ATHORA LIFE RE LTD.

Financial Condition Report

31 December 2023

Athora Life Re Ltd. Financial Condition Report
For the twelve (12) months ending 31 December 2023

CONTENTS

1. EXECUTIVE SUMMARY

Athora Life Re Ltd. ("**ARE**" or the "**Company**") was incorporated under the laws of Bermuda on 4 April 2017 and is registered as a Class E long-term insurer under the Insurance Act 1978, as amended, and related rules and regulations (the "**Insurance Act**") and supervised by the Bermuda Monetary Authority ("**BMA**" or the "**Authority**").

This Financial Condition Report has been prepared in accordance with the Insurance (Public Disclosure) Rules 2015. It provides information on ARE's business and performance, system of governance, risk profile and capital management.

1.1 Business and Performance

ARE is a wholly-owned subsidiary of Athora Holding Ltd., a Bermuda holding company ("**Athora Holding**" or "**Parent**") which is an insurance group supervised by the Authority.

In January 2018, Athora Holding deconsolidated from Athene Holding Ltd. ("**Athene**") becoming its own insurance group, of which ARE forms a part. Athora Holding, through its subsidiaries in Bermuda, Ireland, Germany, Belgium, Italy and Netherlands (collectively the "**Athora Group**"), is a specialist solutions provider in the European insurance market.

ARE is the Designated Insurer appointed by the Authority as the lead insurer and administrative point of contact within the Athora Group, through which the Athora Group is required to fulfil its regulatory reporting and compliance obligations.

ARE is a Bermuda-based reinsurance carrier that provides capital optimisation and risk management solutions to European life insurers. It offers reinsurance solutions to insurers to free up capital, management capacities and operating resources, and enhance policyholder value.

On 3 April 2018, ARE acquired Aegon Ireland plc (now known as Athora Ireland plc ("**Athora Ireland**")) from Aegon N.V. Athora Ireland, as a direct subsidiary of ARE, supports ARE's strategy to provide reinsurance solutions.

ARE and Athora Ireland have been assigned the following credit ratings by A.M. Best[1] and Fitch Ratings[2]:

	A.M. Best	Fitch
Athora Life Re Ltd.	A-	A
	Outlook: Stable	Outlook: Stable
	05/2023	09/2023
Athora Ireland plc	A-	A
	Outlook: Stable	Outlook: Stable
	05/2023	09/2023

As permitted by the Insurance Act, ARE has elected to use IFRS to prepare its statutory financial statements.

ARE adopted IFRS 17 with effect from 1 January 2023 as its valuation basis for insurance contracts.

IFRS 9 applies to ARE's asset holdings which results in all assets being measured at fair value through profit and loss which impact ARE's IFRS equity.

The Company reported an IFRS profit after tax of €41.7m at 31 December 2023. This was due to a combination of the impact of interest rate movements on the fair value of assets compared to the fair value of liabilities, as well as the change in asset mix over the period.

1.2 System of Governance

ARE is committed to a high standard of corporate governance and has adopted a governance framework to provide effective governance over the affairs of the Company under the direction of the Company's Board of Directors (the "**Board**", each a "**Director**"), and in compliance with applicable laws and regulations, the Company's Bye-laws and other corporate governance documents of the Company.

The Company is satisfied that the system of governance remains fit for purpose and appropriate for the nature, scale and complexity of risks inherent in its business.

[1] For the latest rating, access www.ambest.com.
[2] Fitch's ratings and analysis reflect the ability of an insurer to meet its policyholder, reinsurance and contract holder obligations on a timely basis.

1.3 Risk Profile

The Company faces a number of risks that are external in nature, primarily financial market risks and underwriting risks. Other risks arise from internal factors, such as inadequate systems or processes. Both external and internal risks can affect the Company´s operations, its earnings, the value of its investments, or the ability to write new business.

The Company's risk management framework defines the tools, policies and processes used to measure and manage risks, and to help guide the development of ARE's desired risk profile. The risk management and control systems are designed to ensure that these risks are managed effectively and efficiently in a way that is aligned with the Company's risk strategy.

The Company's operational framework and infrastructure has evolved since inception in 2018 and continues to mature to support the increased risk exposure that accompanies balance sheet growth. Looking ahead, further strengthening of processes, systems, and controls is anticipated as and when the risk profile of the Company goes through a material change.

1.4 Solvency Valuation

The Company has valued its assets and liabilities on a market consistent basis, i.e., using information that is market observable where possible in accordance with Economic Balance Sheet ("**EBS**") valuation principles. The Company uses uncertainty margins reflecting the simplifications and limitations in the methodology, assumptions, data, and modelling of the technical provision calculation.

1.5 Capital Management

The Company manages capital on an economic basis within the constraints and requirements of its external stakeholders. The primary objective of the Company's capital management process is to ensure that a strong financial position is maintained, and solvency volatility is minimised. The Capital Management Policy outlines the capital management process.

The Company's Capital and Investment Management Committee and the Risk Committee, together with the Board, regularly consider capital assessments and projections for the Company to ensure that capital is managed with continuous adherence to the Company's principles relating to capital adequacy, financial flexibility and the efficient use of capital.

The Company's required capital is calculated using the regulatory capital requirements i.e., the Enhanced Capital Requirement ("**ECR**") which is calculated using the Bermuda Solvency Capital Requirement ("**BSCR**") model. The table below summaries the Company's capital position.

€'000	2023	2022
Available Capital	230,091	260,782
ECR	123,560	124,069
Solvency Ratio	186%	210%

The decrease in Available Capital over the period is explained by an update to actuarial best estimate lapse assumptions, credit market movements and a change in asset mix over the period, resulting in a lower overall spread on the valuation date, leading to an increase in best estimate liability ("**BEL**") and therefore a decrease to Available Capital.

2. BUSINESS AND PERFORMANCE

2.1 Name of the Insurer

Athora Life Re Ltd.
First Floor, Swan Building
26 Victoria Street
Hamilton HM 12, Bermuda

2.2 Insurance Supervisor

Bermuda Monetary Authority
BMA House
43 Victoria Street
Hamilton HM 12, Bermuda

2.3 Approved Auditor

EY Bermuda Ltd.
3 Bermudiana Road
Hamilton, HM08
Bermuda

2.4 Ownership details

ARE is a wholly owned subsidiary of Athora Holding, which is the Athora Group’s parent company headquartered in Bermuda. Athora Holding’s shareholder base is comprised of high-quality, long-term minded global institutional investors.

2.5 Group structure

The Company’s structure is shown in **Appendix 1**.

2.6 Insurance business written by business segment and by geographical region during the reporting period

Geographical distribution of business written for the reporting period.

€ ‘000	2023	2022
Gross Premium Written - Belgium	50,142	1,073,892
Gross Premium Written - Ireland	63,546	107,243
Gross Premium Written - Germany	6,205	7,468
Gross Premium Written - Other	2,800	–
Total Gross Premium Written	**122,693**	**1,188,602**
Net Premium Written - Belgium	50,142	1,073,892
Net Premium Written - Ireland	63,546	107,243
Net Premium Written - Germany	6,205	7,468
Net Premium Written - Other	2,800	–
Total Net Premium Written	**122,693**	**1,188,602**

2.7 Performance of investments, by asset class and details on material income and expenses incurred during the reporting period

2.7.1 Investment performance

The table below details the Company's net investment income as reported in the Company's 2023 and 2022 audited financial statements. The investment losses on financial assets in 2022 are due to the susceptibility of the assets to interest rate and other macroeconomic factors in the market and are therefore not deemed to be a permanent credit risk related to the diminution in the asset value. Investment returns over 2023 are driven by interest income earned from assets on the balance sheet and fair value gains on existing assets due to interest rate movements over the period.

€ '000	2023	Restated 2022*
Net income /(expense) from derivatives held	47,202	(60,890)
Interest revenue	77,259	38,030
Net gains / (losses) on financial assets	55,850	(344,483)
Cash and cash equivalents	11,853	371
Other investment income	6,189	10,850
Net foreign exchange gains / (losses)	836	–
Total Investment Return	**199,189**	**(356,122)**

** Restated 2022 refers to restated YE 2022 balance sheet due to adoption of IFRS17, Insurance Contracts and IFRS9, Financial Instruments*

2.7.2 Material income and expenses

The Company derives its revenues primarily from premiums on reinsurance contracts and investment income generated from its investment portfolio. The Company's expenses consist largely of acquisition expenses, claim payments, investment expenses and general administrative expenses.

