not applicable to Irish Life Health or apply to immaterial amounts.

> For material intangible assets: nature of the assets and information on the evidence and criteria used to conclude that an active market exists for those assets;

> For financial and operating leases: describe in general the leasing arrangements in relation to each material class of assets subject to leasing arrangement, separately for financial and operating leases;

> For related undertakings: where related undertakings were not valued using quoted market prices in an active market or using the adjusted equity method, provide an explanation why the use of these methods was not possible or practical.

D.2 TECHNICAL PROVISIONS

Technical provisions represent the value of the Company's liabilities under policies which have been written at the valuation date or that the Company is legally obliged to accept.

Solvency II technical provisions include the following components:

> Best Estimate Technical Provisions

> Risk Margin

Technical provisions are calculated before allowing for reinsurance and the impact of reinsurance is separately allowed for in the reinsurance recoverable.

At end 2024 the Company commenced offering Dental Insurance to Corporate clients to complement our Health offering. The impact of this is reflected in the tables below.

D.2.1 SOLVENCY II TECHNICAL PROVISIONS AND REINSURANCE RECOVERABLE: OVERVIEW

Irish Life Health writes health and dental insurance. All of the Company's policies are classified as medical expenses insurance under Solvency II.

The value of technical provisions and the reinsurance recoverable is shown below as at 31 December 2024:

Liability Description €000s	Gross	Recoverable from Reinsurance	Net
Claims provisions	122,385	95,660	26,725
Premium provisions	-54,913	-4,447	-50,467
Best estimate technical provisions	67,472	91,214	-23,742
Risk margin	6,020	—	6,020
Total technical provisions	73,492	91,214	-17,722

The value of technical provisions and reinsurance recoverable is shown below as at 31 December 2023:

Liability Description €000s	Gross	Recoverable from Reinsurance	Net
Claims provisions	116,736	93,961	22,775
Premium provisions	-54,955	-6,459	-48,495
Best estimate technical provisions	61,781	87,502	-25,721
Risk margin	5,580	—	5,580
Total technical provisions	67,361	87,502	-20,141

The movement in technical provisions over 2024 has been impacted by factors including claims payments, changes in business volumes, changes in claims and risk equalisation experience over the period and considerations relating to the level of uncertainty which exists at year-end 2024.

The methodology used in calculating technical provisions is described in the sections below.

D.2.1.1 BEST ESTIMATE TECHNICAL PROVISIONS

Best estimate technical provisions ("BETPs") are calculated in line with Solvency II regulations. The BETPs represent the best estimate of the value of Irish Life Health's obligations under its policies.

Under Solvency II, the term "best estimate" is defined as the probability weighted average of future cash-flows taking account of the time value of money, using the relevant risk-free interest rate.

Irish Life Health's BETPs include the claims provision and the premium provision:

> The claims provision is held in respect of claims that have occurred on or before the valuation date;

> The premium provision includes all future expected cash-flows arising from policies in force and legally obliged but unincepted business at the valuation date.

D.2.1.2 BEST ESTIMATE REINSURANCE RECOVERABLE

The reinsurance recoverable reflects the expected recoveries from reinsurance based on the terms of the Company's reinsurance arrangements, based on the same assumptions as used to calculate the BETPs.

Irish Life Health does not have any reinsurance arrangements with special purpose vehicles.

D.2.1.3 RISK MARGIN

The risk margin is intended to represent the premium which another insurer would require for taking on the Company's insurance portfolio, and reflects the cost of holding the policy related capital for all policies.

The risk margin is determined as the present value of the projected cost of capital on the underlying business, where the future cost of capital in any given year is equal to the projected SCR arising on the Company's underlying business in that year multiplied by a cost of capital rate. EIOPA has prescribed a cost of capital rate of 6%.

Irish Life Health has adopted a simplified approach to calculate its risk margin which is to approximate the individual risks with the SCR modules to calculate the future SCR.

D.2.2 SOLVENCY II BEST ESTIMATE TECHNICAL PROVISIONS AND REINSURANCE RECOVERABLE: BASES, METHODOLOGY AND ASSUMPTIONS

D.2.2.1 CLAIMS PROVISIONS – BASES, METHODOLOGY AND ASSUMPTIONS

Overview

The claims provision includes the present value of expected future claim costs in respect of claim events which have already occurred. Irish Life Health's claims provision includes the following components:

> **Outstanding Claims Reserve:** This reserve is held for all claims that are recorded on the Company's system but have not yet been paid.

> **Incurred but not Reported ("IBNR") Reserve:** This is a reserve for historic claims that have not yet been reported to the Company.

> **Claims Handling Expense Reserve:** This is a reserve to cover the expected expenses relating to the future handling of all outstanding and IBNR claims.

> **Provision for future risk equalisation costs and credits:** This relates to expected future cashflows to and from the risk equalisation fund, where those cashflows relate to claims which have occurred in the past or insurance coverage which has been provided in the past.

> **Provisions for Events not in Data ("ENID") and other uncertainties:** Additional provisions are held in respect of reasonably foreseeable events that are not included in the Company's data because they have not occurred in the past and other uncertainties relevant to claim events which have already occurred.

Outstanding Claims Reserve

This reserve is based on the expected amount payable based on the amount invoiced by the hospital (allowing for any elements that have been declined or adjusted) or claimed by the customer.

Incurred but not Reported Reserve

This reserve is calculated by estimating the total value of claims for each historic treatment month and then deducting total claims already incurred (including claims already paid and claims included within the outstanding claims reserve) for that treatment month.

The reserve is calculated separately for different sub-categories of claims that have broadly similar experience.

The total value of claims for each treatment month is estimated using assumptions about future claims development which are determined by considering historical claims development patterns and other relevant information.

Claims Handling Expense Reserve

The Claims Handling Expense Reserve is calculated by estimating the expected expenses associated with claims handling, including both expenses directly related to claims handling and a share of overhead expenses.

Risk equalisation fund costs and credits

Risk equalisation costs and credits are projected based on the rules of the risk equalisation scheme allowing for the characteristics of our business.

Provisions for ENID and other uncertainties

Setting the provision for ENID and other uncertainties is an area where expert judgement has been applied. At year-end 2024, considerations included the specific uncertainties which exist due to recent claims trends and the impact of inflation on claims costs.

D.2.2.2 PREMIUM PROVISION – BASES, METHODOLOGY AND ASSUMPTIONS

Overview

The premium provision reflects future cashflows in relation to events occurring after the valuation date and during the remaining in-force coverage period of policies that are either in force or that the Company is legally obliged to write.

