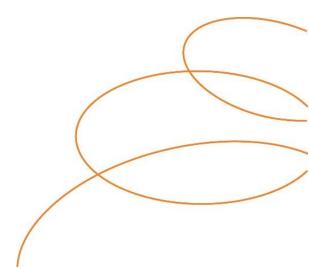




SOLVENCY AND FINANCIAL CONDITION REPORT 2020

PROTECTOR FORSIKRING ASA





This document is prepared in accordance with the requirements of the Norwegian Supervisory Authority for SFCR reporting in line with Commission Delegated Regulation 2015/35. *This is an office translation; the Norwegian version of the document precedes in case of deviations.*

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Summary

Protector Forsikring ASA had growth of 8% (2% in local currency) in 2020. Combined ratio for own account was 94,8%. The company's SCR ratio calculated using standard formula including volatility adjustment was 190% per 31.12.2020. NOK 3 dividend per share (TNOK 246 859 in total) is subtracted from available solvency capital in calculation of SCR ratio. Eligible solvency capital was TNOK 3 814 019 compared to TNOK 2 967 433 at the end of 2019 as a result of good investment and technical result. Solvency capital requirement was TNOK 2 002 854 per 31.12.2020 compared to TNOK 1 725 772 year before. Increase is driven by higher reserves for own account as a result of the company's growth and reduced reinsurance share as well as higher market risk due to growth in the investment portfolio and change in risk profile.

The company implemented multiple profitability measures in 2020. The underlying profitability is good and with high/ moderate increase in prices in the Nordics the technical result is expected to further improve.

Protector Forsikring works continuously with risk management systems in the company and this has been a focus area in 2020. Established processes and reporting systems ensure that Protector's risk management system is adequately organized and that the company's risk profile is followed up on a regular basis.

A. Business and Performance

A.1 Business

Protector Forsikring ASA, org. nr. 985279721, business address Støperigata 2, 0250 Oslo, Norge, is a general insurance company organized as a public limited liability company and listed on the Oslo Stock Exchange. The company operates in Norway, Sweden, Denmark, the UK and Finland.

This report is presented in TNOK, which is the company's reporting currency unless otherwise stated.

Name and contacts of the company's public supervisory authority

Name: The Norwegian Supervisory Authority

Business address: Revierstredet 3, 0151 Oslo, Norway

Phone: 22 93 98 00

Company's external auditor per 31.12.2019

Name: Ernst & Young AS

Business address: Dronning Eufemias street 9, 0191 Oslo, Norway

Phone: 91 66 90 00





A.2 Underwriting performance

The company's growth was 8% (2% in local currency) in 2020 compared to 2019. Growth is driven by the UK (9,3 percentage points) while growth in the Nordics was negative (1,2 percentage points). Gross combined ratio was 92,5% in 2020 compared to 102,8% in 2019. Combined ratio for own account was 94,8% (103,8% in 2019). The technical result was driven by very strong results in the UK and Norway, good results in Sweden, reserve gains in Finland and large reserve losses in Denmark. In total, the underlying profitability is considered to be somewhat better as the reserve losses and large claims are above normal and in total exceed the positive effects of Covid-19.

The claims ratio for own account was 84,6%, down from 95,2% in 2019. Price increases and portfolio clean-up drives claims ratio down. Covid-19 pandemic had a positive effect on claims ratio for own account, approximately at 1 percentage point for the full year. The effect was primarily related to motor insurance, partially offset by business interruptions in the UK. The landslide in Gjerdrum in December was defined as natural peril event and resulted in a loss of NOK 45 mill. The effect on claims ratio was 1 percentage point for the full year.

Table 1 shows results per geographic area¹.

For more information about the company's results and development in 2020, please see Protector's annual report for 2020 which is available at the company's home page www.protectorforsikring.no.