For further details, see the Company's audited financial statements for the reporting period.

2.8 Any other material information

Since the publication of the last FCR, the focus of the Company's business strategy has evolved from pursuing both growth in external markets and supporting internal transactions with other Athora Group subsidiaries to focussing mostly on the latter.

3. GOVERNANCE STRUCTURE

The Company has established a system of governance that is appropriate for the nature, scale and complexity of risks inherent in its business. The Company's governance framework is set out in its Bye-laws, Board Governance Guidelines, Audit Committee Charter and management committees' terms of reference.

The Company's governance structure emulates its Parent's corporate governance framework. This governance framework operates a 'Three Lines of Defence' structure to ensure appropriate segregation of responsibilities.

3.1 Board and Senior Executives

3.1.1 A description of the structure of the board and senior executive, the roles, responsibilities and segregation of these responsibilities

Board and committee structure

The Board is responsible for the sound and prudent oversight of the Company and for the overall governance of the Company's business and strategic objectives. The Company's Bye-laws and Board Governance Guidelines define the duties, membership and meeting procedures of the Board.

The business and affairs of the Company are overseen by its Board as the primary policy-making body of the Company, taking into account Athora Group-wide policies and procedures established by the Parent's board of directors.

The Board is currently comprised of five (5) Directors. Each Director is appointed based on several factors, including relevant skills and qualifications and industry experience. The Board's responsibilities are outlined in the Company's Bye-laws and its Board Governance Guidelines.

To assist in fulfilling its oversight responsibilities, the Board has established an Audit Committee with its own charter. The Chair of the Audit Committee reports to the Board on the committee's activities.

The purpose of the Audit Committee is to provide oversight and monitoring of the integrity of the financial statements and financial and accounting processes; monitoring compliance with audit, internal audit and internal controls requirements; monitoring the appointment and dismissal of the external auditor, approval of their fees, monitoring their independence and performance; and monitoring legal and regulatory compliance and ethical standards.

Management Committee structure

While the Company's business is managed under the direction of the Board, the chief/senior executives of the Company ("**Management**") are responsible for overseeing the day-to-day operations of the Company and adopting, formalising and implementing policies, procedures, internal controls and operational mechanics in order to effect the long-term strategic direction of the Company.

Management assists the Board with its oversight responsibilities regarding the Company's business activities. Management is responsible for the execution of the Company's strategic plans and objectives and for the effective execution of the roles and responsibilities of their respective functions.

Management comprises six (6) primary officers[3]: Chief Executive Officer; Chief Financial Officer; General Counsel and Chief Compliance Officer; Chief Risk Officer; Chief Actuary and Chief Reinsurance Marketing Actuary. Only one (1) member of the Board, the Chief Executive Officer, is directly involved with the day-to-day management of the Company.

The Company has established a number of Management committees (each with their own terms of reference) that provide oversight, review, challenge and monitoring of business and operational activities.

Set out on the next page is an overview of the management committees.

[3] The Chief Pricing Officer resigned effective 29 February 2024.

Committee	Membership	Responsibilities
Athora Reinsurance Operations Committee (“AROC”)	▪ CEO ▪ CFO ▪ General Counsel ▪ Business Operations Manager	AROC provides senior management oversight of the operations of the business. AROC meets quarterly and as needed.
Risk Committee (“ARC”)	▪ CEO ▪ Chief Risk Officer ▪ General Counsel ▪ Athora Group Head of Capital Steering and Measurement, Group Risk	Oversees the development of risk strategy for ARE and integration with the Athora Group strategy. Exercises oversight and provides advice to all key functions within the Company to ensure alignment with the Company’s risk strategy and embedding of the risk management system in day-to-day operations. ARC meets quarterly and as needed. Effective 10 July 2024, the Athora Group Head of Capital Steering and Measurement, Group Risk replaced the Group Enterprise Risk Management Director as a member of the ARC.
Capital and Investment Management Committee (“CIC”)	▪ CFO CEO Chief Actuary Athora Group Senior Director, Financial Planning and Analysis	Reviews and monitors ARE’s capital requirements and capital management, and optimises ARE’s balance sheet regarding capital and cash generation within the limits of solvency, liquidity, rating agency capital and ARE’s risk appetite. CIC provides strategy and direction regarding the investment activity of ARE and makes recommendations to the ARE Board on such matters. CIC meets quarterly and as needed. Effective 15 March 2024, the Chief Pricing Officer ceased to be a member of the CIC.
Athora Transactions Committee	▪ CEO Chief Actuary CFO Chief Reinsurance Marketing Actuary Chief Actuary	Conducts a robust appraisal of all reinsurance, retrocession and funding agreement transactions prior to issuing offers of terms for a transaction proportionate its risk and scale. Effective 15 March 2024, the Chief Actuary replaced the Chief Pricing Officer as a member of the Transactions Committee.

3.1.2 A description of remuneration policy and practices and performance-based criteria governing the board, senior executive and employee

The Company has adopted the Athora Group Remuneration Policy which sets forth the Group's philosophy and principles which guide how it compensates and incentivises its employees, including those whose professional activities have a material impact on the undertaking's risk profile.

The Athora Group's remuneration program seeks to:

- provide a well-balanced and, where appropriate, performance-related compensation package for employees, considering the interests of all stakeholders and relevant regulators;
- provide a motivational employment package, as appropriate to each role and to the markets in which we operate, which seeks to drive high levels of individual, team and collective engagement;
- remain competitive in all markets; and
- keep all design aspects modern and as simple as possible, allowing for efficient management and administration of all programs.

The Athora Holding Compensation Committee is responsible for oversight of the Athora Group compensation program.

Employee Reward

The Company aims to attract, recruit, develop and retain competent employees with the skills, knowledge and expertise to fulfil their allocated responsibilities and seeks to provide a motivational employment package, as appropriate to each role and to the markets in which we operate. All employees are required to set performance objectives, aligned to corporate objectives. Compensation and discretionary bonus (where applicable) are based on the output of annual appraisals and aligned with the interests of policyholders and shareholders.

Executive Director Compensation

In order to avoid any misperceptions between compensation and fiduciary responsibilities, members of Management are not additionally compensated for their roles as members of the Board.

Non-executive directors do not receive any payments linked to ARE's performance.

Independent non-executive directors (INEDs)

INEDs are typically remunerated by means of an annual base retainer fee and committee membership and/or chair fee that is fixed and does not vary based on business performance. Where required, INEDs are provided with professional indemnity (Directors and Officers) insurance for the period during which they undertake their duties. INEDs receive reimbursement for expenses incurred in the performance of their duties.

3.1.3 A description of the supplementary pension or early retirement schemes for members, the board and senior executive

The Company has a pension scheme and provides all employees with pension benefits through a defined contribution pension program. The Company does not have any early retirement schemes.

3.1.4 Any material transactions with shareholder controllers, persons who exercise significant influence, the board or senior executives

Apollo Global Management, Inc. and its subsidiaries ("**Apollo**") and Athene and its affiliates are key minority shareholders in Athora Holding. On 3 January 2022, Athene and Apollo (excluding Athene) completed a merger under Apollo Global Management, Inc. Apollo Global Management, Inc. has two principal subsidiaries:

- Apollo Asset Management (formerly Apollo Global Management, Inc.), its alternative asset management business, and
- Athene, its retirement services business.

Athora has a strategic relationship with Apollo and Athene as cofounders of Athora. The Company is party to, or indirectly benefits from, certain service, advisory and cooperation agreements with Athene and/or Apollo (or their respective affiliates).

Athene has a cooperation agreement with Athora. Under this agreement, which excludes Athora Netherlands, Athene and Athora have certain rights of first refusal relating to certain reinsurance and acquisition transactions. As at 31 December 2023, Athene has not exercised its right of first refusal to reinsure liabilities ceded to ARE.

The Company has entered into an investment management agreement with Apollo Asset Management Europe LLP ("**AAME**"), a subsidiary of Apollo. AAME provides the Company with specific asset management and specialised investment expertise that includes asset liability management ("**ALM**") strategies to evaluate, source and manage investments originated by Apollo. We expect the strategic relationship with Apollo to continue for the foreseeable future.