Methodology

The best estimate premium provision is calculated as the expected present value of future in- and outgoing cashflows. Future cashflows include:

> Future premiums;
> Cashflows resulting from future claims;
> Cashflows arising from future risk equalisation costs and credits; and
> Future expenses.

The best estimate includes all future cashflows associated with business which is in force and which the Company is legally obliged to write. The best estimate allows for ENID and other uncertainties, considering the specific uncertainties in relation to future claims which exist at year-end 2024, considering relevant factors such as recent claims trends and the uncertainty in the hospital system.

Assumptions

Future projected claims allow for expected changes in claims due to ageing, medical inflation and utilisation trend.

The future expense assumption is derived from the Company's current expense base. It includes administrative expenses, claims management expenses, reinsurance costs and overheads. Expenses are projected on the assumption that Irish Life Health continues to write new business.

Future risk equalisation cashflows reflect amounts due to be paid to and received from the risk equalisation fund in the future, which depend on the characteristics of the business we have written.

The calculation of the premium provision takes account of expected future policyholder behaviour such as the likelihood of mid-term cancellation.

D.2.3 LEVEL OF UNCERTAINTY ASSOCIATED WITH THE VALUE OF TECHNICAL PROVISIONS

The main sources of uncertainty in the technical provisions are as follows:

(a) Claims: A change in product mix, profile of customers, medical inflation or newly emerging claim types may result in a different claims level or a different claims development pattern than assumed. Claims can also be impacted by other factors such as government actions. The final amount of incurred but not reported claims and the amount of future claims occurring after the valuation date (but during the future coverage period of in force and legally obliged policies) may therefore be higher or lower than expected;

(b) Expenses: Future expenses may be higher or lower than expected;

(c) Policyholder behaviour: Future policyholder behaviour (e.g. rates of mid-term cancellation) may be different to expected; and

(d) Claims adjudication process: The final settlement cost of notified claims will not be known until adjudication is complete.

The best estimate technical provisions make appropriate allowance for the current level of uncertainty.

D.2.4 DIFFERENCES BETWEEN SOLVENCY II TECHNICAL PROVISIONS AND VALUATION OF LIABILITIES FOR THE FINANCIAL STATEMENTS

Liability Description €000s	Solvency II basis 31.12.2024	Financial Statements 31.12.2024	Difference 31.12.2024
Premium provisions	-50,467	-41,312	-9,154
Gross	-54,913	-41,312	-13,601
Total recoverable from Reinsurance	4,447	—	4,447
Claims provisions	26,725	121,322	-94,597
Gross	122,385	120,703	1,682
Total recoverable from Reinsurance	-95,660	619	-96,279
Risk margin	6,020		6,020
Total Technical Liabilities - Gross	73,492	79,391	-5,899
Total Technical Liabilities - Net	-17,722	80,010	-97,732

Premium provision

The valuation of liabilities for the financial statements are shown on a IFRS 17 basis. The premium provision on the financial statements basis is the Liability for Remaining Coverage in relation to business written before the valuation date and allows for expected future cashflows (premiums and risk equalisation credits and costs). The premium provision on the financial statements basis also includes an allowance for acquisition costs expected in relation to business written before the valuation date.

On the Solvency II basis the premium provision is set on a best estimate basis and allows for expected future cash in-flows (premiums and risk equalisation credits) and cash out-flows (claims, risk equalisation costs and expenses), as discussed in Section D.2.2.2 above.

As discussed in Sections D.1 and D.3, there are also differences in the valuation of some other assets and liabilities between IFRS and Solvency II. The difference in the premium provision combined with these other differences results in future profits being recognised on the Solvency II basis. However, under Solvency II the value of expected future profit recognised must be stressed within the calculation of the Solvency Capital Requirement (as discussed in Section E.2 below).

Claims provision

The claims provision on the financial statements basis is the Liability for Incurred Claims and includes a margin for uncertainty which brings the claims reserves from best estimate to the 75th percentile of potential outcomes. On the Solvency II basis, claims provisions are set at best estimate.

Future risk equalisation costs and credits relating to historical periods are included in claims provisions on both bases.

Irish Life Health operates on a funds withheld basis (i.e. any net balance owed to the reinsurer is held by the Company) with its primary reinsurer. Within the Financial Statements the measurement of reinsurance as a single bundle of rights and obligations results in a single net balance in respect of the value payable in respect of reinsurance arrangements. On the Solvency II basis the reinsurance recoverable reflects the expected recoveries from reinsurance based on the terms of the Company's reinsurance arrangements, based on the same assumptions as used to calculate the BETPs.

Risk margin

The risk margin is not held on the financial statements basis.

D.2.5 LONG-TERM GUARANTEE MEASURES

Irish Life Health does not apply the matching adjustment or the volatility adjustment for calculating technical provisions.

Irish Life Health does not apply the transitional interest rate risk free structure or the transitional measure on technical provisions.

D.2.6 MATERIAL CHANGES IN RELEVANT ASSUMPTIONS COMPARED TO PREVIOUS REPORTING PERIOD

For the claims provision, demand for healthcare services remained strong in 2024. Together with inflationary pressures including from drug costs this has increased claims costs at 31 December 2024 relative to previous years. Public hospital claims have been impacted by Government Sláintecare initiatives over 2024. For other hospital claim types, there has been no change to the material assumption that the claims development patterns seen in the past will be appropriate for the future. The claims provision assumptions are regularly reviewed and updated to reflect the current level of uncertainty.

For the premium provision, the assessment of future cashflows has been updated to reflect the Company's latest best estimate assessment of future claims and expense levels taking into account recent experience, historical trends, expected medical inflation, recent trends, the current level of uncertainty and other relevant information.

D.3 OTHER LIABILITIES

Set out below is information regarding Irish Life Health's valuation of each material class of other liabilities for Solvency II purposes, including:

a. Quantitative explanations of material differences in valuations between Solvency II and those used for the financial statements; and

b. Valuation bases, methods and main assumptions used for Solvency II and those used for financial statements for the financial year ended 31 December 2024.

D.3.1 VALUATION DIFFERENCES BETWEEN SOLVENCY II AND FINANCIAL STATEMENTS

The table below shows the value of the liabilities as reported in the Company's Solvency II balance sheet compared to the values reported in the Company's financial statements for each material class of liability.