Table 1 Geographic distribution of the company's 2020-2019 results

	Norway Sweden Denmark UK Finland Total									tal		
[1.000 NOK]	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019
Gross premiums written	1 382 605	1 540 492	1 607 426	1 549 545	972 504	937 058	1 327 792	852 688	225 996	220 675	5 516 322	5 100 457
Gross premiums written	1 443 433	1 583 931	1 605 185	1 491 939	982 997	921 528	1 130 990	744 386	216 957	253 970	5 379 562	4 995 754
•			(1 269 108)							(360 069)		(4 723 921
Gross claims incurred	(1 170 485)	(1 591 525)	,,	(1 343 331)	(1 105 963)	(885 105)	(722 110)	(543 892)	(156 954)	(,	(4 424 620)	•
Earned premiums, net of reinsurance	1 292 632	1 367 102	1 401 905	1 264 815	861 121	786 018	863 837	504 947	194 018	224 631	4 613 513	4 147 513
Other insurance-related income	4 986	4 153	457	664	443	1 733	8 588	2 275	5 035	1 685	19 510	10 510
Claims incurred, net of reinsurance	(1 036 188)	(1 356 585)	(1 119 342)	(1 058 088)	(991 252)	(776 548)	(610 976)	(436 362)	(143 612)	(321 515)	(3 901 370)	(3 949 099
Sales cost	(66 448)	(37 645)	(141 004)	(127 649)	(22 321)	(16 721)	(97 390)	(47 504)	(4 169)	(3 990)	(331 332)	(233 508
Administration cost	(58 003)	(45 801)	(63 440)	(42 861)	(43 851)	(42 466)	(48 895)	(39 239)	(7 097)	(9 548)	(221 286)	(179 916)
Commission from reinsurance	45 189	546	24 598	31 348	(16 527)	12 893	23 880	22 690	4 467	(10 288)	81 607	57 188
Other insurance-related expenses	(1 123)	(7 126)	(1 792)	(2 962)	(5 904)	(2 081)	(2 897)	(2 011)	(2 334)	(1 537)	(14 049)	(15 717)
Technical result	181 046	(75 357)	101 382	65 266	(218 290)	(37 173)	136 146	4 797	46 307	(120 562)	246 591	(163 029)
Other income/cost	(63 837)	(50 067)	(479)	(98)	(1 166)	2	(1 787)	11	295	(194)	(66 973)	(50 346)
Net financial income	770 023	84 851	84 108	39 960	3 724	2 222	14 812	3 689	(7 468)	10 718	865 199	141 439
Profit before tax	887 232	(40 573)	185 011	105 128	(215 732)	(34 949)	149 172	8 497	39 135	(110 038)	1 044 818	(71 935)
Claims ratio, net of ceded business	80,2 %	99,2 %	79,8 %	83,7 %	115,1 %	98,8 %	70,7 %	86,4 %	74,0 %	143,1 %	84,6 %	95,2 %
Expense ratio, net of ceded business	6,1 %	6,1 %	12,8 %	11,0 %	9,6 %	5,9 %	14,2 %	12,7 %	3,5 %	10,6 %	10,2 %	8,6 %
Combined ratio, net of ceded business	86,3 %	105,3 %	92,7 %	94,7 %	124,7 %	104,7 %	84,9 %	99,1 %	77,5 %	153,7 %	94,8 %	103,8 %
Dross claims ratio	81,1 %	100,5 %	79,1 %	90,0 %	112,5 %	96,0 %	63,8 %	73,1 %	72,3 %	141,8 %	82,2 %	94,6 %
Gross expense ratio	8,6 %	5,3 %	12,7 %	11,4 %	6,7 %	6,4 %	12,9 %	11,7 %	5,2 %	5,3 %	10,3 %	8,3 %
Gross combined ratio	89,7 %	105,7 %	91,8 %	101,5 %	119,2 %	102,5 %	76,8 %	84,7 %	77,5 %	147,1 %	92,5 %	102,8 %

¹ Excluding change of ownership (COI) in Norway. It was decided to discontinue COI in 2018 and COI is defined as discontinued operations in the financial statements.





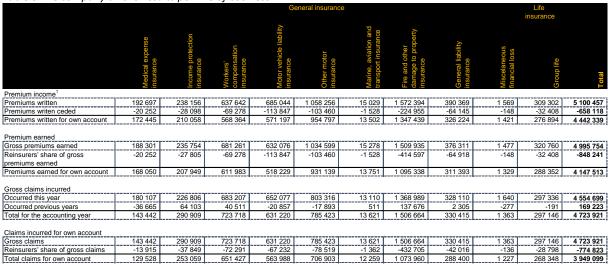
The company's underwriting results in 2020 and 2019 are presented in Table 2 and Table 3 below.