3.2 Fitness and Propriety Requirements

3.2.1 A description of the fit and proper process in assessing the board and senior executive

The Company uses a hiring and vetting process, including recruitment and interviewing requirements, such as assessments of relevant experience, skills and knowledge to fulfil the particular duties and responsibilities, to confirm fitness and propriety for the relevant role. The Company has adopted the Athora Group Fit & Proper Policy which sets out the principles to be applied when assessing whether individuals are fit and proper and provides guidelines to ensure procedures for such assessments.

In addition, all Board and senior management appointments are subject to a fit and proper assessment.

3.2.2 A description of the professional qualifications, skills, and expertise of the board and senior executives to carry out their functions

A. ARE's Board of Directors[2]

Steven Braudo
Chair

Appointed 4 December 2023

Steven is Group Chief Operating Officer at Athora Holding. He is an experienced leader with broad experience of working across the financial services sector in Europe and South Africa. Over his three decade career, he has held senior positions across investment management, wealth management, insurance and banking. His previous roles include COO at wealth manager, Quilter plc, where he managed the separation from Old Mutual Group and delivered major transformation projects, culminating in the successful listing of Quilter plc in June 2018. Steven has also held Chief Executive Officer roles at insurers Liberty Life and Standard Bank Wealth in South Africa. He holds a Bachelor of Science (Hons) and Bachelor of Economic Science from University of Witwatersrand and is a Fellow of the Institute and Faculty of Actuaries.

Christopher James
Appointed 22 April 2022

Christopher is Group Chief Structuring Officer Athora Holding and in his role coordinates investments and transactions to ensure compliance and efficiency from a finance, legal, and regulatory perspective. Prior to joining Athora, he was Vice President, International Tax and Senior Counsel at Athene Holding Ltd. In this capacity, he worked closely with the investment and finance team coordinating the structuring and facilitation of investments ranging from derivatives to private equity. When Athora deconsolidated from Athene in 2018, Christopher joined Athora. Previously, he was a US State Assistant Attorney General before transferring into private practice with the Dentons Davis Brown law firm where he was a Senior Partner within the business division working with a broad array of corporate, private equity, and transaction related matters. Christopher has a BS – Accounting from the University of North Carolina cum laude, Doctor of Jurisprudence (JD) from Drake University Law School with honours, and a Master of Laws (LLM) from Northwestern Law School with honours.

William Pollett
Appointed 1 June 2022

William has served the Bermuda reinsurance industry in a variety of executive management roles for over 25 years, latterly as CEO of an insurance-linked investment manager and, concurrently, CEO of an NYSE listed reinsurer until August 2015. William currently services as an independent non-executive director on a portfolio of Bermuda companies. Between 2016 and 2019, William served as interim Chief Financial Officer at Oceanview Insurance Ltd and Sellas Life Sciences Group, respectively. In 2012, he founded Blue Capital, an investment manager offering insurance-linked products to institutional investors and led the build-out of the extended platform, product development, strategic direction and all aspects of the management of the business, culminating in the initial public offering of Blue Capital Global Reinsurance Fund Limited on the London Stock Exchange in December 2012 and Blue Capital Reinsurance Holdings Ltd. on the New York Stock Exchange in November 2013. Prior to being acquired by Endurance, William served as Treasurer and then Chief Corporate Development and Strategy Officer of Montpelier Reinsurance Holdings Ltd, a leading global property specialty reinsurance company headquartered in Bermuda and listed on the NYSE. At Montpelier he was responsible for Corporate Finance, Capital Management, Investor Relations, Strategic Planning, Treasury, Rating Agencies and Enterprise Risk Management. William is a Chartered Accountant (ICAEW), CFA Charter holder (CFA Institute) and a member of the 2018 Institute of Directors. William holds a BCom Honors degree in Business Studies and Accounting from Edinburgh University.

Amy Ponnampalam
Appointed 21 February 2018

Amy is the Chief Executive Officer of the Company and is responsible for the Bermuda operations for the Athora Group. Amy joined Athora at its inception in 2018, and has worked in Bermuda for 12 years. Prior to joining Athora, Amy was based in London as Head of Corporate Projects for L&G Retirement, and previously worked in Bermuda as the Corporate Actuary and CRO for Hannover Life Re Bermuda. Amy is a Fellow of the Institute and Faculty of Actuaries in the UK and has a Bachelor of Actuarial Science from The London School of Economics.

Ralf Schmitt
Appointed 28 April 2020

Ralf is Deputy Chief Executive Officer and a member of the Executive Board of Athora Deutschland GmbH & Co. KG and is responsible for the areas of Legal, Regulatory Relationship and Compliance, as well as a non-executive director of Athora's reinsurance carrier, Athora Life Re Ltd. Ralf joined Athora in 2015 and has been a member of Athora Group's senior management team since inception, last as Group General Counsel and Member of the Management Executive Committee of Athora Holding. Before he took on his current responsibilities in Germany, he served on the Board of Directors of Athora's insurance companies in Ireland and Italy as well as the holding companies for its insurance companies in the Netherlands and Italy. He was also Deputy Chairman of the Supervisory Board of Athora Lebensversicherung AG and Athora Pensionskasse AG. He is a German qualified lawyer with more than 20 years of experience in Corporate M&A at international law firms such as DLA Piper and Dewey & LeBoeuf as well as in investment banking at Citigroup. He holds an honours degree from Frankfurt's Goethe University.

[2]Henrik Matsen resigned as Chair of the Board of ARE effective 9 August 2023.

B. ARE's Senior Management[4]

Amy Ponnampalam

Chief Executive Officer

See biography above.

Neha Arora
Chief Financial Officer[5]

Neha was appointed as Chief Financial Officer of the Company in November 2023 and is responsible for Finance, Investments, Balance Sheet Management and Treaty Operations. Previously, she was Chief Risk Offcier at the Company and was responsible for ARE's risk management function. Neha was previously with Pension Insurance Corporation (PIC) in the UK where she was responsible for enterprise risk management, including the ORSA process, stress and scenario testing, risk appetite and strategy and baseline risk reporting to the Board. Prior to PIC, Neha had a diverse experience of working in several financial institutions including the Bank of England where she worked in Financial Risk and Strategy, a global macro hedge fund where she worked in investment strategy, and Nomura where she worked in quantitative research and strategy. She has a master's degree in Financial Economics from University of Oxford and is a Chartered Financial Analyst (CFA).

Liam Mohan
Chief Risk Officer

Liam was appointed Chief Risk Officer of the Company in November 2023. Previously, Liam was Head of Balance Sheet Management at ARE with areas of responsibility divided across actuarial, risk and balance sheet management. Prior to joining Athora in November 2020, Liam was a Life Consultant with UK-based Hymans Robertson LLP. During this time he worked with large UK BPA insurers and performed several secondments covering reinsurance transactions. Liam has a Master's degree in Mathematics, Operational Research, Statistics and Economics (first class) from the University of Warwick (UK) and is a Fellow of the Institute and Faculty of Actuaries (UK).

Joelina Redden
General Counsel, Chief Compliance Officer and Corporate Secretary

Joelina is the General Counsel and Chief Compliance Officer of the Company. Prior to joining ARE, she was Vice President and Associate General Counsel at Allied World Assurance Company, Ltd where she was responsible for corporate, compliance and regulatory matters for Allied World's Bermuda companies and served as underwriting counsel for professional lines, M&A and trade credit. Prior to Allied World, Joelina was Counsel, Corporate and Commercial, in the Insurance Team of Appleby (Bermuda) Limited where she advised on a broad range of (re)insurance regulatory and transactional matters, public and private offerings, restructuring and acquisitions and mergers. Joelina holds a Postgraduate Diploma in Law from City, University of London, England, a Postgraduate Diploma in Legal Practice from BPP Law School, London, England and a Bachelor of Arts (cum laude) from Saints Mary's University, Halifax, Canada. Joelina has been a member of the Bermuda Bar Association since 2002.