Other Liability €000s	Notes (see Valuation bases, methods and main assumptions)	Solvency II basis 31.12.2024	Financial Statements 31.12.2024	Difference 31.12.2024
Deferred tax liabilities	Note 1	1,524	116	1,408
Reinsurance payables	Note 2	908	908	—
Deposits from reinsurers	Note 3	95,375	-	95,375
Provision	Note 4	370	370	—
Financial liabilities other than debts owed to credit institutions	Note 5	2,092	2,092	—
Other liabilities	Note 6	24,702	13,208	11,494
Total Other Liabilities		124,970	16,693	108,277

Other Liability €000s	Notes (see Valuation bases, methods and main assumptions)	Solvency II basis 31.12.2023	Financial Statements 31.12.2023	Difference 31.12.2023
Deferred tax liabilities	Note 1	998	—	998
Reinsurance payables	Note 2	94,120	434	93,685
Provision	Note 4	424	100	324
Other liabilities	Note 6	25,608	13,838	11,770
Total Other Liabilities		121,150	14,372	106,778

D.3.2 VALUATION BASES, METHODS AND MAIN ASSUMPTIONS

For each material class of liability shown in Section D.3.1, further information is included in the notes below on the valuation basis for Solvency II purposes. Any material differences between the valuation bases, methods and main assumptions used for Solvency II and those used for the financial statements are also discussed below. There are no material assumptions or judgements used in the valuation of these liabilities and no significant sources of estimation uncertainty which would affect the value of these liabilities.

Liabilities are of a short term nature with most cash flows occurring within a 12 month period.

Note 1: Deferred Tax Liability

Solvency II purposes:	Financial Statements purposes:
The value of the Company's net assets under Solvency II is higher than on the financial statements, due to the valuation differences described throughout section D. Irish Life Health is subject to tax on profits as calculated in its financial statements (with some minor differences as described in Note 3 of section D.1.2). This means that the additional profits recognised on the Solvency II basis have not yet been subject to tax, but will be taxed when they emerge in the future on the financial statements basis. The deferred tax liability reflects the future tax expected to be payable based on the Solvency II valuation relative to the valuation used for tax purposes.	A deferred tax liability is held in respect of unrealised gains on invested assets.

Note 2: Reinsurance payables

Reinsurance payables represent the balance due to reinsurers in respect of outstanding reinsurance premiums.

Solvency II purposes:	Financial Statements purposes:
Reinsurance payables represent the balance due to reinsurers in respect of outstanding reinsurance premiums.	The measurement of reinsurance as a single bundle of rights and obligations, results in a single net balance in respect of the value payable in respect of reinsurance arrangements under IFRS 17.

Note 3: Deposits from reinsurers

Deposits from reinsurers represent the value of reinsurance funds withheld which back the reinsurance recoverable.

Solvency II purposes:	Financial Statements purposes:
The value of reinsurance funds withheld which back the reinsurance recoverable.	See note 2

Note 4: Provisions

Provisions relate to existing provisions in 2024 and reflect the best estimate of the expenditure required to settle any present legal obligations as at 31 December 2024.

Solvency II purposes:	Financial Statements purposes:
The value of each provision is derived through senior management review and evaluation of the expected outflow required to settle the liability to which the provision applies. We do not believe the settlement value will differ significantly from the amount we have estimated.	Other Provisions are included within Insurance Contract Liabilities under IFRS 17.

Note 5: Financial liabilities other than debts owed to credit institutions

Financial liabilities other than debts owed to credit institutions refers to liabilities under lease commitments.

Solvency II purposes:	Financial Statements purposes:
Lease Liabilities On initial application of IFRS 16 lease liabilities were measured as the present value of lease payments that were not paid at the date of commencement. The Company will increase its lease liabilities to reflect the interest charge and will reduce the lease liabilities for any lease payments made. The Company will remeasure lease liabilities if there are any lease modifications or if there is a change in the lease payments. The lease liability shall also be remeasured by the Company if there is a change in the lease term. These remeasurements may also lead to a change in the discount rate used.	There are no valuation differences between Solvency II and IFRS basis.

Note 6: Other Liabilities

Other liabilities include liabilities not elsewhere shown on the Statement of Financial Position, for example intercompany liabilities, other taxation balances and accruals. Dividends which have been approved are also included within other liabilities.

Solvency II purposes:	Financial Statements purposes:
Payables are recorded on an accruals basis. Dividends which have been approved are also included within other liabilities.	Commission creditors and Professional Services Withholding Tax accruals are included within Insurance Contract Liabilities under IFRS 17. Dividends which have been approved are not required to be disclosed in the financial statements.

D.3.3 ITEMS NOT IN SCOPE

The following requirements in the EIOPA Level 3 - Guidelines on reporting and public disclosure as outlined in 'Guideline 10 Content by material classes of liabilities other than technical provisions' are not applicable to Irish Life Health or apply to immaterial amounts.

- Describe in general the material liabilities arising as a result of leasing arrangements, separately disclosing information on financial and operating leases;
- The nature of the liabilities for employee benefits and a breakdown of the amounts by nature of the liability and the nature of the defined benefit plan assets, the amount of each class of assets, the percentage of each class of assets with respect to the total defined benefit plan assets, including reimbursement rights.

D.4 ALTERNATIVE METHODS FOR VALUATION

The valuation of assets and liabilities is discussed in Sections D.1, D.2 and D.3 above. There are no alternative methods to note.

D.5 ANY OTHER INFORMATION

No items to note.

E

CAPITAL MANAGEMENT

Irish Life health

E.1 OWN FUNDS

This Section provides information regarding the Company's own funds as at 31 December 2024 and the policies and processes employed for managing own funds to meet all of the Company's regulatory capital requirements.

Own funds are the excess of the value of the Company's assets over the value of its liabilities, where the value of the liabilities includes technical provisions and other liabilities. Own funds are divided into three tiers based on their permanence, and how well they can absorb losses. Tier 1 own funds are of the highest quality. All of the Company's own funds are Tier 1.

Irish Life Health manages its own funds so that its solvency position stays within a targeted range as specified in its risk management framework. The range targeted has sufficient coverage above the SCR to ensure the Company is able to meet all of its ongoing financial liabilities. Irish Life Health's capital management policy is supported by its capital management plan. The capital management plan is produced annually and forecasts the solvency ratio and dividend payments over a five year horizon using the business strategy set out in the annual business plan and detailed capital projections, sensitivity stresses and scenario tests on capital requirements from the ORSA.