Table 2 The company's 2020 results per line of business

Table 2 The company's	2020 resu	iits per iin	e of busii	ness							
	General insurance							Life insurance			
	Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Miscelaneous financial loss	Group life	Total
Premium income ^{1,2}											
Premiums written	191 415	142 662	546 864	691 892	1 170 216	15 592	2 007 399	450 221	1 688	298 374	5 516 322
Premiums writen ceded	-20 503	-9 494	-57 246	-135 685	-116 961	-1 543	-304 045	-101 210	-181	-30 858	-777 726
Premiums written for own account	170 912	133 168	489 618	556 206	1 053 256	14 048	1 703 353	349 011	1 508	267 516	4 738 596
Premium earned											
Gross premiums earned	197 038	182 410	561 979	701 600	1 169 607	15 433	1 831 364	415 621	1 806	302 705	5 379 562
Reinsurers' share of gross premiums earned	-20 386	-10 970	-57 246	-135 685	-116 961	-1 543	-302 669	-89 550	-181	-30 858	-766 049
Premiums earned for own account	176 652	171 440	504 733	565 915	1 052 646	13 890	1 528 694	326 070	1 625	271 847	4 613 513
Gross claims incurred											
Occurred this year	175 870	177 014	515 933	616 540	721 245	8 049	1 441 507	337 138	859	310 273	4 304 429
Occurred previous years	2 731	41 940	65 214	52 441	-25 868	-2 498	-24 563	14 026	-401	-2 832	120 191
Total for the accounting year	178 601	218 955	581 147	668 981	695 378	5 551	1 416 943	351 164	458	307 441	4 424 620
Claims incurred for own account											
Gross claims	178 601	218 955	581 147	668 981	695 378	5 551	1 416 943	351 164	458	307 441	4 424 620
Reinsurers' share of gross claims	-18 239	-28 643	-57 828	-108 661	-71 127	-555	-138 900	-67 364	-46	-31 887	-523 249
Total claims for own account	160 362	190 312	523 320	560 320	624 250	4 996	1 278 044	283 800	413	275 554	3 901 370

¹ Premiums comprise insurance premiums in Norway, Sweden, Denmark, Finland and the UK. Gross written premiums constitute NOK 1.382,6 millioner (25,1%) in Norway, NOK 1.607,4 millioner (29,1%) in Sweden, NOK 972,5 millioner (17,6%) in Denmark, NOK 1.327,8 millioner (24,1%) in the UK and NOK 226 millioner (4,1%) in Finland.

Table 3 The company's 2019 results per line of business



Premiums comprise insurance premiums in Norway, Sweden, Denmark, Finland and the UK. Gross written premiums in Norway consitute NOK 1.540,5 million (30,2%), in Sweden NOK 1.549,5 million (30,4%), in Denmark NOK 937,1 million (18,4%), in the UK 852,7 million (16,7%) and in Finland NOK 220,7 million (4,3%)

Protector Forsikring has in the beginning of 2021 exited workers compensation market within the health and welfare sectors in Norway due to authorities' decision to include Covid-19 in workers compensation coverage. Furthermore, the company has exited workers compensation as a single product market in Denmark due to high risk capital consumption combined with poor historical profitability. These defined measures constitute a premium reduction of TNOK 200 000.



² Defined as alternative performance measures (APM). APMs are described on the company's website hjemmeside www.protectorforsikring.no in a documents APMs Protector Forsikring 2020.



A.3 Investment performance

The company's net investment results per asset class is presented in Table 4.