Ken Sennewald
Chief Reinsurance Marketing Actuary

Ken is Chief Reinsurance Marketing Actuary at the Company and is responsible for third-party and internal reinsurance. Ken was previously with Hannover Life Re Bermuda where he was responsible for the marketing, structuring and implementation of structured reinsurance solutions, as well as for general business development. He has wide-ranging experience in traditional and non-traditional reinsurance worldwide with extensive technical knowledge and solid understanding of actuarial and financial concepts. Ken holds a Ph.D. in Economics and a master's degree in Financial Mathematics from Dresden University of Technology, as well as a bachelor's degree in Mathematics from Université Caen Normandie. He is a Fellow of the German Actuarial Society.

Dave Waterhouse
Chief Actuary[5]

Dave is the Chief Actuary at the Company, he is responsible for calculation of IFRS reserves, EBS technical provisions and EBS capital requirements, as well as balance sheet management, including ALM, capital and liquidity. Prior to assuming the role, Dave worked at Phoenix Group providing advice around IFRS17 implementation. Prior to Phoenix, Dave worked in a variety of roles including Head of ALM at Canada Life UK, Stochastic Reporting manager at Legal and General and led Pillar 3 actuarial reporting for Aviva's ex-Friends Life business. Dave has a wealth of financial reporting experience, having worked under Canadian GAAP, EBS, Solvency II and USGAAP reporting measures, valuing both non-profit and with-profits products. Dave holds a Bachelor of Science in Mathematics, Operational Research, Statistics and Economics from the University of Warwick. He holds the FIA designation from the Institute and Faculty of Actuaries.

[4] Neil Snyman, Chief Financial Officer, resigned effective 31 October 2023 / Wendy Yu, Chief Pricing Officer, resigned effective 29 February 2024.

[5] Subject to requisite approvals.

3.3 Risk Management and Solvency Assessment

3.3.1 A description of the risk management process and procedures to effectively identify, measure, manage and report on risk exposures

The ARE risk framework interfaces directly with the Athora Group's Enterprise Risk Management ("**ERM**") framework and is comprised of:

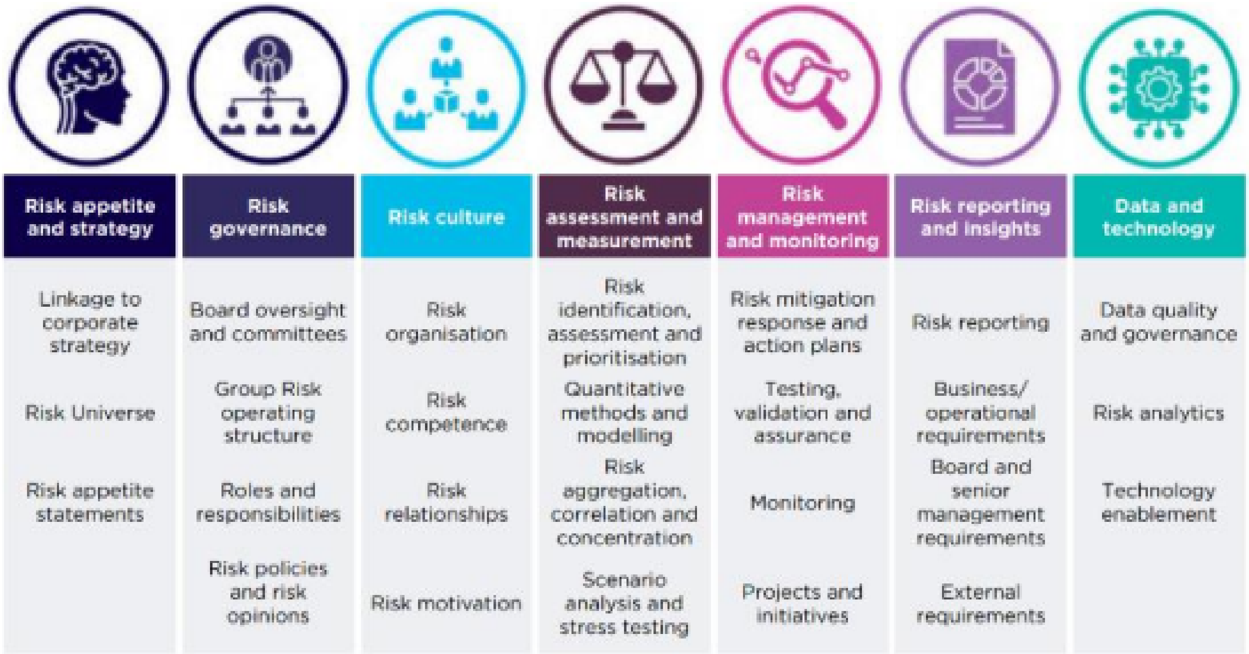
A System of Governance:

- ARE's committee structure is embedded within the Athora Group Governance Framework.
- ARE is subject to Athora Group policies and guidelines and develops its own specific policies where necessary.

While the Board retains overall responsibility for approving the ARE risk framework, the ARC is charged with developing and overseeing compliance with the risk framework.

As part of the Athora Group ERM framework risk need to be identified, understood, and assessed (against levels defined as acceptable) before the right controls can be designed and implemented. Risks are managed from multiple perspectives, including economic, regulatory, and accounting. The ERM Framework includes Risk Strategy and Appetite, Risk Governance, Risk Culture, Risk Measurement and Assessment, Risk Management and Monitoring, Risk Reporting and Insights and Data and Technology.

The following graphic sets out these components:



A Risk Appetite and Strategy:

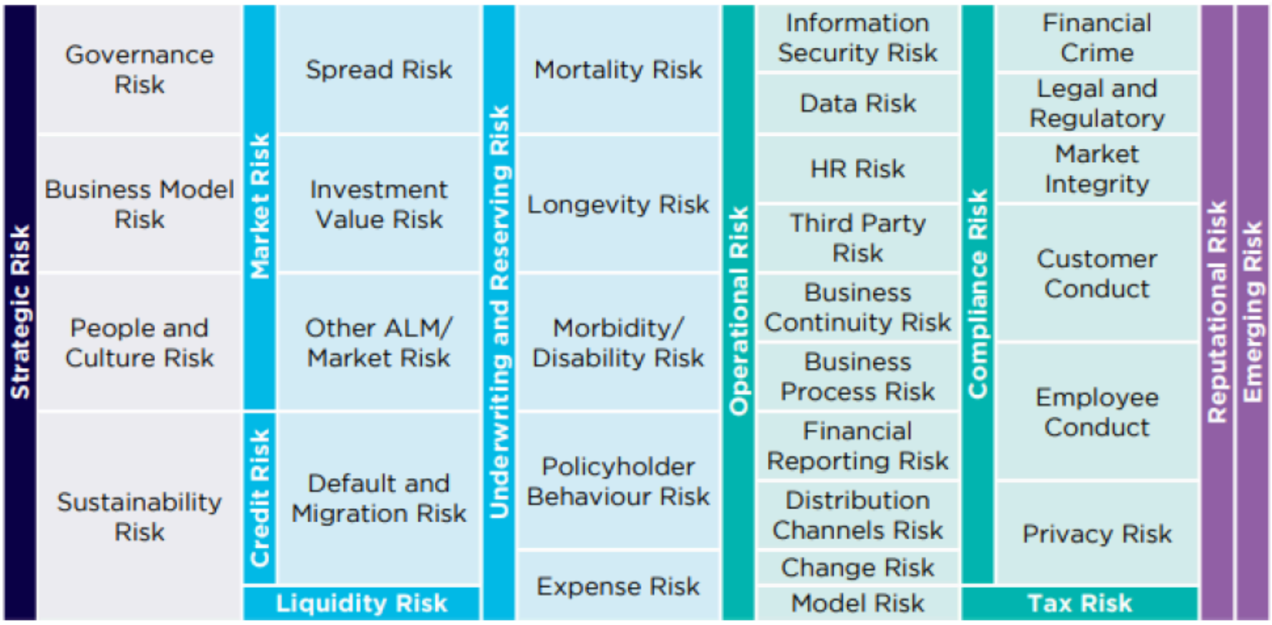
The Risk Appetite and Strategy is an integral part of the business strategy and determines how ARE selects risks it can control and extract value from in line with its strategy. ARE's risk strategy encompasses the following core pillars:

- Risk Identification – assessment of all material risks facing the business.
- Risk Appetite – a definition of appetite for risk taking and risk controlling for each material risk.
- Risk Monitoring – a system of stress and scenario testing to assess ARE's resilience to risk, covering internally defined stress testing, regulatory stress testing, and reverse stress testing.

