ARAG SE

# 2022 Solvency and Financial Condition Report

5->30

ARAG

ARAG 5->30

Structure of the ARAG Group and ARAG SE

# ARAG Group

## Asset and investment management

### ARAG Holding SE

## Operating management company and legal insurance

### ARAG SE

- Speaker of the Management Board and Central Group Functions
- Group Sales, Products and Innovation
- Group Finance
- Group IT and Operations
- Group Risk Management and Group Controlling
- Group Human Resources/ Group Internal Audit

## Operating insurance companies

- **ARAG Allgemeine Versicherungs-AG** (Casualty and property insurance)
- **ARAG Krankenversicherungs-AG** (Health insurance)
- **Interlloyd Versicherungs-AG** (Specialized in broker sales)
- **International companies** (Legal insurance/ legal services)

## Service companies

- **ARAG IT GmbH** (IT services for the ARAG Group)
- **Cura Versicherungsvermittlung GmbH** (Brokerage firm)
- **ARAG Service Center GmbH** (Emergency telephone service)

# Structure of ARAG SE

Company

## ARAG SE

Members of the Management Board and areas of responsibility

| | | |
|---|---|---|
| **Speaker of the Management Board and Central Group Functions**<br>Dr. Renko Dirksen | **Group Sales, Products and Innovation**<br>Dr. Matthias Maslaton | **Group Finance**<br>Wolfgang Mathmann |
| **Group IT and Operations**<br>Hanno Petersen | **Group Risk Management and Group Controlling**<br>Dr. Joerg Schwarze | **Group Human Resources/Audit**<br>Dr. Werenfried Wendler |

**Group strategy:** ARAG **5→30**

You need to know what you are aiming for to be able to get there. Having a focus is key, particularly in times of major upheaval and far-reaching global turmoil. With this in mind, ARAG has revised its Group strategy, gearing it toward five areas of action. ARAG **5→30** shows what the Group is aiming for in the period up to 2030 and what it needs to get there.

## Key Figures for ARAG SE

Gross premiums written:

€ 1,170 million

2021: €1,092 million

Net income for the year:

€ 22 million

2021: € 23 million

Net combined ratio:

94.0 %

2021: 96.6 %

Eligible own funds:

€ 1,711 million

2021: € 1,811 million

Solvency capital requirement:

€ 500 million

2021: € 533 million

Solvency ratio:

342.1 %

2021: 339.5 %

# Contents

# Summary

**Chapter A. Business and Performance**
ARAG SE (also referred to as the Company) is the largest family-managed insurance company in Germany and the leading legal insurer worldwide. It focuses on state-of-the-art product concepts aimed at both private and small business customers.

In 2022, gross premiums written went up by 7.1 percent to €1,169,859 thousand at ARAG SE (2021: €1,092,403 thousand). The Company generated 59.7 percent of its total gross premium income outside Germany. On the benefit expenses side, gross expenses for claims incurred rose by €20,229 thousand to €575,489 thousand (2021: €555,260 thousand), which was mainly due to strong premium growth but was slowed by profits on settlements in international business.

Under the German Commercial Code (HGB), the underwriting result – after taking into account costs and before the change in the equalization provision – increased from €37,929 thousand to €70,484 thousand in the reporting year.

Gains and losses on investments deteriorated by €30,263 thousand to a net gain of €34,560 thousand (2021: €64,823 thousand). In spite of the backdrop of inflation, interest-rate rises, and the unpredictable Russia-Ukraine war, the Company again generated sound net income for the year of €21,654 thousand (2021: €23,492 thousand).

**Chapter B. System of Governance**
Chapter B.1 contains information on the Management Board and Supervisory Board as well as on the tasks of the following four key functions: risk management, compliance, internal audit, and the actuarial function. As these key functions are kept strictly separate from the operational departments and they have a direct reporting line to the Management Board member with relevant responsibility, they can perform their duties objectively and independently.

There were changes to the composition of the Supervisory Board during the reporting period.

The remuneration granted to the members of the Management Board and Supervisory Board and to the holders of key functions is structured such that it is consistent with market rates and rewards performance without creating undesirable incentives.

Chapter B.2 provides an overview of the specific 'fit and proper' requirements that must be satisfied by the members of the Management Board and Supervisory Board, and by the holders of other key functions. It also explains how the Company assesses whether these requirements are met.

Chapter B.3 describes the Company's risk management system and its implementation by the risk management function. The chapter also includes a description of the risk management process and the process for the Own Risk and Solvency Assessment.

A description of the internal control system and the implementation of the compliance function can be found in chapter B.4.

The other key functions (internal audit and actuarial function) are presented in chapters B.5 and B.6. Chapter B.7 describes how the Company handles outsourcing.

The statements in this chapter confirm that ARAG SE has a system of governance that facilitates prudent management of the insurance business and that is appropriate for the nature, scope, and complexity of the Company's activities.

No significant changes were made to the system of governance in the reporting period.

**Chapter C. Risk Profile**

The two main risks influencing ARAG SE's risk profile are market risk and underwriting risk. The solvency capital requirement (SCR) for market risk is €500,240 thousand (December 31, 2021: €515,683 thousand). The primary sub-risks in this regard are equity investment risk and credit risk (attaching to investments). Underwriting risk, for which the solvency capital requirement is €167,736 thousand (December 31, 2021: €179,071 thousand), is mainly influenced by accumulation risk, reserve risk, and premium risk.

**Chapter D. Valuation for Solvency Purposes**

Solvency II lays down requirements, which differ from the financial reporting standards under HGB, for recognizing, valuing, and disclosing assets, technical provisions, and other liabilities. The Solvency II balance sheet presents the line items from an economic perspective, whereas the financial reporting standards under HGB enforce the principle of prudence through application of the realization principle, the historical cost convention, and the principle of lower of cost or market value. Consequently, the individual line items on the Solvency II balance sheet and HGB balance sheet can only be compared once the carrying amounts have been reconciled.

There were no material changes in the valuation methods for solvency purposes compared with the prior year.

The Company did not apply any transitional measures pursuant to section 351 et seq. of the German Insurance Supervision Act (VAG) or volatility adjustment pursuant to section 82 VAG in the reporting period.

**Chapter E. Capital Management**

The SCR for ARAG SE is €499,957 thousand (December 31, 2021: €533,471 thousand). To cover this requirement, the Company has eligible own funds of €1,710,565 thousand (December 31, 2021: €1,811,235 thousand), giving a coverage ratio of 342.1 percent (December 31, 2021: 339.5 percent). ARAG SE thus has a high level of capital adequacy. Rough calculations that are performed weekly also consistently showed a comfortable level of coverage in the reporting year.

The Company's minimum capital requirement is €188,022 thousand (December 31, 2021: €185,307 thousand), which means the coverage ratio for the minimum capital requirement is 909.8 percent (December 31, 2021: 977.4 percent).

ARAG SE uses a partial internal model to determine its solvency capital requirement. Chapter E.4 provides an overview of the differences between the partial internal model and the standard formula.

The Company complied with the minimum capital requirement and the solvency capital requirement at all times in the reporting year.

There were no events of particular importance for assessing the solvency capital requirement of ARAG SE after December 31, 2022. The Company is closely monitoring changes in the capital markets, developments stemming from the Russian Federation's invasion of Ukraine, changes in relation to health emergencies, and consumer protection issues.

The events described above may also affect the Company's risk position. Although it is difficult to predict any specific impact at present, the aforementioned weekly assessments mean that the solvency situation is monitored on an ongoing basis. No significant adverse impact is currently discernible.

So far in 2023, business performance has been in line with expectations.

# A. Business and Performance

# A.1 Business

## General disclosures

**Legal basis**
ARAG SE, which has its headquarters in Düsseldorf, trades in the legal form of a European Company (Societas Europaea, SE). Its contact details are:

ARAG SE
ARAG Platz 1
40472 Düsseldorf
Germany
Tel: +49 (0)211 98 700 700
Fax: +49 (0)211 963 2850
Email: service@ARAG.de
Website: www.ARAG.com

**Address of the German Federal Financial Supervisory Authority (BaFin):**
Bundesanstalt für Finanzdienstleistungsaufsicht
Graurheindorfer Strasse 108
53117 Bonn, Germany

Or:
Postfach 1253
53002 Bonn, Germany

**Contact details for BaFin**
Tel: +49 (0)228 4108 0
Fax: +49 (0)228 4108 1550
Email poststelle@bafin.de or
De-Mail: poststelle@bafin.de-mail.de

**Independent auditor**
The contact details of the appointed auditor are:

KPMG AG Wirtschaftsprüfungsgesellschaft, headquartered in Berlin
KPMG Cologne branch
Barbarossaplatz 1a
50674 Cologne, Germany
Tel: +49 (0)221 2073 00
Fax: +49 (0)221 2073 6000
Email: information@kpmg.de
Website: www.kpmg.de

## Structure of ARAG SE and holders of qualifying holdings

The ARAG Group[1] comprises 47 Group companies, including seven insurance companies headquartered in Germany, Norway, Switzerland, and the United States.

Indirectly, ARAG SE, Düsseldorf, is wholly owned by ARAG Holding SE, headquartered at ARAG Platz 1, 40472 Düsseldorf, which directly holds a 50.0 percent equity investment. The second shareholder is AFI Verwaltungs-Gesellschaft mbH, Düsseldorf, which holds a 50.0 percent equity investment in ARAG SE.

ARAG Holding SE holds all of the shares in AFI Verwaltungs-Gesellschaft mbH. ARAG SE is therefore a dependent company of ARAG Holding SE within the meaning of section 17 (1) of the German Stock Corporation Act (AktG). ARAG SE is responsible for the operational management of the insurance business of the ARAG Group.

ARAG SE is integrated into the set of main affiliated companies and associates listed below. The Company itself has a European branch structure, details of which can be found in the Appendix:

### List of the main companies of ARAG SE

| Name and location of registered office | Legal form | Type of business | Country | Direct share | Group's share |
|---|---|---|---|---|---|
| 1 ARAG Holding SE, Düsseldorf | SE (European company) | Holding company | Germany | 0.0 % | Group parent company |
| 2 AFI Verwaltungs-Gesellschaft mbH, Düsseldorf | GmbH (private limited company) | Holding company | Germany | 0.0 % | 100.0 % |
| 3 ARAG 2000 Grundstücksgesellschaft bR, Düsseldorf | GbR (partnership under the German Civil Code) | Real estate management | Germany | 50.9 % | 94.9 % |
| 4 ARAG Allgemeine Versicherungs-AG, Düsseldorf | AG (stock corporation) | Insurer | Germany | 100.0 % | 100.0 % |
| 5 ARAG International Holding GmbH, Düsseldorf | GmbH | Holding company | Germany | 100.0 % | 100.0 % |
| 6 ARAG IT GmbH, Düsseldorf | GmbH | IT | Germany | 100.0 % | 100.0 % |
| 7 ARAG Krankenversicherungs-AG, Munich | AG | Insurer | Germany | 94.0 % | 94.0 % |
| 8 ARAG Legal Solutions Inc., Toronto | Corporation | Service provider | Canada | 100.0 % | 100.0 % |
| 9 ARAG North America, Inc., Des Moines | Corporation | Holding company | United States | 100.0 % | 100.0 % |
| 10 ARAG plc, Bristol | plc (public limited company) | Service provider | United Kingdom | 100.0 % | 100.0 % |
| 11 ARAG Service Center GmbH, Düsseldorf | GmbH | Service provider | Germany | 80.0 % | 100.0 % |
| 12 Cura Versicherungsvermittlung GmbH, Düsseldorf | GmbH | Service provider | Germany | 100.0 % | 100.0 % |
| 13 HELP Forsikring AS, Oslo | AS (private limited liability company) | Insurer | Norway | 100.0 % | 100.0 % |
| 14 ALIN 1 GmbH & Co. KG, Düsseldorf | GmbH & Co. KG (limited partnership with a GmbH as general partner) | Asset manager | Germany | 100.0 % | 100.0 % |
| 15 ALIN 1 Verwaltungs-GmbH, Düsseldorf | GmbH | Service provider | Germany | 100.0 % | 100.0 % |
| 16 AXA-ARAG Rechtsschutz AG, Zurich | AG | Insurer | Switzerland | 29.2 % | 29.2 % |

[1] A simplified representation of the group structure has already been provided and can be found on page 2.

**Description of the main affiliated companies and associates**

1. ARAG Holding SE is the parent company of the ARAG Group from a company law perspective. It does not exercise influence in the sense of acting as an overarching Group management entity.
2. AFI Verwaltungs-Gesellschaft mbH manages 50.0 percent of the shares in ARAG SE. This management remit is limited to exercising its rights and fulfilling its obligations as a shareholder in the equity investment.
3. ARAG 2000 Grundstücksgesellschaft bR manages the site at ARAG Platz 1, 40472 Düsseldorf, where the ARAG Group's headquarters are located.
4. ARAG Allgemeine Versicherungs-AG operates the Group's casualty and property insurance business in Germany and, through branches, mainly the legal insurance business in the United Kingdom and the Republic of Ireland. It is necessary to operate this business in a separate company because, in Germany, legal insurance claims have to be settled separately (section 164 of the German Insurance Supervision Act [VAG]).
5. ARAG International Holding GmbH is an intermediate holding company connecting strategic subsidiaries – allocated on the basis of internal criteria – outside Germany (in the United States, the Republic of Ireland, and Canada) to the ARAG Group in Germany. It is purely a financial holding company and limits itself to exercising its rights and fulfilling its obligations as a parent company.
6. ARAG IT GmbH, which is located at the Düsseldorf site, primarily carries out data center activities and IT services for the ARAG Group.
7. ARAG Krankenversicherungs-AG operates the private health insurance business. The need to separate the different segments (section 8 (4) VAG) means that a separate company has to operate the health insurance business.
8. ARAG Legal Solutions Inc., Canada, was established in 2010. In 2022, it was merged with a company that was acquired from unrelated parties. It is one of the leading managing general agents in Canada specialized in legal insurance. Its product portfolio encompasses legal insurance products for families, landlords, home owners, and small businesses in Canada.
9. ARAG North America Inc., United States, is the country-specific holding company for the ARAG Group's US business lines. It holds all of the shares in the three US operating subsidiaries.
10. ARAG plc, United Kingdom, works as an intermediary by brokering business with end customers and passing it on to primary insurers within and outside the ARAG Group. The bulk of claims settlement for the primary insurers is handled by ARAG plc itself.
11. ARAG Service Center GmbH is the customer service center for all German insurance companies in the ARAG Group, providing comprehensive assistance and mediation services and a telephone hotline around the clock.
12. Cura Versicherungsvermittlung GmbH brokers insurance business to third parties that the ARAG Group does not underwrite itself.

13. HELP Forsikring AS, Norway, primarily offers family legal insurance coverage for interest groups – predominantly members of labor unions and associations – in Norway, Sweden, and Denmark via local branches. In Norway, it also offers a special legal insurance product for homebuyers.
14. ALIN 1 GmbH & Co. KG is a company whose purpose is to establish, hold, manage, and realize a portfolio of passive investments including, but not limited to, equity investments in companies with a similar object.
15. ALIN 1 Verwaltungs-GmbH is a company whose purpose is to acquire, hold, and manage shares in companies and various investments as well as to accept the general partner liability and handle management activities in connection with companies or partnerships structured in accordance with HGB. Its main object is to hold an equity investment in, and be the general and managing partner of, ALIN 1 GmbH & Co. KG.
16. AXA-ARAG Rechtsschutz AG (AXA-ARAG), Switzerland, is a legally independent subsidiary of the AXA Group. It is also one of the leading providers of legal insurance in Switzerland, offering legal cover for families and businesses.

**Dividend/profit-and-loss transfer agreements**

ARAG SE received an amount of €4,941 thousand from ARAG Allgemeine Versicherungs-AG (ARAG Allgemeine) for 2022 (2021: €11,816 thousand) on the basis of a profit-and-loss transfer agreement. It also received a total of €48,916 thousand in dividend distributions from other companies during the reporting period (2021: €40,792 thousand).

The Management Board of ARAG SE is proposing to the Annual General Meeting that a dividend of €20,000 thousand be distributed to shareholders from the net retained profit for 2022.

In the period under review, no other material transactions were conducted with shareholders, persons able to exercise significant influence over the Company, or members of the administrative, management, or supervisory bodies.

**Qualitative and quantitative disclosures on relevant events and significant intragroup transactions**

ARAG SE performs centralized services for the insurance companies in the Group, such as investment management, accounting, risk management, and personnel development; it also manages groupwide projects.

ALIN 1 GmbH & Co. KG, whose sole limited partner is ARAG SE, was formed in 2014 for the purpose of carrying out and managing investments in infrastructure funds and private equity funds. The general partner is ALIN 1 Verwaltungs-GmbH.

ARAG IT GmbH, Düsseldorf, carries out consultancy/software development services and data center activities for ARAG SE. They are settled at a price agreed between the parties.

ARAG SE, ARAG 2000 GbR, and ARAG Krankenversicherungs-AG have entered into rental agreements concerning the use of office and storage space and underground parking spaces in Düsseldorf.

ARAG SE has contracts with all affiliated companies concerning the performance of services, insurance brokerage, the use of trademark rights, and support for and shared use of real estate, office furniture, and equipment.

There were no other material intragroup transactions to report.

All services are charged on the basis of arm's-length terms and conditions that are typical in the market.

## Line of business

ARAG SE is the largest family-managed insurance company in Germany and the leading legal insurer worldwide. It focuses on state-of-the-art product concepts aimed at both private and small business customers. The modular structure of these concepts means that insurance can be precisely tailored to the requirements of each customer. An important role is also played by customized legal insurance products designed for particular target groups.

The Company is a legal insurance provider focusing on private and small business customers. It is not involved in diversified corporate business with individual risks. Outside Germany, it also operates travel insurance business in connection with its provision of legal insurance.

ARAG now operates in a total of 19 countries (Germany, other European countries, the United States, Canada, and Australia) through branches, subsidiaries, and equity investments.

In Germany, ARAG SE's activities are limited to just one class of insurance: legal insurance. In Italy, Spain, and Portugal, it also operates legal-insurance-related special service package business in addition to legal insurance business. As well as in the aforementioned international branches, legal insurance is also provided in the United States, Norway, Sweden, and Denmark. In each case, the business is operated through legally independent affiliated companies, under the unified management of ARAG SE in its role as parent company.

In addition, ARAG SE operates in Switzerland via equity investments in legal insurance associates. In the United Kingdom, a Group company acts as a broker for legal insurance business and legal-insurance-related special service package business, passing this business to several UK primary insurers. Some of this insurance is then ceded to ARAG SE under quota-share reinsurance treaties. This intermediary model has been adapted for use in the Canadian and Australian markets, where ARAG offers legal insurance through a Group company. ARAG SE also holds an equity investment in a legal insurance company in Luxembourg.

**Insurance portfolio**

At the end of the reporting year, ARAG SE had 4,753,824 in-force insurance policies (December 31, 2021: 4,677,789), of which 1,806,980 related to the business in Germany (December 31, 2021: 1,747,331) and 2,946,844 to international business (December 31, 2021: 2,930,458).

## Significant business or other events in the reporting period

### Products, digitalization, and other topics

The success of the ARAG Group is based on the high quality of its products and the particular innovative strength of the Group. The quality of its offerings is reflected in the many awards and seals of approval that it regularly receives from independent organizations. In its core legal insurance segment, ARAG has helped to shape the German market through innovative products and services for more than 85 years, offering protection, security, and legal guidance to customers and consumers.

ARAG SE added further innovations to its portfolio of products in Germany in the reporting year. In February 2022, the Company added a new ARAG Aktiv legal insurance product version that offers immediate assistance to private individuals. This allows ARAG to help customers by providing retroactive cover, up to a specified limit and on one occasion during the term of the policy, in disputes that arose before the policy came into force. ARAG offers this legal insurance in the Komfort and Premium product lines.

The most recent product development is the legal insurance for managers that was launched in October 2022. It is also available in three product lines – Basis, Komfort, and Premium – and can be taken out by companies or private individuals. The solution for companies insures executives and employees, with options for legal insurance covering criminal proceedings and/or financial loss. The private solution only insures the individual manager, with flexible modules that they can choose to suit their individual needs for legal insurance covering criminal proceedings, financial loss, and employment contracts. In the private solution, the legal insurance for managers includes back-up legal insurance covering criminal proceedings. New features are the claims-made principle under the financial loss legal insurance and legal insurance for coverage claims against the D&O insurer. Furthermore, the insurance includes additional comprehensive services such as the ARAG Manager SOS landing page, which provides rapid access to a 24-hour criminal defense hotline.

A digital upgrade campaign has been running for existing ARAG legal insurance customers since November 2022. Selected customers receive personal quotes to upgrade their current legal insurance policies in line with the current rate scale. The policy upgrade process is simple and fully digital – including a landing page leading to compact quote pages and rate scale comparisons. Policy upgrades are processed and certificates of insurance issued automatically; the downstream process is also digital and automated.

Following the conclusion of the ARAG Smart Insurer Program, ARAG is now embarking on the next stage of its digital journey by devising and implementing digital services. The Group strategy ARAG 5>30 centers on a digital by default approach to optimizing speed and agility. The aim is to take a digital first approach for all core processes in the future, fulfilling the criteria of paperless, automated, and instantaneous. ARAG will only continue to rely on analog procedures where they offer clear advantages for its customers or partners and add value. What is more, the Group will promote the use of artificial intelligence (AI) both for product and service innovations and for streamlining processes.

**Insurance-specific events**

In 2022, ARAG SE had no significant insurance-specific events (such as major claim payouts) to report that materially affected its business performance.

**Company changes**

ARAG continued to focus on digitalization and growing its business in 2022. 'The ARAG Group at a Glance' chapter, section ARAG 5>30 of the 2022 Annual Report of ARAG Holding SE contains further information. ARAG Services Corporation, Canada, and ARAG Legal Solutions Inc., Canada, were merged in the reporting year. The Supervisory Board of ARAG SE appointed Dr. Shiva Meyer to the Company's Management Board with effect from April 2, 2023. She took over the remit of Dr. Werenfried Wendler, whose term of appointment ended as planned on April 1, 2023.

There were no other changes to the structure of ARAG SE. Nor were there any changes in the Company's shareholdings, any personnel changes at senior management level, or any material changes in business activities in the reporting year.

**Other events**

Three years after the outbreak of the COVID-19 pandemic, the global economy is still facing significant challenges. Although the direct challenges are easing significantly in Europe, the zero-COVID policy in the People's Republic of China, which encompassed strict measures such as the closure of businesses and production facilities and was pursued until the end of 2022, adversely affected downstream supply chains around the world.

The challenging economic situation worsened dramatically at the start of 2022 when the Russian Federation invaded Ukraine. In response, various sanctions were imposed on Russia, primarily by western nations, including restrictions on the supply of Russian gas. This exacerbated the existing disruptions to production. Energy costs soared, pushing up the production cost of industrial products and food. Inflation rates across Europe, the United States, and other economies surged and wages fell in real terms, hitting households and businesses very hard. The high volatility in the capital markets and the associated flight to safe havens are further exacerbating the impact on the real economy.

The fast pace of inflation put central banks around the world under intense pressure to react and saw the US Federal Reserve (Fed) raise interest rates for the first time in March 2022, followed by several more hikes through to the start of 2023. After some initial hesitation, the European Central Bank (ECB) followed suit in autumn 2022. Due to the expansionary monetary policy pursued in virtually all major economies in recent years, government borrowing and thus government debt jumped. Given the higher interest rates, public budgets are left with considerably less leeway.

In the first half of 2022, the lifting of measures to contain the spread of COVID-19 revived the global economy. However, this revival was overshadowed by the aforementioned effects from the war in Ukraine and the related political and financial uncertainty. In Germany, the energy crisis coupled with inflation heaped financial pressure on households, leading to a fall in consumer demand.

According to the ifo Institute of Economic Research (ifo), the German insurance industry was generally negative about the course of business in 2022. Despite the challenging economic conditions, however, the German insurance industry again proved to be robust in the face of a crisis. Only the life insurance business, which the ARAG Group has discontinued, experienced a sharp decrease in premiums.

These events presented major challenges for the ARAG Group. The Group's response in 2022 once again demonstrated the strength of its capabilities in terms of speed, flexibility, and innovation. From the start of the pandemic, and as a consequence of the war in Ukraine too, customers needed more reassurance and legal guidance, and demand for health insurance also increased. An increase in demand for legal insurance and private health insurance products was a consequence of this. In response to the change in its customers' requirements, ARAG offered many different services (some of which were new) and provided general information that was continually updated. Since the outbreak of the pandemic, ARAG has also implemented a range of internal measures to support its workforce and to equip its employees for remote working. As in the prior year, there was no negative impact on new business nor was there an increase in lapse rates in 2022.