Table 4 Investment result 2020-2019 per asset class

Investment portfolio	2020	2019
Avg. investment portfolio	12 060 249	10 814 411
Equities	1 242 199	1 146 836
Bonds	10 818 050	9 667 575
Share equities	10 %	11 %
Share bonds	90 %	89 %
Result equities	34,9%	-3,9%
Result bonds	5,0%	2,1%
Return equities	433 835	-44 533
Return bonds	535 717	201 709
Investment result, net	969 552	157 176
Return, net	8,0%	1,5%

Average share invested in equities was 10% in 2020 compared to 11% in 2019. Protector's investments in equities comprised mainly investments in companies listed on stock exchange in Sweden, Norway and Denmark. Net return on equity investment was 34,9% in 2020. Return on equities excluding put options was 36,1%. Equities return was affected by strong underlying development in the investment companies and repricing of the companies during the year. Return on the total bond portfolio was 5,0% in 2020. The company increased allocation to high-yield obligations at the end of Q1 and in the beginning of Q2 after a significant fall in the financial markets. Following price gains due to tightening of credit spreads combined with interest rate income contributed to a good 2020 result in the interest-bearing portfolio. Total risk in the bond portfolio is valued at A- at the end of 2020. Total investment result was 8,0% in 2020 compared to 1,5% in 2019.

The company's investment portfolio is accounted for at fair value through profit and loss, and the company had no investment gains or losses which were accounted for directly in shareholder capital in 2020.

A.4 Performance of other activities

The company had no significant income or expenses from other activities.

A.5 Any other information

All significant information about Protector's operations and results is deemed provided above.





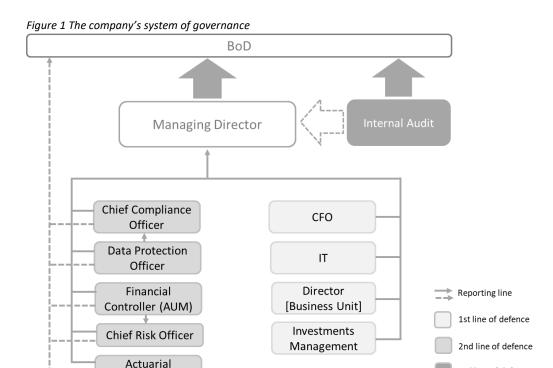
3rd line of defence

B. System of Governance

Function

B.1 General information on the system of governance

The company's overall system of governance is presented in Figure 1.



The figure presents an overview of key functions and reporting lines in the company. All risk management and compliance functions report directly to the managing director with an exception of internal audit which reports directly to the Board of Directors. Chief Compliance Officer, Chief Risk Officer and actuarial function has right and duty to report directly to the Board of Directors in special cases. Second line functions are administratively organized under CFO. The company's Data Protection Officer reports to Chief Compliance Officer and has right and duty to report to the Board of Directors directly in special cases. Financial Controller reports to the managing director and the Board of Directors.

The Board of Directors has the ultimate responsibility for Protector Forsikring having established appropriate and effective processes for risk management and internal control. The Board of Directors shall ensure that these processes are adequately established, implemented and followed up.

Through establishment of the company's goals, strategies and risk appetite the Board of Directors define framework for types and extent of risks the company can be exposed to. The Board of Directors shall at least annually ensure that significant risks are continually identified, assessed, and managed in a systematic way, and that the risks are acceptable and within defined framework. The above is ensured through internal control and ORSA processes. The company's Board of Directors has Audit and Risk sub-committees. These sub-committees support the Board of Directors in execution of its responsibilities for the company's total risk management and control.



Managing director ensures that risk management and internal control in Protector Forsikring is carried out, documented, monitored and followed up in a satisfactory way. The managing director defines for this purpose descriptions and guidelines for how the company's risk management and internal control shall be implemented in practice as well as establishes adequate control functions and processes.

The managing director follows up continuously changes in the company's risk exposure and informs the Board of Directors about significant changes. The managing director ensures that the company's risks are secured or in compliance with the Board of Directors' guidelines, and ensures that leaders for all the significant business areas follow up implementation of internal control.

All leaders are responsible for that risk management and internal control within own area of responsibility is sufficient. This entails:

- having overview of all significant risks within own area of responsibility at all times,
- following up implementation of and compliance with corresponding control measures,
- adjusting general requirement for risk management and control to type, extent and complexity within own area, hereunder assessing need for more detailed instructions or guidelines.