The risk strategy is reviewed annually but expected to remain stable over time. Risk Appetite and Strategy is translated into specific Risk Policies and Limits for the relevant risk types, which set out the policy objectives, requirements, the roles and responsibilities, as well as the required processes and controls for each risk.

Risk Identification

Risk identification requires a rigorous assessment of the business to determine the universe of risks to which the business is exposed. The risk universe is shown below:



Risk Appetite

Risk appetite defines ARE's appetite for risk taking/risk controlling by applying the risk strategy to the universe of risk that Athora is exposed to. A traffic light system is used to define ARE's risk appetite:

Risk Appetite Statement Indicator

None - A risk which is outside of our business model and for which there is no appetite.

- No acceptance of these risks
- Focus efforts on removing entirely and design our business model to actively avoid exposure, where deemed required, even at significant cost.
- Monitor that any such risk is fully mitigated/ hedged away.

Undesired - A risk that we will seek to avoid or fully eliminate where possible.

- Accept tightly limited exposure, if at all, where necessary.
- Aggressively pursue risk mitigation/hedging options.
- Closely monitor both inherent and residual risk levels.

Tolerated – A risk that we incur as a result of the business model but are reduced through mitigation.

- Target exposure conducive to implement strategy successfully.
- Acceptance of large risks where mitigation options are unavailable or not economically viable.
- Will tactically engage in limited risk-specific mitigation/hedging.

Desired – A risk that is core to the business model and is underpinned by proactive risk and capital management.

- Actively pursue risks and retain exposure implementing strategy.
- These risks tend to drive our business performance and we believe we have a strategic advantage in underwriting and managing.
- Ensure sufficient capacity is available even in stress scenarios.

Risk monitoring

Monitoring of risks comprises both ongoing monitoring activities in the normal course of management and separate evaluations. There is regular reporting of monitoring activities to the ARC and Board. Group Risk provides guidance on quarterly monitoring in line with the Risk Strategy and Appetite and Risk Tolerances and Limits set out in the Risk Policies. Consistent monitoring across the Group allows for aggregation and active monitoring of risks at Group level.

3.3.2 A description of how the risk management and solvency self-assessment systems are implemented and integrated into the insurer's operations; including strategic planning and organisational and decision-making process

ARE's risk management and solvency self-assessment is embodied in the Commercial Insurer's Solvency Self Assessment ("**CISSA**") regulatory requirement in Bermuda. CISSA capital is defined as the amount of capital the Company has determined, that is required to achieve its strategic goals upon undertaking an assessment of all material (reasonably foreseeable) risks arising from its operations or operational environment.

The CISSA is implemented and integrated into the Company's operations as follows:

Strategic Planning

CISSA capital is used in assessing the attractiveness of new markets or risks. CISSA capital is assessed for all new reinsurance transactions and, as such, provides ARE with an indicator of the relative attractiveness of transactions. In addition to this, a subset of the stresses used in the CISSA are considered in the pricing approval process.

Annual Business Planning

ARE's annual business planning is driven primarily by assumed volumes of new reinsurance transactions, where it is assumed that the level of capital committed to new transactions is equal to the level of CISSA capital. In collaboration with the Athora Group Balance Sheet Management function, ARE delivers an annual capital plan which considers the level of CISSA capital required over the following three years. Capital planning is a tool which continues to be developed by the Athora Group and will be a key input in the management of Group capital.

Setting Risk Limits

ARE's risk limits are identified and defined through the risk policies which are established as part of the CISSA process. This covers limits and thresholds for investment and credit risk, operational risk, ALM risk and liquidity risk. ARE will continue to expand its universe of risk limits as the risk profile of the Company changes.

Defining Risk Appetite

ARE's risk appetite is defined under the Risk Appetite and Strategy Policy and is reviewed as part of the annual policy review process.

Evaluation of Capital Adequacy

CISSA capital is central to ARE's Capital Management and is the key internal measure of capital adequacy.

Allocation of Capital to Business Segments and Lines of Business

ARE in collaboration with the Athora Group Balance Sheet Management function, conduct capital planning on an annual basis that is updated quarterly for changes in outlook.

Capital Management

CISSA capital is reported to ARC, CIC, Board and Athora Group Finance and Capital Committee on a quarterly basis and is a key driver of the management of capital.

Determination of Rates of Return for Pricing and Underwriting Guidelines

ARE's reinsurance pricing policy targets IRR with respect to an approved capital target as set out in the Capital Management Policy.

Reinsurance Purchase

In assessing the cost-benefit of retrocession of unwanted risks, ARE reviews the impact on the return on CISSA capital.

Determination of Investment Policies and Strategies

ARE's strategic asset allocation is optimised to achieve an optimal return on CISSA capital.

Meeting Regulatory Requirements

The CISSA is the primary framework for the development and adoption of risk policies which are required to meet regulatory requirements. The reference to EBS and BSCR in the definition of CISSA capital also ensures alignment between the level of CISSA capital and the regulatory capital requirement.

Improving Credit Rating

The CISSA provides demonstrable progress in ARE's ability to write and prudently manage reinsurance business as set out in its business plan and strategy. This includes the setup of a governance framework, internal capital adequacy assessment, and stress and scenario testing. These factors all contribute to ARE's ability to secure and maintain an investment grade credit rating.

3.3.3 A description of the relationship between the solvency self-assessment, solvency needs, and capital and risk management systems

See above (section 3.3.2).

3.3.4 A description of the solvency self-assessment approval process including the level of oversight and independent verification by the board and senior executives

ARE's CISSA policy is owned by the ARC and is reviewed and presented to the Board for approval at least annually

3.4 Internal Controls

3.4.1 A description of the internal control system

A system of internal controls is fundamental to the safe and sound management of the Company and the Athora Group. Effective internal controls play a critical role in helping the Group protect and enhance shareholder value by reducing the possibility of unexpected losses or damages to its reputation. Athora Group has an Internal Control Framework ("**ICF**") Policy describing the system of internal controls and uses it to mitigate the risk of unexpected events. The ICF is based on key principles of Governance, Roles and Responsibilities, Risk Identification and Assessment, Control Activities, Testing and Assurance, Monitoring and Reporting and Skills, Resources and Tools. The ICF, established by the Athora Holding Board, has been adopted in order to support the Athora Group in executing robust and effective internal controls over the risks to which it is exposed in conducting its business and management activities while supporting strategic decision-making.

ARE adopted the ICF Policy in June 2022. As part of the ICF Policy implementation over H2 2022, a list of key processes were identified across the business and risk and control self assessments were completed for each of these. This process helped to identify the key risks and key controls, along with risk and control owners. This has enabled the Company to continue to strengthen its control framework in 2023.

3.4.2 A description of how the compliance function is executed

The Company's Compliance function is a core component of the Company's ICF and its duties and responsibilities are within the second line of defence at ARE. The Company's Compliance function is headed up by the Company's Chief Compliance Officer and supported by a compliance officer. The role reports to the ARC and provides quarterly updates to the Company's Audit Committee on the Company's compliance activities. The Chief Compliance Officer is responsible for the provision of annual compliance risk assessments and plans. Quarterly reporting, which focuses on the progress against plan and static risk assessment reporting, is delivered to the ARC, the Board and to the Group Head of Compliance.

The Company's Compliance function operates in accordance with the Group Compliance Framework and the Company's Compliance Function Policy, which includes policies and specific control objectives set by Group Compliance. In order to be able to perform its duties, the Compliance function has full access rights to all information, documents and data.

In addition, the Company's Compliance function comprises the following additional elements: compliance culture and business integrity, compliance training and communication.

The Compliance Function monitors the legal and regulatory landscape to identify relevant changes and assess potential impacts on the Company's operations. The Compliance Function reports to Management, the ARC and the Audit Committee/ Board on any significant changes in the legal and regulatory environment.

The Company has adopted the Group Speaking-Up Policy, which alongside a speak-up facility, allows employees to report anonymously in case they observe any potentially unlawful or improper behaviour.

The Company's Compliance function, in conjunction with Group Compliance, regularly advises and trains management and employees on policy requirements and compliance risk areas.

