

## TEMPLATE D FOR THE DISCLOSURE OF QUALITATIVE AGGREGATE STATISTICAL DATA ON THE SUPERVISORY AUTHORITY

Cell Number	Item	31.12.2021	31.12.2022	31.12.2023	31.12.2024
B1a	The structure of the supervisory authority	Organisational structure	Organisational structure	Organisational structure	Organisational structure
B8a	The criteria used for the application of capital add-ons	Capital add-on covering incremental risks arising from shortcomings in the corporate governance system, applied for deficiencies in the BEL and SCR calculation processes as well as in the ORSA process and capital management due to governance failures in the processes related to SII assessments. These shortcomings prevent the correct detection, measurement, monitoring, management and reporting of the risks to which a company is or could be exposed, as they do not allow to clearly identify the risk profile. Other supervisory measures taken were found to be ineffective.	N/A	N/A	Capital add-on under Article 47-sexies (1) (a) of the Code of Private Insurance for significant deviation of the risk profile from the assumptions underlying the Solvency Capital Requirement calculated using the standard formula and considering that an internal model is being prepared.
B8b	The criteria used for the calculation of capital add-ons	Capital add-on identified as 10% of SCR based on the following factors under Art. 277 of Delegated Regulation 2015/35:  - the deviations from governance standards resulting from non-compliance with statutory and regulatory provisions are such as to jeopardise sound and prudent management and are particularly relevant in view of the 'enhanced' corporate governance;  - anomalies in the BEL calculation processes are likely to affect the size of the shocks included in the standard formula for quantifying the financial losses underlying the SCR calculation. These shortcomings, also on the basis of the available quantitative evidence, are of such a magnitude as to have a negative impact on the solvency safeguards put in place to protect policyholders and beneficiaries; - the resolution of the anomalies does not appear to be rapidly defined, also in view of the time that has elapsed since the conclusion of inspections and of IVASS' repeated interventions. The widespread and complex shortcomings still present may affect the time needed for their complete removal.	N/A		The capital add-on to the requirement is calculated, in accordance with Article 282 of Delegated Regulation (EU) 2015/35 and Article 10 of IVASS Regulation No. 48/2021, on the basis of the difference between the capital requirement for the health insurance underwriting risk calculated by adopting the volatility parameters, determined by applying the USP methodology to the business and corporate sub-segments of the income protection segment, in the pricing and reserving risk sub-module and the capital requirement for health insurance underwriting risk calculated by adopting the standard formula parameters.
B8c	The criteria used for the removal of capital add-ons	N/A	N/A	N/A	As a result of the review of the capital add-on carried out pursuant to Article 47-sexies, paragraph 6, of Legislative Decree 209/2005, Article 15 of IVASS Reg. No. 48/2021 and Article 6 of Implementing Reg. (EU) 2015/2012, IVASS has ascertained that the deficiencies found have been remedied.  In this regard, the analyses carried out, both off-site and on-site, revealed the adequacy of the actions implemented by the company to remove the prerequisites underlying the measure by which the capital add-on was imposed. This was in view of:  - the actions that have strengthened the overall corporate governance system, including the changes to the organisational and control structures, together with the strengthening of the key functions, also with regard to staffing, which are in line with regulatory standards;  - the changes to the BEL and SCR calculation processes, with particular regard to the adoption of the new model for determining technical items and the related adjustment of methodological choices and the calibration of assumptions;  - the positive effects on the ORSA process of the new calculation model, which allows an adequate representation of an undertaking's risk profile and solvency position  - the positive assessment by the Board of Directors on the complete implementation of the initiatives envisaged in the Remedial Plan.
B16b	The main features of the approved items of ancillary own funds	N/A	N/A	N/A	N/A
B17b	The main features of the approved items of own-fund items, which are not covered by the relevant lists of the Articles 69, 72, 74, 76 and 78 of Delegated Regulation (EU) 2015/35	N/A	N/A	N/A	N/A
В17с	The method used to assess and classify the approved items of own-fund items, which are not covered by the relevant lists of the Articles 69, 72, 74, 76 and 78 of Delegated Regulation (EU) 2015/35	N/A	N/A	N/A	N/A
B18b	The scope of peer review analyses organised and conducted by EIOPA in accordance with Article 30 of Regulation (EU) No 1094/2010, in which the supervisory authority participated.	Peer review on product oversight and governance (PoG) only for insurance-based investment products (IBIPs) – questionnaire, answers of supervisors and fieldwork     Peer review on propriety of administrative, management or supervisory body members and qualifying shareholders – assessment and report structure	Follow-up of the peer review on propriety of AMSB Members and qualifying shareholders – finished in July – final activities and report      Peer review on product oversight and governance (PoG) only for insurance based investment products (IBIPs) – fieldwork, recommendations to Supervisors and report      Peer review on Prudent Person Principle (PPP): notice and appointment of reviewers	Follow-up of the peer review on product oversight and governance (PoG) only for insurance-based investment products (IBIPs) – conclusion and report published in July     Follow-up of the peer review on Prudent Person Principle (PPP): fieldwork and drafting of recommendations to Supervisors	Peer review on the Prudent Person Principle (PPP) - conclusion and Report published in May 2024.      Peer review on stochastic technical provisions valuations for products with options and guarantees, covering life insurance - conclusion and report published in March 2025.      Follow-up of the peer review on externalisation - launch, appointment of auditors, preparatory work and definition of questionnaire.