The trends in the capital markets affected the ARAG Group companies differently depending on the composition and size of their investment portfolios. Claims incurred in the reporting year were also influenced by the pandemic, but a nuanced view needs to be taken of the effects on the individual insurance segments of the ARAG Group.

As described in chapter A.2 'Underwriting Performance', ARAG SE maintained its strong business performance of recent years in 2022 despite the prevailing uncertainty of the economic situation. The Company is confident that it can maintain its profitability at a high level over the coming years. Due to the withdrawals from the equalization provision that are likely to be required, the Company expects a year-on-year increase in the amount of profit in 2023. Taking into account the discernible opportunities and risks, ARAG SE forecasts that business performance will be steady in 2023.

# A.2 Underwriting Performance

## Underwriting performance – overview

In the year under review, ARAG SE generated **income from gross premiums written** of €1,169,859 thousand (2021: €1,092,403 thousand). This increase was attributable to a rise in premiums of 5.6 percent in direct business in Germany and to growth in the international markets. The latter consisted of an 8.0 percent increase for the branches and a 9.3 percent rise in subsidiaries' inward reinsurance business from other countries.

**Claims incurred (gross)** were up by 3.6 percent to €575,489 thousand (2021: €555,260 thousand). The claim settlement costs included in this figure amounted to €156,429 thousand (2021: €144,912 thousand). These costs are high relative to the payouts because, in the branches outside Germany, inhouse staff also performed the attorney services rendered in connection with the settlement of claims. Expenses for claims incurred increased overall due to the growth of the insurance portfolio. In 2021, there had been catch-up effects from when courts in Austria and Spain were closed during the pandemic. The claims ratio (net) based on the recognized claims incurred declined from 51.6 percent to 49.7 percent.

The **change in other technical provisions (net)** amounted to an expense of €131 thousand (2021: income of €21 thousand).

**Insurance business operating expenses (gross)** went up year on year, from €484,434 thousand to €512,188 thousand. The acquisition costs included in this figure amounted to €126,361 thousand (2021: €114,354 thousand). At 44.3 percent, the cost ratio was slightly lower than in the prior year (2021: 45.0 percent). Administrative expenses climbed by 4.3 percent to €385,827 thousand (2021: €370,080 thousand). The steady expansion of business (commissions), the inflation-induced jump in pension expenses, and higher IT costs due to ongoing digitalization and use of software as a service were a key factor in this trend.

There were no **miscellaneous underwriting expenses (net) or other miscellaneous items** in 2022 or 2021.

The **underwriting result** in accordance with HGB net of reinsurance in 2022 amounted to €55,563 thousand (2021: €26,535 thousand). Based on the quantitative reporting required for regulatory purposes (see template S.05.01.02 in the Appendix), the underwriting result for the reporting period came to €61,920 thousand (2021: €29,333 thousand).

The following table shows this underwriting result with a reconciliation to the underwriting result in accordance with the German Commercial Code (HGB), as published in the Company's 2022 Annual Report:

**Underwriting result (net) [1]**

| (€'000) | 2022 | 2021 |
|---|---|---|
| Premiums earned | 1,155,709 | 1,076,242 |
| Claims incurred (excluding claim settlement costs) | 417,926 | 410,482 |
| Changes in other technical provisions | – 131 | 21 |
| Expenses incurred | 675,732 | 636,448 |
| **Underwriting result in accordance with template S.05.01.02** | **61,920** | **29,333** |
| Miscellaneous underwriting income | 1,450 | 1,495 |
| Expenses for investment management | – 7,115 | – 7,101 |
| **Underwriting result in accordance with HGB [2]** | **70,484** | **37,929** |
| Change in the equalization provision and similar provisions | **– 14,921** | **– 11,394** |
| **Underwriting result in accordance with HGB** | **55,563** | **26,535** |

[1] The net amount is adjusted for the reinsurer's share and refers, where applicable, to the individual line items.
[2] Underwriting result before change in the equalization provision and similar provisions.

## Key figures – by main line of business and main geographical area

The following table shows a breakdown of the key figures reported in the template by main line of business:

**Main lines of business [3] (net [4])**

| (€'000) | Premiums earned | Premiums earned | Claims incurred [5] | Claims incurred [5] |
|---|---|---|---|---|
| | 2022 | 2021 | 2022 | 2021 |
| Legal insurance | 1,082,949 | 1,028,739 | 378,267 | 389,064 |
| Assistance | 64,724 | 39,227 | 38,888 | 20,839 |
| Miscellaneous insurance | 8,035 | 8,276 | 771 | 579 |
| **Total** | **1,155,709** | **1,076,242** | **417,926** | **410,482** |

[3] Presentation of results and lines of business based on S.05.01.02 in the Appendix.
[4] The net amount is adjusted for the reinsurer's share and refers, where applicable, to the individual line items.
[5] Excluding claim settlement costs.

The following table shows a breakdown of the key figures reported in the template by main geographical area:

**Main geographical areas (net [1])**

| (€'000) | Premiums earned | Premiums earned | Claims incurred [2] | Claims incurred [2] |
|---|---|---|---|---|
| | **2022** | **2021** | **2022** | **2021** |
| Germany | 514,326 | 484,122 | 269,279 | 289,139 |
| Netherlands | 187,495 | 175,877 | 20,621 | 16,895 |
| Italy | 165,825 | 166,376 | 25,202 | 17,433 |
| Spain | 162,143 | 132,032 | 65,953 | 52,449 |
| Austria | 83,537 | 78,210 | 20,867 | 21,695 |
| Other areas | 42,383 | 39,625 | 16,004 | 12,871 |
| **Total** | **1,155,709** | **1,076,242** | **417,926** | **410,482** |

[1] The net amount is adjusted for the reinsurer's share and refers, where applicable, to the individual line items.
[2] Excluding claim settlement costs.

## Other insurance disclosures

The miscellaneous underwriting income of €1,450 thousand (2021: €1,495 thousand) largely comprised income from costs from pre-court and court proceedings to recover debts from policyholders.

No miscellaneous underwriting expenses (net) or other miscellaneous items were incurred in 2022 or 2021.

# A.3 Investment Performance

Investment performance is reported as gains and losses on investments, which, as described below, consist of current income, realized gains and losses, depreciation, amortization, and write-downs, reversals of write-downs, current expenses, and loss transfers.

**Gains and losses on investments** fell sharply from a net gain of €64,823 thousand to a net gain of €34,560 thousand. The **total income from investments** came to €78,500 thousand (2021: €86,927 thousand), mainly because there were far fewer reversals of write-downs than in the prior year. These reversals amounted to €185 thousand in 2022 (2021: €12,564 thousand). **Current income** from other investments advanced from €72,488 thousand to €75,595 thousand. This was mainly due to the increase in dividend income from affiliated companies and equity investments. The Company generated **extraordinary income** of €2,905 thousand in 2022 (2021: €14,438 thousand).

**Total expenses from investments** rose to €43,940 thousand (2021: €22,103 thousand), which was largely the result of an increase in write-downs and in losses on the disposal of investments. **Current expenses** edged up to €8,256 thousand (2021: €8,225 thousand). **Extraordinary expenses** rose to €35,684 thousand (2021: €13,879 thousand) due to higher write-downs year on year and increased losses on the disposal of investments.

The net gains[1] on investments of €34,560 thousand described above equated to a **net yield**[2] on investments of 1.5 percent (2021: 2.9 percent). The **current average yield**[3] on investments was 2.9 percent (2021: 2.9 percent).

The following table shows the breakdown of ARAG SE's gains and losses on investments in accordance with HGB[4] by individual asset class as required by Solvency II:

1) The expense for the management of investments is included in the net gain or loss.

2) Calculation of net yield: net gain or loss on investments/average value of investment portfolio.

3) Calculation of current average yield: ordinary gains and losses on investments/average value of investment portfolio.

4) The total of the gains and losses on investments presented in the table equates to the gains and losses on investments published in ARAG SE's 2022 Annual Report.

## Gains and losses on the investments of ARAG SE

| Type of investment | | | | | | | Change in gains and losses | |
|---|---|---|---|---|---|---|---|---|
| *(€'000)* | Current income | Realized gains | Realized losses | Reversals of write-downs | Depreciation, amortization, and write-downs | Current expense/ loss transfers | Gains and losses on investments in 2022 | Gains and losses on investments in 2021 |
| Property, plant & equipment held for own use | 2,986 | 0 | 0 | 0 | 626 | 0 | 2,360 | 2,167 |
| Property (other than for own use) | 1,519 | 320 | 46 | 185 | 761 | 1,078 | 139 | 518 |
| Holdings in related undertakings, including participations | 53,857 | 0 | 0 | 0 | 8,100 | 60 | 45,697 | 53,497 |
| Equities – listed | 19 | 0 | 0 | 0 | 0 | 0 | 19 | 78 |
| Equities – unlisted | 10 | 0 | 0 | 0 | 0 | 0 | 10 | 5 |
| Government bonds | 4,157 | 1,808 | 48 | 1 | 4,226 | 0 | 1,691 | 2,867 |
| Corporate bonds | 8,865 | 568 | 155 | 0 | 5,209 | 0 | 4,070 | 5,910 |
| Structured notes | 151 | 0 | 0 | 0 | 0 | 0 | 151 | 1,000 |
| Collateralized securities | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Collective investment undertakings | 3,643 | 23 | 5,372 | 0 | 12,283 | 0 | –13,988 | 4,062 |
| Derivatives | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Deposits other than cash equivalents | 149 | 0 | 0 | 0 | 0 | 68 | 81 | –354 |
| Other investments | 49 | 0 | 0 | 0 | 0 | 0 | 49 | 55 |
| Deposits to cedants | 192 | 0 | 0 | 0 | 0 | 0 | 192 | 169 |
| Cash and cash equivalents | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Current expense (unallocated)/loss transfers | 0 | 0 | 0 | 0 | 0 | 5,909 | –5,909 | –5,152 |
| **Total** | **75,595** | **2,720** | **5,621** | **186** | **31,204** | **7,115** | **34,560** | **64,823** |

### Information on gains or losses recognized directly in equity

In the reporting year, the Company did not have to recognize any gains or losses directly in equity, for example as a result of the disposal of own shares.

### Information on securitization instruments

As defined in HGB accounting rules, securitization instruments mainly comprise instruments such as asset-backed securities and mortgage-backed securities. Pfandbriefs, on the other hand, are not classified as securitization instruments because they are treated as government or corporate bonds.

From a Solvency II perspective, the Company held asset-backed securities and mortgage-backed securities with a value of €701 thousand as of the reporting date (December 31, 2021: €790 thousand). But it held them only indirectly as shares/units in such securities that did not need to be reported separately. These are part of the collective investment undertakings. No shares/units in securitization instruments were held directly.

## A.4 Performance of Other Activities

Other net income/expense includes staff costs and general and administrative expenses that are not allocated to an insurance or investment-related function in accordance with function-based accounting.

**Other income** went up from €116,956 thousand in 2021 to €127,412 thousand in the reporting year. This was mainly due to a rise in currency gains (€4,828 thousand) and higher income from services (€4,020 thousand).

**Other expenses** came to €176,123 thousand in 2022, compared with €162,330 thousand in 2021. This was mainly due to a rise in expenses for services rendered (€7,725 thousand) and in expenses for the Company as a whole (€7,173 thousand). With regard to the latter expenses, rising inflation impacted pension commitments to non-active pension beneficiaries.

**Other net income/expense** deteriorated by €3,337 thousand to a net expense of €48,710 thousand in the reporting year.

### Tax income/expense

Largely as a result of earnings and investments, the tax expense amounted to €19,759 thousand in 2022 (2021: €22,493 thousand). The decrease is largely attributable to the reduction in profit before tax.

### Information on leases

A distinction is made between finance leases and operating leases. ARAG SE is a lessee under leases that are accounted for as operating leases. It is not involved in any special finance leases. The operating leases mainly relate to the company cars, rented offices, office equipment, and cellphones used by the Company's employees. As lessee, ARAG SE recognizes the lease payments as an expense.

## A.5 Any Other Information

Chapters A.1 to A.4 inclusive contain all of the important information about business and performance.

# B. System of Governance

# B.1 General Information on the System of Governance

ARAG SE has structured its system of governance in such a way that its business activities can be managed soundly and conservatively in line with the business and risk strategies. The sections below describe the structure of the Company's Management Board and Supervisory Board, provide an overview of the system of governance, and assess whether this system is adequate.

## Management Board and Supervisory Board

**Management Board**

The Management Board manages the business of ARAG SE in accordance with legal requirements, the Company's articles of incorporation, and the Management Board's rules of procedure. As part of its overall responsibilities, the Management Board ensures that there is an orderly system of governance in place, so that it:

- Is effective, and – in terms of its nature, scope, and complexity – is commensurate with the Company's business activities
- Ensures compliance with laws, regulations, and regulatory requirements
- Ensures sound and prudent management of the Company
- Has an adequate, transparent organizational structure with clearly allocated and separated responsibilities
- Has an effective inhouse communications system
- Is regularly reviewed

As of December 31, 2022, the Management Board of ARAG SE had six members. The responsibilities were allocated as follows:

- Dr. Renko Dirksen: Speaker of the Management Board/Central Group Functions
- Dr. Matthias Maslaton: Group Sales, Products and Innovation
- Wolfgang Mathmann: Group Finance
- Hanno Petersen: Group IT and Operations
- Dr. Joerg Schwarze: Group Risk Management and Group Controlling
- Dr. Werenfried Wendler: Group Human Resources/Audit

The Group Executive Committee (GEC) is a groupwide body that manages and monitors the international branch business of the operating management company, ARAG SE. It also serves as a platform for sharing all information about the insurance business in Germany and abroad and about the performance of the business. Group strategy as well as guidelines, policies, and standards are discussed in the GEC.

Together with the members of the Management Boards of the other ARAG Group companies, the Management Board has set up the Risk Committee to help it to fulfill its risk management duties. To ensure the regulatory requirements concerning the use of a partial internal model are met in day-to-day operations, the Risk Committee has set up a subcommittee, the Internal Model Committee.

ARAG SE does not currently have an independent remuneration committee within the meaning of article 275 (1) (f) of Delegated Regulation (EU) 2015/35 (the Delegated Regulation). The size of the Company (particularly the number of employees) in relation to the internal structure means that, at the moment, the organization itself is able to help the Management Board and the Supervisory Board supervise the remuneration guidelines and policies as well as the way they are put into practice and how they function. Therefore, it does not appear to be necessary to appoint an independent remuneration committee.

**Supervisory Board**

The Supervisory Board is responsible for appointing and monitoring the Company's Management Board. There were changes to the Supervisory Board during the reporting period. Kirsten Rose and Wolfgang Platen joined as new employee representatives on April 26, 2022. Kirsten Rose took up the post of Deputy Chairwoman. The previous employee representatives Margit Schuler and Richard Wenhart stepped down from the Supervisory Board as of April 26, 2022. As of December 31, 2022, the members of the Supervisory Board were as follows:

- Dr. Dr. h. c. Paul-Otto Faßbender (Chairman)
- Gerd Peskes (Deputy Chairman)
- Kirsten Rose (Deputy Chairwoman, employee representative)
- Dr. Tobias Bürgers
- Dr. Michael Pielorz
- Professor Dr. Fred Wagner
- Dr. Sven Wolf
- Marco Hoogendam (employee representative)
- Wolfgang Platen (employee representative)

To facilitate the decision-making process, the Supervisory Board has delegated individual tasks to the Finance Committee, Accounting and Audit Committee, and Human Resources Committee.

By the nature of its remit, the Finance Committee deals mainly with transactions that require approval according to the Company's articles of incorporation and the Management Board's rules of procedure. Such transactions include investment decisions, fundamental strategic decisions on asset allocation, and business decisions involving the Company's portfolio. The committee also deals with the approval of loans to members of the Management Board and other employees in senior positions (Prokuristen).

The Accounting and Audit Committee is responsible for advising on financial reporting, tax law, corporate planning, risk management, solvency, and the timely implementation of the related regulatory requirements. Furthermore, it monitors the awarding of contracts for non-audit services to the Company's current auditor and to firms that might potentially become the Company's auditor in the future. It is also responsible for the invitation to tender and short-listing for the appointment by the full Supervisory Board of a new auditor.

By the nature of its remit, the Human Resources Committee deliberates primarily on personnel matters relating to the members of the Management Board. As well as appointing, dismissing, and reappointing Management Board members, this also involves discussing the remuneration system, target achievement, and evaluation of targets.

## Key functions

The establishment of controls in the Company lies at the heart of the system of governance. These controls are mainly carried out by the four key functions: risk management, compliance, internal audit, and the actuarial function. As these functions are kept strictly separate from the operational departments as far as Management Board level, they can perform their duties objectively and independently. Moreover, they have a direct reporting line to the ARAG SE Management Board member with relevant responsibility and can also communicate directly with the Supervisory Board. The employees in these functions have the knowledge they need to be able to carry out their tasks adequately. The duties of the four key functions are briefly described below. Detailed information can be found in chapters B.3 to B.6.

**Risk management**

The tasks of the risk management function are performed by the Group Risk Management Central Department. As part of the risk management system that is in place, this department is primarily responsible for the risk management process, which includes submitting regular reports to the Management Board. Operational management of risk is carried out by the relevant process owners in compliance with internal rules. All risk-relevant decisions to be made by the Management Board must take into account the information from and opinions of the Group Risk Management Central Department.

**Compliance**

The tasks of the compliance function are performed by the Group Legal/Compliance Central Department. The main duty of the function is to create the framework for compliance with the obligation to operate within the law, for example by issuing policies and guidelines, in order to ensure legal requirements are fulfilled and corporate objectives are achieved. Responsibility for implementing the guidelines and policies lies with the manager of each individual department. The Chief Compliance Officer advises the Management Board on the risk resulting from changes to the law and submits regular reports on their work to the Management Board.

**Internal audit**

Internal audit tasks are performed by the Group Internal Audit Central Department. This department is a process-independent function that examines and assesses structures and activities within the Group. Auditing is carried out on behalf of the Management Board and covers all processes relating to business operations. Group Internal Audit has to assess and evaluate the integrity, propriety, effectiveness, efficiency, and adequacy of the internal control system (ICS). Audit findings are made available to the members of the Management Board in the form of an audit report.

**Actuarial function**

The Actuarial Function department is responsible for the actuarial functions. It is essentially responsible for verifying the methodology used to calculate the technical provisions and for ensuring the adequacy of both the underwriting and contracting policy and the reinsurance policy. This includes verifying the methods applied, the assumptions made, and the data used. Responsibilities also include validating the partial internal model. The department submits reports on its findings to the Management Board and the supervisory authority.

## Information on remuneration guidelines and policies

As a core element of the Company's system of governance, the remuneration of the members of the governing bodies – and that of all those working for the Company – is based on the principles of appropriateness and transparency and is focused on sustainability.

This includes ensuring that the remuneration of members of governing bodies and employees is consistent with market rates and individual performance, and therefore appropriate. Those responsible for remuneration in the Company monitor remuneration levels in the relevant market and make adjustments accordingly, taking account of the performance of the individual employees and members of the governing bodies.

Transparency means that the general principles of the remuneration policy are disclosed to all employees. But it also means that the remuneration structures are designed to be only as complex as necessary and as simple as possible.

To ensure that the remuneration policy is compatible with the Company's sustainable development, the remuneration structure is adequately aligned with the Company's business strategy and risk profile.

As a company that takes the long view, ARAG attaches great importance to forward-looking risk management that takes both existing and emerging risks into account. It ensures that any events or circumstances that could have a substantially negative effect on the assets, profitability, or reputation of ARAG are identified, analyzed, and assessed through the risk management process that is in place and that is managed by designated process owners.

This includes ensuring that risks for the Company arising in relation to remuneration are managed effectively. The Company relies in part on the structure of remuneration as a whole to achieve this, for example the proportion of fixed salary to variable remuneration at the relevant management levels, the structure of variable remuneration (target categories, close caps on target achievement, etc.), and related governance measures.

The remuneration of the Company's **Management Board members** comprises a fixed basic salary and a variable element and is in line with regulatory requirements. In particular, the basic salary is set at a level that ensures the members of the Management Board are not heavily reliant on the variable component. This is especially important to ensure that the variable component rewards good performance but does not create such a significant incentive that it could encourage actions counter to the interests of the Company.

The variable element is equivalent to a percentage of the basic salary. No share plans or share option programs are offered anywhere in the ARAG Group. Against this background and with a view to ensuring that the Company offers attractive, market-level remuneration, the variable element of the remuneration for Management Board members is set at 60.0 percent of basic salary and is subdivided into short-term and long-term components. For all Management Board members, the long-term component equates to 60.0 percent of the aforementioned variable remuneration and, in accordance with article 275 (2) (c) and (f) of the Delegated Regulation, is deferred and takes into account the outcome of a review to establish whether there is any requirement for a potential downward adjustment as a result of exposure to current or future risks.

The targets relevant to variable remuneration are based on a mixture of objective Group and company key performance indicators drawn from the strategic planning and of individual targets for each member of the governing body. The weighting of the targets is defined beforehand. Target achievement in respect of each target is capped at predefined limits. The variable remuneration never exceeds the basic salary.

If members of the Management Board of ARAG SE simultaneously hold Management Board or senior management positions in subsidiaries of ARAG SE, they do not receive any additional remuneration for these activities. However, such multiple roles can be acknowledged in the various categories within target agreements related to the variable remuneration granted under the principal employment contract. In this case, particular attention is paid to ensuring that this does not give rise to conflicts of interest.

If an individual does hold such multiple positions or fulfill multiple roles, a proportion of the costs is passed on to the relevant company by the company responsible for paying the remuneration.

If members of the Management Board of ARAG SE are also members of a Supervisory Board or administrative board of a subsidiary of ARAG SE, they receive fixed remuneration for these activities, but this remuneration is offset against the remuneration for the Management Board activities.

**Supervisory Board members** receive fixed remuneration for their work. Where members do other work within the Group, individual arrangements are in place to determine whether remuneration for this work is offset against their Supervisory Board remuneration.

Unless **employees** of insurance companies in the Group are granted variable remuneration components under a pay agreement or other collective agreement on a non-discretionary basis, employees only receive such variable remuneration when they reach a certain management level.

The variable remuneration for these managers is based on annual target agreements, which include a mix of objective Group and division key performance indicators and individual targets. The variable element is equivalent to a percentage of the basic salary and varies depending on management level, function, and country.

The variable remuneration never exceeds the relevant basic salary. Target achievement is capped at predefined limits. The basic salary for the postholders concerned is set at an appropriate level to ensure that they are not substantially dependent on the variable remuneration components. Once again, the variable remuneration must encourage good performance but not create such a significant incentive that it could encourage actions counter to the interests of the Company.

Variable remuneration granted to individuals responsible internally for **key functions** follows the general principles for managers described above. Care is taken to ensure that the targets relevant to this variable remuneration are designed such that the variable remuneration is independent of the performance of the operating units and divisions that are supervised by the function holder concerned.

Variable remuneration granted to individuals responsible internally for key functions ranges from 15.0 percent to 35.0 percent of their basic salary, depending on the postholder concerned. As part of the Company's obligation to work toward compliance, deferred payment of 40.0 percent of their variable remuneration was agreed for all postholders with one exception. To date, no arrangement has been made with this remaining postholder for a partial deferral of payments.

Where subsidiaries of ARAG SE have outsourced key functions to ARAG SE, the persons responsible for these key functions at ARAG SE do not receive any additional remuneration for performing this work.

The Company grants **members of the Management Board** and their surviving dependants rights to a retirement pension, a widow's/widower's pension, and an orphan's pension. The retirement pension is calculated as a percentage of pensionable salary, which equates to the basic salary (excluding bonuses, remuneration in kind, etc.). There is also a cap on the absolute maximum amount. The widow's/widower's pension is equivalent to two-thirds of the retirement pension; the orphan's pension for each child is equivalent to one-third of the widow's/widower's pension. The total of the surviving dependants' pensions is limited to the amount of the retirement pension.

No early retirement arrangements have been made with **Management Board members**. However, the Company is entitled to make them retire five years before the standard retirement age with the contractually agreed deductions. The Management Board members do not have a corresponding right themselves.

The information provided about remuneration for Management Board members who simultaneously fulfill roles for the subsidiaries of ARAG SE applies analogously to pension and early retirement agreements.

**Supervisory Board members** do not receive any supplementary pensions.

Persons responsible for **key functions** receive an occupational retirement pension, the amount and extent of which is determined by the management level of the person concerned and standard market practice. No early retirement arrangements have been made.

## Material transactions

Information on material transactions with shareholders, persons able to exercise significant influence over the Company, or members of the administrative, management, or supervisory bodies can be found in chapter A.1.

## Significant changes to the system of governance

No significant changes were made to the system of governance in the reporting period.

## Adequacy of the system of governance

ARAG SE's system of governance facilitates sound, prudent management of the insurance business and is commensurate with the nature, scope, and complexity of the Company's activities. It is regularly reviewed and modified, if required.