3.5 Internal Audit

3.5.1 Internal Audit Function

As part of the third line of defence, the Internal Audit function assists Management and the Audit Committee of the Board in protecting the Company's assets, reputation and sustainability by independently and objectively evaluating the effectiveness of internal controls, risk management and governance processes.

Internal Audit's main tasks and responsibilities are:

- Prepare and execute a risk-based audit plan which is approved by the Audit Committee.
- Identify, and agree with Management, opportunities to improve internal controls, risk management and governance processes and verify that such improvements are implemented within a reasonable period of time.
- Issue periodic reports to Management and the Audit Committee, summarising the progress and results of the annual audit plan, as well as on the sufficiency of Internal Audit resources.
- Assist in the investigation of any significant suspected fraudulent activities within the organisation and notify Management and the Audit Committee, of the results.
- Consider the scope of work of the external auditors and regulators, as appropriate, for the purpose of providing optimal audit coverage to the organisation at a reasonable overall cost.
- Coordinate and work together with other control and monitoring functions (e.g. Risk Management, Compliance and external auditors).
- Execute audits on the functioning of the first and second line of defence.
- Assemble and maintain a professional audit staff (of an adequate size relative to the size and nature of the organisation and the remit of the Internal Audit function) with sufficient knowledge, skills, experience, and professional certifications.
- Ensure the Audit Committee and Management are kept informed of emerging trends and successful practices in internal auditing.
- Ensure the audit work conforms to the Institute of Internal Auditors or other regulatory bodies and Athora Group standards.
- Ensure the principles of integrity, objectivity, confidentiality and competency are applied and upheld.

3.5.2 Independence and objectivity of the Internal Audit function

The Internal Audit function, is independent of Management, which has responsibility for the first and second lines of defence, and is, therefore, able to provide independent assurance opinions on the effectiveness of the systems of internal control, risk management and governance.

To provide for the independence of Internal Audit, the Athora Group Chief Internal Auditor ("**GCIA**") has been appointed as an officer of ARE with responsibility for ARE's Internal Audit function ("**ARE Head of Internal Audit**"). The ARE Head of Internal Audit reports directly to the Chair of the ARE Audit Committee and to ARE's CEO. In her Athora Group role, the GCIA reports to the Chair of the Athora Holding Audit Committee and administratively to the Athora Group Chief Executive Officer. Athora Ireland Services Limited ("**AIS**") provides internal audit support services to the ARE Head of Internal Audit and executes their duties freely and objectively in accordance with the Institute of Internal Auditors' International Standards for the Professional Practices of Internal Audit, including the Code of Ethics, as well as with Athora Group's policies and procedures. Internal Audit avoids any conflicts of interest and accesses the expertise and knowledge necessary to undertake work in respect of specialist business functions.

3.6 Actuarial Function

ARE's Chief Actuary is responsible for monitoring information concerning the liabilities of the Company, managing the overall balance sheet and oversees the Company's actuarial reporting function. ARE's Actuarial Function comprises an actuarial team in Bermuda with some support from AIS and consulting firms from time to time.

The Actuarial Team are responsible for:

- Setting and monitoring statutory and IFRS reserves for ARE.
- Setting and monitoring the EBS BEL and Risk Margin (Technical Provisions) for ARE.
- Determining the EBS capital requirements.
- Solvency Reporting and management of the solvency position of ARE
- Monitoring and management of the ALM position of ARE
- Liquidity monitoring, reporting and management for ARE

ARE's Approved Actuary reviews and provides an actuarial opinion on ARE's EBS Technical Provisions, in accordance with the Insurance Act.

3.7 Outsourcing

3.7.1 A description of the outsourcing policy and information on any key or important functions that have been outsourced

The Company manages external outsourcing in accordance with applicable regulatory requirements. The Company's Outsourcing Policy establishes key and minimum requirements to ensure that appropriate controls and governance structures are established with respect to any initiative involving the outsourcing of services or activities to a service provider whether internal or external.

The Outsourcing Policy is designed so that outsourcing of key functions or material activities does not lead to a reduction in Management's responsibility for the outsourcing arrangement, including the quality of the service and the control environment and governance which must be aligned to the company's agreed risk appetite. Material outsourcing attracts the highest level of rigor, including performance and relationship reviews, compliance reviews, and risk and control assessments.

The Company has implemented its Outsourcing Policy to ensure sufficient due diligence is carried out on its service providers and to manage outsourcing risk by applying the key requirements and minimum standards to establish controls and governance. Where appropriate, the Company enters into service level agreements that will include an obligation on the parties to comply with all legal and regulatory obligations and ensure that any sub-outsourcing is overseen and managed in line with those service level agreements.

3.7.2 A description of material intra-group outsourcing

The Company has access to support services from service companies within the Athora Group. The Outsourcing Policy requires that similar standards are applied to these services as they are to external service providers, including implementing appropriate service level agreements, identification of risk and process owners and monitoring of key controls. Material intra-group outsourcing arrangements with AIS and include: IT services such as network and infrastructure, IT security, application support, finance systems and data services; risk support services; actuarial support services; internal audit; HR services; reinsurance operations and finance support services.

4. RISK PROFILE

4.1 Material risks that the insurer is exposed to, including how these risks are measured and any material changes that have occurred during the reporting period

The Company manages risk for the benefit of its customers and other stakeholders. The Company is exposed to a range of underwriting, operational and financial risks. The risk management and control systems are designed to ensure that these risks are managed effectively and efficiently in a way that is aligned with the Company's strategy.

Risk	Description	Mitigation/measurement
Longevity risk	Longevity risk is assumed through the reinsurance of annuity business. Longevity risk may be due to trend, base level, or catastrophe.	Underwriting processes include use of expert judgement, industry data, and stress testing, and comply with the Underwriting & Reserving Risk Policy.
Policyholder behaviour risk	Policyholder behaviour risk is due to variability in lapse rates or annuity take-up rates on reinsured annuity and endowment business.	Underwriting processes include use of expert judgement, industry data and stress testing.
Fixed income risk	Fixed income risk is the risk of default, downgrade or spread widening on ARE's fixed income assets.	Bespoke asset selection and underwriting processes to minimise systemic fixed income risk. Credit Concentration and Counterparty Risk Policy controls exposure limits.
Interest rate and liquidity risk	Interest rate and liquidity risk is the risk of mismatches between asset and liability cash flows on reinsured business.	Duration mismatch limits are defined in the ALM Risk Policy. Liquidity Risk Policy sets risk-based liquidity limits.
Equity risk	Equity risk is the risk of reductions in equity values and alternative investments.	Bespoke asset selection and underwriting processes to minimise systemic equity risk. Exposure limited by Credit Concentration and Counterparty Risk Policy
Operational risk	Operational risk arises from ARE's business processes, systems, and people.	Managed through operational risk reporting and compliance with the Operational Risk Policy, Internal Control Framework and Model Risk Policy.

There has been no change to the material risks over the period as described in the above table.

4.2 How risks are mitigated including the methods used and the process to monitor the effectiveness of these methods

See table above at Section 4.1.

4.3 Material risk concentrations

The Company has a Credit Concentration and Counterparty Risk Management Policy to manage risk concentrations in relation to counterparties and credit quality. These risks are monitored by both the ARC and CIC and reported to the Board.

4.4 How assets are invested in accordance with the prudent person principle as stated in Paragraph 5.1.2 of the Code

The 'prudent person principle' ("**PPP**") requires that companies only invest in assets and instruments whose risks they can properly identify, measure, monitor, manage, control and report, and appropriately take into account in the assessment of its overall solvency needs. The Company considers these requirements before any investment in new assets or instruments, with a PPP checklist in place which sets out the following steps:

- Athora pre-trade investment memorandum: acts as an assessment template for PPP requirements at each individual asset class level, supplemented by monthly PPP calls.

- Regular pipeline discussion between the asset manager, first and second line: adds further transparency into new investments and work as pre-screening tool for deal flow management and asset sourcing.

- Monthly asset deep dive: a cycle of periodic reviews covering discussion on significant market developments, asset class specific consideration and watch-listing credit, carried out at an asset class level.

The Company complies with the PPP through the implementation of the following key policies:

- Credit Concentration and Counterparty Risk Policy: sets out a system of limits and thresholds which apply to the investment of the Company's assets; and

- ALM and Liquidity Risk Policies: defines ALM limits, thresholds, and stress testing requirements, which must be observed in the investment of the Company's assets.