There have been no material changes in the Company's approach to managing its own funds over the reporting period.

E.1.1 COMPONENTS OF OWN FUNDS

The table below sets out the approach Irish Life Health takes to valuing its own funds and Irish Life Health's assessment of each component of own funds.

Solvency II Own Funds item	How Own Funds item is valued (according to Solvency II rules)	Assessment
Ordinary share capital	Valued in accordance with Article 75 of the Solvency II Directive.	This is the share capital and share premium, based on the Company's financial statements.
Share premium account related to ordinary share capital		All of the Company's share capital and share premium is classed as tier 1 unrestricted.
Reconciliation Reserve	Valued in accordance with Article 70 of the Delegated Act.	The reconciliation reserve equals the excess of assets over liabilities from the Company's Solvency II balance sheet. For Irish Life Health, the reconciliation reserve is reduced by the following amounts: > Planned dividends > The basic own funds item listed above (ordinary share capital and share premium) In line with Article 69 of the Delegated Act, all of the reconciliation reserve is classified as tier 1 unrestricted. The reconciliation reserve will vary over time based on the experience of the company, including the claims experience, expense levels, risk equalisation impact and the impact of writing new business in the future.

The table below shows the Company's own funds as at 31 December 2024 and as at 31 December 2023.

Own Funds €000s	31.12.2024	31.12.2023
Ordinary Share Capital	9	9
Share Premium Account	12,441	12,441
Reconciliation Reserve	97,550	88,735
Tier 1 Unrestricted	110,000	101,185
Tier 1 Restricted	—	—
Tier 2	—	—
Tier 3	—	—
Available and Eligible Own Funds	110,000	101,185

Changes in own funds in 2024

Overall, own funds have increased by €8.8m in 2024.

The increase in own funds is mainly due to profits which emerged from Irish Life Health's business as discussed in Section A.2 above, partially offset by dividends (including those paid and "foreseeable dividends" expected to be paid in the near future).

Future own funds movements

Movements in the Company's own funds in the future will depend on a number of factors including the Company's experience and the dividends that the Company decides to pay. Irish Life Health intends to manage its own funds so that its solvency position stays within a targeted range, as discussed at the beginning of Section E.1.

Deferred taxes

The Company's Solvency II own funds include a deferred tax liability of €1.5m at 31 December 2024. This reflects tax that is expected to be paid in the future, if the future profits reflected in own funds arise as expected (as described in Section D.3.2, Note 1).

No deferred tax asset is held under Solvency II at year-end 2024.

Deductions and Restrictions

There are no deductions from own funds. There are no significant restrictions on the transferability of own funds.

Limits on eligibility of capital

The limits on eligible Tier 2 capital, Tier 3 capital and restricted Tier 1 capital have no impact on the Company's eligible own funds to cover the SCR.

The Company's own funds are all unrestricted Tier 1 capital and are fully eligible to cover the SCR and the Minimum Capital Requirement ("MCR").

E.1.2 ELIGIBLE OWN FUNDS TO COVER SOLVENCY CAPITAL REQUIREMENT AND MINIMUM CAPITAL REQUIREMENT

The table below shows the Company's eligible own funds to cover the SCR and MCR as at 31 December 2024 and 31 December 2023.

Own Funds €000s	31.12.2024	31.12.2023	Difference
Tier 1 Unrestricted	110,000	101,185	8,815
Eligible own funds to meet SCR	110,000	101,185	8,815
Solvency Capital Requirement	73,002	67,414	5,587
Solvency Ratio	150.7%	150.1%	0.6%
Minimum Capital Requirement	18,250	16,854	1,397
Eligible own funds as a percentage of MCR	602.7%	600.4%	2.3%

E.1.3 EQUITY IN FINANCIAL STATEMENTS COMPARED TO SOLVENCY OWN FUNDS

Irish Life Health prepares financial statements under IFRS rules. As at 31 December 2024, the difference between the equity in the financial statements and the Solvency II own funds is as follows:

€000s	31.12.2024
Net Assets as per Financial statements	104,456
Removal of Acquisition Cost Reserve and prepayments	-18,236
Removal of intangible assets	-6,330
Addition of future profits (net of reinsurance)	29,986
Removal of margins for uncertainty in financial statements	10,565
Addition of Risk Margin	-6,020
Impact of Deferred Tax	-1,408
Planned Dividends	-3,000
Other	-14
Solvency II Eligible Own Funds	110,000

The key differences between the equity in the financial statements and the Solvency II own funds are:

> The valuation of insurance contract liabilities in the financial statements differs from the valuation of technical provisions under Solvency II, as discussed in Section D.2 above.

> Due to the difference in valuation of insurance contract liabilities, there is a difference in the deferred tax.

E.1.4 TRANSITIONAL ARRANGEMENTS

Irish Life Health does not avail of any Solvency II transitional arrangements relating to own funds.

E.1.5 ANCILLARY OWN FUNDS

Irish Life Health does not have any ancillary own fund items.

E.2 SOLVENCY CAPITAL REQUIREMENT AND MINIMUM CAPITAL REQUIREMENT

Irish Life Health calculates the SCR using the standard formula. The SCR includes the Basic Solvency Capital Requirement ("BSCR") and the SCR for operational risk.

The BSCR is calculated using a correlation matrix approach and three risk modules are relevant for Irish Life Health:

- Health underwriting (non-SLT);
- Market;
- Counterparty (default).

The non-life underwriting, life underwriting and intangible assets risk modules are not applicable to Irish Life Health.

The SCR and MCR at 31 December 2024 and 31 December 2023 are shown below:

€000s	31.12.2024	31.12.2023	Difference
Solvency Capital Requirement	73,002	67,414	5,587
Minimum Capital Requirement	18,250	16,854	1,397

E.2.1 SOLVENCY II CAPITAL REQUIREMENTS SPLIT BY RISK MODULE

The split of the SCR by risk module at 31 December 2024 and 31 December 2023 is shown below. The movements in the SCR in 2024 are discussed in Section E.2.5 below.