The Company has an appropriate organizational structure and an effective information system with clear lines of reporting. There are written guidelines covering the key elements of the system of governance and also detailed descriptions of the key functions, including the roles of the Management Board and Supervisory Board. In addition, the system of governance includes an appropriate remuneration system, business continuity plans, the implementation of the 'fit and proper' requirements, a risk management system (including the own risk and solvency assessment), an internal control system, the establishment of key functions, and rules governing outsourcing.

## B.2 Fit and Proper Requirements

Each company's Fit&Proper guidance specifies requirements, responsibilities, and processes to ensure that senior managers, Supervisory Board members, persons responsible for key functions, and their employees are always professionally and personally suitable ('fit and proper') for the roles concerned. The main points are set out below.

**Management Board members and CEOs of branches in the European Economic Area (EEA)**

To ensure they are fit for the role in terms of their professional suitability, members of the Management Board are required to have the professional qualifications, knowledge, and experience that ensures they can manage the Company soundly and prudently at all times. This calls for adequate theoretical and practical knowledge of insurance business and, in the case of managerial tasks, for sufficient leadership experience. Management Board members must be familiar with all of the material risks to which the Company is exposed and must be able to assess their potential impact.

Besides having the essential expertise in the individual areas for which each Management Board member is responsible, the Management Board as a whole must, as a minimum, have knowledge, skills, and experience pertaining to insurance and financial markets, business strategy and business models, the system of governance, financial analysis and actuarial analysis, the regulatory framework, and the regulatory requirements. In addition, each Management Board member must also have adequate knowledge of IT in view of the related risks and opportunities. The individual members of the Management Board are each expected to have not only specialist knowledge of the areas for which they are responsible but also adequate knowledge in all of the aforementioned areas. This is so that they can monitor each other's work.

Many years of experience working in the insurance industry or in another financial services company are crucial requirements for this role, as are managerial experience and the willingness to undertake continuing professional development.

The aforementioned qualifications apply analogously to the CEOs of the Company's branches in the EEA. Their knowledge must relate primarily to the particular branch for which they are responsible. They also need to know about the domestic market in which their branch operates.

A standard benchmark is used to assess whether Management Board members and CEOs of EEA branches are personally suitable for their role. Someone is assumed to be of good repute ('proper') if there is nothing to indicate the contrary. Someone is assumed not to be of good repute if, based on general life experience, their personal circumstances justify the assumption that these circumstances might negatively affect the careful and proper performance of their role or of the tasks assigned to them. The factors considered are personal behavior and business conduct with regard to criminal-law, financial, property-law, and regulatory aspects. The laws of both Germany and other jurisdictions are taken into account.

The Company's Supervisory Board assesses whether a potential Management Board member meets the 'fit and proper' requirements. This assessment is based not only on personal interviews but also on candidates' CVs – which should be informative and, in particular, contain details of all previous jobs – and associated documents. Good repute is verified by obtaining a criminal records check and an extract from the central register of companies and by having candidates complete, sign, and submit to the Company a form containing a personal declaration and details about their good repute. The Company reserves the right to request additional documents, if necessary.

The Company's Management Board assesses whether Branch CEOs meet the 'fit and proper' requirements. In other respects, the information pertaining to Management Board members applies analogously.

**Supervisory Board members**

The members of the Supervisory Board must have the necessary knowledge, skills, and experience to be able to perform their monitoring role. They must always have the expertise needed to adequately monitor and oversee the Management Board and to actively support the Company's growth. Each member must therefore understand the Company's business and be able to assess the relevant risks. They must also be familiar with the main statutory requirements applicable to the Company. The individual members are not required to have specialist knowledge. However, they must be capable of identifying when they need to take advice and of obtaining this advice. In any case, the expertise of the Supervisory Board as a whole must cover investments, underwriting, financial reporting, and auditing. Having the necessary professional suitability entails undertaking continuing professional development.

Before the Annual General Meeting appoints someone to the Supervisory Board, both the potential Supervisory Board member and the Supervisory Board that proposed the candidate are expected to make sure that the potential member is sufficiently qualified. The special requirements published by the German Federal Financial Supervisory Authority (BaFin) apply to employee representatives.

With regard to the assessment of whether someone is of good repute, the information pertaining to Management Board members/Branch CEOs applies analogously.

**Key functions**

The people responsible for key functions must have extensive knowledge and many years of experience of working in their particular field. All individuals in such roles must also be familiar with the legal parameters relevant to their position, the Company's organization and system of governance, and its business model. In addition, the people in key functions must have very good knowledge of the relevant operating processes, business systems, and the insurance industry.

The minimum initial requirements in terms of specialist expertise for any appointment to a role with internal responsibility for a key function are described below:

- Risk management: Actuarial or business management skills and qualifications or comparable academic qualifications are required. In particular, persons appointed to such roles are expected to have in-depth knowledge of relevant risk parameters, risk types, and valuation methods applicable to insurance business. Knowledge of all regulatory requirements pertaining to risk management is absolutely essential.
- Actuarial function: An individual responsible for this key function must have very well-honed actuarial and financial mathematics expertise together with a good level of business management knowledge. This expertise is normally acquired through a university degree in mathematics or through comparable training. The person concerned must also be a member of the German Actuarial Association (DAV), be able to provide evidence of equivalent professional status, or be prepared to combine work with study to obtain DAV membership or equivalent professional status.
- Compliance: The postholder must have a university degree in law or business management as well as specialist compliance expertise evidenced by professional development documentation or previous employment in this area of activity. They must continually keep abreast of statutory requirements and be able to demonstrate expertise, in particular, in the following areas: regulation, company law, and capital markets law, as well as competition and antitrust legislation.
- Internal audit: To ensure they are fit for the role in terms of professional suitability, the person responsible for this key function must hold a university degree in economics or business administration, or have undergone equivalent training, and must be able to demonstrate professional experience built up over a number of years. They must also have knowledge of the insurance industry, financial reporting, and business organization. In-depth know-how relating to auditing standards, auditing methodology, and audit-related software is a further prerequisite.

In all cases, people responsible for key functions must have a sufficient level of management experience for these positions. Because of the overlapping nature of many areas of the business, it is important that they have not only extensive knowledge of the work carried out in their own central department but also adequate knowledge of other departments with which they come into contact. It is essential that they are willing to undertake continuing professional development.

Job applicants must submit a detailed CV so that their career history and relevant previous experience can be examined. For both internal and external candidates, recruitment is based on a structured assessment process in which internal and external auditors assess their specialist and interdisciplinary qualifications in an assessment center. Each candidate's professional suitability is assessed individually, taking all the circumstances into consideration. The Company's Management Board is responsible for assessing whether the persons responsible for key functions meet the 'fit and proper' requirements.

If outsourcing officers are appointed, the same fundamental requirements apply. However, the critical factors here are the requirements profile and, particularly in the case of internal candidates, relevant prior experience.

With regard to the assessment of whether someone is of good repute, the information pertaining to Management Board members/Branch CEOs applies analogously.

It is the responsibility of the person responsible for a key function to assess the professional suitability of the employees working in the function or of candidates for relevant positions on the basis of suitable documentation or the day-to-day work carried out by the employee and to ensure that employees undertake regular professional development so that they always have the expertise they need to carry out their tasks. It is also the responsibility of employees themselves to keep up to date with the latest information. Professional development activities are documented.

With regard to the assessment of whether the people responsible for key functions and the employees working in these functions are of good repute, the same standard applies.

**Continuing professional development as an ongoing process**

The responsible departments in the Company check whether all of the aforementioned members of governing bodies and postholders undertake the continuing professional development necessary to satisfy the requirements of their position. The professional development activities undertaken are documented.

**Cause for reassessment**

The Company's Fit&Proper guidance defines circumstances that will result in a reassessment of whether someone is deemed 'fit and proper'.

The general rule regarding professional suitability is that the type and extent of any action to be taken by the Company depend on the supposed/actual shortcoming of the individual member of a governing body or holder of a key function. For example, they may be asked to undergo further training in a particular subject area. In extreme cases, however, the Company may consider removal from office or dismissal.

Doubts about personal suitability are investigated without delay. If there are circumstances that, based on general opinion, indicate that someone is not of good repute, the appropriate people within the Company will take immediate action. This action depends on the specific case in question and, above all, on the severity of the alleged or proven misconduct and may be temporary or permanent.

# B.3 Risk Management System Including the Own Risk and Solvency Assessment

The assumption of risk is the core business of ARAG as an insurer. This means that its activities aimed at achieving its strategic business objectives naturally involve taking on risks in order to achieve the desired success. To deal with these risks, ARAG has implemented a risk management system, the main elements of which are the risk strategy, a system of limits, a process for own risk and solvency assessment (ORSA), and the operational risk management process, comprising the identification, analysis, measurement, management, monitoring, and reporting of risk.

## Implementation of the risk management system

**Risk strategy**

The Management Board specifies the risk strategy on the basis of the business strategy. As well as providing the framework for how the risk management system is configured from an operational and organizational perspective, it also creates the basis for an appropriate risk culture within the Company. The objective of the risk strategy is to define the parameters for the operational and organizational structures of the risk management system. It is formulated in such a way that it provides a basis for the operational management of the risks. The risk strategy also contains rules on risk-bearing capacity in the form of coverage ratios that are determined by business policy requirements and are set by the Management Board based on its risk appetite. The risk-bearing capacity is used to define limits for operational risk management. The risk management processes are described in the guidance for the risk management system.

The risk strategy is reviewed at least once a year to ensure it is aligned with the business strategy and risk profile. It is adjusted if required. Adjustments to the strategy must be approved by the Management Board.

**Risk-bearing capacity and limit system**

The risk-bearing capacity describes the extent to which potential losses from the assumed risks can be offset by own funds. From a regulatory perspective, the Company has risk-bearing capacity if the solvency capital requirement does not exceed the value of eligible own funds, i.e. the regulatory coverage ratio is at least 100.0 percent. The minimum coverage ratio in the business policy expresses the maximum extent to which the Company is prepared to take on risk to achieve the objectives specified in the business strategy.

ARAG SE has set a minimum coverage ratio in the business policy both for the current time and for the period covered by the strategic planning. Due to ARAG SE's conservative risk and solvency policy, this ratio stands at 150.0 percent. The Company therefore aims to maintain a risk buffer that is higher than the regulatory requirement at all times.

ARAG SE's limit system provides an additional means of monitoring the risk-bearing capacity as it looks at the risk contribution from individual risk categories. Limits are set at the level of the risk categories (including sub-risks) based on the Management Board's risk appetite. The limit system must be strictly adhered to when the strategic asset allocation is set and in strategic planning. The utilization of the limits is calculated during the year so that an assessment can then be made as to whether further risks can be assumed, risks need to be reduced, or an adjustment to the limits is required. These calculations also take account of changes to own funds. A traffic light system is used, for both risk-bearing capacity and the limits at risk category level. The system enables ARAG to identify changes in the utilization of limits in good time and initiate corrective measures if necessary.

**Risk management function**

The Group Risk Management Central Department is responsible for implementing the risk management system. Group Risk Management is separate from the operational departments with profit-and-loss responsibility up to Management Board level. The Chief Risk Officer is responsible for the implementation of the risk management system in all Group companies. The Chief Risk Officer is a member of the Management Board of ARAG SE and responsible for Group Risk Management and Group Controlling. By reporting regularly to the Management Board, Group Risk Management ensures comprehensive transparency with regard to the risk position and any changes to the risk position. Group Risk Management is also responsible for refining the risk management system and for drawing up proposals for uniform standards to be applied throughout the Group. The remit of the central department also includes developing and operating models for determining risk-bearing capacity, the solvency capital requirement, and the allocation of solvency capital.

Operational management of risk is carried out by the managers and process owners in those departments where the risks occur. The roles and responsibilities of all the people involved in the process, such as members of the Management Board, managers, and local and central risk managers, are clearly defined and documented in the Company's risk management system guidelines.

## Risk management process

### Risk identification

The aim of risk identification is to identify the emergence of new risks or changes in existing risks at an early stage and to assess them using a standard procedure. For example, risks arising in connection with the development of new markets or the launch of new products are identified, analyzed, measured, and submitted to the Management Board for decision using appropriate cross-functional review processes, such as the new-product process. Corresponding processes have also been put in place for new investment products and reinsurance instruments. These procedures are also integrated into the existing limit and monitoring processes.

### Risk analysis

To ensure risks are managed appropriately, the influencing factors determining the relevant exposures on the Solvency II balance sheet are examined. These influencing factors are regularly validated to check that they are appropriate for the measurement of risk. Risks that are not explicitly quantified in the calculation of the solvency capital requirement (one-year horizon) are analyzed as part of the ORSA process.

### Risk assessment

All identified risks are regularly assessed using suitable methods and on the basis of systematically captured and continually updated data.

The key element in this process is the solvency capital requirement that is calculated for all downside risk. The purpose is to ensure that unexpected losses are covered. A partial internal model is used to quantify the solvency capital requirement. The model shows the potential loss from the risk exposures that, with a probability of 99.5 percent, will not be exceeded within a holding period of one year. This loss could arise, in particular, as a result of unfavorable movements affecting investments or as a result of unexpected developments in the insurance business. The methodology is regularly reviewed using suitable validation tests. Potential risks that are hard to quantify and so do not form part of the solvency capital requirement are measured as part of the ORSA process.

### Risk management

The Company's approach is to manage risk where it arises. Operational management of risk is thus carried out by the managers and process owners in those departments where the risks occur. Risk management consists of implementing measures to reduce, mitigate, transfer, and diversify risks.

**Risk monitoring and reporting**
Changes in the risks and adherence to the prescribed limits are examined as part of risk monitoring. The results are presented in the quarterly risk report. A risk/measures inventory is created for operational risks, also on a quarterly basis. The results of the ORSA process are documented in the annual ORSA report.

Unexpected or extreme events can also affect the risk profile. Ad hoc reports are submitted if this is the case.

## Own risk and solvency assessment (ORSA)

Insurance companies are required to carry out an own risk and solvency assessment (ORSA) at regular intervals. The ORSA primarily involves measuring all risks associated with a company's business activity and business strategy and determining/assessing the resulting capital requirements.

The annual review of the ORSA policy, which sets out the framework for each ORSA process, provides the starting point for all regular ORSA processes. A risk analysis of strategic positioning is then carried out; this takes the form of a bottom-up assessment by the managers involved.

Another analysis relates to the Solvency II balance sheet, which is material to calculating the solvency capital requirements and serves as the basis for projecting the balance sheet line items and related solvency capital requirements.

The risk model used is also evaluated, whereby the evaluation is primarily based on the results from validating the internally modeled components and from assessing the assumptions used in the standard formula.

The Management Board is responsible for the annual ORSA process and takes a lead role in ensuring it is carried out. Using suitable budgeted figures, the Solvency II balance sheet and the solvency capital requirements are projected beyond the strategic planning period. The results of the risk analysis and the projections are used to determine the overall solvency requirement.

All results are aggregated in the ORSA report and signed off by the Management Board. Once approved, the report is sent to all the relevant responsible parties so that they can incorporate the results into their decision-making processes.

The ORSA process is the link between the risk management system and the Company's capital management. The ORSA report describes the extent to which the Company can bear its risks over the planning horizon. The comparison between the overall solvency capital requirement and eligible own funds provides an indication of future coverage. The Management Board can then use this information to assess whether there may be a need for action regarding the level and structure of own funds and the structure of the risk profile. This may involve the implementation of measures related to capital management and/or adjustments to the risk positioning. In addition to workshops at which the Company's strategic positioning is discussed with the Management Board members, the Management Board also makes decisions on key elements of the ORSA process (e.g. stress tests and sensitivity analyses). The Management Board is thus always aware of, and able to influence, relevant developments affecting the risk profile. In the event of a significant change to the risk profile, the Management Board must trigger an ad hoc ORSA process.

## Governance of the partial internal model

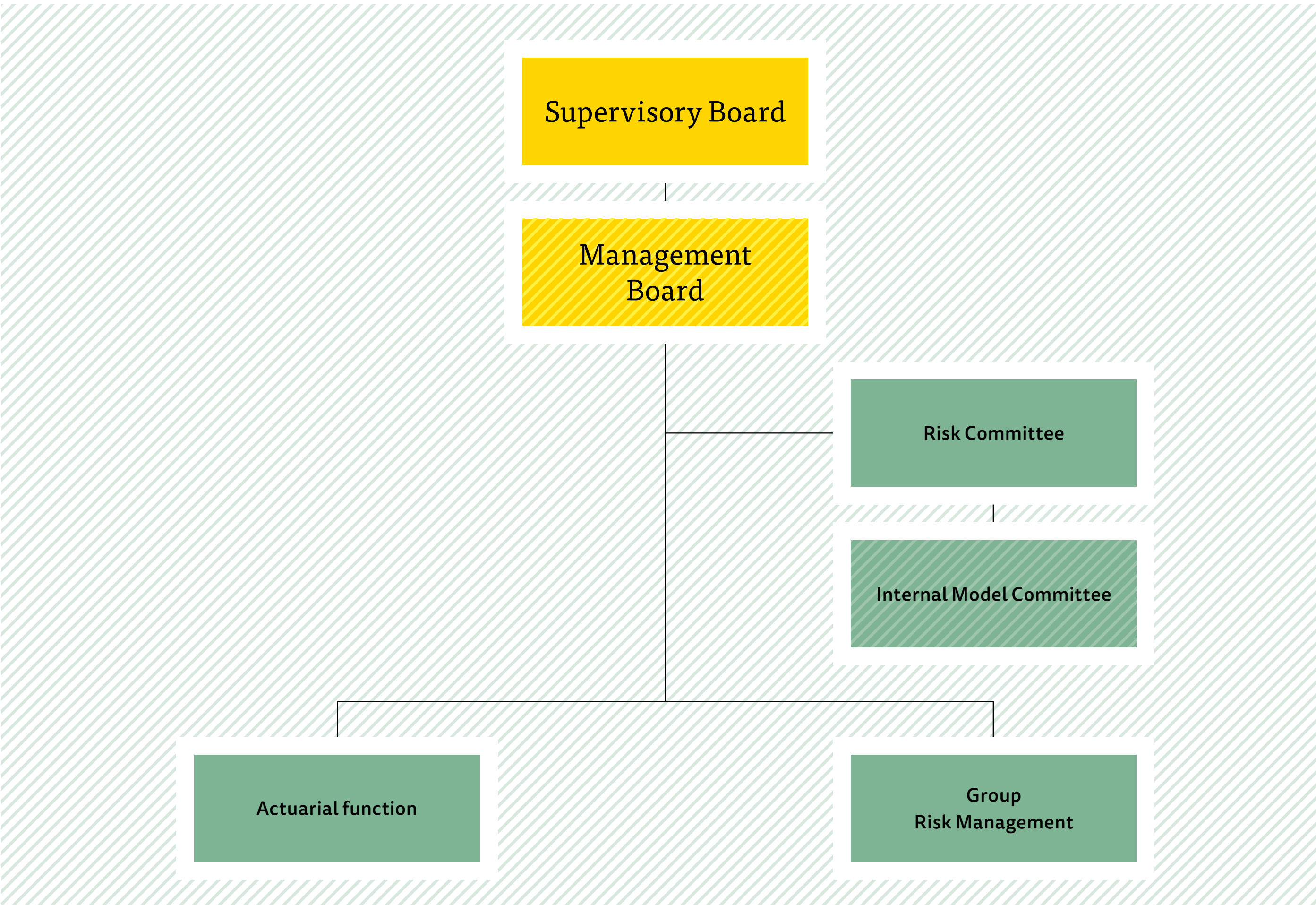
The Management Boards of the operating companies in the ARAG Group have formed a Risk Committee (RiCo) in order to incorporate the partial internal model into corporate management. The Risk Committee's main task is to assist the individual Management Boards with performing their risk management tasks in accordance with all statutory and internal requirements. In particular, this includes the establishment and monitoring of the groupwide risk management system. To ensure the regulatory requirements concerning the use of a partial internal model are met in day-to-day operations, the Risk Committee has set up a subcommittee, the Internal Model Committee. The Risk Committee and Internal Model Committee act in both an advisory capacity and a decision-making/monitoring capacity that are defined in internal policies and guidance.

A regular validation process ensures that ARAG SE's partial internal model is always effective and its specifications are appropriate. Responsibility for validating the model lies with the actuarial function. By assigning the task of model validation to this department, ARAG SE ensures the necessary independence of the validation process.

Validation involves using qualitative and quantitative processes to check whether the results and forecasts of the partial internal model are sufficiently accurate. Both the mathematical and statistical methods used in the model and the governance processes relating to ARAG SE's partial internal model are verified. At the end of the annual validation cycle, the actuarial function submits a comprehensive validation report to the ARAG SE Management Board, which evaluates whether the partial internal model is suitable for measuring solvency in accordance with Solvency II and can be used as a basis for management decisions and corporate management.

Should it be necessary to modify the model as a result of the validation or for other reasons, these changes are carried out using a process that is defined in the model modification policy. Firstly, in accordance with regulatory requirements, the Internal Model Committee classifies the required change as either a major or a minor model modification. Model enhancements are not the responsibility of the Internal Model Committee. In such cases, a process to obtain new authorization from BaFin must be initiated. Major model modifications must be approved in writing by the Management Board and then submitted to BaFin for authorization. Minor model modifications are approved and initiated by the Risk Committee on the recommendation of the Internal Model Committee. All approved changes must be implemented without delay. BaFin is informed in writing on a quarterly basis of any minor model modifications that have been applied. The actuarial function carries out an ad hoc validation process to analyze major model modifications. BaFin is informed in good time if there are any plans for major model modifications. This ensures that the internal model is accurately tailored to the Company's circumstances at all times.

The Risk Committee's position within the organization



# B.4 Internal Control System

## Internal control system

### Definition and tasks

The ARAG Group defines the internal control system (ICS) as follows: "The internal control system refers to all control and monitoring mechanisms as well as other measures that help to support the effectiveness and profitability of business activities and to identify and minimize risk at an early stage. It also ensures compliance with the applicable laws and regulations, all regulatory requirements, and internal rules."

The ICS has a consistent structure throughout the Group, ensuring that the connected systems and reports in the Group can be verified.

It is based on the principles, functions, processes, measures, and policies implemented by the Management Board and on statutory and regulatory requirements that ensure the decisions of the Management Board are implemented operationally. The ARAG Group pursues four main objectives with the ICS:

- The ICS is designed to create and maintain compliance with an organizational framework that ensures that statutory and, in particular, regulatory requirements are implemented.
- The ICS is designed to help with identifying and reducing risks that may jeopardize the continued independence of the ARAG Group.
- The ICS is designed to create the regulatory environment required for use of the partial internal model under Solvency II.
- Thanks to a functioning operational and organizational structure, the ICS contributes to effective and profitable business activities.

An organizational structure that is transparent and appropriate to the Company's risk profile requires tasks and responsibilities to be clearly defined and delineated. Clear rules have to be imposed about who in the Company is responsible for tasks and who is responsible for signing off decisions. Above all, conflicts of interest between the establishment of risk exposures and the monitoring and control of these exposures must be avoided.

### Organizational structure of the ICS

The Management Board occupies a special position within the organizational structure because it is responsible for ensuring an orderly and effective system of governance and thus for ensuring that the Company's risk management and its ICS are appropriate and effective. This means that the Management Board is directly responsible for the ARAG Group's ICS. Vis-à-vis third parties, it is responsible for the appropriate specification of the ICS, i.e. its design, establishment, integrity, and monitoring as well as ongoing adjustments and refinements.

The Management Board has delegated the day-to-day running of the entire ICS to the responsible managers in the ARAG Group, i.e. the Senior Vice Presidents (in Germany) and Branch CEOs (internationally). The ARAG Group structures its ICS in accordance with the 'three lines of defense' model:

**First line of defense** The first line of defense is formed by all employees and managers in operational roles. Responsibility for risks and processes lies with the Senior Vice Presidents and Branch CEOs. If an organizational unit does not have a Senior Vice President, responsibility lies with the Vice President. The people in this first line are directly responsible for the risks and processes in their departments. In the risk control process, the risk managers are responsible for identifying and evaluating the risks in their area.

**Second line of defense** The monitoring of the business and central units is carried out by various interdisciplinary functions (Group Controlling Central Department, Group Legal/Compliance Central Department, Group Risk Management Central Department, and the actuarial function) that are also part of the organizational structure of the ICS. They specify standards for the design and monitoring of controls and for the handling of risk.

**Third line of defense** The Group Audit Central Department conducts internal audits of the functions in the first and second lines of defense within the ARAG Group. The Group Audit Central Department is also the internal auditor for the Group companies that have contractually appointed it to this role.