- Investment Governance and Oversight Policy: outlines the principles and minimum standards for the management and control of the investment and asset management activities.

Minimum requirements to be met are also set by Athora Group for all Athora subsidiaries, with standards applied to meet local prudential requirements.

4.5 The stress testing and sensitivity analysis to assess material risks, including the methods and assumptions used, and the outcomes

Underwriting Stress Tests

ARE has developed a set of underwriting stress tests which provide Management with an understanding of the sensitivity of the balance sheet to underwriting risks. The stress tests are reviewed at least annually by Management and ARC. The underwriting stresses are designed to reflect the key underwriting risks to which ARE's in-force business is exposed.

These underwriting scenarios only affect the long-term insurance liabilities.

The underwriting stresses are applied as instantaneous shocks to ARE's best estimate assumptions at the relevant reporting period. For 2023, the following underwriting stress tests were applied:

Scenario	Available Capital (€k)	ECR (€k)	Solvency Ratio	Change in Solvency Ratio
Base	230,091	123,560	186%	
Increase of 20% in Lapse Rates	222,459	123,617	180%	(6)%
Decrease of 10% in Mortality Rates	219,662	123,689	178%	(8)%
150% Annuity Take Up Rate	230,506	123,560	186%	1%
Expenses Increase by 10%	223,143	123,677	180%	(6)%

- **Increase of 20% in lapse rates:** lapse rates are increased by 20%, which means that surrender benefits are paid out sooner. For policies with lower annual guarantees, this increases the present value of future claims and results in an increase in Technical Provisions.
- **Decrease of 10% in base mortality rates:** Base mortality rates are reduced by 10% which has the effect of increasing the level of Technical Provisions required across most treaties.
- **50% Increase in annuity take up rate:** The annuity take-up rate on deferred annuities assumed in the calculation of reserves is increased by 50%. This has the effect of increasing the proportion of deferred annuities which take up the in-payment annuity option upon retirement, which results in an slight decrease to Technical Provisions.
- **Increase in Expenses of 10%:** Expense assumptions are increased by 10% which results in an increase to Technical Provisions.

Financial Market Stress Tests

The Company utilises stress tests that have been developed by the Athora Group Risk Function. These tests provide Management with an understanding of the sensitivity of the balance sheet to market risks. The stress tests are reviewed at least annually by Management and ARC.

The stresses are designed to reflect the market risks to which Company's balance sheet is exposed. The stresses are applied as instantaneous shocks to the Company's balance sheet at the relevant reporting period. The key 2023 market stresses are set out in the table below:

Scenario	Available Capital (€k)	ECR (€k)	Solvency Ratio	Change in Solvency Ratio
Base	230,091	123,560	186%	
Broad Market Stress	142,859	117,216	122%	(64)%
Interest Rate Up	211,896	119,366	178%	(8)%
Equity Stress	178,302	112,689	158%	(28)%

- **Broad Market Stress:** This scenario represents a scenario in which both equity and credit markets suffer losses combined with an increase in interest rate. This scenario has been calibrated to represent a 1-in-40-year event.

- **Interest Rates Up:** This scenario shows the impact of an increase in interest rates,
- calibrated to a 1-in-40-year event, which is broadly equivalent to an increase of 182bps.

- **Equity Stress:** This scenario shows the impact of a reduction in equity, calibrated to a 1-in-40-year event, which is broadly equivalent to a shock of 29%.

Liquidity risk

The Company has a Liquidity Risk Policy in place to ensure that it maintains sufficient liquidity resources to meet requirements as they fall due, both in normal and stressed environments. As part of this policy, the Company uses the Liquidity Coverage Ratio (**LCR**) metric to assess its liquidity sources and uses under stressed scenarios covering a range of risk drivers. This metric is expressed as the ratio of liquidity sources to liquidity uses, under stressed scenarios. ARE calculates a 1-week, 3-month and 1-year LCR.

The main drivers of Athora's required liquidity uses vary by time horizon. The table below summarizes these key drivers of liquidity requirements under different time horizons as captured in the Company's LCR calculation.

Time horizon	Uses
1-week severe LCR	**Derivatives margin requirements**
3-month severe LCR	1. **Derivatives margin requirements** 2. **Reinsurance claims** a. Mass lapse is the key driver of liquidity requirements under stress. 3. **Operating Expenses** 4. **Investment management expenses** 5. **Financing activities' interest and repayment** 6. **Collateral account top ups** a. Although collateral top-ups are likely not expected under a best estimate projection, they may be required under stress scenarios.
1-year severe LCR	**As above**

4.6 Any other material information

There is no other material information to note in relation to the Company's risk profile.

5. SOLVENCY VALUATION

5.1 The valuation bases, assumptions and methods used to derive the value of each asset class

ARE has considered the valuation principles outlined by the Authority's Guidance Note for Statutory Reporting Regime for the reporting period's statutory filing. The Company's economic valuation principles are to measure assets on a fair value basis.

The table below summarises the assets held on the EBS balance sheet.

€ '000	2023	2022
Cash and Cash Equivalents	179,195	524,601
Investments and funds held by ceding reinsurers	2,334,916	2,058,876
Reinsurance Balances Receivable	5,399	–
Other Assets	92,219	69,007
Total Assets	**2,611,729**	**2,652,484**

During the reporting period, the Company did not make any material changes to the recognition and valuation bases used for assets, or to estimation techniques employed. The fair value principles used for assets are as follows:

Cash and cash equivalents

Cash and cash equivalents include liquid investments that are readily convertible to known amounts of cash and which are subject to an insignificant risk of change in value and a maturity date of less than 90 days.

Shareholder financial assets

- ***Fixed maturity***

Fixed maturity securities are recorded at fair value using quoted market prices, where possible. For marketable securities without an active market, pricing information is obtained from several commercial pricing services. The pricing services incorporate a variety of market observable information in their valuation techniques including benchmark yields, trading activity, credit quality, issuer spreads, bids, offers and other reference data.

- ***Loans and receivables***

Loans and receivables are recorded at fair value plus transaction costs when cash is advanced to the borrowers. They are subsequently accounted for at amortised cost using the effective interest method.

- ***Investment in Associates***

The Company has invested in two Athora Luxembourg Funds through AAME.

5.2 The valuation bases, assumptions and methods used to derive the value of Technical Provisions and the amount of the best estimate. The amount of the risk margin as well as the level of uncertainty to determine the value of the Technical Provisions should be included

ARE's Approved Actuary reviews and provides an actuarial opinion on ARE's EBS Technical Provisions, in accordance with the Insurance Act.

The table below summarises the Company's Technical Provisions.

€ '000	2023	2022
Best Estimate Policy Reserves	2,176,578	2,078,846
Reinsurance Recoverable	-	-
Risk Margin	18,121	18,189

EBS Best Estimate Liabilities

In general, the best estimate reserves are calculated at a policy level using a deterministic gross premium valuation approach (i.e., reserves are calculated as the present value of future claims plus future expenses less present value of future premiums).

For ARE's reinsurance exposure, premium, claim and expense (maintenance expenses and the expenses associated with servicing the treaty) cashflows are determined using actuarial modelling software on latest internal best-estimate assumptions. These cashflows are then used under the scenario-based approach for the valuation of the BEL.

EBS Risk Margin

EBS Technical Provisions include a risk margin, in addition to the BEL, to reflect the uncertainty associated with the probability-weighted cashflows. While in principle, the best estimate reflects the amount required on average to meet policyholder obligations and associated insurer expenses, the insurer will also need to hold additional funds to meet those situations where cashflows exceed those expected. The risk margin is intended to reflect the compensation that the insurer needs to bear this risk.

The key aspects of the risk margin calculation are as follows:

- A 6% cost-of-capital rate is used,
- The calculation reflects the regulatory capital requirements i.e., the ECR,
- The risks included within the BSCR for the risk margin calculation are insurance risk, counterparty credit risk and operational risk. There is no requirement to include market risk on the basis that an asset portfolio can be constructed that will act as a hedge against market risk, and
- The calculation uses the risk-free discount curve specified by the Authority, with the Euro curve being used.