€000s	31.12.2024	31.12.2023
Market Risk	1,826	1,550
Counterparty default risk	1,029	867
Life underwriting risk	—	—
Health underwriting risk	64,660	58,632
Non-life underwriting risk	—	—
Diversification	-2,104	-1,784
Intangible asset risk	—	—
Basic Solvency Capital Requirement	65,411	59,265
Operational Risk	19,623	17,780
Loss-absorbing capacity of deferred taxes	-12,032	-9,631
Solvency Capital Requirement	73,002	67,414

E.2.2 USE OF SIMPLIFIED METHODS

Irish Life Health uses a simplified calculation permitted by the Delegated Acts for the calculation of lapse risk within the health underwriting risk module.

None of the other simplifications allowed in the Delegated Acts to estimate the SCRs were used.

E.2.3 UNDERTAKING SPECIFIC PARAMETERS

Irish Life Health does not use undertaking specific parameters.

E.2.4 LOSS ABSORBING CAPACITY OF DEFERRED TAXES

The SCR has been reduced by €12.0m for the loss absorbing capacity of deferred taxes at 31 December 2024. This reflects that if the Company incurs losses due to adverse experience there will be a reduction in the tax paid by the Company.

The source of the loss absorbing capacity of deferred taxes is as follows:

- **Deferred Tax Liability €1.5m.** As noted in Section E.1, own funds allow for a deferred tax liability of €1.5m. The SCR calculation anticipates stress events which reduce the value of future profits. The occurrence of these stress events would also mean that this tax liability would not arise.
- **Carry back against prior year tax payments €2.6m.** Under Irish tax law if losses are incurred, it is possible to reclaim tax paid in respect of the previous calendar year. Tax payable in respect of 2024 is €2.6m. If the stress events envisaged in the SCR calculation arise this tax payment can be reclaimed.
- **Future profits €7.9m.** This reflects an expected reduction in future tax payments which would arise if the stress events envisaged in the SCR calculation occur.

It is anticipated that there will be a deferred tax asset of €7.9m after allowing for the loss absorbing capacity of deferred taxes. The Company has deemed that it is probable that this tax asset will be recovered from future profits. The assumptions used to assess this include assumptions around future claims, expenses, premiums and numbers of customers. The assessment is informed by the Company's current business plans and strategy and allows for changes which would be expected to arise following adverse experience and the actions that the Company would take. The assessment has been reviewed and approved by the Board.

E.2.5 CALCULATION OF THE MINIMUM CAPITAL REQUIREMENT

Under Solvency II, the MCR is calculated using a formula set out in the Delegated Act and is subject to a minimum of 25% of the SCR and a maximum of 45% of the SCR. For Irish Life Health, the minimum value of the MCR of 25% of the SCR applies.

- As at 31 December 2024 the MCR of €18.3m is 25% of the Solvency Capital Requirement of 73.0m.
- As at 31 December 2023 the MCR of €16.9m is 25% of the Solvency Capital Requirement of €67.4m.

E.2.6 MATERIAL CHANGES DURING THE REPORTING PERIOD

During 2024, the SCR increased by €5.6m. The increase in the SCR was mainly due to an increase in health underwriting risk partly offset by an increase in the loss absorbing capacity of deferred taxes.

During 2024, the MCR increased by €1.4m due to the increase in the SCR.

E.3 USE OF DURATION BASED SUB-MODULE IN THE CALCULATION OF THE SOLVENCY CAPITAL REQUIREMENT

Irish Life Health does not use the duration based equity risk sub-module.

E.4 DIFFERENCES BETWEEN STANDARD FORMULA AND ANY INTERNAL MODEL USED

Irish Life Health uses the standard formula to calculate the SCR and MCR and does not use any internal model to calculate these.

E.5 NON-COMPLIANCE WITH THE MINIMUM CAPITAL REQUIREMENT AND NON-COMPLIANCE WITH THE SOLVENCY CAPITAL REQUIREMENT

During 2024, Irish Life Health was in compliance with the SCR and MCR requirements.

E.6 ANY OTHER INFORMATION

No items to note.

APPENDICES

APPENDIX 1 LIST OF ABBREVIATIONS USED IN THE DOCUMENT

Basic Solvency Capital Requirement (BSCR)
Best Estimate Technical Provision (BETP)
Board Audit Committee (BAC)
Board Risk Committee (BRC)
Canada Life Asset Management Limited (CLAM)
Canada Life Ltd (CLL)
Chronic Obstructive Pulmonary Disease (COPD)
The Canada Life Group (U.K.) Limited (CLG)
Chief Risk Officer (CRO)
Compliance and Operational Risk Committee (CORC)
Designated Activity Company (dac)
Diversity, Equity and Inclusion (DEI)
Enterprise Risk Management (ERM)
European Insurance and Occupational Pension Authority (EIOPA)
Events not in Data (ENID)
Fit and Proper Policy (the F&P Policy)
The Great-West Life Assurance Company (GWL)
Great-West Lifeco Inc. group of companies (Lifeco)
Group Finance (GF)
Group Operational Risk Committee (GORC)
Head of Finance (HOF)
Irish Life campus (the Campus)
Irish Life Group Limited (ILGL)
Irish Life Health dac (the Company)
Irish Life Health dac (ILH)
Irish Life Health Board of directors (the Board)
Incurred but not Reported (IBNR)
Independent Non-Executive Director (INED)
Institute of Internal Auditor’s (IIA)
International Financial Reporting Standards (IFRS)
Management Risk Forum (MRF)
Minimum Capital Requirement (MCR)
Non Similar to Life Techniques (Non-SLT)
Net Promoter Score (NPS)
Own Risk and Solvency Assessment (ORSA)
Own Solvency Needs Assessment (OSNA)
Pre-approved controlled function (PCF)
Prudential Regulation Authority (PRA)
Social Return on Investment (SROI)
Solvency and Financial Condition Report (SFCR)
Solvency Capital Requirement (SCR)