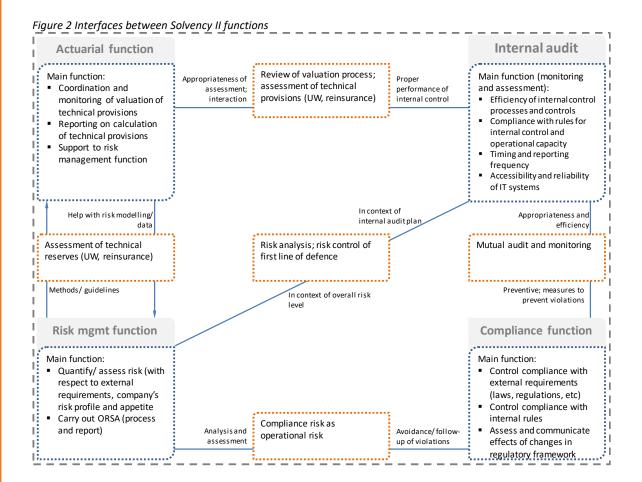
Leaders shall be able to substantiate that adequate control of risks is established and functions. Leaders for significant business areas carry out and document an annual risk assessment according to the company's requirements as well as follow up earlier control measures.

Risk management function in the company is responsible for monitoring the company's risk management system and for having an overview of the risks the company is or can be exposed to. Chief Risk Officer ensures that the company's management and the Board of Directors are adequately informed about the company's risk profile at all times and that it is within the company's risk appetite. Risk management function is responsible for the managing director and the Board of Directors receiving relevant and timely information about implementation of the company's risk management. Risk management function shall ensure that in case of significant changes or establishment of new products and significant routines risk assessment is carried out before activities are started. Risk management function facilitates the annual ORSA process.

Information about compliance, internal audit and actuarial functions is provided in chapters B.4 Internal control system, B.5 Internal audit function and B.6 Actuarial function.

Figure 2 in next page describes interaction between the key Solvency II functions.





Protector Forsikring works continuously with risk management systems in the company and this area has continued to be in focus in 2020.

Remuneration. The company's Board of Directors prepares guidelines for determination of salary and other remuneration for senior managers, ref. Public Limited Companies Act § 6-16a. General meeting shall approve guidelines, ref. Limited Companies Act § 5-6 (3). The Board of Directors has since 2010 had a separate Compensation Committee which consists of three members: the chairman of the Board of Directors and two Board members. The Compensation Committee prepares cases for the Board of Directors and puts forward cases related to remuneration to senior executives and cases related to significant personnel-related cases in the company.

The purpose of Protector's salary policy is to attract employees with the necessary competence, further develop and maintain the key competence and motivate for long-term and continued progress in order to achieve Protector's business goals. Protector's policy shall, first and foremost, be directed towards proposition of a total remuneration which is competitive so that the company can attract and maintain the best senior executives.

Salary to the managing director and other economic benefits are established by the Board of Directors based on the proposition from the compensation committee. Terms and approval for other senior executives are established by the managing director within the framework approved by the Board of Directors.



The total remuneration to senior executives consists of fixed salary, variable salary, pension, and other benefits.

The fixed salary is reviewed annually and determined based on salary development in the society in general and financial sector in particular.

The total remuneration to senior executives shall be competitive and reflect work efforts, responsibilities and professional challenges that are related to the leadership responsibilities in a company of the size of Protector and the branch.

The variable salary (bonus) to senior executives can be paid based on a concrete result measurement of the defined goal areas derived from the company's strategy and goals. The review takes into account a combination of the company's total targeted result, relevant business unit as well as estimation of a personal contribution, thereof a total valuation with regards to the compliance with the company's vision, values and leadership principles. Variable salary for senior executives is set by the Board of Directors on the basis of levels set by the compensation committee.

The company in 2013 established a long-term bonus policy for the senior executives and other key personnel. See note 21 in the company's annual report for 2020 for a detailed description of calculation and pay-out method for the long-term bonus scheme.

Any fringe benefits shall have connection with one's functions in the company and shall be in line with general practices in the market.

Pension age for the managing director is 62 years and 67 years for other senior manages in Norway. Senior executives' pension age is 65 years in Sweden, the UK and Finland, and 70 years in Denmark. In Norway the senior executives are participants in the company's defined contribution pension plan. The managing director has in addition an agreement about top pension which totals maximum 8,4G. Senior executives in Sweden and Denmark have defined contribution pension arrangement which is a standard for the branch.