The calculation of the risk margin requires a projection of the BSCR for the period needed to run-off the insurance liabilities. A guidance note issued by the Authority in 2016 outlines a number of simplified approaches that may be adopted in order to project the BSCR required for the risk margin. ARE has used one of the simplified approaches, which is to approximate the individual risk module capital charges using an appropriate run-off proxy. ARE use projected best estimate reserves as the run-off proxy, using the components of the aggregate reserves that best align to the risk module in question.

5.3 A description of recoverables from reinsurance contracts, including special purpose insurers and other risk transfer mechanisms

ARE does not hold recoverables from reinsurance contracts as at end 2023.

5.4 The valuation bases, assumptions and methods used to derive the value of other liabilities

Similar to the valuation principles for assets, the Company's liabilities follow the valuation principles outlined by the Authority's "*Guidance Note for Statutory Reporting Regime*" which values liabilities on a fair value basis.

5.5 Any other material information

There is no further material information regarding valuation for solvency purposes.

6. CAPITAL MANAGEMENT

6.1 Eligible Capital

6.1.1 A description of the capital management policy and process to determine capital needs for business planning, how capital is managed and any material changes during the reporting period

The Company manages capital on an economic basis within the constraints and requirements of its external stakeholders. The primary objective of the Company's capital management process is to ensure that a strong financial position is maintained, and that solvency volatility is minimised. The Company has adopted a Capital Management Policy outlining its capital management process.

The CIC and ARC, together with the Board, regularly consider capital assessments and projections for the Company to ensure that capital is managed with continuous adherence to the Company's principles around capital adequacy, financial flexibility, and the efficient use of capital.

A integrated management plan is prepared, at least annually, for which the Company performs capital projections over the business planning period. The projections allow for the current and expected business strategy, risk profile and capital management activities. The current time horizon used for business planning is usually three years. This exercise allows the Board to assess the Company's current and projected solvency needs and helps trigger appropriate and timely capital management actions. The integrated management plan is regularly monitored and updated to reflect up to date information and the performance of the business.

The Company's required capital is calculated using the regulatory capital requirements, i.e., the ECR. The table below summaries the Company's capital position.

€ '000	2023	2022
Available Capital	230,091	260,782
ECR	123,560	124,069
Solvency Ratio	186%	210%

6.1.2 A description of the eligible capital categorised by tiers in accordance with the Eligible Capital Rules

Available capital must be adjusted to reflect, where applicable, the limited accessibility of the assets. At the end of the reporting period, the Company's Eligible Capital was categorised as Tier 1. This means that 100% of the available capital can be used to support the ECR.

Eligible capital

€ '000	2023	2022
Tier 1	230,091	260,782
Tier 2	-	-
Tier 3	-	-

6.1.3 A description of the eligible capital categorised by tiers, in accordance with the Eligible Capital Rules used to meet the Enhanced Capital Requirement and the Minimum Margin of Solvency ("MSM") defined in accordance with Section (1)(1) of the Insurance Act

See Section 6.1.2.

6.1.4 Confirmation that eligible capital is subject to transitional arrangements as required under the Eligible Capital Rules

The Company has no eligible capital subject to transitional arrangements.

6.1.5 Identification of any factors affecting encumbrances affecting the availability and transferability of capital to meet the ECR

Under the regulatory assessment of encumbrances prescribed by the Authority, all the Company's capital is deemed unencumbered.

6.1.6 Identification of ancillary capital instruments that have been approved by the Authority

The Company has no ancillary capital instruments.

6.1.7 Identification of differences in shareholder's equity as stated in the financial statements versus available statutory capital and surplus

Differences between IFRS shareholder equity and available statutory capital and surplus include the reduction in available statutory capital for intangible assets.

6.2 Regulatory Capital Requirements

6.2.1 Identification of amount of the ECR and MSM at the end of the reporting period

As of 31 December 2023, the Company's regulatory capital requirements were assessed as follows:

€ '000	2023	2022
MSM	38,259	43,245[3]
ECR	123,560	124,069

6.2.2 Identification of any non-compliance with the MSM and the ECR

At the end of the reporting period the Company is compliant with the MSM and ECR.

6.2.3 A description of the amount and circumstances surrounding the non-compliance, the remedial measures taken and their effectiveness

Not applicable (see 6.2.2).

6.2.4 Where the non-compliance has not been resolved, a description of the amount of the non-compliance at the end of the reporting period

Not applicable (see 6.2.2).

6.3 Approved Internal Capital Model used to derive the ECR

The Company has not applied to use an internal capital model in the calculation of the ECR.

[3] Minor update to this figure from published figure (43,401) in 2022 FCR, following a clarification from BMA

7. SUBSEQUENT EVENTS

There have been no subsequent events between year-end 2023 and the approval of this report.

DECLARATION

To the best of our knowledge and belief this financial condition report fairly represents the financial condition of the Athora Life Re Ltd. in all material respects.

Signed:

Name: Neha Arora

Position: Chief Financial Officer

Date: 25 April 2024

Signed:

Name: Joelina Redden

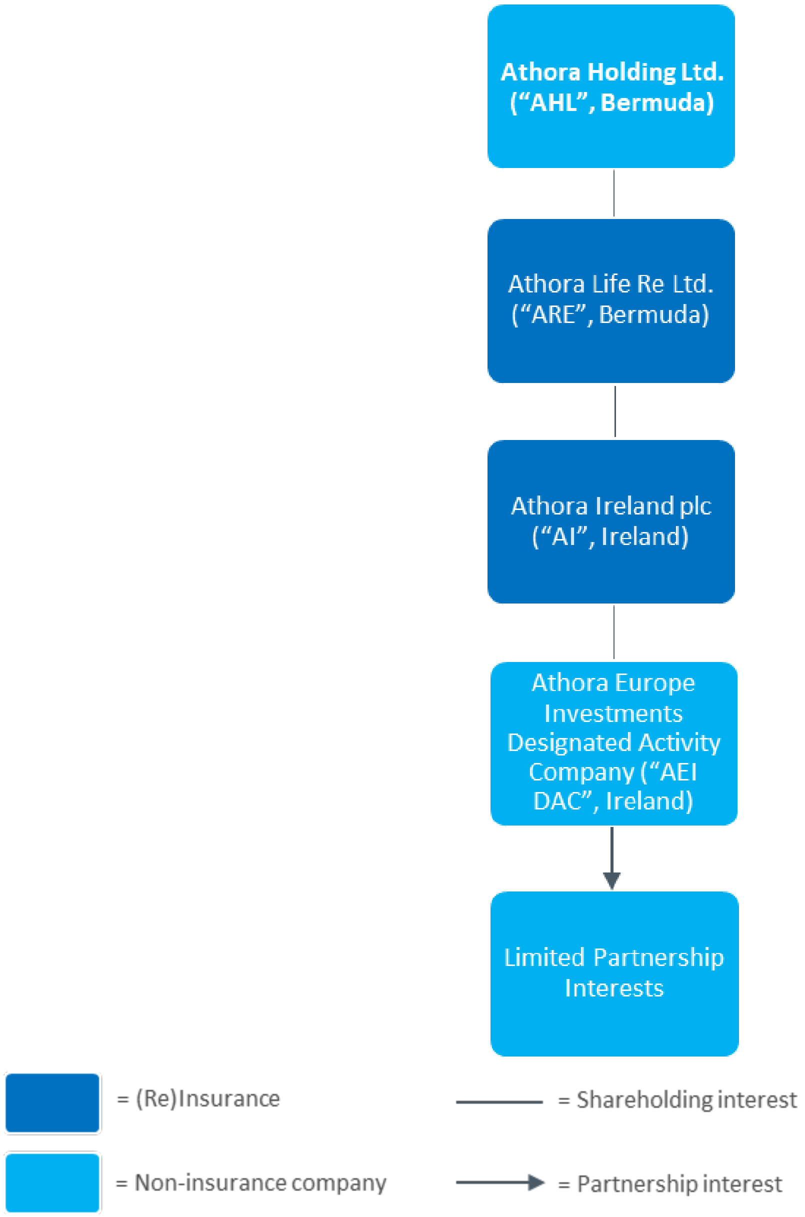
Position: General Counsel and Chief Compliance Officer

Date: 25 April 2024

Appendix 1

ATHORA LIFE RE LTD. GROUP SIMPLIFIED STRUCTURE

As at 31 December 2023



ATHORA