### Operational structure of the ICS

As part of the ICS's operational structure, all activities, responsibilities, participating functions, and verification procedures for the processes relevant to the ICS are documented using a process and control system in the ADONIS NP tool. This provides an overview of the process architecture within the ARAG Group. An annual reapproval procedure ensures that all process documentation is up to date, accurate, and complete. Processes are classified as being relevant to the ICS on the basis of the following criteria:

- Processes that, if not implemented, will jeopardize the achievement of the ARAG Group's targets (e.g. due to high financial losses, significant loss of reputation, sanctions imposed by the supervisory authority)
- Frequent/high-volume processes (particularly those tying up a large amount of employee capacity)
- Processes relating to a department's main tasks
- Processes that have to be documented by law

## Compliance

Because of their intangible nature, insurance products require customers to place a great deal of trust in their insurance company. The leap of faith that customers have to make is based on the expectation that ARAG SE as an insurance company will comply with the contractual arrangements and legal requirements and, moreover, will measure itself by its own high standards. Customers also need to be able to rely on the Company having adequate and systematic management, control, and sanctioning mechanisms in place to ensure that it lives up to its value proposition. The ARAG Group's compliance management system therefore focuses on fulfilling these objectives.

At Group level, the compliance function is part of the Group Legal/Compliance Central Department and is the responsibility of the Speaker of the Management Board of ARAG SE. Although the Compliance Officer submits reports to the Management Board as a whole, this role is directly and exclusively accountable to the Speaker of the Management Board of ARAG SE.

The risk management, compliance, and internal audit functions regularly share information with each other. This helps to ensure a risk-appropriate compliance structure, avoid duplication of work, and take account of the findings of the other functions when action is to be taken. Furthermore, the compliance function is regularly audited by the internal audit function.

At Group level, there is also a Compliance Steering Group to which the managers in the following areas belong (or can be involved in if required):

- Chief Information Security Officer (optional)
- Internal audit
- IT Security (optional)
- Corporate Communications (optional)
- Risk management
- Tax Department (optional)

This committee holds interdisciplinary discussions on compliance-relevant matters and coordinates management measures. If required, the steering group can be expanded to include other managers or reduced in size to make it more efficient.

# B.5 Internal Audit Function

The Group Internal Audit Central Department is an instrument of the Management Board, to which it is directly accountable and to which it reports. It is assigned to the Management Board member responsible for Human Resources/Group Internal Audit at ARAG SE, to whom responsibility for Group Audit is assigned under the schedule of responsibilities. Group Audit is bound only by the instructions of the Management Board.

The Group Internal Audit Central Department assists the Management Board of ARAG SE with corporate management and helps it to fulfill its managerial and monitoring duties. This department ensures that auditing activities are carried out professionally and in a manner appropriate to the risk situation, in relation to both the Company's targets and its operations.

Following the orders issued by the Management Board, Group Internal Audit examines the operational and organizational structure as well as the ICS for all operating and business processes from a risk perspective.

The Management Board ensures that internal audit carries out its duties autonomously and independently of the units that it audits, particularly in respect of its audit planning, audit procedures, and evaluation of audit results.

To ensure that it is able to fulfill its role and responsibilities properly, the Group Internal Audit Central Department does not get involved in operational processes. Its employees must not be assigned tasks that would conflict with the central department's independence within the ARAG Group, nor are internal audit employees allowed to carry out non-auditing work or operational activities. Group Internal Audit itself does not have any authority to issue instructions to employees in other departments.

To avoid conflicts of interest, internal audit does not perform any audit procedures relating to projects. Instead, its involvement in projects is limited to an advisory role, in particular regarding the design of the ICS. It does not sign off the results of (sub)projects. This safeguards its independence and ensures it does not have any responsibility for the outcome of the projects in question.

## B.6 Actuarial Function

The actuarial function is directly accountable to the member of the Management Board of ARAG SE responsible for Group Risk Management and Group Controlling. It acts independently of the units at ARAG SE with profit-and-loss responsibility. Its core tasks include ensuring that the methods, models, and assumptions used to calculate the technical provisions are appropriate. In addition, it ensures the appropriateness of ARAG SE's underwriting, contracting, and reinsurance policies. The actuarial function has also been assigned responsibility for validating ARAG SE's partial internal model, so it plays an important part in implementing the risk management system.

To ensure that they are able to fulfill the tasks assigned to the actuarial function adequately, the head and employees of the actuarial function must be able to communicate with all relevant employees at ARAG SE independently. They therefore have unrestricted access to the information that they need to complete their tasks and are notified of relevant matters promptly, including on an ad hoc basis if necessary. Each year, the actuarial function submits a report to the Management Board containing information about the results of its work over the year. Above all, this report provides evidence that the appropriateness of ARAG SE's technical provisions, underwriting and contracting policies, and reinsurance agreements is assured. Besides this general reporting channel, the head of the actuarial function is also able to report directly to the Management Board and Supervisory Board of ARAG SE if necessary.

## B.7 Outsourcing

In accordance with section 7 no. 2 of the German Insurance Supervision Act (VAG), ARAG defines any kind of outsourcing as "an agreement in any form between an insurance company and a service provider, on the basis of which the service provider carries out a process, service, or task directly or by outsourcing it to another company that the insurance company would otherwise carry out itself; the service provider may or may not be subject to regulatory supervision". This includes services previously carried out by the insurance company itself and services that the insurance company could carry out itself.

Apart from the Management Board's primary tasks, in particular ensuring a proper system of governance and making strategic decisions, all activities can in principle be outsourced. Third parties can only be involved with the Management Board in an advisory or support capacity.

Every outsourcing project must be assessed to establish whether it involves the outsourcing of a function or typical insurance activity subject to the regulatory outsourcing requirements. Section 32 VAG specifies that this includes functions (actuarial function, compliance, risk management, and internal audit) and insurance activities (e.g. policy management and claims handling) subject to enhanced requirements where the insurance activities concerned are classified as important (e.g. due to the scope of the outsourced activity). The outsourcing of functions is always classified as important. If a project is to be classified as 'outsourcing', there must always be a relationship between the outsourced function or activity and the insurance business. This applies regardless of whether the service provider is an external company or a Group company. Where outsourcing within the Group takes place, no less care is taken in respect of the outsourced projects and their monitoring and control, for example by the service provider's dedicated points of contact. Outsourcing within the Group may justify a more flexible approach in individual cases if this involves fewer risks than with outsourcing to an external company. Nevertheless, it is still essential that service activities in the individual Group companies are adequately separated from an organizational perspective.

The outsourcing of a key function represents a special situation, however. In this case, the Management Board has to appoint an outsourcing officer for the outsourced function who is responsible for the proper performance of the key function by the service provider and has to meet the 'fit and proper' requirements because of their monitoring role.

In view of the legal requirements, an internal policy is in effect that sets out minimum criteria that must be met when considering outsourcing projects. It also contains rules regarding the assignment of responsibilities, authorization levels, and accountability. The principle of proportionality must be applied for each project. This means there are no fixed scopes of assessment. Instead, the requirements have to be proportionate to the risks. In general, ARAG SE ensures that outsourcing never has an adverse impact on the proper performance of the outsourced functions or insurance activities, on the Management Board's ability to manage and control them, or on the supervisory authority's ability to verify and control them. It also ensures that the service provider can be monitored at any time by the supervisory authority.

ARAG SE does not outsource the key functions of risk management, compliance, internal audit, and the actuarial function. All four key functions are carried out independently of each other within the Company.

Use was made in the reporting year of the option of outsourcing insurance activities in compliance with all legal requirements. However, these were exclusively instances of partial outsourcing that did not affect the internal decision-making powers in the individual units.

## B.8 Any Other Information

The preceding chapters contain all of the important information about the system of governance.

# C. Risk Profile

The following chapter describes the risk profile of ARAG SE, which results from the risks inherent in the business strategy and in the business itself.

There are no material risks arising from off-balance-sheet exposures, nor are any risks transferred to special-purpose entities.

The global economy is currently suffering under the combination of the still tangible fallout from the COVID-19 pandemic, and the effects of the Russian Federation's war of aggression in Ukraine. These could have an impact on the Company's risk profile. At present, there has not been any significant change to the Company's risk profile. Its capacity to assume risk has been maintained in full. In addition to the quarterly risk calculations, this has been demonstrated by regular approximate calculations of own funds and solvency capital requirements.

Several scenario analyses were carried out in order to assess the potential impact of the geopolitical situation on the investment portfolio over the planning period. The outcome in all scenarios showed that the solvency capital requirement is comfortably covered.

Sustainability risks are of growing importance and thus form part of the risk management process, with climate change risks being a particular focus at present. Although climate change risks play a minor role in legal insurance business at present, they could give rise to risks for ARAG SE, particularly in relation to its investments. In the reporting year, the Company performed scenario analyses in this context.

## C.1 Underwriting Risk

**Risk exposure**

Underwriting risk is the risk of a loss from an adverse change in insurance claims. It can arise from pricing that is subsequently found to be inadequate or from provisioning assumptions that require adjustment. These losses result from the following risk categories:

- Premium/reserve risk: fluctuations in the timing, frequency, and severity of insured events and in the duration of claims settlement and the amount involved
- Catastrophe and accumulation risk: significant uncertainties regarding the volume or frequency of claims arising from extreme events
- Lapse risk: incidence of customers exiting their contracts early that is above the expected lapse rate

The solvency capital requirement for underwriting risk went down from €179,071 thousand as of December 31, 2021 to €167,736 thousand as of December 31, 2022, a decrease of €11,335 thousand or 6.3 percent. The biggest sub-risks were accumulation risk, premium risk, and reserve risk.

**Risk measurement**

Risks are measured with an internal model. Using simulations, possible losses and adverse changes in liabilities that could occur within a one-year observation period are forecast. The value of the risk equates to the 99.5 percent quantile. Each risk is measured separately. For premium and reserve risk, specified criteria are used to aggregate historical losses into groups of risks sharing similar characteristics. These are then used for simulations of future claims and/or required additions to reserves. Likewise, catastrophe risk and accumulation risk are assessed by simulating potential accumulation losses in the legal insurance business. Lapse risk is calculated on the basis of historical data. The actual underwriting risk arises from the aggregation of the individual risks, taking diversification effects into account.

There were no significant changes in the risk measurement methodology in the period under review.

**Risk concentration**

The Company focuses on small-scale insurance business for private customers and small businesses. It has a large portfolio of products and does not underwrite serious or industry risks. This should avoid concentrations of risk. In individual cases, unfavorable timing in the occurrence of claims could lead to a concentration of catastrophe risk or accumulation risk. The limit system ensures that the underwriting risk as a whole and its sub-risks remain limited in the Company's risk profile.

### Risk mitigation

The Company uses outward reinsurance in the form of an excess of loss treaty as a measure to restrict the risks.

### Risk sensitivity

In the reporting period, various sensitivity analyses were carried out as of June 30, 2022 as part of the own risk and solvency assessment (ORSA) process. A baseline scenario, which reflected the best estimates for actuarial parameters, was produced first. Then the impact of the claims ratio and cost ratio rising by up to 20.0 percent in 2023 was examined. Taking the loss transferred from ARAG Allgemeine Versicherungs-AG into account, this showed that these changes would cause the coverage ratio, compared with the best estimate, to decrease by no more than 31.1 percentage points to 302.1 percent. This ratio is still well above the minimum coverage ratio of 150.0 percent specified in the business policy.

## C.2 Market Risk

### Risk exposure

Market risk is the risk of adverse changes to market prices of assets, liabilities, and financial instruments. The risk arises directly or indirectly from the following sub-risks:

- Interest-rate risk: changes in the term structure or volatility of interest rates
- Equity risk (including equity investments): changes in the level or volatility of the market prices of equities
- Property risk: changes in the level or volatility of the market prices of real estate
- Credit risk (attaching to investments): changes resulting from investments in default (default risk), changes in the level or volatility of credit spreads over the risk-free interest-rate term structure (spread risk), and changes resulting from the migration of investments to different credit ratings (migration risk)
- Currency risk: changes in the level or volatility of exchange rates

The solvency capital requirement for market risk went down from €515,683 thousand as of December 31, 2021 to €500,240 thousand as of December 31, 2022, a fall of €15,443 thousand or 3.0 percent. The biggest sub-risks were equity investment risk and credit risk (attaching to investments).

### Risk measurement

Risks are measured with an internal model. An economic scenario generator is used to simulate capital market scenarios looking at factors such as interest rates, share prices, real estate prices, credit spreads, credit ratings/defaults, and exchange rates. These risk factors are used to determine the possible fair values of investments in one year's time.

The market risk itself – when all risk factors are considered simultaneously – equates to the difference between the performance expectation and the 99.5 percent quantile of the distribution, taking diversification effects into account.

There were no significant changes in the risk measurement methodology in the period under review.

**Risk concentration**

The Company applies the prudent person principle to its investments. This requires an appropriate diversification of the portfolio, as a result of which risk concentrations are generally restricted. The Company's limit system takes into account the individual risk profile of the investment and prevents a concentration of the sub-risks, which the Company would not be able to bear. The actuarial function has classified concentration risk as not material and monitors it regularly. The limit system also ensures that market risk as a whole does not exceed an undesirable level in the risk profile of the Company.

**Risk mitigation**

The regulatory requirements for implementing the prudent person principle form the framework for the risk mitigation measures. At strategic level, risk is limited by virtue of the fact that market risk limits are taken into account when determining the strategic asset allocation each year. Adherence to the limits is reviewed every quarter. A focus on a target portfolio that is steady over a number of years and an annual review of the asset/liability management (ALM) situation also ensure that these risk mitigation measures remain effective over the long term.

Operational measures to mitigate risk are set out in the investment guidelines. These specify that derivatives can only be used to hedge market risk.

**Risk sensitivity**

The impact of the geopolitical situation on the capital markets was examined as part of the ORSA process. A baseline scenario as of June 30, 2022, which reflected the best estimates for the relevant parameters, such as capital markets and costs, was produced first. Compared with the baseline scenario, the 'investment and geopolitical' scenario assumed a high level of inflation for an extended period, a delayed interest-rate rise, and knock-on effects on the capital markets. Taking the profit-and-loss transfer agreement that is in place for 2023 into account, this showed that these changes would cause the coverage ratio, compared with the baseline scenario, to decrease by 19.6 percentage points to 313.5 percent. This ratio is still well above the minimum coverage ratio of 150.0 percent specified in the business policy.

Another analysis carried out as part of the ORSA process examined the impact of the long-term risks associated with climate change on the Company's investment portfolio. These climate risks relate, for example, to costs resulting from political decisions on carbon emissions and costs resulting from extreme weather events. At the same time, profits can be made due to technological advances. The analysis was undertaken for several climate scenarios and took into account the pace of climate change and its relationship with greenhouse gas emissions and the global business processes that lead to those emissions. The analyses performed showed that the potential loss of own funds from climate change would be tangible but would not endanger ARAG SE's risk-bearing capacity.

## C.3 Credit Risk

**Risk exposure**

While counterparty default risk attaching to investments is determined as part of market risk, counterparty default risk in the insurance business is treated separately. Counterparty default risk in the insurance business largely arises in connection with receivables from reinsurers and receivables from policyholders/insurance brokers. It is the downside risk arising from the unexpected default of counterparties and debtors during the next twelve months.

The solvency capital requirement for credit risk went up from €23,419 thousand as of December 31, 2021 to €24,572 thousand as of December 31, 2022, an increase of €1,153 thousand.

**Risk measurement**

Risk is measured using the partial internal model and components of the standardized approach. The risk of default on receivables from reinsurers is measured on the basis of the information available and proportionality considerations. The reinsurers' individual credit ratings are explicitly used.

To measure the risk of default on receivables from policyholders and insurance brokers, a constant factor is applied to the fair value of the relevant exposures on the Solvency II balance sheet.

There were no significant changes in the risk measurement methodology in the period under review.

**Risk concentration**

There was no material concentration risk.

**Risk mitigation**

Default risk in connection with reinsurance treaties is reduced in accordance with the reinsurance strategy, which is reviewed at regular intervals.

As regards counterparty default risk arising from the insurance business, receivables from policyholders are managed by means of an automated reminder and dunning process. Outstanding receivables from insurance brokers are offset.

**Risk sensitivity**
A separate stress test was not carried out for credit risk because of the relatively minor significance of credit risk in the overall risk profile of the Company.

## C.4 Liquidity Risk

**Risk exposure**
Liquidity risk is the risk that insurance companies are unable to realize investments and other assets in order to settle their financial obligations when they fall due.

Liquidity risk is therefore a derived risk: It is a type of investment risk (assets are not liquid) and a type of underwriting risk (insurance benefits due for payment may exceed available liquidity).

**Risk measurement**
Liquidity risk is measured by calculating the monthly excess liquidity cover or liquidity shortfall on a rolling basis. Liquidity planning is updated regularly so that ARAG has early warning of whether it will require liquidity in the coming months. ALM is used to determine the liquidity requirement over the medium to long term. There were no significant changes in the risk measurement methodology in the period under review.

**Risk concentration**
A risk concentration could arise if the Company had to simultaneously settle an increased number of liabilities because of disasters or accumulation events. To ensure the Company can always meet its liabilities when due, most investments are made in the 'available-for-sale at short notice' liquidity class. Tight counterparty and issuer limits also restrict the liquidity risk for individual issuers, such that a concentration of liquidity risk is unlikely.

**Risk mitigation**
The liquidity planning is updated regularly so that liquidity can be managed. The Company thus has early warning of whether it will require liquidity in the coming months. If it becomes apparent that selling securities is also becoming more difficult, the Company responds by increasing the liquidity that it holds as a safety buffer. Further protection is provided by the current investment policy, which stipulates diversification across a broad range of security types and issuers.

A medium- to long-term liquidity summary was prepared as part of ALM.

**Risk sensitivity**
Sensitivity analyses were carried out as part of ALM in order to ensure appropriate liquidity levels even in the event of a business downturn. This involved examining how constraints on the ability to liquidate certain asset classes and any potential markdown would impact on the realizable market values of fungible investments. Liquidity was found to be sufficient in all of the analyses carried out.

**Profits contained in future premiums**
The expected profits included in future premiums represent a very illiquid component of basic own funds. These profits are therefore associated with a potential liquidity risk. Even if the expected profits contained in future premiums are not factored into basic own funds, the resulting liquidity risk is still classified as very low because of the significant excess cover. The expected profits included in future premiums amount to €137,998 thousand.

## C.5 Operational Risk

**Risk exposure**
Operational risk is the downside risk arising from inadequate or failed internal processes or systems, employee misconduct, or unexpected external events that disrupt or even prevent business operations. It also includes losses from cyber risk. In addition, operational risk encompasses legal risk but does not include reputational risk or risks arising from strategic decisions.

The solvency capital requirement for operational risk went up from €32,463 thousand as of December 31, 2021 to €34,724 thousand as of December 31, 2022, an increase of €2,260 thousand or 7.0 percent.

**Risk measurement**
The Company uses the standard formula to determine the solvency capital requirement. Measurement for operational purposes is carried out on the basis of two dimensions: probability of occurrence and impact. The probability of occurrence describes the likelihood that an operational risk will materialize within a defined period. The second dimension describes the potential impact of the occurrence of an operational risk and is measured in quantitative or qualitative terms. The gross and net values are recorded for each dimension in this context. The gross values are the values before implementation of possible measures to mitigate the risk; the net values are the values after implementation of the chosen measures. As risks are measured using subjective estimates carried out by experts, a loss event database is used as an additional instrument to help determine the

values. This contains data on all loss events that have occurred and their actual impact. Material operational risks are also included in the strategic positioning risk analysis in the ORSA process.

There were no significant changes in the risk measurement methodology in the period under review.

**Risk concentration**

The Company does not believe it is exposed to any operational risk that would lead to an unsustainable loss. There are contingency plans in place, for example in the areas of business continuity management and cybersecurity, for risks that could have an impact on the entire Company.

**Risk mitigation**

Specific measures are agreed upon and carried out at operational level in order to reduce the identified risks. The possible strategies for dealing with a risk include:

- Accept: No measures to reduce the effects are possible or considered necessary.
- Mitigate: The effects are mitigated by taking suitable measures.
- Transfer: The effects are transferred to another risk carrier, e.g. by taking out insurance.
- Avoid: Measures are taken to avoid the risk, even as far as not carrying out the activities that give rise to the risk.

With regard to cyber risk, these strategies include information technology security measures and insurance solutions. Additional measures have been taken to counter the potential impact from a cyberattack. These include, for example, the definition of appropriate countermeasures as part of a business continuity management system. The implementation of each strategy used is continuously monitored to ensure the measures taken to reduce the risk remain effective on an ongoing basis.

In light of the current uncertainties surrounding the security of the energy supply, the possibility of an electricity outage for an extended period cannot be ruled out. The steps required to mitigate the immediate impact on operations are documented in business continuity manuals. ARAG has taken out business interruption insurance to limit the financial consequences.

**Risk sensitivity**

A separate stress test was not carried out for operational risk because of the specific nature of this type of risk in terms of the measurement methodology used for solvency and management purposes.

## C.6 Other Material Risks

Strategic risks, reputational risks, and emerging risks are further risks specified in the Company's risk strategy. These risks are measured during the annual ORSA process. The risk categories described below do not encompass any risks to the Company's continued existence as a going concern.

**Strategic risks**
Strategic risks are the risks that arise from strategic business decisions. They also include the risk of failure to adapt business decisions in line with changes in the economic environment. Strategic risks are normally risks that occur in connection with other risks.

**Reputational risks**
Reputational risks are the risk of potential damage to the reputation of the Company arising from a negative perception of the Company among the general public (for example, among customers, business partners, authorities). Like strategic risks, reputational risks are normally risks that occur in connection with other risks.

**Emerging risks**
Emerging risks are risks that arise from changes in the socio-political or scientific/technical environment and that could have an impact on the Company's portfolio that is as yet unrecorded or unknown. The very nature of these risks means that there is a very high degree of uncertainty as to the probability of occurrence and the extent of potential losses.

## C.7 Any Other Information

The preceding chapters contain all of the important information about the risk profile.

# D. Valuation for Solvency Purposes



The following chapters explain how assets, technical provisions, and other liabilities are valued for solvency purposes (Solvency II or SII). The methods prescribed by the German Commercial Code (HGB) for the valuation of individual items are addressed in connection with the explanation of the valuation differences.

The table below provides an initial overview:

**Total assets, technical provisions, and other liabilities**

| *(€'000)* | **SII as of Dec. 31, 2022** | **HGB as of Dec. 31, 2022** | **Valuation difference** | **SII as of Dec. 31, 2021** | **SII change** |
|---|---|---|---|---|---|
| Assets | 3,279,713 | 2,632,497 | 647,216 | 3,484,202 | – 204,489 |
| Technical provisions | 983,408 | 1,681,849 | – 698,441 | 1,018,092 | – 34,684 |
| Other liabilities | 510,292 | 438,436 | 71,856 | 623,295 | – 113,003 |
| **Excess of assets over liabilities [1)]** | **1,786,012** | **512,212** | **1,273,800** | **1,842,815** | **– 56,803** |

1) For 2021, this item also includes the subordinated liabilities classified as own funds.

## Key valuation bases for the economic values

The valuation of the Solvency II balance sheet requires a holistic, economic, and market-consistent approach. Financial assets and liabilities are therefore reported at market value (economic value).

In accordance with article 10 of Delegated Regulation (EU) 2015/35 (the Delegated Regulation), the economic values are determined using the following valuation hierarchy:

- Mark-to-market approach **(level 1)**
- Marking-to-market approach **(level 2)**
- Mark-to-model approach **(level 3)**

If, as of the reporting date, a price is quoted in an active market for the assets or liabilities to be valued (standardized approach), this is used for the valuation **(level 1)**. Where it is not possible to determine the price with the aid of an active market, an economic value is determined on the basis of similar assets, with any necessary adjustments **(level 2)**. Alternative valuation methods are used if it is not possible to determine an economic value for assets and liabilities using either the mark-to-market approach or the marking-to-market approach **(level 3)**. Taking the nominal amount, amortized cost, or value derived from the adjusted equity method as the economic value represents a potential simplification. A representation of the main items aggregated according to the valuation hierarchy is shown in chapter D.4 'Alternative Methods for Valuation'.

## Materiality and proportionality approach

This chapter outlines the key items under assets, technical provisions, and other liabilities where the valuation using the hierarchy and simplification method is considered material. The following distinctions are made:

- The explanation of the **main items** includes a description of how they are valued in accordance with Solvency II. Supplementary information on the aforementioned hierarchy method is provided on a case-by-case basis in the descriptions of how individual items are valued. Significant year-on-year changes in the SII value are also reported.
- Brief explanations are provided for **other items that appear on the balance sheet** but that are not material for the Company based on their valuation under Solvency II. No details are provided on year-on-year changes in the SII value as these are categorized as immaterial.
- Unlike in the cases above, no further descriptions are provided for all **other items** that are not recognized under Solvency II or did not exist as of the reporting date. These are shown with a zero value in the overview tables provided at the beginning of each subchapter.