Irish Life health

APPENDIX 2 BALANCE SHEET

	S.02.01.02	Solvency II value (nearest €)
	Assets	C0010
R0030	Intangible assets	
R0040	Deferred tax assets	
R0050	Pension benefit surplus	
R0060	Property, plant & equipment held for own use	2,375,069
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	179,885,953
R0080	Property (other than for own use)	
R0090	Holdings in related undertakings, including participations	
R0100	Equities	
R0110	Equities - listed	
R0120	Equities - unlisted	
R0130	Bonds	137,551,710
R0140	Government Bonds	85,263,254
R0150	Corporate Bonds	52,288,457
R0160	Structured notes	
R0170	Collateralised securities	
R0180	Collective Investments Undertakings	42,334,242
R0190	Derivatives	
R0200	Deposits other than cash equivalents	
R0210	Other investments	
R0220	Assets held for index-linked and unit-linked contracts	
R0230	Loans and mortgages	
R0240	Loans on policies	
R0250	Loans and mortgages to individuals	
R0260	Other loans and mortgages	
R0270	Reinsurance recoverables from:	91,213,943
R0280	Non-life and health similar to non-life	91,213,943
R0290	Non-life excluding health	
R0300	Health similar to non-life	91,213,943
R0310	Life and health similar to life, excluding index-linked and unit-linked	
R0320	Health similar to life	
R0330	Life excluding health and index-linked and unit-linked	
R0340	Life index-linked and unit-linked	
R0350	Deposits to cedants	
R0360	Insurance and intermediaries receivables	3,140,899
R0370	Reinsurance receivables	
R0380	Receivables (trade, not insurance)	
R0390	Own shares (held directly)	
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	
R0410	Cash and cash equivalents	8,999,639
R0420	Any other assets, not elsewhere shown	22,846,871
R0500	**Total assets**	**308,462,374**

APPENDIX 2 BALANCE SHEET (CONTINUED)

	S.02.01.02	Solvency II value (nearest €)
	Liabilities	C0010
R0510	Technical provisions - non-life	73,492,423
R0520	Technical provisions - non-life (excluding health)	
R0530	TP calculated as a whole	
R0540	Best Estimate	
R0550	Risk margin	
R0560	Technical provisions - health (similar to non-life)	73,492,423
R0570	TP calculated as a whole	
R0580	Best Estimate	67,472,270
R0590	Risk margin	6,020,152
R0600	Technical provisions - life (excluding index-linked and unit-linked)	
R0610	Technical provisions - health (similar to life)	
R0620	TP calculated as a whole	
R0630	Best Estimate	
R0640	Risk margin	
R0650	Technical provisions - life (excluding health and index-linked and unit-linked)	
R0660	TP calculated as a whole	
R0670	Best Estimate	
R0680	Risk margin	
R0690	Technical provisions - index-linked and unit-linked	
R0700	TP calculated as a whole	
R0710	Best Estimate	
R0720	Risk margin	
R0740	Contingent liabilities	
R0750	Provisions other than technical provisions	370,000
R0760	Pension benefit obligations	
R0770	Deposits from reinsurers	95,374,598
R0780	Deferred tax liabilities	1,523,848
R0790	Derivatives	
R0800	Debts owed to credit institutions	
R0810	Financial liabilities other than debts owed to credit institutions	2,091,685
R0820	Insurance & intermediaries payables	
R0830	Reinsurance payables	908,183
R0840	Payables (trade, not insurance)	10,234,512
R0850	Subordinated liabilities	
R0860	Subordinated liabilities not in BOF	
R0870	Subordinated liabilities in BOF	
R0880	Any other liabilities, not elsewhere shown	14,467,277
R0900	**Total liabilities**	198,462,527
R1000	**Excess of assets over liabilities**	**109,999,847**

Irish Life health

APPENDIX 3 PREMIUMS, CLAIMS AND EXPENSES BY LINE OF BUSINESS

	S.05.01.02		
	Premiums, claims and expenses by line of business: Non-life insurance and reinsurance obligations		
	Non-life	Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)	Total
		Medical expense insurance	
	Premiums written	C0010	C0200
R0110	Gross - Direct Business	718,309,513	718,309,513
R0120	Gross - Proportional reinsurance accepted		0
R0130	Gross - Non-proportional reinsurance accepted		0
R0140	Reinsurers' share	524,164,210	524,164,210
R0200	Net	194,145,303	194,145,303
	Premiums earned		
R0210	Gross - Direct Business	677,032,321	677,032,321
R0220	Gross - Proportional reinsurance accepted		0
R0230	Gross - Non-proportional reinsurance accepted		0
R0240	Reinsurers' share	494,312,909	494,312,909
R0300	Net	182,719,412	182,719,412
	Claims incurred		
R0310	Gross - Direct Business	532,419,675	532,419,675
R0320	Gross - Proportional reinsurance accepted		0
R0330	Gross - Non-proportional reinsurance accepted		0
R0340	Reinsurers' share	378,869,397	378,869,397
R0400	Net	153,550,278	153,550,278
R0550	**Expenses incurred**	127,341,365	127,341,365
R1210	**Balance - other technical expenses/income**		
R1300	**Total technical expenses**		127,341,365

APPENDIX 4 NON-LIFE TECHNICAL PROVISIONS

	S.17.01.02		
	Non-Life Technical Provisions	Direct business and accepted proportional reinsurance Medical expense insurance	Total Non-Life obligation
	Technical provisions calculated as a sum of BE and RM		
	Best estimate	C0020	C0180
R0010	**Technical provisions calculated as a whole**	0	0
R0050	Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole		0
	Technical provisions calculated as a sum of BE and RM		
	Best estimate		
	Premium provisions		
R0060	Gross	-54,913,054	-54,913,054
R0140	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	-4,446,512	-4,446,512
R0150	Net Best Estimate of Premium Provisions	-50,466,542	-50,466,542
	Claims provisions		
R0160	Gross	122,385,324	122,385,324
R0240	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	95,660,455	95,660,455
R0250	**Net Best Estimate of Claims Provisions**	26,724,869	26,724,869
R0260	**Total best estimate - gross**	67,472,270	67,472,270
R0270	**Total best estimate - net**	-23,741,673	-23,741,673
R0280	**Risk margin**	6,020,152	6,020,152
R0320	**Technical provisions - total**	73,492,423	73,492,423
R0330	**Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total**	91,213,943	91,213,943
R0340	**Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total**	-17,721,520	-17,721,520