The managing director has an agreement for 6-month termination notice and up to 12-month salary after termination of employment relationship. Other senior executives have an agreement for 6-12 months termination notice and some have an agreement for up to 12-month salary after termination of employment relationship.

The Board of Directors has approved establishment of a long-term bonus policy for key personnel in investments department. See note 21 in the company's annual report for 2020 for a detailed description of calculation and pay-out method for the long-term bonus scheme for key personnel in investments department.

The Board of Directors has approved establishment of share purchase program for all employees in Protector Forsikring ASA including the managing director and senior executive managers. All permanents employees are given an opportunity to buy shares for a defined annual amount. Shares





are bought once a year after General Meeting is held. The company provides an interest-free loan for the invested amount which is paid back during 12 months through deductions from salary. Employees receive a 20% discount on the purchase of shares, limited up to maximum tax-free discount. After two years the employee will receive one bonus share for each fifth share owned provided that the employee is still employed in the company.

On 1 January 2021, the Board has allocated 200,000 shares to Country Manager Sweden Hans Didring and 200 000 shares to Director UK and public sector Henrik Golfetto Høye (new CEO from September 2021) provided that they remain in the company for three years and subject to the approval of the general meeting. In the Board's assessment, it is of great importance for the company's further development that both continue in the company for a minimum of a three-year period.

Information about remuneration for 2020 as well as overview of transactions between members of administrative, managing or control bodies is provided in note 21 in Protector Forsikring's annual report for 2020.

B.2 Fit and proper requirements

The company has established "Policy for fit and proper assessment in Protector Forsikring ASA" in order to ensure that key personnel, including members of administration, the Board of Directors and senior management have adequate qualifications, knowledge and relevant experience for managing the company in a prudent way.

Fitness is assessed based on relevant professional qualifications in addition to a sound reputation and other relevant information about conduct in order to ensure that the position will be fulfilled in a prudent manner. Professional and formal qualifications, knowledge and relevant experience within insurance, other finance, law or other business is the basis for assessment of competence. Assessment includes, when relevant, skill within economy, accounting, insurance mathematics as well as managerial skills.

Education and personal traits as well as competence and experience requirements for key functions are specified in relevant position descriptions as well as guidelines for the functions. During recruitment process potential candidates are assessed against requirements for competence and experience before decision is taken. In cases of new information indicating need for renewed assessment, changes in regulatory framework, new requirements for corporate governance, changes in key functions or changes in the composition of the Board of Directors, Protector Forsikring will carry out new fit and proper assessments. Every second year the company will review need for new fit and proper assessment even if persons are the same.

Fit and proper assessment of relevant leading and key persons is carried out according to the Financial Supervisory Authority's regulatory framework.



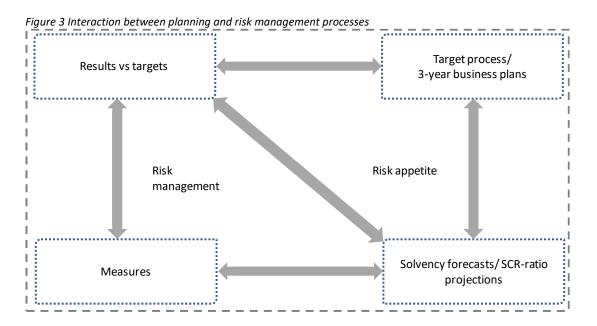


B.3 Risk management system including the own risk and solvency assessment

Protector Forsikring has prepared risk management policy which is the main tool for fulfilling own and society's requirements for god risk management. The policy is prepared in accordance with current regulatory framework for insurance companies and financial institutions and Solvency II requirements.

The company's risk appetite which is set by the Board of Directors forms the basis for risk monitoring and management in the company. The Board of Directors approves framework for market, insurance, operational and compliance, business as well as counterparty risks. Risk appetite defines either lower or upper limit as well as ranges, or any other definition of risk exposure which is accepted by the Board of Directors in order to achieve the company's strategic goals.