## Material changes compared with the prior year

In the reporting period, there were no changes in the valuation bases (including any estimates) described below that are used for the Solvency II balance sheet.

All quantitative disclosures can be found together with the quantitative reporting form in the Appendix.

# D.1 Assets

## Comparison between the Solvency II balance sheet and HGB balance sheet: Assets

### Assets as of December 31, 2022

| *(€'000)* | Solvency II as of Dec. 31, 2022 | HGB as of Dec. 31, 2022 | Valuation difference | Solvency II as of Dec. 31, 2021 | SII change |
|---|---|---|---|---|---|
| **Goodwill** | **0** | **0** | **0** | **0** | **0** |
| **Deferred acquisition costs** | **0** | **0** | **0** | **0** | **0** |
| **Intangible assets** | **0** | **3,035** | **-3,035** | **0** | **0** |
| **Deferred tax assets** | **0** | **0** | **0** | **0** | **0** |
| **Pension benefit surplus** | **0** | **0** | **0** | **0** | **0** |
| **Property, plant & equipment held for own use** | **53,756** | **41,951** | **11,805** | **47,974** | **5,781** |
| **Investments** | | | | | |
| Property (other than for own use) | 33,395 | 19,084 | 14,311 | 35,808 | -2,413 |
| Holdings in related undertakings, including participations | 1,199,641 | 446,183 | 753,458 | 1,248,840 | -49,199 |
| Equities | 734 | 719 | 14 | 747 | -13 |
| Bonds | 1,025,762 | 1,131,887 | -106,125 | 1,103,925 | -78,164 |
| Collective investment undertakings | 609,625 | 632,175 | -22,549 | 711,084 | -101,459 |
| Derivatives | 0 | 0 | 0 | 0 | 0 |
| Deposits other than cash equivalents | 57,044 | 57,044 | 0 | 28,230 | 28,814 |
| Other investments | 0 | 0 | 0 | 16 | -16 |
| | **2,926,201** | **2,287,092** | **639,109** | **3,128,650** | **-202,449** |
| **Assets held for index-linked and unit-linked contracts** | **0** | **0** | **0** | **0** | **0** |
| **Loans and mortgages** | **2,293** | **2,293** | **0** | **2,551** | **-258** |
| **Reinsurance recoverables** | **470** | **1,195** | **-725** | **217** | **253** |
| **Deposits to cedants** | **65,224** | **65,201** | **23** | **68,588** | **-3,364** |
| **Insurance and intermediaries receivables** | **118,020** | **117,980** | **40** | **109,376** | **8,644** |
| **Reinsurance receivables** | **16** | **16** | **0** | **19** | **-3** |
| **Receivables (trade, not insurance)** | **45,781** | **45,781** | **0** | **46,739** | **-958** |
| **Own shares (held directly)** | **0** | **0** | **0** | **0** | **0** |
| **Amounts due in respect of own fund items or initial fund called up but not yet paid in** | **0** | **0** | **0** | **0** | **0** |
| **Cash and cash equivalents** | **59,638** | **59,638** | **0** | **71,943** | **-12,305** |
| **Any other assets, not elsewhere shown** | **8,315** | **8,315** | **0** | **8,145** | **170** |
| **Total assets** | **3,279,713** | **2,632,497** | **647,216** | **3,484,202** | **-204,489** |

## Deferred tax assets

International Accounting Standard (IAS) 12 requires deferred tax assets to be set up for temporary differences between the Solvency II balance sheet and the tax base that result from the recognition and valuation of assets and liabilities.

In accordance with the option to net deferred tax assets and deferred tax liabilities under the guidelines of the European Insurance and Occupational Pensions Authority (EIOPA) on recognition and valuation of assets and liabilities (guideline 9, section 1.27), a deferred tax liability of €130,706 thousand was reported and is explained in chapter D.3 'Other Liabilities'.

Under the German Commercial Code (HGB), the excess deferred tax assets after netting are not recognized because the option available under section 274 (1) sentence 2 HGB has not been applied. The way in which deferred taxes are recognized under Solvency II is therefore no different than under HGB.

## Property, plant & equipment held for own use

The balance sheet line item 'Property, plant & equipment held for own use' comprises material property, plant, and equipment that is used by the Company for its own purposes and on a permanent basis.

Under Solvency II, fair values are used to determine the value of **property held for own use**. This differs from the approach taken under HGB, which is to value it at cost less depreciation. The value of the land is based on the prevailing standard land values. The value of the buildings is calculated using the income capitalization approach.

The treatment of **plant and equipment held for own use** for solvency purposes is no different from its treatment under HGB for reasons of materiality, low risk, and the disproportionate time, effort, and expense that would otherwise be involved.

It is recognized at amortized cost on the HGB balance sheet and subsequently depreciated on a straight-line basis over the standard operating useful life.

## Property (other than for own use)

This item includes all property that is held as a financial investment and is thus not intended for own use as well as buildings under construction that are earmarked for use by third parties after completion.

Fair values are used for Solvency II purposes. The economic values are revised annually by means of an internal assessment that takes the form of an update to the most recent external appraisal. The internal valuations are augmented by external appraisals at intervals of between three and five years. In the event of a change in the portfolio, the valuation is carried out on the basis of an external appraisal. The value of the land is based on the prevailing standard land values. The value of the buildings is calculated using the income capitalization approach. This method discounts the expected future rental income less the likely management costs to the balance sheet date.

The fair value of €33,395 thousand was the sum of the values of the land and the values of the buildings. The year-on-year decrease of €2,413 thousand in fair value was attributable to falling property prices and lower rents in Spain.

The valuation difference between the Solvency II balance sheet and the HGB financial statements arose because the historical cost convention, taking into account depreciation and write-downs, was applied in the valuation under HGB, whereas the higher fair values were recognized on the Solvency II balance sheet.

## Holdings in related undertakings, including participations

Related undertakings are companies that are majority owned by, or controlled by, another Group company. For simplification purposes, a participation is understood to mean ownership or control of at least 20.0 percent of the voting rights or share capital of an undertaking.

The Company's main affiliated companies (related undertakings), including other equity investments (participations), as of December 31, 2022 are listed in chapter A.1 'Business'.

At the first valuation level, quoted market prices are taken as the economic value. As no quoted market prices (level 1) are available, the adjusted equity method is used as the alternative valuation method (level 3). Applying this method, the subsidiary's own funds under Solvency II are recognized on a pro rata basis and taken as the economic value. As of December 31, 2022, the Solvency II carrying amount came to €1,199,641 thousand.

The year-on-year decrease of €49,199 thousand in the Solvency II carrying amount was mainly attributable to rising inflation and the related interest-rate hikes as well as the resulting falls in the market value of fixed-income securities in the portfolios of related undertakings (affiliated companies) and participations (equity investments).

The difference between the carrying amount at cost on the HGB balance sheet and the fair value on the Solvency II balance sheet results from using different valuation methods. Under HGB, shares in affiliated companies (related undertakings), including equity investments (participations), are valued at cost and – where necessary – written down to their fair value. Write-downs are reversed to no more than the historical cost if the reason for recognizing them ceases to apply. The fair value is determined using an income capitalization approach based on a planning horizon of usually three years.

## Equities

| (€'000) | SII as of Dec. 31, 2022 | HGB as of Dec. 31, 2022 | Valuation difference | SII as of Dec. 31, 2021 | SII change |
|---|---|---|---|---|---|
| Equities – listed | 0 | 0 | 0 | 0 | 0 |
| Equities – unlisted | 734 | 719 | 14 | 747 | – 13 |
| **Total** | **734** | **719** | **14** | **747** | **– 13** |

The balance sheet line item 'Equities' comprises both listed and unlisted equities. It is where shares in the equity of limited companies are recognized.

For solvency purposes, equities are valued at their quoted market price or market value. If this price/value is not available, the value is estimated using a valuation model. If the necessary information for a premium on the security or on the issuer is not available, it is determined – where available – on the basis of the investment's credit rating; otherwise, the credit rating of the issuer or the sector is used.

The valuation difference results from recognition at cost (taking into account the quoted market prices or market values on the reporting date) on the HGB balance sheet and recognition at fair value on the Solvency II balance sheet.

## Bonds

| (€'000) | SII as of Dec. 31, 2022 | HGB as of Dec. 31, 2022 | Valuation difference | SII as of Dec. 31, 2021 | SII change |
|---|---|---|---|---|---|
| Government bonds | 360,083 | 394,471 | – 34,388 | 402,171 | – 42,088 |
| Corporate bonds | 662,241 | 733,842 | – 71,601 | 697,760 | – 35,519 |
| Structured notes | 3,438 | 3,573 | – 135 | 3,994 | – 557 |
| Collateralized securities | 0 | 0 | 0 | 0 | 0 |
| **Total** | **1,025,762** | **1,131,887** | **– 106,125** | **1,103,925** | **– 78,164** |

Bonds are debt securities through which a loan is raised on the capital market. Unlike personal loans, bonds are public instruments and can be issued only by legal entities. They encompass government bonds, corporate bonds, structured notes, and collateralized securities.

The economic values of interest-bearing financial instruments are calculated at the quoted market price or market value that contains the accrued interest income as of the valuation date. If no quoted market price or market value is available for valuation (level 1), the discounted cash flow method – applying risk-adjusted yield curves – is used as the alternative valuation method (level 3). Premiums and discounts are not recognized separately.

The year-on-year decrease of €78,164 thousand in the Solvency II carrying amount was mainly attributable to falls in government and corporate bond prices. This substantial reduction was offset to a smaller extent by an increase in the portfolio of corporate bonds.

The valuation difference results from valuation on the HGB balance sheet in line with the discretionary principle of lower of cost or market value based on the decision to hold the securities until maturity, and from recognition at fair value on the Solvency II balance sheet.

## Collective investment undertakings

| (€'000) | SII as of Dec. 31, 2022 | HGB as of Dec. 31, 2022 | Valuation difference | SII as of Dec. 31, 2021 | SII change |
|---|---|---|---|---|---|
| Equities | 176,166 | 148,223 | 27,944 | 206,415 | – 30,249 |
| Bonds | 399,255 | 450,089 | – 50,835 | 474,716 | – 75,462 |
| Other | 34,204 | 33,863 | 342 | 29,952 | 4,252 |
| **Total** | **609,625** | **632,175** | **– 22,549** | **711,084** | **– 101,459** |

The balance sheet line item 'Collective investment undertakings' includes equities and investment fund shares/units. These are investment companies or specific funds whose sole purpose is to invest pooled capital in securities and/or other financial assets.

For solvency purposes, the redemption price determined by the investment management company for the investment fund units/shares is used to determine the economic value. If no redemption price is available for valuation (level 1), the adjusted equity method is used as the alternative valuation method (level 3). This value is not restricted to the cost.

Investment funds are generally, in accordance with EU Directives 2009/65/EC and 2011/61/EU, classified as collective investment undertakings or as alternative investment funds. In accordance with the Delegated Regulation, collective investment undertakings in which the stake held is more than 20.0 percent are reported under the line item 'Holdings in related undertakings, including participations'. If the stake in investment companies or other incorporated entities is no more than 20.0 percent, it is recognized under 'Unlisted equities'. If the stake cannot be assigned to either of these items, it is recognized under 'Other investments'.

As of December 31, 2022, the Solvency II carrying amount for collective investment undertakings was €609,625 thousand. The year-on-year decrease of €101,459 thousand in the economic value was mainly due to sharp falls in equity and bond prices.

The valuation difference results from recognition at cost on the HGB balance sheet, based on the discretionary principle of lower of cost or market value due to designation as held for long-term investment, and recognition at fair value on the Solvency II balance sheet.

## Deposits other than cash equivalents

This balance sheet line item comprises deposits other than cash equivalents that cannot be used on demand to settle payments and that cannot be converted into cash or transferred without restrictions.

Deposits other than cash equivalents primarily comprise bank deposits (call and term deposits) that have a corresponding contractual maturity. Due to the short-term nature of these assets, the nominal amount serves as a reliable proxy of the fair value in application of the principle of proportionality. As a result, the value under HGB and the value for solvency purposes are the same.

## Loans and mortgages

| (€'000) | SII as of Dec. 31, 2022 | HGB as of Dec. 31, 2022 | Valuation difference | SII as of Dec. 31, 2021 | SII change |
|---|---|---|---|---|---|
| Loans on policies | 0 | 0 | 0 | 0 | 0 |
| Loans and mortgages to individuals | 118 | 118 | 0 | 76 | 42 |
| Other loans and mortgages | 2,175 | 2,175 | 0 | 2,475 | –300 |
| **Total** | **2,293** | **2,293** | **0** | **2,551** | **–258** |

This item comprises loans on policies, loans and mortgages to individuals, and other loans and mortgages, i.e. financial assets that are created when a creditor lends secured or unsecured funds to borrowers.

For reasons of materiality and because of the low risk, no present value calculations were carried out in the year under review, as had also been the case in 2021. Instead, HGB carrying amounts were also used for Solvency II purposes. Under HGB, the amounts are recognized at cost, adjusted for any permanent changes in value. The year-on-year decline was mainly attributable to repayments.

## Reinsurance recoverables

| (€'000) | SII as of Dec. 31, 2022 | HGB as of Dec. 31, 2022 | Valuation difference | SII as of Dec. 31, 2021 | SII change |
|---|---|---|---|---|---|
| **Non-life and health similar to non-life** | **470** | **1,195** | **–725** | **217** | **253** |
| of which: non-life excluding health | 0 | 0 | 0 | 0 | 0 |
| of which: health similar to non-life | 470 | 1,195 | –725 | 217 | 253 |
| **Life and health similar to life, excluding health and index-linked and unit-linked** | **0** | **0** | **0** | **0** | **0** |
| of which: health similar to life | 0 | 0 | 0 | 0 | 0 |
| of which: life excluding health and index-linked and unit-linked | 0 | 0 | 0 | 0 | 0 |
| **Life index-linked and unit-linked** | **0** | **0** | **0** | **0** | **0** |
| **Total** | **470** | **1,195** | **–725** | **217** | **253** |

This balance sheet line item records the reinsurers' share of technical provisions. It includes reinsurance/special purpose vehicle (SPV) recoverables, cash flows from reinsurance receivables and liabilities, and deposits and liabilities from reinsurance business.

On the HGB balance sheet, the reinsurers' share of technical provisions is deducted from the provision for unearned premiums and the provision for outstanding claims. The reinsurers' share of the unearned premiums is determined in accordance with the contractual agreements. The proportions of the provision for outstanding claims relating to outward reinsurance business are calculated in accordance with the stipulations in the reinsurance treaties.

On the economic balance sheet, the reinsurers' shares are aggregated. To determine the economic value, the reinsurers' pro rata share of the technical provisions is calculated using the reinsurers' best estimate in accordance with the underlying treaty. The reinsurers' share is determined on an individual claim basis in accordance with the contractual terms.

Applying the aforementioned valuation methods, the carrying amount on the Solvency II balance sheet as of December 31, 2022 was lower than the HGB carrying amount.

## Deposits to cedants

Deposits to cedants comprise receivables for the underwriting liabilities taken on in the inward reinsurance business. These deposits are largely repayable within twelve months.

As is the case under HGB, the nominal amount of deposits to cedants is generally used as their economic value. However, exchange-rate adjustments in inward reinsurance business gave rise to a difference of €23 thousand.

## Insurance and intermediaries receivables

This item comprises contractual claims for payment or for other benefits vis-à-vis policyholders and insurance intermediaries.

Because there is no active market for insurance[1] and intermediaries receivables, and because of the short-term nature of the receivables (due within twelve months), the materiality of the risk, and the disproportionate time, effort, and expense that would otherwise be involved, the nominal amount of the receivables is used as the economic value, which is also the case under HGB. Loss allowances are taken into account.

## Reinsurance receivables

Included in this item are claims for payment or for other benefits arising from treaties with reinsurers.

There is also no active market for reinsurance receivables. On grounds of materiality, the carrying amount (nominal amount) can be used for receivables maturing within twelve months. If the maturity period of the receivables is longer (more than twelve months), the economic value is determined using the present value method. In the case of a reinsurance arrangement that is long term, renewed annually, and under which the deposits are regularly settled at the end of each year and reissued, the formal term of the treaty is taken to be the payment term. In the event of actual default risk relating to rating downgrades, specific allowances are recognized in the amount that is no longer likely to be recovered. None of the Company's reinsurance treaties have terms longer than twelve months, so the economic value is the same as the nominal amount under HGB.

[1] Insurance receivables for the most part refer to receivables due from policyholders and insurance companies.

## Receivables (trade, not insurance)

This item comprises contractual claims against a debtor for payment or other benefits that are not related to insurance, for example receivables due from affiliated companies, tax assets, and interest and rent receivables that are due.

There is no active market in which receivables (trade, not insurance) can be traded on arm's-length terms between knowledgeable, willing parties. As is the case under HGB, the economic value is reported as the nominal amount reduced by allowances. With the exception of tax assets, these receivables are mostly classified as current (due within twelve months).

## Cash and cash equivalents

The balance sheet line item 'Cash and cash equivalents' comprises demand deposits and cash on hand valued at their nominal amounts. It includes outstanding bank notes and coins used as general forms of payment. Also reported here are deposits that can be converted directly into foreign currency at their nominal amount on demand and without penalty or restriction.

As is the case under HGB, the nominal amount of cash and cash equivalents (cash and demand deposits) is used as the economic value.

## Any other assets, not elsewhere shown

Assets that are not otherwise included in other balance sheet line items are recognized here. As is the case under HGB, the nominal amount is used as the economic value.

Please refer to chapter A.4 'Performance of Other Activities' of this report for disclosures relating to **leases**.

# D.2 Technical Provisions

## Comparison between the Solvency II balance sheet and HGB balance sheet: Technical provisions

### Technical provisions as of December 31, 2022

| (€'000) | Solvency II as of Dec. 31, 2022 | HGB as of Dec. 31, 2022 | Valuation difference | Solvency II as of Dec. 31, 2021 | SII change |
|---|---|---|---|---|---|
| **Technical provisions – non-life** | | | | | |
| Technical provisions – non-life (excluding health) | | | | | |
| Technical provisions calculated as a whole | 0 | 1,591,420 | –1,591,420 | 0 | 0 |
| Best estimate | 951,224 | 0 | 951,224 | 979,587 | –28,363 |
| Risk margin | 32,184 | 0 | 32,184 | 38,505 | –6,321 |
| | **983,408** | **1,591,420** | **–608,012** | **1,018,092** | **–34,684** |
| Technical provisions – health (similar to non-life) | | | | | |
| Technical provisions calculated as a whole | 0 | 0 | 0 | 0 | 0 |
| Best estimate | 0 | 0 | 0 | 0 | 0 |
| Risk margin | 0 | 0 | 0 | 0 | 0 |
| | **0** | **0** | **0** | **0** | **0** |
| | **983,408** | **1,591,420** | **–608,012** | **1,018,092** | **–34,684** |
| **Technical provisions – life (excluding index-linked and unit-linked)** | | | | | |
| Technical provisions – health (similar to life) | | | | | |
| Technical provisions calculated as a whole | 0 | 0 | 0 | 0 | 0 |
| Best estimate | 0 | 0 | 0 | 0 | 0 |
| Risk margin | 0 | 0 | 0 | 0 | 0 |
| | **0** | **0** | **0** | **0** | **0** |
| Technical provisions – life (excluding health and index-linked and unit-linked) | | | | | |
| Technical provisions calculated as a whole | 0 | 0 | 0 | 0 | 0 |
| Best estimate | 0 | 0 | 0 | 0 | 0 |
| Risk margin | 0 | 0 | 0 | 0 | 0 |
| | **0** | **0** | **0** | **0** | **0** |
| | **0** | **0** | **0** | **0** | **0** |
| **Technical provisions – index-linked and unit-linked** | | | | | |
| Technical provisions calculated as a whole | 0 | 0 | 0 | 0 | 0 |
| Best estimate | 0 | 0 | 0 | 0 | 0 |
| Risk margin | 0 | 0 | 0 | 0 | 0 |
| | **0** | **0** | **0** | **0** | **0** |
| | **983,408** | **1,591,420** | **–608,012** | **1,018,092** | **–34,684** |
| **Other technical provisions** | **0** | **90,429** | **–90,429** | **0** | **0** |
| **Total provisions** | **983,408** | **1,681,849** | **–698,441** | **1,018,092** | **–34,684** |

## Technical provisions

The valuation in accordance with HGB requirements and its results are described first. This is followed by an explanation of the regulatory valuation methods and their results.

As of the reporting date, the technical provisions in accordance with HGB amounted to €1,681,849 thousand (December 31, 2021: €1,608,817 thousand). In addition to unearned premiums of €232,689 thousand (December 31, 2021: €221,416 thousand), the HGB technical provisions included the provision for outstanding claims (gross) of €1,358,732 thousand (December 31, 2021: €1,312,024 thousand), the equalization provision of €89,349 thousand (December 31, 2021: €74,428 thousand), and the miscellaneous technical provisions of €1,080 thousand (December 31, 2021: €949 thousand).

Gross unearned premiums for direct insurance business are calculated pro rata for each individual policy on the basis of the premiums and cancellations posted, less the installment surcharges. The calculated unearned premiums are reduced by the income components intended to cover the acquisition costs. An individually determined proportion (international units of the Company) or a flat rate of 85.0 percent (Group headquarters) of the commissions and other remuneration for agents is recognized as a non-transferable income component. The gross unearned premiums for inward reinsurance business are recognized in accordance with the requirements of the primary insurer. The reinsurers' share of the unearned premiums is determined in accordance with the contractual agreements.

The provision for outstanding claims in relation to direct insurance business is recognized separately by event year for claims reported in the financial year concerned and for claims that have occurred up to the balance sheet date but have not yet been reported. A provision for claim settlement expenses is also recognized. These provisions are valued in accordance with prudent business practice, taking into account the ongoing need to satisfy the obligations under insurance contracts. Valuation is based on values as of the balance sheet date. The provisions are not discounted. The results from the group-based and individual valuations are reviewed on a portfolio basis using actuarial methods.

The provision for outstanding claims in the inward reinsurance business is recognized in accordance with the requirements of the primary insurer. The provision for outstanding claims in connection with the inward reinsurance business from the United Kingdom and Canada is determined on the basis of past experience and statistics produced by the Company's own local claims settlement company.

## Technical provisions – by Solvency II line of business

| (€'000) | Best estimate 2022 | Risk margin 2022 | Best estimate 2021 | Risk margin 2021 |
|---|---|---|---|---|
| Legal insurance | 935,855 | 30,920 | 967,860 | 37,451 |
| Assistance | 7,038 | 663 | 5,437 | 419 |
| Miscellaneous insurance | 8,331 | 601 | 6,290 | 634 |
| **Total** | **951,224** | **32,184** | **979,587** | **38,505** |

## Technical provisions – non-life (excluding health)

| (€'000) | SII as of Dec. 31, 2022 | HGB as of Dec. 31, 2022 | Valuation difference | SII as of Dec. 31, 2021 | SII change |
|---|---|---|---|---|---|
| Technical provisions calculated as a whole | 0 | 1,591,420 | –1,591,420 | 0 | 0 |
| Best estimate | 951,224 | 0 | 951,224 | 979,587 | –28,363 |
| Risk margin | 32,184 | 0 | 32,184 | 38,505 | –6,321 |
| **Total** | **983,408** | **1,591,420** | **–608,012** | **1,018,092** | **–34,684** |

The individual components of the technical provisions are the best estimate and the risk margin.

For non-life insurance, the best estimate comprises the claims provision and the premiums provision, both of which include a provision for investment management expenses.

The claims provision is calculated for each homogeneous risk group of ARAG SE. It contains expected claim payments and claim settlement costs that are necessary for the settlement of claims already incurred. The claims reserve is valued using the standard actuarial reserving methods used in the market: the chain-ladder method, the additive method based on accident-year-independent growth of the claims ratio (AUSQZ), and the Bornhuetter-Ferguson method. Alternative reserving methods may be used in exceptional cases. The New York method is used to value the claim settlement provision. Due to the sharp rise in inflation in the reporting year, an addition to the claims reserve was calculated for the associated rise in claims expenses. The amount of the addition for the overly high level of inflation in the claims reserve was calculated for each individual risk segment and is based on internal and external information.

The premiums provision is made up of the provision for premiums written but not yet earned and the expected future profit or loss from in-force policies. The provision for premiums written but not yet earned is recognized in the amount of the present values of the expected claim payments and costs (less commission) relating to the relevant policies. The expected profit or loss is determined for the outstanding premium income from in-force policies (installment payments and premiums from multi-year policies). The inflation-induced rise in claims expenses was also taken into account in the premiums provision.

The provision for investment management expenses is calculated as of the reporting date as the present value of the costs that will be incurred in the future for the management of investments in the amount of the remaining claims provision and premiums provision. This continues until such time as the insurance ends.