APPENDIX 5 NON-LIFE INSURANCE CLAIMS

	S.19.01.21																
	Non-Life insurance claims																
	Total Non-life business																
Z0020				Accident year / underwriting year		Accident year											
	Gross Claims Paid (non-cumulative) (absolute amount)																
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160
	Year	Development year															
		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15 +
R0100	Prior																255
R0110	N-14	88,190,987	37,909,506	2,645,017	636,442	289,864	115,709	170,017	17,560	3,552	-1,608	4,220	445	290	0	969	
R0120	N-13	151,872,625	59,602,248	2,836,460	1,008,147	316,502	409,985	60,926	22,208	-10,531	7,621	1,777	150	160	576		
R0130	N-12	185,541,267	56,381,276	4,994,070	1,164,983	1,321,752	61,659	80,203	-67,683	11,397	13,250	834	1,990	1,248			
R0140	N-11	168,567,986	61,907,167	4,971,955	2,508,205	269,850	104,691	-2,425	6,431	14,240	-4,735	263	4,450				
R0150	N-10	157,515,193	64,467,438	12,623,292	390,918	50,043	-32,750	188,831	29,448	3,874	653	7,443					
R0160	N-9	155,770,521	73,734,126	2,207,420	270,933	68,457	216,681	95,929	13,777	1,185	12,024						
R0170	N-8	175,771,465	55,864,584	3,865,416	1,022,932	533,563	146,250	63,242	20,061	8,208							
R0180	N-7	192,285,498	69,092,816	4,527,397	1,746,787	554,735	331,334	134,096	65,332								
R0190	N-6	231,320,155	87,550,261	6,822,524	1,599,357	422,534	323,556	178,701									
R0200	N-5	261,587,007	88,060,112	4,664,260	1,999,978	1,218,503	396,957										
R0210	N-4	202,703,026	77,731,313	7,576,040	2,018,998	622,263											
R0220	N-3	264,425,627	104,907,500	7,326,802	1,374,632												
R0230	N-2	315,864,898	98,757,186	4,739,908													
R0240	N-1	382,047,289	94,894,850														
R0250	N	427,613,109															
R0260																	

		C0170	C0180
		In Current year	Sum of years (cumulative)
R0100		255	255
R0110		969	129,982,970
R0120		576	216,128,855
R0130		1,248	249,506,245
R0140		4,450	238,348,078
R0150		7,443	235,244,382
R0160		12,024	232,391,053
R0170		8,208	237,295,721
R0180		65,332	268,737,994
R0190		178,701	328,217,087
R0200		396,957	357,926,817
R0210		622,263	290,651,641
R0220		1,374,632	378,034,560
R0230		4,739,908	419,361,992
R0240		94,894,850	476,942,139
R0250	Total	427,613,109	427,613,109
R0260		529,920,925	4,486,382,897

APPENDIX 5 NON-LIFE INSURANCE CLAIMS CONTINUED

	Gross undiscounted Best Estimate Claims Provisions (absolute amount)																		
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0310	C0320	C0330	C0340	C0350		C0360
	Year	Development year																	Year end (discounted data)
		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15 +		
R0100	Prior																1,386		1,375
R0110	N-14	0	0	0	0	0	0	87,655	6,301	5,154	3,483	1,514	1,508	1,330	1,334	100			99
R0120	N-13	0	0	0	0	0	158,221	15,642	6,859	3,859	1,573	534	533	535	0				0
R0130	N-12	0	0	0	0	351,462	83,465	25,653	20,673	14,417	2,217	2,029	2,035	434					430
R0140	N-11	0	0	0	439,119	113,188	48,467	29,366	17,340	5,726	5,396	5,238	530						526
R0150	N-10	0	0	1,282,578	1,687,279	347,845	281,327	202,761	206,942	67,266	10,703	2,445							2,425
R0160	N-9	0	6,320,024	3,588,907	1,378,264	1,020,140	917,623	897,618	317,389	9,614	5,714								5,667
R0170	N-8	72,583,203	7,350,961	3,342,341	1,210,566	922,070	797,857	308,097	3,817	3,010									2,985
R0180	N-7	69,598,774	6,225,366	2,558,472	1,266,320	763,375	268,822	125,267	70,739										70,164
R0190	N-6	86,999,405	8,654,228	4,242,706	805,929	179,490	193,147	71,469											71,134
R0200	N-5	95,464,581	9,875,632	4,326,586	750,133	238,463	413,857												411,050
R0210	N-4	96,791,501	10,063,399	2,394,908	715,670	347,624													345,298
R0220	N-3	127,241,375	13,461,227	3,225,173	827,345														821,229
R0230	N-2	116,891,766	10,182,631	3,389,152															3,361,912
R0240	N-1	103,753,242	8,652,524																8,575,964
R0250	N	109,714,699																	108,715,066
R0260																		Total	122,385,324

APPENDIX 6 OWN FUNDS

	S.23.01.01					
	Own Funds					
	Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35	Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
R0010	Ordinary share capital (gross of own shares)	9,000	9,000		0	
R0030	Share premium account related to ordinary share capital	12,441,000	12,441,000		0	
R0040	Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings	0	0		0	
R0050	Subordinated mutual member accounts	0		0	0	0
R0070	Surplus funds	0	0			
R0090	Preference shares	0		0	0	0
R0110	Share premium account related to preference shares	0		0	0	0
R0130	Reconciliation reserve	97,549,847	97,549,847			
R0140	Subordinated liabilities	0		0	0	0
R0160	An amount equal to the value of net deferred tax assets	0				0
R0180	Other own fund items approved by the supervisory authority as basic own funds not specified above	0	0	0	0	0
R0220	**Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds**	0				
R0230	**Deductions for participations in financial and credit institutions**	0				
R0290	**Total basic own funds after deductions**	109,999,847	109,999,847	0	0	0
	Ancillary own funds					
R0300	Unpaid and uncalled ordinary share capital callable on demand	0				
R0310	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	0				
R0320	Unpaid and uncalled preference shares callable on demand	0				
R0330	A legally binding commitment to subscribe and pay for subordinated liabilities on demand	0				
R0340	Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	0				
R0350	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	0				
R0360	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0				
R0370	Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0				
R0390	Other ancillary own funds	0				
R0400	**Total ancillary own funds**	0			0	0
	Available and eligible own funds					
R0500	Total available own funds to meet the SCR	109,999,847	109,999,847	0	0	0

CONTINUED OVER

APPENDIX 6 OWN FUNDS (CONTINUED)

	S.23.01.01					
	Own Funds					
	Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35	Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
R0510	Total available own funds to meet the MCR	109,999,847	109,999,847	0	0	
R0540	Total eligible own funds to meet the SCR	109,999,847	109,999,847	0	0	0
R0550	Total eligible own funds to meet the MCR	109,999,847	109,999,847	0	0	
R0580	**SCR**	73,001,697				
R0600	**MCR**	18,250,424				
R0620	**Ratio of Eligible own funds to SCR**	150.68%				
R0640	**Ratio of Eligible own funds to MCR**	602.72%				
	Reconcilliation reserve	C0060				
R0700	Excess of assets over liabilities	109,999,847				
R0710	Own shares (held directly and indirectly)	0				
R0720	Foreseeable dividends, distributions and charges					
R0730	Other basic own fund items	12,450,000				
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	0				
R0760	**Reconciliation reserve**	97,549,847				
	Expected profits					
R0770	Expected profits included in future premiums (EPIFP) - Life business					
R0780	Expected profits included in future premiums (EPIFP) - Non- life business	31,803,462				
R0790	**Total Expected profits included in future premiums (EPIFP)**	31,803,462				