Figure 3 provides an overview of interaction between planning and risk management processes in the company.



Separate policies and/ or strategy documents are established for different types of risks. These documents are part of the total corporate governance in the company.

In order to ensure that the company's corporate governance system is organized in an adequate way and that the company's risk profile is within the approved limits, Protector Forsikring has established various processes and reporting systems.

Quarterly risk reports summarizing exposure to main risk with respect to the defined limits are prepared on a quarterly basis. The Board of Directors, together with the management, carries out the company's strategy process at least annually. Based on the strategy process the company prepares different scenarios which forecast probable development of result and capital as well as risk exposure. The company estimates the necessary shareholders capital to cover risk exposure as well as its capacity to fulfil its obligations related to insurance contracts based on this view of risks. The





company also assess how well standard formula reflects the company's risk profile and how capital requirement calculated using standard model compares with the company's own assessment of capital requirement. At least annually Protector Forsikring prepares ORSA report in accordance with the company's ORSA policy which is reviewed by the Board of Directors.

B.4 Internal control system

Protector Forsikring has prepared policy and guidelines for operational and compliance risk. Responsibility of compliance function is to contribute to low compliance risk in Protector Forsikring. This is ensured through seeing to that managers and employees have adequate insight into and understanding of compliance risk as well as through identification, assessment, monitoring, reporting about and advising on management of compliance risk in different business areas. Compliance function ensures that all business areas at least annually carries out a systematic assessment of if risk management and internal control are adequate for management of identified risks in an appropriate way. Compliance contributes to compliance with laws and rules and informs management about all factors that have or may have significant importance for compliance with laws and rules without encouragement.

Compliance function is the company's whistle-blowing institution and is responsible for investigating any irregularities or fraud.

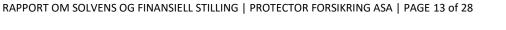
All business areas have appointed compliance-responsible who assist compliance function in its work.

The company's Data Protection Officer ensures compliance with General Data Protection Act.

In accordance with policy and guidelines for operational and compliance risk internal control in the company is carried out according to the annual plan for internal control. The company's internal control is based on identifying operational events which can prevent achievement of goals and these are placed into risk groups based on probable frequency and consequence. Internal control system implies that a complete revision of each business area and administrative units is carried out annually. Timing of completion is coordinated with the audit of the company by the external auditor and occurs in autumn. It is the responsible for each business area who presents the results of the current year's analysis in a form of an updated risk matrix and a verification to the managing director. This verification shall also include an assessment of the last year's planned measures with respect to implementation and realized effect. This process is initiated, managed and coordinated by the company's Chief Compliance Officer who also provides the necessary information to the managing director's verification of the internal control to the Board of Directors as a part of area of responsibility described in the job description for the company's chief compliance officer.

B.5 Internal audit function

Internal audit is an independent, objective function for verification and advising and carries out only internal audit in the company. The internal audit conducts its activities independently and objectively in accordance with acknowledged standards for internal audit. Work of the internal audit is based on





a Board-approved, risk-based annual plan which takes into account type, extent and complexity of business activities as well as established internal control. Changes in the company's risk situation and development in demanding business initiatives may lead to need for revision of the internal audit's annual plan. At least once a year the internal audit function reports to the Board of Directors and the managing director about the company's risk management and control.

B.6 Actuarial function

Actuarial function is carried out in accordance with the Article 272 through continuous dialog with the company's actuary in order to discuss data quality, development of premiums and claims in various lines of business and insurance markets that the company is exposed to. The actuarial function gives feedback to control activities in order to ensure that the underlying data for estimating technical provisions is complete, accurate and appropriate. The actuarial function contributes also with control activities which ensure that the underlying data used for calculation of the technical provisions is satisfactory, and that estimated technical provisions correspond to the amounts in the financial accounts. The actuarial function contributes as discussions partner to the choice of models and assumptions underlying estimation of the technical provisions within various lines of business and insurance markets that the company is exposed to. In connection to the quarterly estimation of the technical provisions underlying data and results are exchanged between the company's actuary and the actuarial function. The actuarial function gives feedback on results of the calculations carried out by the company's actuary and, in cases where assessment deviates, assumptions and choice of models are discussed, and final results are based on assumptions and model choices that both the company's actuary and the actuarial function find appropriate. The actuarial function ensures that the technical provisions are sufficient. Quarterly reports describing underlying data, assumptions and results of calculation of the technical provisions are prepare by the actuarial function. The report includes process and results assessment by both the company's actuary and the actuarial function. The actuarial function prepares a more extensive report in connection with annual reporting which shall cover all areas of responsibilities covered by the actuarial function in accordance with Article 272.