Pursuant to article 37 of the Delegated Regulation, the risk margin is calculated with the aid of an approximation method as described in article 58 of the Delegated Regulation.

## Other technical provisions

The other technical provisions[1] (miscellaneous technical provisions on the HGB balance sheet) primarily consist of the equalization provision (€ 89,349 thousand). The equalization provision for direct insurance business and inward reinsurance business is recognized under HGB as additional actuarial reserves that can be used to offset fluctuations in the course of business.

The calculation is carried out separately for the direct insurance business and for the inward reinsurance business, in each case broken down by class of insurance. These provisions are valued in accordance with the German Regulation on the Accounting of Insurance Undertakings (RechVersV).

The lapse provision reported under miscellaneous technical provisions to cover the discontinuation or reduction of technical risk is recognized in the amount of the estimated requirement.

As the Solvency II balance sheet is a static overview, no items to smooth out future fluctuations in the course of business are recognized under other technical provisions (the equivalent line item). For Solvency II purposes, lapse risk is already included in the best estimate item under technical provisions – non-life. Accordingly, there is no requirement to explain the year-on-year change here.

[1] In accordance with the Solvency II structure.

## Reinsurance recoverables

For regulatory purposes, the (gross) provisions are reported on the liabilities side of the balance sheet without deducting reinsurance recoverables. However, the reinsurers' share is reported as an asset on the other side of the balance sheet.

Retrospective and prospective markdowns are recognized to take into account the default risk on the part of reinsurers. In accordance with HGB, nominal amounts are recognized, these amounts being determined on the basis of the reinsurance treaties.

On the HGB balance sheet, technical provisions are recognized using a net approach in which the gross amount of the obligation is reduced by the portion covered by outward reinsurance. The difference between the Solvency II and HGB figures is attributable to this difference in the valuation methods.

In addition, there were no changes in the stated recognition and valuation methods compared with the previous year.

On the Solvency II balance sheet, reinsurance recoverables are reported under assets (see chapter D.1 'Assets').

Reinsurance recoverables are of no material significance to ARAG SE.

## Provisions assumptions

The claims provision recognized on the Solvency II balance sheet is a best estimate. It does not include any safety margins. The level of uncertainty in the provision estimate is quantified individually for each homogeneous risk group using a stochastic simulation as part of internal modeling.

The calculation of technical provisions is subject to uncertainty because the actual level of claims incurred in the future may differ from current forecasts. The degree of uncertainty can be measured on the basis of the extent to which future cash flows can be predicted. Technical provisions are determined using a wide range of assumptions relating to future trends in claim payments and reported claims. Wherever possible, these assumptions are based on historical patterns or estimates drawn up by experts.

The level of uncertainty in relation to both the premiums provision and the claims provision is quantified individually for each homogeneous risk group. The assumptions made are regularly reviewed, particularly as part of the validation process.

No transitional measures or volatility adjustments have been applied for calculating the technical provisions at ARAG SE.

# D.3 Other Liabilities

## Comparison of other liabilities on the HGB balance sheet and Solvency II balance sheet

**Other liabilities as of December 31, 2022**

| (€'000) | Solvency II as of Dec. 31, 2022 | HGB as of Dec. 31, 2022 | Valuation difference | Solvency II as of Dec. 31, 2021 | SII change |
|---|---|---|---|---|---|
| Contingent liabilities | 0 | 0 | 0 | 0 | 0 |
| Provisions other than technical provisions | 84,918 | 87,034 | –2,116 | 84,706 | 213 |
| Pension benefit obligations | 169,475 | 223,186 | –53,712 | 236,461 | –66,987 |
| Deposits from reinsurers | 4 | 4 | 0 | 11 | –7 |
| Deferred tax liabilities | 130,706 | 2,946 | 127,760 | 169,433 | –38,727 |
| Derivatives | 0 | 0 | 0 | 0 | 0 |
| Debts owed to credit institutions | 0 | 0 | 0 | 0 | 0 |
| Financial liabilities other than debts owed to credit institutions | 0 | 0 | 0 | 0 | 0 |
| Insurance and intermediaries payables | 44,401 | 44,401 | 0 | 44,399 | 2 |
| Reinsurance payables | 121 | 121 | 0 | 139 | –18 |
| Payables (trade, not insurance) | 50,550 | 50,550 | 0 | 56,012 | –5,462 |
| Subordinated liabilities | 29,924 | 30,000 | –76 | 32,023 | –2,099 |
| Any other liabilities, not elsewhere shown | 194 | 194 | 0 | 111 | 83 |
| Total liabilities | 510,292 | 438,436 | 71,856 | 623,295 | –113,003 |

## Provisions other than technical provisions

These provisions are for payment obligations of uncertain timing or amount. HGB stipulates that if the liability is likely to be settled in more than twelve months, the provisions are discounted.

On the Solvency II balance sheet, provisions for long-service awards, early retirement obligations, and pre-retirement part-time employment obligations are valued using the projected unit credit (PUC) method in accordance with an IAS 19 curve. Unlike under HGB, the term structure used for discounting on the Solvency II balance sheet is determined on the basis of the yields achieved for senior industrial bonds on the balance sheet date. Expected growth in income (2.5 percent) and the Company's projections for staff turnover (1.5 percent) are taken into account. The amount calculated in this way equates to the economic value. The discount rate under HGB was 1.45 percent, whereas an IAS 19 curve was used for the economic value, which explains the valuation difference.

Sundry provisions other than technical provisions are valued on the basis of the expected settlement amount. The residual maturity for all sundry other provisions is generally less than one year. On grounds of materiality, they are not discounted separately. Instead, the discounting applied for HGB accounting purposes is used. The economic values are therefore the same as the HGB carrying amounts.

## Pension benefit obligations

Pension benefit obligations are net liabilities for the employee pension scheme, provided it is a direct pension entitlement scheme.

For the Solvency II balance sheet, pension benefit obligations are valued using the PUC method in accordance with an IAS 19 curve. Unlike under HGB, the term structure used for discounting on the Solvency II balance sheet is determined on the basis of the yields achieved for senior industrial bonds on the balance sheet date. Expected growth in income (2.5 percent), rising pension benefits (2.3 percent), and the Company's projections for staff turnover (1.5 percent) are taken into account. The amount calculated in this way equates to the economic value. The discount rate under HGB was 1.79 percent, whereas an IAS 19 curve was used for the economic value, which explains the valuation difference.

The year-on-year decrease of €66,968 thousand in the Solvency II valuation was mainly attributable to changes in the level of interest rates in the IAS 19 curve used and the related changes in the discounting of pension benefit obligations.

## Deposits from reinsurers

Deposits from reinsurers are premiums that the reinsurer has provided to the primary insurer as collateral for the underwriting liabilities taken on in the inward reinsurance business.

There were no valuation differences between the Solvency II balance sheet and the HGB balance sheet because the maturity period did not exceed twelve months. The nominal amount was therefore used as the economic value.

## Deferred tax liabilities

IAS 12 requires deferred tax liabilities to be set up for temporary differences between the Solvency II balance sheet and the tax base that result from the recognition and valuation of assets and liabilities.

If differences arise between the carrying amounts on the Solvency II balance sheet and those in the tax base and these differences are expected to reverse in subsequent years, deferred taxes are recognized on the Solvency II balance sheet in respect of these differences using separate entity-specific tax rates. This also includes differences for which the timing of the reversal is not yet precisely known, differences that depend on action by the entity concerned, or differences that will only reverse in the event of any liquidation. For the purpose of recognition on the Solvency II balance sheet, the effects of the reversal of the differences between the Solvency II balance sheet and the tax base are reviewed in terms of their impact on the basis of tax assessment.

After netting in accordance with the guideline mentioned in chapter D.1 under 'Deferred tax assets', the deferred tax liabilities amounted to €130,706 thousand. This was due mainly to the deferred taxes resulting from the technical provisions (€163,793 thousand, netted) and to investments (€27,321 thousand, netted). Deferred tax liabilities are not discounted.

Deferred taxes from tax group subsidiaries (companies controlled by the parent company and/or with which a profit-and-loss transfer agreement has been concluded) are recognized by the tax group parent because the income of the tax group is aggregated for tax purposes and taxed overall at the level of the tax group parent. Of this income, deferred tax liabilities of €11,920 thousand were transferred to the Company from subsidiaries.

## Insurance and intermediaries payables

All amounts due in connection with the insurance business to insurance companies, policyholders, and insurance intermediaries are reported under insurance[1] and intermediaries payables.

The Company's payables reported at their nominal amounts are thus valued at the amount at which they could be exchanged in an arm's-length transaction between knowledgeable, willing parties. In particular because of the short-term nature of the payables (due within twelve months) and the fact that counterparty default risk is taken into account (in the form of write-downs), the nominal amount that is recognized serves as a suitable proxy for the economic value, as is the case under HGB. If the maturity period of the payable is longer (more than twelve months), the economic value is determined using the present value method.

Due to use of the nominal amount as the economic value, there are no valuation differences.

## Reinsurance payables

Reinsurance payables comprise all amounts due in connection with the reinsurance business, excluding deposits.

Reinsurance payables are recognized at their settlement value. As they have no active market and because of the short-term nature of these liabilities (due within twelve months), the nominal amount can be used as a proxy for the economic value.

Due to use of the nominal amount as the economic value, there are no valuation differences.

[1] Insurance payables for the most part refer to liabilities to policyholders and insurance companies.

## Payables (trade, not insurance)

All non-insurance-related liabilities are reported under payables (trade, not insurance). This includes obligations to employees, suppliers, and public bodies.

As is the case under HGB, the economic value of those of a short-term nature (maturing within twelve months) is based on the nominal amount. If the maturity period of the payable is longer (maturing in more than twelve months), the economic value is determined using the present value method.

Due to use of the nominal amount as the economic value, there are no valuation differences.

## Subordinated liabilities

These are liabilities that, in the event of insolvency or liquidation of the Company, will be paid only after all the claims of other, non-subordinated creditors have been settled.

The subordinated liabilities that had been included in basic own funds until 2021 had been issued by way of private placement to improve the own funds used to determine the solvency ratio. The registered bond has a fixed maturity of ten years and will be redeemed in 2024. The subordinated bearer bonds are recognized at their settlement amount. These bonds are not tradable in Germany on a regulated market within the meaning of section 2 (5) of the German Securities Trading Act (WpHG).

On the Solvency II balance sheet, the subordinated liabilities in basic own funds are modified using the risk-free interest rate derived from investment-grade industrial bonds and discounted with the value of ARAG's different credit rating at the time the subordinated bond was issued. This results in an interest rate that is lower than the bond's nominal interest rate and in a valuation difference.

## Any other liabilities, not elsewhere shown

Included under this item are all liabilities that are not recorded in other balance sheet line items. They are generally current liabilities.

All non-interest-bearing liabilities are valued at their nominal amount. An economic value is taken as a proxy for those maturing within twelve months. For reasons of simplicity and materiality, liabilities to authorities are valued at their nominal amounts.

There are therefore no differences in their recognition and valuation on the HGB and Solvency II balance sheets.

Please refer to chapter A.4 'Performance of Other Activities' of this report for disclosures relating to **leases**.

## D.4 Alternative Methods for Valuation

Alternative valuation methods are required if there are no active markets for assets, technical provisions, and other liabilities in which prices can be obtained. Active markets are essential for finding market prices. An active market is one in which homogeneous items are traded among willing buyers and sellers at publicly quoted prices.

If the criteria of an active market are not satisfied for the purposes of determining economic values using the mark-to-market approach **(level 1)** or the marking-to-market approach **(level 2)**, alternative valuation methods are used **(level 3)**.

Simplification techniques are applied under the alternative valuation methods. Article 9 (4) of the Delegated Regulation permits the use of **proportionality**, **timing**, and **materiality** as the central assessment criteria for use of a simplification.

The table below shows the main items aggregated according to the valuation hierarchy:

### Main items according to the valuation hierarchy

| *(€'000)* | Level 1 | Level 2 | Level 3 |
|---|---|---|---|
| Holdings in related undertakings, including participations | 0 | 0 | 1,199,641 |
| Bonds | 747,175 | 0 | 278,587 |
| Collective investment undertakings | 598,932 | 0 | 10,693 |
| Technical provisions – non-life (excluding health) | 0 | 0 | 983,408 |
| Pension benefit obligations | 0 | 0 | 169,475 |
| **Total** | **1,346,107** | **0** | **2,641,804** |

In accordance with article 9 (4) of the Delegated Regulation, all the Company's other items are recognized – unless stated otherwise – at their economic value using the HGB valuation rules. To validate recognition of the relevant items at their nominal amount, ARAG SE uses an internal valuation hierarchy that is agreed with the external auditor and reviewed regularly.

No assumptions or judgments were made, including about the future or other major sources of uncertainty.

## D.5 Any Other Information

Changes attributable to the other events described under 'Other events' in chapter A.1 potentially have consequences for ARAG SE's results of operations as well as its assets and liabilities. Material impacts, especially in relation to assets, are influenced by the capital market environment. Any changes that arise are reflected in the individual market values as of the reporting date. Depending on what changes, there could be a knock-on effect on the technical provisions. As of the reporting date, the trends in the capital markets in 2022 had had a material impact on the excess of assets over liabilities, primarily as a result of interest rates.

It is difficult to predict other future effects on the valuation for solvency purposes, including the impact of the Russian Federation's war of aggression.

Chapters D.1 to D.4 inclusive contain all of the important information about the valuation for solvency purposes.

# E. Capital Management

# E.1 Own Funds

**Objectives, guidance, and procedures for managing own funds**

In 2022, Solvency II balance sheets were prepared for the planning horizon on the basis of the budgeted results of operations.

Besides managing capital, capital management involves monitoring the solvency capital requirement and ensuring that ARAG SE has sufficient eligible own funds to cover the requirement. Capital management thus secures the Company's own funds base and identifies interdependencies between risk management and capital management in order to monitor, manage, and secure at all times the Company's capital requirements based on its risk exposure.

ARAG's internal capital management guidance sets out the necessary measures for managing capital resources, ensuring solvency coverage, and reducing potential risk in line with the allocation of capital. The ARAG escalation path plays a key part in strengthening own funds by identifying any shortfall at an early stage, examining suitable options, devising corrective measures for own funds, and submitting them to the decision-making bodies for consideration. A distinction is made between strengthening own funds (actual) and reducing the solvency capital requirement (target) through risk mitigation.

ARAG distinguishes between the internal – specified in business policy – minimum coverage ratio (see chapter B.3 'Risk Management System Including the Own Risk and Solvency Assessment') and the regulatory requirement. The coverage ratio must not fall below the internal minimum coverage ratio or the regulatory requirement.

If, contrary to expectations, too great a fall in solvency coverage were to materialize, the Company would consider steps to increase own funds, such as an additional payment into the capital reserves, borrowing pursuant to section 89 (3) no. 2 of the German Insurance Supervision Act (VAG), or an increase in share capital, in addition to risk-mitigating procedures.

In 2022, the Company did not identify any need to strengthen components of basic own funds within its planning horizon. ARAG SE did not need to take any action in the reporting year.

**Components and quality of own funds**

As of December 31, 2022, the Company held an excess of assets over liabilities of €1,786,012 thousand (December 31, 2021: €1,842,815 thousand) according to the Solvency II balance sheet. The Company's minimum capital requirement (MCR) as of the reporting date was €188,022 thousand (December 31, 2021: €185,307 thousand) and the solvency capital requirement (SCR) was €499,957 thousand (December 31, 2021: €533,471 thousand).

In the prior year, it had a subordinated liability of €32,023 thousand classified as own funds. This registered bond has a fixed maturity of ten years and will be redeemed in 2024. In light of this residual maturity, this bond has not been included in the calculation of own funds. In the event of liquidation, it will be subordinate to all other liabilities. For the reconciliation of net asset value (NAV) to eligible own funds (EOF), there was a deduction (ring-fenced fund) of €55,447 thousand in accordance with article 81 (1) of Delegated Regulation (EU) 2015/35 (the Delegated Regulation).

According to the Management Board's proposal for appropriation of the profit recognized on the HGB balance sheet, a sum of €20,000 thousand will be distributed to shareholders as dividends.

This results in eligible own funds of €1,710,565 thousand to cover the solvency and minimum capital requirement (December 31, 2021: €1,811,235 thousand). All of the eligible own funds are classified at the highest quality level for own funds (Tier 1). The Company had no own funds at the other quality levels (Tier 2 and Tier 3) as of the reporting date. The classification of own fund items is not expected to change in the future.

The equity on the HGB balance sheet can be reconciled to eligible own funds as follows:

**Reconciliation of the equity on the HGB balance sheet to eligible own funds**

| *(€'000)* | **Dec. 31, 2022** | **Dec. 31, 2021** |
|---|---|---|
| **Equity as of December 31 on the HGB balance sheet** | **512,212** | **510,559** |
| Revaluation of investments with recognition of deferred taxes | 678,235 | 893,137 |
| Revaluation of technical provisions with recognition of deferred taxes | 533,985 | 456,795 |
| Revaluation of pension benefit obligations with recognition of deferred taxes | 68,147 | 9,517 |
| Revaluation of miscellaneous items with recognition of deferred taxes | 2,408 | –3,037 |
| Transfer of deferred taxes, particularly arising from the tax group | –8,974 | –24,156 |
| **Excess of assets over liabilities according to the Solvency II balance sheet** | **1,786,012** | **1,842,815** |
| Additional basic own funds resulting from subordinated liabilities | 0 | 32,023 |
| Dividend distribution (foreseeable dividend) | –20,000 | –20,000 |
| Deduction (ring-fenced fund) | –55,447 | –43,602 |
| **Total own funds as of December 31 that are eligible to cover the solvency capital requirement** | **1,710,565** | **1,811,235** |

Explanations of how the economic values of the individual items are determined are provided in chapter D. 'Valuation for Solvency Purposes' of this report.

### Impact of the other events on own funds

The extent to which the other events described under 'Other events' in chapter A.1 affected the excess of assets over liabilities proved to be material, particularly for assets. At the time this report was prepared, it was not possible to reliably estimate the long-term impact of the other events on own funds.

### Information on deferred taxes

ARAG SE netted deferred taxes in accordance with the guideline described in chapter D.1 'Assets'; in chapter D.3 'Other Liabilities', it only recognized deferred tax liabilities, which are not discounted.

The analysis was based on the timing of the reversal effects, with the time until reversal of the deferred tax expense shorter than the time until reversal of the deferred tax benefit. The expense thus materializes earlier than the benefit.

Deferred tax liabilities totaling €130,706 thousand were recognized in the table 'Reconciliation of the equity on the HGB balance sheet to eligible own funds'. The calculation of deferred taxes takes into account applicable tax legislation and tax rates. Recognition under Tier 3 is not necessary due to the excess of deferred tax liabilities.

### Own funds reconciliation reserve

| *(€'000)* | **Total** | **Tier 1 own funds** | **Tier 2 own funds** | **Tier 3 own funds** |
|---|---|---|---|---|
| Share capital | 100,000 | 100,000 | 0 | 0 |
| Share premium account related to ordinary share capital | 0 | 0 | 0 | 0 |
| Reconciliation reserve | 1,610,565 | 1,679,212 | 0 | 0 |
| **Basic own funds** | **1,710,565** | **1,710,565** | **0** | **0** |
| Ancillary own funds (subordinated liabilities) | 0 | 0 | 0 | 0 |
| **Own funds as of December 31 that are eligible to cover the solvency capital requirement** | **1,710,565** | **1,710,565** | **0** | **0** |

The reconciliation reserve amounted to €1,610,565 thousand and predominantly consisted of HGB revenue reserves of €308,700 thousand and valuation differences of €1,301,865 thousand. As of December 31, 2022, the Company's eligible own funds were €100,670 thousand lower than they had been a year earlier. This decrease was attributable to the changes in assets (see chapter D.1 'Assets').

All quantitative disclosures relate to the figures in the quantitative reporting forms set out in the Appendix.

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

ARAG SE uses a partial internal model to calculate the solvency capital requirement. In this certified model, the modules for market risk, non-life underwriting risk, and counterparty default risk (where the risks are covered by the market risk module) are calculated using internal modeling. The other risk modules and the aggregation of the risk modules are based on the standardized approach.

The solvency capital requirement decreased by 6.3 percent year on year, from €533,471 thousand to €499,957 thousand. Please refer to chapter C. 'Risk Profile' for further information on the changes in the individual risks. At 342.1 percent, the coverage ratio is significantly higher than the regulatory requirement and, in ARAG SE's view, constitutes a substantial risk buffer, particularly for customers. As of the reporting date, the coverage ratio was slightly higher, by 2.6 percentage points, than the equivalent figure as of December 31, 2021 (339.5 percent).

To gauge the effect on the solvency situation of current developments, such as the war in Ukraine and the COVID-19 pandemic, rough calculations of the solvency situation are performed on a weekly basis in addition to the quarterly risk calculations. These calculations have consistently showed a sufficient level of coverage.

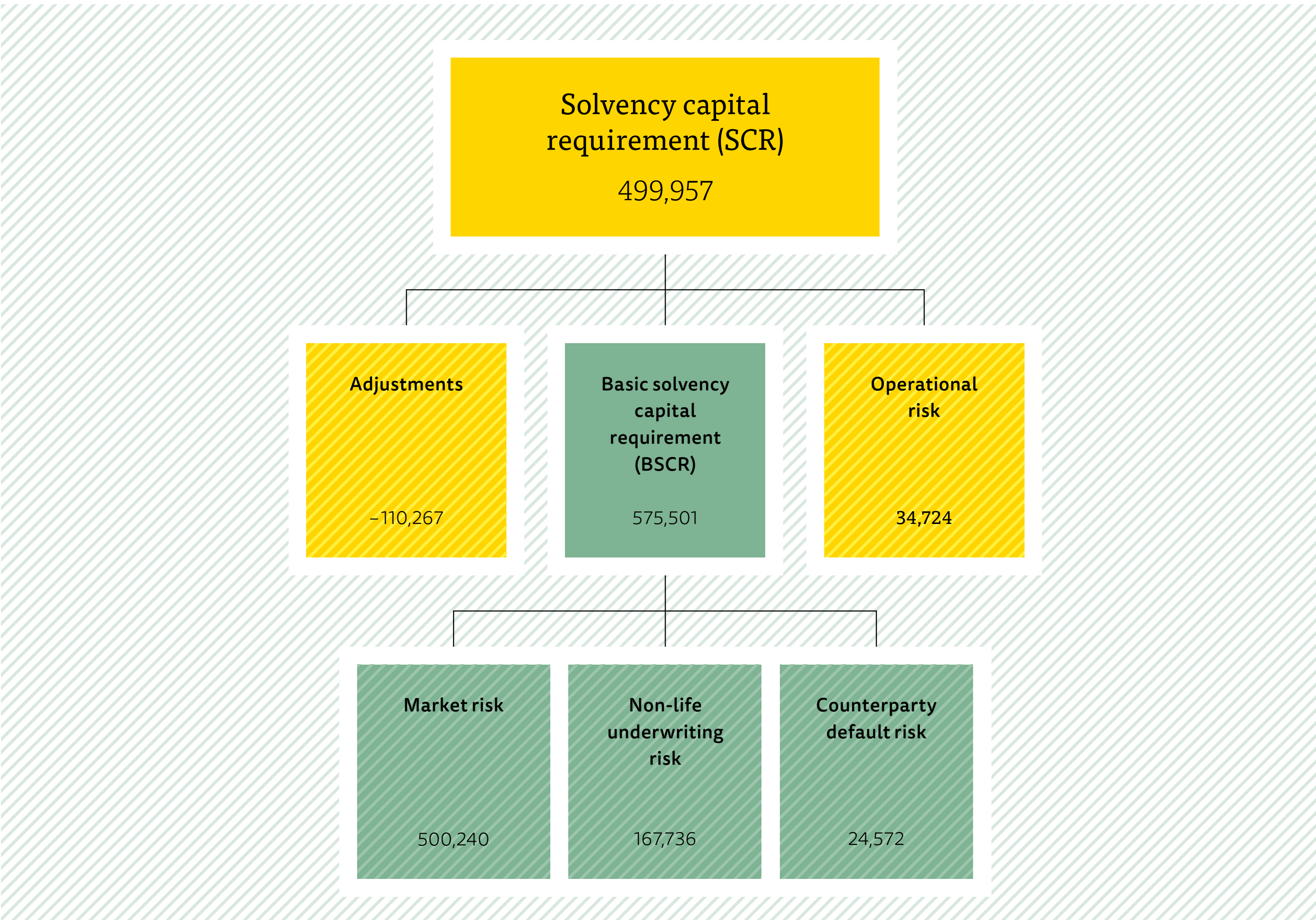
Neither a simplified calculation of the SCR standard formula nor undertaking-specific parameters (USPs) are used.