APPENDIX 7 SOLVENCY CAPITAL REQUIREMENT - FOR UNDERTAKINGS ON STANDARD FORMULA

	S.25.01.21			
	Solvency Capital Requirement - for undertakings on Standard Formula			
		Gross solvency capital requirement	USP	Simplifications
		C0040	C0090	C0120
R0010	Market risk	1,825,740		
R0020	Counterparty default risk	1,029,185		
R0030	Life underwriting risk	0	9	
R0040	Health underwriting risk	64,660,170	9	Non-SLT health lapse risk
R0050	Non-life underwriting risk	0	9	
R0060	Diversification	-2,104,319		
R0070	Intangible asset risk	0		
R0100	**Basic Solvency Capital Requirement**	65,410,776		
	Calculation of Solvency Capital Requirement	C0100		
R0130	Operational risk	19,623,233		
R0140	Loss-absorbing capacity of technical provisions	0		
R0150	Loss-absorbing capacity of deferred taxes	-12,032,312		
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0		
R0200	**Solvency Capital Requirement excluding capital add-on**	73,001,697		
R0210	Capital add-ons already set	0		
R0211	of which, capital add-ons already set - Article 37 (1) Type a	0		
R0212	of which, capital add-ons already set - Article 37 (1) Type b	0		
R0213	of which, capital add-ons already set - Article 37 (1) Type c	0		
R0214	of which, capital add-ons already set - Article 37 (1) Type d	0		
R0220	**Solvency capital requirement**	73,001,697		
	Other information on SCR			
R0400	Capital requirement for duration-based equity risk sub-module	0		
R0410	Total amount of Notional Solvency Capital Requirements for remaining part	0		
R0420	Total amount of Notional Solvency Capital Requirements for ring fenced funds	0		
R0430	Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	0		
R0440	Diversification effects due to RFF nSCR aggregation for article 304	0		

USP Key

For life underwriting risk:

1 - Increase in the amount of annuity benefits

9 - None

For health underwriting risk:

1 - Increase in the amount of annuity benefits

2 - Standard deviation for NSLT health premium risk

3 - Standard deviation for NSLT health gross premium risk

4 - Adjustment factor for non-proportional reinsurance

5 - Standard deviation for NSLT health reserve risk

9 - None

For non-life underwriting risk:

4 - Adjustment factor for non-proportional reinsurance

6 - Standard deviation for non-life premium risk

7 - Standard deviation for non-life gross premium risk

8 - Standard deviation for non-life reserve risk

9 - None

CONTINUED OVER

APPENDIX 7 SOLVENCY CAPITAL REQUIREMENT - FOR UNDERTAKINGS ON STANDARD FORMULA (CONTINUED)

	S.25.01.21			
	Solvency Capital Requirement - for undertakings on Standard Formula			
		Gross solvency capital requirement	USP	Simplifications
	Approach to tax rate	C0109		
R0590	Approach based on average tax rate	2		
	Calculation of loss absorbing capacity of deferred taxes	LAC DT		
		C0130		
R0640	LAC DT	-12,032,312		
R0650	LAC DT justified by reversion of deferred tax liabilities	-1,523,849		
R0660	LAC DT justified by reference to probable future taxable economic profit	-7,918,883		
R0670	LAC DT justified by carry back, current year	-2,589,580		
R0680	LAC DT justified by carry back, future years	0		
R0690	Maximum LAC DT	-12,032,312		

APPENDIX 8 MINIMUM CAPITAL REQUIREMENT - ONLY LIFE OR NON-LIFE OR REINSURANCE ACTIVITY

	S.28.01.01			
	Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity			
	Linear formula component for non-life insurance and reinsurance obligations	C0010		
R0010	MCR_{NL} Result	9,124,829	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
			C0020	C0030
R0020	Medical expense insurance and proportional reinsurance		0	194,145,303
R0030	Income protection insurance and proportional reinsurance		0	
R0040	Workers' compensation insurance and proportional reinsurance		0	
R0050	Motor vehicle liability insurance and proportional reinsurance		0	
R0060	Other motor insurance and proportional reinsurance		0	
R0070	Marine, aviation and transport insurance and proportional reinsurance		0	
R0080	Fire and other damage to property insurance and proportional reinsurance		0	
R0090	General liability insurance and proportional reinsurance		0	
R0100	Credit and suretyship insurance and proportional reinsurance		0	
R0110	Legal expenses insurance and proportional reinsurance		0	
R0120	Assistance and proportional reinsurance		0	
R0130	Miscellaneous financial loss insurance and proportional reinsurance		0	
R0140	Non-proportional health reinsurance		0	
R0150	Non-proportional casualty reinsurance		0	
R0160	Non-proportional marine, aviation and transport reinsurance		0	
R0170	Non-proportional property reinsurance		0	
	Linear formula component for life insurance and reinsurance obligations	C0040		
R0200	MCR_{L} Result	0		

CONTINUED OVER

APPENDIX 8 MINIMUM CAPITAL REQUIREMENT - ONLY LIFE OR NON-LIFE OR REINSURANCE ACTIVITY (CONTINUED)

	S.28.01.01			
	Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity			
			Net (of reinsurance/ SPV) best estimate and TP calculated as a whole	Net (of reinsurance/ SPV) total capital at risk
			C0050	C0060
R0210	Obligations with profit participation - guaranteed benefits			
R0220	Obligations with profit participation - future discretionary benefits			
R0230	Index-linked and unit-linked insurance obligations			
R0240	Other life (re)insurance and health (re)insurance obligations			
R0250	Total capital at risk for all life (re)insurance obligations			
	Overall MCR calculation	C0070		
R0300	Linear MCR	9,124,829		
R0310	SCR	73,001,697		
R0320	MCR cap	32,850,764		
R0330	MCR floor	18,250,424		
R0340	Combined MCR	18,250,424		
R0350	Absolute floor of the MCR	2,700,000		
R0400	**Minimum Capital Requirement**	18,250,424		

Irish Life
health