The minimum capital requirement is calculated on the basis of the technical provisions (excluding the risk margin) and net premiums written in the past twelve months in each line of business; it must not fall below 25.0 percent and not exceed 45.0 percent of the solvency capital requirement. As of December 31, 2022, the minimum capital requirement was €188,022 thousand (December 31, 2021: €185,307 thousand), which equated to 37.6 percent of the solvency capital requirement at that time and resulted in a coverage ratio for the minimum capital requirement of 909.8 percent (December 31, 2021: 977.4 percent).

The final amount of the solvency capital requirement is still subject to verification by the supervisory authority. All quantitative disclosures relate to the figures in the quantitative reporting forms set out in the Appendix.

In the transition from the basic solvency capital requirement (BSCR) to the solvency capital requirement (SCR), a risk-mitigating effect from deferred taxes in an amount of €110,267 thousand was applied. This resulted solely from the netted deferred tax liability. Projected future profits are not factored in for the purposes of determining the loss-absorbing capacity of the deferred taxes. Further information on deferred taxes can be found in chapters D.1, D.3, and E.1.

## EIOPA risk tree for ARAG SE (€'000)




**Solvency capital requirement (SCR)** is the amount of own funds required to be held in case of an unlikely but large loss.

**Adjustments** contain the loss-absorbing capacity of deferred taxes.

**Basic solvency capital requirement (BSCR)** is the sum of the aggregated individual risks (taking into account diversification effects) or the solvency capital requirement (SCR) before adjustments, operational risk (OpRisk), and any non-controlled participations (NCPs).

**Operational risk** is the risk arising from inadequate or failed internal processes, personnel, or systems, or from external events.

**Market risk** is the risk of loss or of adverse changes to market prices of assets, liabilities, and financial instruments.

**Non-life underwriting risk** is the risk of a loss or adverse change in the value of insurance liabilities in the non-life insurance business arising from inadequate pricing and inadequate provisioning assumptions.

**Counterparty default risk** reflects possible losses due to unexpected default or deterioration in the credit standing of counterparties and debtors in the insurance business and of reinsurance companies over the following twelve months.

## E.3 Use of the Duration-Based Equity Risk Sub-Module in the Calculation of the Solvency Capital Requirement

Using the duration-based equity risk sub-module in the calculation of the solvency capital requirement is not relevant to ARAG SE.

## E.4 Differences Between the Standard Formula and Any Internal Model Used

The Group's business model is one of the main reasons why a partial internal model is used for ARAG SE. ARAG SE's specific risk profile cannot be accurately reflected using the standard formula.

ARAG SE's partial internal model is based on the following internally modeled modules: market risk, non-life underwriting risk, and counterparty default risk (where the risks are covered by the market risk module).

Among other things, the partial internal model enables the Company to model the underwriting risks appropriately and on an individual basis, thus ensuring the risks can be presented and managed adequately.

The internal modeling of market risk enables the scope and structure of the investment portfolio to be analyzed more accurately. Furthermore, the use of an economic scenario generator enables capital market risks to be depicted much more precisely than with the scenario-based key figures used in the standardized approach. This is particularly the case for the non-linear maturity profiles that can be found with callable bonds, for example, or for the valuation of government bonds.

The non-life underwriting risk module and the market risk module (including the counterparty default risk arising in connection with securities as part of credit risk) are in each case modeled up to the top module level as a distribution.

Both for market risk and underwriting risk, the results of the internal modeling represent an important basis for corporate management.

**Probability distribution forecast**

The internal modeling of market risk focuses on analysis of the interest-rate, spread, equity, real-estate, and currency sub-risks. The concentration sub-risk is implicitly analyzed in the spread module, but is not classified as material. However, changes in this sub-risk are regularly reviewed as part of the validation process. The analysis is carried out according to various criteria, such as asset class, currency area, maturity, and credit quality level. The underlying stochastic models used are generally accepted in financial mathematics. A critical factor in the calculation of risk is the calibration of the underlying risk factors and their dependencies. The calibration is carried out for each calculation reference date using the latest market data. Separate performance indices are calibrated on the basis of current risk calculations for relevant strategic equity investments in insurance companies within the ARAG Group.

Non-life underwriting risk comprises the following components: premium risk, reserve risk, accumulation risk, and lapse risk. Accumulations of legal insurance represent the catastrophe risk for a legal insurance company.

A critical factor in the calculation of risk is the calibration of the underlying risk factors and their correlations. Copula methods are the approach used to aggregate the distributions into an overall risk distribution for underwriting. The dependencies applied for this purpose are determined internally, supplemented with assessments drawn up by experts.

In the market risk and non-life underwriting risk modules, stochastic simulations are used to project the Company's own funds one year ahead without taking any tax effects into account. For the market risk and non-life underwriting risk modules, the solvency capital requirement is then based on the 99.5 percent quantile of the relevant loss distribution. A going-concern approach is assumed when determining underwriting risk. This means, in particular, that the forecast new business for the coming twelve months is included.

ARAG SE's underwriting portfolio is broken down into various segments according to management and risk considerations. This segmentation enables management-relevant information to be determined from the partial internal model and used for the management of the Company on a value-driven basis. The principle whereby homogeneous risk groups are modeled is also applied in this segmentation.

The individual market risk, non-life underwriting risk, and counterparty default risk modules are aggregated into the BSCR using a correlation approach. The overall solvency capital requirement is determined by adding the solvency capital requirement for operational risk calculated in accordance with the standard formula and by applying the risk-mitigating effect from deferred taxes. No capital add-ons are recognized.

### Main differences between the internal model and the standard formula for each risk module

The differences between the internal model and the standard formula are explained below for each market risk sub-module.

### Comparison between the market risk sub-modules in the internal model and the standard formula

| Sub-module | Standard formula | Internal model |
|---|---|---|
| Interest rate | For each currency area, the risk-free interest-rate term structure is shifted upwards and downwards with maturity-dependent shocks, although negative interest rates are not shifted downwards in the stress test. | A distribution for the underlying interest rate calibrated using current market data and for the resulting interest-rate term structures is simulated for each currency area and each maturity.<br>Turns and bulges in the risk-free interest-rate term structure are observed in addition to shifts. |
| Spread | The market values of investments sensitive to spread risk are reduced by a factor dependent on asset class, credit quality level, and maturity. | In the internal model, firstly, a distribution for the underlying spread calibrated using current market data is simulated for each investment class, credit quality level, and maturity.<br>Secondly, a change in the risk classification and payment defaults are simulated for each issuer. In addition to corporate bonds, other items taken into account in this case (in contrast to the standardized approach) include cash exposures and government bonds. |
| Equities | A factor is used to stress the market values of all equity investments. A distinction is made between the following sub-modules: equity type 1 (including listed equities and strategic equity investments from an OECD or EEA country), equity type 2 (including equities from other countries, commodities, strategic equity investments), qualifying equity investments in infrastructure, and qualifying equity investments in infrastructure companies.<br>The solvency capital requirements determined for these sub-modules are aggregated as the equity solvency capital requirement using a correlation approach. | A distribution of equity performance calibrated using current market data is simulated for each relevant currency area. A similar distribution for private equity investments and comparable asset classes is also simulated.<br>Separate distributions of performance are calibrated and simulated for strategic equity investments. |
| Real estate | The market values of all real estate investments are reduced by a particular factor. | A distribution of real estate performance calibrated using current market data is simulated for each relevant currency area and separately for Germany. |
| Currency | The market values of all assets and liabilities denominated in foreign currency are increased/decreased by a particular factor. This gives rise to a currency increase and a currency decrease risk for each currency area, reported as the corresponding loss of own funds. | A distribution for the change in the foreign currency/euro exchange rate calibrated using current market data is simulated for each materially relevant currency area. |
| Concentration | An additional risk capital requirement is calculated using a factor approach for exposures that exceed a specified percentage of the total portfolio. | Risk concentrations in bonds and cash exposures are taken into account in the spread module via the default distributions simulated for each issuer. There is no explicit calculation of concentration risk in the internal model. |

The differences between the internal model and the standard formula in respect of the counterparty default risk module are explained below.

**Comparison between the counterparty default risk module in the internal model and the standard formula**

| Risk module | Standard formula | Internal model |
|---|---|---|
| Default | Cash exposures and various receivables exposures are subjected to a shock using a factor approach. | Defaults relating to cash exposures are simulated in the market risk module on a stochastic basis. The default risk on receivables (reinsurance and other receivables) is valued in accordance with the standardized approach. |

The differences between the internal model and the standard formula are explained below for each non-life underwriting risk sub-module.

**Comparison between the underwriting risk sub-modules in the internal model and the standard formula**

| Sub-module | Standard formula | Internal model |
|---|---|---|
| Premium and reserve risk | A factor-based approach is used in the standard formula. The standard volatility factors (market average) for each line of business are applied to the relevant volume measure (reserve or premiums). Specified correlation parameters are used in a linear correlation approach. Regional diversification is taken into account. | In the partial internal model, legal insurance is broken down into groups of risks sharing similar characteristics. The risk calculation is based on company-specific data and internal calibration. The aggregation method follows a copula approach. Well-established, up-to-date actuarial methods are used. |
| Lapse risk | A stress scenario is applied to the forecast profits from the current portfolio. | A lapse distribution is modeled, with calibration based on company-specific data. |
| Legal insurance accumulation risk | This risk is not taken into account in the standard formula. | Accumulation events represent a heightened risk in the legal insurance business. ARAG therefore models these losses with its own data using a distribution of the number and of the amount of claims. |

## Diversification

Diversification effects are highlighted by aggregating the risk distributions for the individual sub-risks into the total risk capital requirement. The diversification effect between the modules for underwriting risk, market risk, and default risk amounted to €117,047 thousand. Diversification effects arise if the risks to be aggregated are independent or only partially dependent on each other. Key diversification factors include, for example:

- Classes of insurance or segments: legal insurance disputes involving private or small business customers
- Regions: losses in different countries

To value the diversification effects within ARAG SE's partial internal model, the dependencies between the risk sub-modules and risk categories are quantified. ARAG uses its own historical data to measure the dependencies. The parameters that are calculated are reviewed annually by a committee of experts to check that they remain plausible. The correlations from the standard formula are used to aggregate the individual risk modules for the purpose of producing the BSCR (integration of the partial model into the standard formula).

**Appropriateness of data**

ARAG SE's partial internal model uses a variety of data sources as inputs for calibration and parameterization purposes. The basis is provided by the Company's own data. By using internal historical data for the calibration, it is possible to ensure that the risk profile is modeled accurately and an adequate forecast is generated.

The quality of the data used in the partial internal model's calculations is regularly reviewed. To this end, data quality standards have been laid down in a data quality management policy. The objective of the standards is to safeguard the quality and appropriateness of the necessary data over the long term. ARAG examines data quality from the following perspectives:

- Accuracy: Data must be error-free, consistent, and trustworthy.
- Completeness: Data must be up to date and provide the necessary level of detail and granularity.
- Appropriateness: Data must reflect current reality, be relevant to the business, and be fit for the intended purpose.

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

The solvency capital requirement and minimum capital requirement were complied with at all times in the reporting period.

## E.6 Any Other Information

The preceding chapters contain all of the important information about capital management.

# Appendix

## S.02.01.02
## Balance sheet

| | | Solvency II value |
|---|---|---|
| **Assets** | | **C0010** |
| Intangible assets | R0030 | 0 |
| Deferred tax assets | R0040 | 0 |
| Pension benefit surplus | R0050 | 0 |
| Property, plant & equipment held for own use | R0060 | 53,756 |
| Investments (other than assets held for index-linked and unit-linked contracts) | R0070 | 2,926,201 |
| Property (other than for own use) | R0080 | 33,395 |
| Holdings in related undertakings, including participations | R0090 | 1,199,641 |
| Equities | R0100 | 734 |
| Equities – listed | R0110 | 0 |
| Equities – unlisted | R0120 | 734 |
| Bonds | R0130 | 1,025,762 |
| Government bonds | R0140 | 360,083 |
| Corporate bonds | R0150 | 662,241 |
| Structured notes | R0160 | 3,438 |
| Collateralized securities | R0170 | 0 |
| Collective investment undertakings | R0180 | 609,625 |
| Derivatives | R0190 | 0 |
| Deposits other than cash equivalents | R0200 | 57,044 |
| Other investments | R0210 | 0 |
| Assets held for index-linked and unit-linked contracts | R0220 | 0 |
| Loans and mortgages | R0230 | 2,293 |
| Loans on policies | R0240 | 0 |
| Loans and mortgages to individuals | R0250 | 118 |
| Other loans and mortgages | R0260 | 2,175 |
| Reinsurance recoverables from: | R0270 | 470 |
| Non-life and health similar to non-life | R0280 | 470 |
| Non-life excluding health | R0290 | 470 |
| Health similar to non-life | R0300 | 0 |
| Life and health similar to life, excluding health and index-linked and unit-linked | R0310 | 0 |
| Health similar to life | R0320 | 0 |
| Life excluding health and index-linked and unit-linked | R0330 | 0 |
| Life index-linked and unit-linked | R0340 | 0 |
| Deposits to cedants | R0350 | 65,224 |
| Insurance and intermediaries receivables | R0360 | 118,020 |
| Reinsurance receivables | R0370 | 16 |
| Receivables (trade, not insurance) | R0380 | 45,781 |
| Own shares (held directly) | R0390 | 0 |
| Amounts due in respect of own fund items or initial fund called up but not yet paid in | R0400 | 0 |
| Cash and cash equivalents | R0410 | 59,638 |
| Any other assets, not elsewhere shown | R0420 | 8,315 |
| **Total assets** | R0500 | **3,279,713** |

## S.02.01.02
## Balance sheet

| | | Solvency II value |
|---|---|---|
| **Liabilities** | | **C0010** |
| Technical provisions – non-life | R0510 | 983,408 |
| Technical provisions – non-life (excluding health) | R0520 | 983,408 |
| Technical provisions calculated as a whole | R0530 | 0 |
| Best estimate | R0540 | 951,224 |
| Risk margin | R0550 | 32,184 |
| Technical provisions – health (similar to non-life) | R0560 | 0 |
| Technical provisions calculated as a whole | R0570 | 0 |
| Best estimate | R0580 | 0 |
| Risk margin | R0590 | 0 |
| Technical provisions – life (excluding index-linked and unit-linked) | R0600 | 0 |
| Technical provisions – health (similar to life) | R0610 | 0 |
| Technical provisions calculated as a whole | R0620 | 0 |
| Best estimate | R0630 | 0 |
| Risk margin | R0640 | 0 |
| Technical provisions – life (excluding health and index-linked and unit-linked) | R0650 | 0 |
| Technical provisions calculated as a whole | R0660 | 0 |
| Best estimate | R0670 | 0 |
| Risk margin | R0680 | 0 |
| Technical provisions – index-linked and unit-linked | R0690 | 0 |
| Technical provisions calculated as a whole | R0700 | 0 |
| Best estimate | R0710 | 0 |
| Risk margin | R0720 | 0 |
| Contingent liabilities | R0740 | 0 |
| Provisions other than technical provisions | R0750 | 84,918 |
| Pension benefit obligations | R0760 | 169,475 |
| Deposits from reinsurers | R0770 | 4 |
| Deferred tax liabilities | R0780 | 130,706 |
| Derivatives | R0790 | 0 |
| Debts owed to credit institutions | R0800 | 0 |
| Financial liabilities other than debts owed to credit institutions | R0810 | 0 |
| Insurance and intermediaries payables | R0820 | 44,401 |
| Reinsurance payables | R0830 | 121 |
| Payables (trade, not insurance) | R0840 | 50,550 |
| Subordinated liabilities | R0850 | 29,924 |
| Subordinated liabilities not in basic own funds | R0860 | 29,924 |
| Subordinated liabilities in basic own funds | R0870 | 0 |
| Any other liabilities, not elsewhere shown | R0880 | 194 |
| **Total liabilities** | R0900 | **1,493,701** |
| **Excess of assets over liabilities** | R1000 | **1,786,012** |

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

| | | Medical expense insurance | Income protection insurance |
|---|---|---|---|
| | | C0010 | C0020 |
| **Premiums written** | | | |
| Gross – direct business | R0110 | 0 | 0 |
| Gross – proportional reinsurance accepted | R0120 | 0 | 0 |
| Gross – non-proportional reinsurance accepted | R0130 | – | – |
| Reinsurers' share | R0140 | 0 | 0 |
| Net | R0200 | 0 | 0 |
| **Premiums earned** | | | |
| Gross – direct business | R0210 | 0 | 0 |
| Gross – proportional reinsurance accepted | R0220 | 0 | 0 |
| Gross – non-proportional reinsurance accepted | R0230 | – | – |
| Reinsurers' share | R0240 | 0 | 0 |
| Net | R0300 | 0 | 0 |
| **Claims incurred** | | | |
| Gross – direct business | R0310 | 0 | 0 |
| Gross – proportional reinsurance accepted | R0320 | 0 | 0 |
| Gross – non-proportional reinsurance accepted | R0330 | – | – |
| Reinsurers' share | R0340 | 0 | 0 |
| Net | R0400 | 0 | 0 |
| **Changes in other technical provisions** | | | |
| Gross – direct business | R0410 | 0 | 0 |
| Gross – proportional reinsurance accepted | R0420 | 0 | 0 |
| Gross – non-proportional reinsurance accepted | R0430 | – | – |
| Reinsurers' share | R0440 | 0 | 0 |
| Net | R0500 | 0 | 0 |
| **Expenses incurred** | R0550 | **0** | **0** |
| **Other expenses** | R1200 | **–** | **–** |
| **Total expenses** | R1300 | **–** | **–** |

| Line of business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance) | | | | | | |
|---|---|---|---|---|---|---|
| Workers' compensation insurance | Motor vehicle liability insurance | Other motor insurance | Marine, aviation and transport insurance | Fire and other damage to property insurance | General liability insurance | Credit and suretyship insurance |
| C0030 | C0040 | C0050 | C0060 | C0070 | C0080 | C0090 |
| | | | | | | |
| 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| – | – | – | – | – | – | – |
| 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | | | | | | |
| 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| – | – | – | – | – | – | – |
| 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | | | | | | |
| 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| – | – | – | – | – | – | – |
| 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | | | | | | |
| 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| – | – | – | – | – | – | – |
| 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| **–** | **–** | **–** | **–** | **–** | **–** | **–** |
| **–** | **–** | **–** | **–** | **–** | **–** | **–** |

Continued on next page

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

| | | Line of business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance) | | |
|---|---|---|---|---|
| | | Legal expenses insurance | Assistance | Miscellaneous financial loss |
| | | C0100 | C0110 | C0120 |
| **Premiums written** | | | | |
| Gross – direct business | R0110 | 801,152 | 51,717 | 7,748 |
| Gross – proportional reinsurance accepted | R0120 | 294,363 | 14,567 | 312 |
| Gross – non-proportional reinsurance accepted | R0130 | – | – | – |
| Reinsurers' share | R0140 | 821 | 130 | 0 |
| Net | R0200 | 1,094,694 | 66,154 | 8,060 |
| **Premiums earned** | | | | |
| Gross – direct business | R0210 | 793,281 | 50,865 | 7,747 |
| Gross – proportional reinsurance accepted | R0220 | 290,489 | 13,989 | 288 |
| Gross – non-proportional reinsurance accepted | R0230 | – | – | – |
| Reinsurers' share | R0240 | 821 | 130 | 0 |
| Net | R0300 | 1,082,949 | 64,724 | 8,035 |
| **Claims incurred** | | | | |
| Gross – direct business | R0310 | 298,887 | 25,524 | 760 |
| Gross – proportional reinsurance accepted | R0320 | 80,511 | 13,367 | 11 |
| Gross – non-proportional reinsurance accepted | R0330 | – | – | – |
| Reinsurers' share | R0340 | 1,131 | 3 | 0 |
| Net | R0400 | 378,267 | 38,888 | 771 |
| **Changes in other technical provisions** | | | | |
| Gross – direct business | R0410 | – 131 | 0 | 0 |
| Gross – proportional reinsurance accepted | R0420 | 0 | 0 | 0 |
| Gross – non-proportional reinsurance accepted | R0430 | – | – | – |
| Reinsurers' share | R0440 | 0 | 0 | 0 |
| Net | R0500 | – 131 | 0 | 0 |
| **Expenses incurred** | R0550 | **638,365** | **32,669** | **4,698** |
| **Other expenses** | R1200 | **–** | **–** | **–** |
| **Total expenses** | R1300 | **–** | **–** | **–** |

| | Line of business for: accepted non-proportional reinsurance | | | | Total |
|---|---|---|---|---|---|
| | Health | Casualty | Marine, aviation, transport | Property | |
| | C0130 | C0140 | C0150 | C0160 | C0200 |
| | | | | | |
| | 0 | 0 | 0 | 0 | 860,616 |
| | 0 | 0 | 0 | 0 | 309,242 |
| | – | – | – | – | 0 |
| | 0 | 0 | 0 | 0 | 951 |
| | 0 | 0 | 0 | 0 | 1,168,908 |
| | | | | | |
| | 0 | 0 | 0 | 0 | 851,893 |
| | 0 | 0 | 0 | 0 | 304,767 |
| | – | – | – | – | 0 |
| | 0 | 0 | 0 | 0 | 951 |
| | 0 | 0 | 0 | 0 | 1,155,709 |
| | | | | | |
| | 0 | 0 | 0 | 0 | 325,170 |
| | 0 | 0 | 0 | 0 | 93,890 |
| | – | – | – | – | 0 |
| | 0 | 0 | 0 | 0 | 1,134 |
| | 0 | 0 | 0 | 0 | 417,926 |
| | | | | | |
| | 0 | 0 | 0 | 0 | –131 |
| | 0 | 0 | 0 | 0 | 0 |
| | – | – | – | – | 0 |
| | 0 | 0 | 0 | 0 | 0 |
| | 0 | 0 | 0 | 0 | –131 |
| | **0** | **0** | **0** | **0** | **675,732** |
| | **–** | **–** | **–** | **–** | **0** |
| | **–** | **–** | **–** | **–** | **675,732** |

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

| | | Health insurance | Insurance with profit participation |
|---|---|---|---|
| | | C0210 | C0220 |
| **Premiums written** | | | |
| Gross | R1410 | 0 | 0 |
| Reinsurers' share | R1420 | 0 | 0 |
| Net | R1500 | 0 | 0 |
| **Premiums earned** | | | |
| Gross | R1510 | 0 | 0 |
| Reinsurers' share | R1520 | 0 | 0 |
| Net | R1600 | 0 | 0 |
| **Claims incurred** | | | |
| Gross | R1610 | 0 | 0 |
| Reinsurers' share | R1620 | 0 | 0 |
| Net | R1700 | 0 | 0 |
| **Changes in other technical provisions** | | | |
| Gross | R1710 | 0 | 0 |
| Reinsurers' share | R1720 | 0 | 0 |
| Net | R1800 | 0 | 0 |
| **Expenses incurred** | R1900 | **0** | **0** |
| **Other expenses** | R2500 | – | – |
| **Total expenses** | R2600 | – | – |

| | Line of business for: life insurance obligations | | | | Life reinsurance obligations | | Total |
|---|---|---|---|---|---|---|---|
| | Index-linked and unit-linked insurance | Other life insurance | Annuities stemming from non-life insurance contracts and relating to health insurance obligations | Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations | Health reinsurance | Life reinsurance | |
| | C0230 | C0240 | C0250 | C0260 | C0270 | C0280 | C0300 |
| | | | | | | | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | | | | | | | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | | | | | | | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | | | | | | | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| | **–** | **–** | **–** | **–** | **–** | **–** | **0** |
| | **–** | **–** | **–** | **–** | **–** | **–** | **0** |

## S.05.02.01
## Premiums, claims and expenses by country

| | | Home country |
|---|---|---|
| | | **C0010** |
| | R0010 | – |
| | | **C0080** |
| **Premiums written** | | |
| Gross – direct business | R0110 | 471,068 |
| Gross – proportional reinsurance accepted | R0120 | 49,310 |
| Gross – non-proportional reinsurance accepted | R0130 | 0 |
| Reinsurers’ share | R0140 | 549 |
| Net | R0200 | 519,829 |
| **Premiums earned** | | |
| Gross – direct business | R0210 | 465,565 |
| Gross – proportional reinsurance accepted | R0220 | 49,310 |
| Gross – non-proportional reinsurance accepted | R0230 | 0 |
| Reinsurers’ share | R0240 | 549 |
| Net | R0300 | 514,326 |
| **Claims incurred** | | |
| Gross – direct business | R0310 | 237,969 |
| Gross – proportional reinsurance accepted | R0320 | 32,266 |
| Gross – non-proportional reinsurance accepted | R0330 | 0 |
| Reinsurers’ share | R0340 | 956 |
| Net | R0400 | 269,279 |
| **Changes in other technical provisions** | | |
| Gross – direct business | R0410 | – 18 |
| Gross – proportional reinsurance accepted | R0420 | 0 |
| Gross – non-proportional reinsurance accepted | R0430 | 0 |
| Reinsurers’ share | R0440 | 0 |
| Net | R0500 | – 18 |
| **Expenses incurred** | R0550 | **249,164** |
| **Other expenses** | R1200 | – |
| **Total expenses** | R1300 | – |

| | | | | | Top 5 countries (by amount of gross premiums written) – non-life obligations | Total top 5 and home country |
|---|---|---|---|---|---|---|
| | C0020 | C0030 | C0040 | C0050 | C0060 | C0070 |
| | AT | BE | ES | IT | NL | – |
| | C0090 | C0100 | C0110 | C0120 | C0130 | C0140 |
| | | | | | | |
| | 84,227 | 29,696 | 120,699 | 41,284 | 103,575 | 850,548 |
| | 0 | 1,556 | 44,787 | 128,194 | 84,039 | 307,887 |
| | 0 | 0 | 0 | 0 | 0 | 0 |
| | 14 | 0 | 388 | 0 | 0 | 951 |
| | 84,212 | 31,252 | 165,098 | 169,478 | 187,614 | 1,157,483 |
| | | | | | | |
| | 83,551 | 29,512 | 118,697 | 40,484 | 104,136 | 841,946 |
| | 0 | 1,556 | 43,833 | 125,341 | 83,359 | 303,400 |
| | 0 | 0 | 0 | 0 | 0 | 0 |
| | 14 | 0 | 388 | 0 | 0 | 951 |
| | 83,537 | 31,068 | 162,143 | 165,825 | 187,495 | 1,144,394 |
| | | | | | | |
| | 20,879 | 11,843 | 38,010 | 3,998 | 9,120 | 321,819 |
| | – 12 | 682 | 28,122 | 21,205 | 11,501 | 93,762 |
| | 0 | 0 | 0 | 0 | 0 | 0 |
| | – 0 | 0 | 178 | 0 | 0 | 1,134 |
| | 20,867 | 12,525 | 65,953 | 25,202 | 20,621 | 414,448 |
| | | | | | | |
| | – 113 | 0 | 0 | 0 | 0 | – 131 |
| | 0 | 0 | 0 | 0 | 0 | 0 |
| | 0 | 0 | 0 | 0 | 0 | 0 |
| | 0 | 0 | 0 | 0 | 0 | 0 |
| | – 113 | 0 | 0 | 0 | 0 | – 131 |
| | **38,236** | **18,540** | **82,745** | **122,678** | **156,675** | **668,037** |
| | – | – | – | – | – | **0** |
| | – | – | – | – | – | **668,037** |

## S.05.02.01
## Premiums, claims and expenses by country

| | | Home country |
|---|---|---|
| | | **C0150** |
| | R1400 | – |
| | | **C0220** |
| **Premiums written** | | |
| Gross | R1410 | 0 |
| Reinsurers' share | R1420 | 0 |
| Net | R1500 | 0 |
| **Premiums earned** | | |
| Gross | R1510 | 0 |
| Reinsurers' share | R1520 | 0 |
| Net | R1600 | 0 |
| **Claims incurred** | | |
| Gross | R1610 | 0 |
| Reinsurers' share | R1620 | 0 |
| Net | R1700 | 0 |
| **Changes in other technical provisions** | | |
| Gross | R1710 | 0 |
| Reinsurers' share | R1720 | 0 |
| Net | R1800 | 0 |
| **Expenses incurred** | R1900 | **0** |
| **Other expenses** | R2500 | – |
| **Total expenses** | R2600 | – |

| | | | | Top 5 countries (by amount of gross premiums written) – life obligations | Total top 5 and home country |
|---|---|---|---|---|---|
| C0160 | C0170 | C0180 | C0190 | C0200 | C0210 |
| | | | | | – |
| C0230 | C0240 | C0250 | C0260 | C0270 | C0280 |
| | | | | | |
| 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 |
| | | | | | |
| 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 |
| | | | | | |
| 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 |
| | | | | | |
| 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 |
| **0** | **0** | **0** | **0** | **0** | **0** |
| – | – | – | – | – | **0** |
| – | – | – | – | – | **0** |

## S.17.01.02
## Non-life technical provisions

| | | Medical expense insurance | Income protection insurance |
|---|---|---|---|
| | | C0020 | C0030 |
| **Technical provisions calculated as a whole** | R0010 | **0** | **0** |
| 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 | R0050 | 0 | 0 |
| **Technical provisions calculated as a sum of BE and RM** | | | |
| Best estimate | | | |
| Premium provisions | | | |
| Gross | R0060 | 0 | 0 |
| Total recoverable from reinsurance/SPV and finite re after the adjustment for expected losses due to counterparty default | R0140 | 0 | 0 |
| Net best estimate of premium provisions | R0150 | 0 | 0 |
| **Claims provisions** | | | |
| Gross | R0160 | 0 | 0 |
| Total recoverable from reinsurance/SPV and finite re after the adjustment for expected losses due to counterparty default | R0240 | 0 | 0 |
| **Net best estimate of claims provisions** | R0250 | **0** | **0** |
| **Total best estimate – gross** | R0260 | **0** | **0** |
| **Total best estimate – net** | R0270 | **0** | **0** |
| **Risk margin** | R0280 | **0** | **0** |
| **Amount of the transitional on technical provisions** | | | |
| Technical provisions calculated as a whole | R0290 | 0 | 0 |
| Best estimate | R0300 | 0 | 0 |
| Risk margin | R0310 | 0 | 0 |
| | | | |
| **Technical provisions – total** | | | |
| Technical provisions – total | R0320 | 0 | 0 |
| Recoverable from reinsurance contract/SPV and finite re after the adjustment for expected losses due to counterparty default – total | R0330 | 0 | 0 |
| Technical provisions minus recoverables from reinsurance/SPV and finite re – total | R0340 | 0 | 0 |

| | | | | | | Direct business and accepted proportional reinsurance | |
|---|---|---|---|---|---|---|---|
| | Workers' compensation insurance | Motor vehicle liability insurance | Other motor insurance | Marine, aviation and transport insurance | Fire and other damage to property insurance | General liability insurance | Credit and suretyship insurance |
| | C0040 | C0050 | C0060 | C0070 | C0080 | C0090 | C0100 |
| | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | | | | | | | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| | | | | | | | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | | | | | | | |
| | | | | | | | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Continued on next page

## S.17.01.02
## Non-life technical provisions

| | |
|---|---|
| **Technical provisions calculated as a whole** | R0010 |
| Total recoverables from reinsurance/SPV and finite re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole | R0050 |
| **Technical provisions calculated as a sum of BE and RM** | |
| Best estimate | |
| Premium provisions | |
| Gross | R0060 |
| Total recoverable from reinsurance/SPV and finite re after the adjustment for expected losses due to counterparty default | R0140 |
| Net best estimate of premium provisions | R0150 |
| **Claims provisions** | |
| Gross | R0160 |
| Total recoverable from reinsurance/SPV and finite re after the adjustment for expected losses due to counterparty default | R0240 |
| **Net best estimate of claims provisions** | R0250 |
| **Total best estimate – gross** | R0260 |
| **Total best estimate – net** | R0270 |
| **Risk margin** | R0280 |
| **Amount of the transitional on technical provisions** | |
| Technical provisions calculated as a whole | R0290 |
| Best estimate | R0300 |
| Risk margin | R0310 |
| | |
| **Technical provisions – total** | |
| Technical provisions – total | R0320 |
| Recoverable from reinsurance contract/SPV and finite re after the adjustment for expected losses due to counterparty default – total | R0330 |
| Technical provisions minus recoverables from reinsurance/SPV and finite re – total | R0340 |

| Direct business and accepted proportional reinsurance | | | Accepted non-proportional reinsurance | | | | Total non-life obligation |
|---|---|---|---|---|---|---|---|
| Legal expenses insurance | Assistance | Miscellaneous financial loss | Non-proportional health reinsurance | Non-proportional casualty reinsurance | Non-proportional marine, aviation and transport reinsurance | Non-proportional property reinsurance | |
| C0110 | C0120 | C0130 | C0140 | C0150 | C0160 | C0170 | C0180 |
| **0** | **0** | **0** | **–** | **–** | **–** | **–** | **0** |
| 0 | 0 | 0 | – | – | – | – | 0 |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| 34,076 | –862 | 6,697 | – | – | – | – | 39,910 |
| 0 | 0 | 0 | – | – | – | – | 0 |
| 34,076 | –862 | 6,697 | – | – | – | – | 39,910 |
| | | | | | | | |
| 901,780 | 7,901 | 1,634 | – | – | – | – | 911,314 |
| 470 | 0 | 0 | – | – | – | – | 470 |
| **901,310** | **7,901** | **1,634** | **–** | **–** | **–** | **–** | **910,844** |
| **935,855** | **7,038** | **8,331** | **–** | **–** | **–** | **–** | **951,224** |
| **935,385** | **7,038** | **8,331** | **–** | **–** | **–** | **–** | **950,754** |
| **30,920** | **663** | **601** | **–** | **–** | **–** | **–** | **32,184** |
| | | | | | | | |
| 0 | 0 | 0 | – | – | – | – | 0 |
| 0 | 0 | 0 | – | – | – | – | 0 |
| 0 | 0 | 0 | – | – | – | – | 0 |
| | | | | | | | |
| | | | | | | | |
| 966,775 | 7,701 | 8,932 | – | – | – | – | 983,408 |
| 470 | 0 | 0 | – | – | – | – | 470 |
| 966,306 | 7,701 | 8,932 | – | – | – | – | 982,938 |

## S.19.01.21
## Non-life insurance claims

| Total non-life business | | |
|---|---|---|
| Accident year/Underwriting year | Z0020 | 1. Accident year |

**Gross claims paid (non-cumulative)**
*(absolute amount)*

| | | Development year | | | | | |
|---|---|---|---|---|---|---|---|
| | Year | 0 | 1 | 2 | 3 | 4 | 5 |
| | | C0010 | C0020 | C0030 | C0040 | C0050 | C0060 |
| Prior | R0100 | – | – | – | – | – | – |
| N-9 | R0160 | 93,273 | 94,943 | 41,510 | 23,419 | 15,610 | 10,642 |
| N-8 | R0170 | 103,537 | 96,881 | 42,779 | 24,060 | 16,401 | 11,180 |
| N-7 | R0180 | 113,709 | 103,612 | 45,042 | 25,770 | 17,718 | 11,441 |
| N-6 | R0190 | 125,968 | 107,656 | 47,933 | 28,615 | 18,785 | 13,205 |
| N-5 | R0200 | 134,099 | 113,966 | 48,477 | 27,411 | 21,315 | 13,671 |
| N-4 | R0210 | 138,249 | 121,834 | 50,614 | 31,711 | 21,395 | |
| N-3 | R0220 | 141,215 | 124,327 | 59,130 | 34,601 | | |
| N-2 | R0230 | 142,725 | 134,171 | 60,686 | | | |
| N-1 | R0240 | 141,925 | 132,910 | | | | |
| N | R0250 | 157,454 | | | | | |

**Gross undiscounted best estimate claims provisions**
*(absolute amount)*

| | | Development year | | | | | |
|---|---|---|---|---|---|---|---|
| | Year | 0 | 1 | 2 | 3 | 4 | 5 |
| | | C0200 | C0210 | C0220 | C0230 | C0240 | C0250 |
| Prior | R0100 | – | – | – | – | – | – |
| N-9 | R0160 | 0 | 0 | 0 | 0 | 0 | 0 |
| N-8 | R0170 | 0 | 0 | 0 | 0 | 0 | 0 |
| N-7 | R0180 | 0 | 0 | 0 | 0 | 0 | 35,197 |
| N-6 | R0190 | 0 | 0 | 0 | 0 | 49,371 | 37,105 |
| N-5 | R0200 | 0 | 0 | 0 | 69,175 | 51,580 | 37,702 |
| N-4 | R0210 | 0 | 0 | 106,344 | 76,042 | 54,345 | |
| N-3 | R0220 | 0 | 171,469 | 115,563 | 80,482 | | |
| N-2 | R0230 | 338,588 | 193,711 | 130,892 | | | |
| N-1 | R0240 | 358,350 | 202,373 | | | | |
| N | R0250 | 388,154 | | | | | |

| | | | | Development year | | In current year | Sum of years (cumulative) |
|---|---|---|---|---|---|---|---|
| 6 | 7 | 8 | 9 | 10 & + | | | |
| C0070 | C0080 | C0090 | C0100 | C0110 | | C0170 | C0180 |
| – | – | – | – | 7,493 | R0100 | 7,493 | 7,493 |
| 7,953 | 4,296 | 3,085 | 2,473 | | R0160 | 2,473 | 297,204 |
| 6,621 | 4,521 | 3,908 | | | R0170 | 3,908 | 309,888 |
| 6,745 | 5,375 | | | | R0180 | 5,375 | 329,412 |
| 9,480 | | | | | R0190 | 9,480 | 351,641 |
| | | | | | R0200 | 13,671 | 358,940 |
| | | | | | R0210 | 21,395 | 363,804 |
| | | | | | R0220 | 34,601 | 359,273 |
| | | | | | R0230 | 60,686 | 337,582 |
| | | | | | R0240 | 132,910 | 274,835 |
| | | | | | R0250 | 157,454 | 157,454 |
| | | | | **Total** | R0260 | **449,446** | **3,147,527** |

| | | | | Development year | | Year end (discounted data) |
|---|---|---|---|---|---|---|
| 6 | 7 | 8 | 9 | 10 & + | | |
| C0260 | C0270 | C0280 | C0290 | C0300 | | C0360 |
| – | – | – | – | 27,127 | R0100 | 24,952 |
| 0 | 17,803 | 12,989 | 8,784 | | R0160 | 8,080 |
| 25,657 | 18,145 | 13,035 | | | R0170 | 11,990 |
| 25,438 | 19,189 | | | | R0180 | 17,652 |
| 28,192 | | | | | R0190 | 25,935 |
| | | | | | R0200 | 34,685 |
| | | | | | R0210 | 49,996 |
| | | | | | R0220 | 74,043 |
| | | | | | R0230 | 120,405 |
| | | | | | R0240 | 186,168 |
| | | | | | R0250 | 357,407 |
| | | | | **Total** | R0260 | **911,314** |

## S.23.01.01
## Own funds

| |
|---|
| **Basic own funds before deduction for participations in other financial sectors as foreseen in article 68 of Delegated Regulation (EU) 2015/35** |
| Ordinary share capital (gross of own shares) |
| Share premium account related to ordinary share capital |
| Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings |
| Subordinated mutual member accounts |
| Surplus funds |
| Preference shares |
| Share premium account related to preference shares |
| Reconciliation reserve |
| Subordinated liabilities |
| An amount equal to the value of net deferred tax assets |
| Other own fund items approved by the supervisory authority as basic own funds not specified above |
| **Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds** |
| Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds |
| **Deductions** |
| Deductions for participations in financial and credit institutions |
| **Total basic own funds after deductions** |
| **Ancillary own funds** |
| Unpaid and uncalled ordinary share capital callable on demand |
| Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual-type undertakings, callable on demand |
| Unpaid and uncalled preference shares callable on demand |
| A legally binding commitment to subscribe and pay for subordinated liabilities on demand |
| Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC |
| Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC |
| Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC |
| Supplementary members calls – other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC |
| Other ancillary own funds |
| **Total ancillary own funds** |
| **Available and eligible own funds** |
| Total available own funds to meet the SCR |
| Total available own funds to meet the MCR |
| Total eligible own funds to meet the SCR |
| Total eligible own funds to meet the MCR |
| **SCR** |
| **MCR** |
| **Ratio of eligible own funds to SCR** |
| **Ratio of eligible own funds to MCR** |

| |
|---|
| **Reconciliation reserve** |
| Excess of assets over liabilities |
| Own shares (held directly and indirectly) |
| Foreseeable dividends, distributions and charges |
| Other basic own fund items |
| Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds |
| **Reconciliation reserve** |
| **Expected profits** |
| Expected profits included in future premiums (EPIFP) – life business |
| Expected profits included in future premiums (EPIFP) – non-life business |
| **Total expected profits included in future premiums (EPIFP)** |

| | Total | Tier 1 – unrestricted | Tier 1 – restricted | Tier 2 | Tier 3 |
|---|---|---|---|---|---|
| | C0010 | C0020 | C0030 | C0040 | C0050 |
| | – | – | – | – | – |
| R0010 | 100,000 | 100,000 | – | 0 | – |
| R0030 | 0 | 0 | – | 0 | – |
| R0040 | 0 | 0 | – | – | – |
| R0050 | 0 | – | 0 | 0 | 0 |
| R0070 | 0 | 0 | – | – | – |
| R0090 | 0 | – | 0 | 0 | 0 |
| R0110 | 0 | – | 0 | 0 | 0 |
| R0130 | 1,610,565 | 1,610,565 | – | – | – |
| R0140 | 0 | – | 0 | 0 | 0 |
| R0160 | 0 | – | – | – | 0 |
| R0180 | 0 | 0 | 0 | 0 | 0 |
| | – | – | – | – | – |
| R0220 | 0 | – | – | – | – |
| | – | – | – | – | – |
| R0230 | 0 | 0 | 0 | 0 | 0 |
| R0290 | **1,710,565** | **1,710,565** | **0** | **0** | **0** |
| | – | – | – | – | – |
| R0300 | 0 | – | – | 0 | – |
| R0310 | 0 | – | – | 0 | – |
| R0320 | 0 | – | – | 0 | 0 |
| R0330 | 0 | – | – | 0 | 0 |
| R0340 | 0 | – | – | 0 | – |
| R0350 | 0 | – | – | 0 | 0 |
| R0360 | 0 | – | – | 0 | – |
| R0370 | 0 | – | – | 0 | 0 |
| R0390 | 0 | – | – | 0 | 0 |
| R0400 | **0** | – | – | **0** | **0** |
| | | | | | |
| R0500 | 1,710,565 | 1,710,565 | 0 | 0 | 0 |
| R0510 | 1,710,565 | 1,710,565 | 0 | 0 | – |
| R0540 | 1,710,565 | 1,710,565 | 0 | 0 | 0 |
| R0550 | 1,710,565 | 1,710,565 | 0 | 0 | – |
| R0580 | **499,957** | – | – | – | – |
| R0600 | **188,022** | – | – | – | – |
| R0620 | **3.42** | – | – | – | – |
| R0640 | **9.10** | – | – | – | – |

| | C0060 |
|---|---|
| | |
| R0700 | 1,786,012 |
| R0710 | 0 |
| R0720 | 20,000 |
| R0730 | 100,000 |
| R0740 | 55,447 |
| R0760 | **1,610,565** |
| | |
| R0770 | 0 |
| R0780 | 137,998 |
| R0790 | **137,998** |

## S.25.02.21
## Solvency capital requirement – for undertakings using the standard formula and partial internal model

| Unique number of component | Components description | Calculation of the solvency capital requirement | Amount modeled | USP | Simplifications |
|---|---|---|---|---|---|
| C0010 | C0020 | C0030 | C0070 | C0080 | C0090 |
| 1 | Market risk | 500,240 | 500,240 | | |
| 2 | Counterparty default risk | 24,572 | 0 | | |
| 3 | Life underwriting risk | 0 | 0 | | |
| 4 | Health underwriting risk | 0 | 0 | | |
| 5 | Non-life underwriting risk | 167,736 | 167,736 | | |
| 6 | Intangible asset risk | 0 | 0 | | |
| 7 | Operational risk | 34,724 | 0 | | |
| 8 | LAC technical provisions | 0 | 0 | | |
| 9 | LAC deferred taxes | – 110,267 | 0 | | |

| Calculation of solvency capital requirement | | C0100 |
|---|---|---|
| Total undiversified components | R0110 | 617,004 |
| Diversification | R0060 | – 117,047 |
| Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC | R0160 | 0 |
| **Solvency capital requirement excluding capital add-on** | R0200 | **499,957** |
| Capital add-ons already set | R0210 | 0 |
| **Solvency capital requirement** | R0220 | **499,957** |
| **Other information on SCR** | | – |
| Amount/estimate of the overall loss-absorbing capacity of technical provisions | R0300 | 0 |
| Amount/estimate of the overall loss-absorbing capacity of deferred taxes | R0310 | – 110,267 |
| Capital requirement for duration-based equity risk sub-module | R0400 | 0 |
| Total amount of notional solvency capital requirements for remaining part | R0410 | 0 |
| Total amount of notional solvency capital requirements for ring fenced funds (other than those related to business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional)) | R0420 | 0 |
| Total amount of notional solvency capital requirement for matching adjustment portfolios | R0430 | 0 |
| Diversification effects due to RFF nSCR aggregation for article 304 | R0440 | 0 |

| Approach to tax rate | | C0109 |
|---|---|---|
| Approach based on average tax rate (yes/no) | R0590 | 1: Yes |

| Loss-absorbing capacity of deferred taxes | | C0130 |
|---|---|---|
| Amount/estimate of LAC DT | R0640 | – 110,267 |
| Amount/estimate of LAC DT justified by reversion of deferred tax liabilities | R0650 | – 110,267 |
| Amount/estimate of LAC DT justified by reference to probable future taxable economic profit | R0660 | 0 |
| Amount/estimate of LAC DT justified by carry back, current year | R0670 | 0 |
| Amount/estimate of LAC DT justified by carry back, future years | R0680 | 0 |
| Amount/estimate of maximum LAC DT | R0690 | – 130,706 |

## 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 |
| MCRNL result | R0010 | 188,022 |

| | | Net (of reinsurance/SPV) best estimate and TP calculated as a whole | Net (of reinsurance) written premiums in the last 12 months |
|---|---|---|---|
| | | C0020 | C0030 |
| Medical expense insurance and proportional reinsurance | R0020 | 0 | 0 |
| Income protection insurance and proportional reinsurance | R0030 | 0 | 0 |
| Workers' compensation insurance and proportional reinsurance | R0040 | 0 | 0 |
| Motor vehicle liability insurance and proportional reinsurance | R0050 | 0 | 0 |
| Other motor insurance and proportional reinsurance | R0060 | 0 | 0 |
| Marine, aviation and transport insurance and proportional reinsurance | R0070 | 0 | 0 |
| Fire and other damage to property insurance and proportional reinsurance | R0080 | 0 | 0 |
| General liability insurance and proportional reinsurance | R0090 | 0 | 0 |
| Credit and suretyship insurance and proportional reinsurance | R0100 | 0 | 0 |
| Legal expenses insurance and proportional reinsurance | R0110 | 935,385 | 1,096,725 |
| Assistance and proportional reinsurance | R0120 | 7,038 | 51,821 |
| Miscellaneous financial loss insurance and proportional reinsurance | R0130 | 8,331 | 21,936 |
| Non-proportional health reinsurance | R0140 | 0 | 0 |
| Non-proportional casualty reinsurance | R0150 | 0 | 0 |
| Non-proportional marine, aviation and transport reinsurance | R0160 | 0 | 0 |
| Non-proportional property reinsurance | R0170 | 0 | 0 |

## S.28.01.01
## Minimum capital requirement – only life or only non-life insurance or reinsurance activity

**Linear formula component for life insurance and reinsurance obligations**

| | | C0040 |
|---|---|---|
| MCRL result | R0200 | 0 |

| | | Net (of reinsurance/SPV) best estimate and TP calculated as a whole | Net (of reinsurance/SPV) total capital at risk |
|---|---|---|---|
| | | C0050 | C0060 |
| Obligations with profit participation – guaranteed benefits | R0210 | 0 | – |
| Obligations with profit participation – future discretionary benefits | R0220 | 0 | – |
| Index-linked and unit-linked insurance obligations | R0230 | 0 | – |
| Other life (re)insurance and health (re)insurance obligations | R0240 | 0 | – |
| Total capital at risk for all life (re)insurance obligations | R0250 | – | 0 |

**Overall MCR calculation**

| | | C0070 |
|---|---|---|
| Linear MCR | R0300 | 188,022 |
| SCR | R0310 | 499,957 |
| MCR cap | R0320 | 224,980 |
| MCR floor | R0330 | 124,989 |
| Combined MCR | R0340 | 188,022 |
| Absolute floor of the MCR | R0350 | 2,500 |
| | | **C0070** |
| Minimum capital requirement | R0400 | 188,022 |

# Further Information

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You can obtain up-to-date **information about the Group** using the following contact details:
**ARAG**
**Corporate Communications/Marketing**
**ARAG Platz 1**
**40472 Düsseldorf**
**Germany**
**Tel: +49 (0)211 963 3488**
**Fax: +49 (0)211 963 2025**
**+49 (0)211 963 2220**
**Email: medien@ARAG.de**

**If you would like an individual quote**, you can contact us at any time by telephone, fax, or email:
**Tel: +49 (0)211 98 700 700**
**Fax: +49 (0)211 963 2850**
**Email: service@ARAG.de**

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**ARAG SE** ARAG PLATZ 1 · 40472 DÜSSELDORF · GERMANY · WWW.ARAG.COM