B.7 Outsourcing

Protector Forsikring has prepared policy and guidelines for outsourcing which defines extent, areas of responsibility, monitoring and reporting in case of outsourcing of business activities. It is not allowed to outsource core business. Core business means product development and work related to take over and underwriting of insurance risk.

The company is fully responsible for all part of the outsourced business and shall have competence and resources to assess risk related to the outsourced business activities itself at all times.

Following principles underlie assessment and any implementation of outsourcing in the company:

- Outsourcing shall be prudent, and relevant information for analysis and assessment shall be gathered before final decision.
- Public requirements and external regulations which the company has to satisfy shall be ensured also when outsourcing.





- Outsourcing shall contribute to providing the company with access to cost-efficient and qualitatively good services, products and distribution channels.
- Outsourcing shall occur in a way that gives the company flexibility with respect to changes in its outsourcing strategy.

The company has outsourced the internal audit to KPMG and the actuarial function to Zabler-Neuhaus AS.

B.8 Any other information

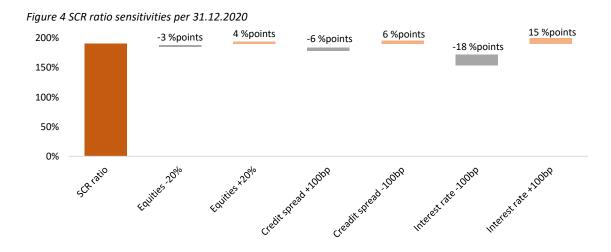
Protector Forsikring's assessment is that the company's risk management and internal control system is appropriate with respect to types, extent and complexity of the risks related to the company's business.





C. Risk Profile

Protector Forsikring is exposed to insurance, market, credit and counterparty, liquidity and operational risks (se chapter E.2 Solvency Capital Requirement and Minimum Capital Requirement for relevant risks). These risks are monitored continuously. Table below shows SCR ratio sensitivities to changes in the market value of investments in equities, credit spread and interest rate levels.



The company has also exposure to climate risk. Protector Forsikring manages own exposure to climate risk through assessment of the risk in forming products and price setting based on historical experiences, expert assessments and forecasts. Protector Forsikring models and evaluates the total exposure to climate risk at least once a year and takes the risk into account when acquiring reinsurance. The company applies known models (AIR and RMS) in valuation of climate risk. Responsible investments is an integral part of the company's investments strategy. Investment guidelines define exclusions from investment universe based on business type and/ or business actions, and Protector Forsikring shall among other things not invest in companies responsible for or contribute to serious environmental damage.

The company has established guidelines for social responsibility where the external environment is a part of the guidelines. Protector Forsikring works targeted with damage prevention measures in order to reduce number of damage cases and lower burden on environment. Within property, approximately 80 % of our claims payments are larger than TNOK 1 000. Protector Forsikring is therefore dedicated to using independent and skilful claims appraisers not only for claims appraisal but also for following up that reparations and construction of new buildings are carried out in accordance with all mandatory regulations, including EHS and climate-directed restrictions. Protector Forsikring as a white collar company is not energy-intensive business and CO2 emission is primarily related to heating and power usage in premises as well as usage of cars and flights. Protector Forsikring's premises have energy efficient lighting, and the company's premises are and will be located so that access to public transportation is good. For more information, please refer to "Environmental and social responsibility" in protector's annual report for 2020, available on the company's website www.protectorforsikring.no.





The company carries out stress test analysis as a part of ORSA process. Choice of factors for stress test scenarios is risk-based with the company's 3-year business plans and focus areas as a starting point. Scenarios are compared to estimated capital requirement and estimated available capital based on a set of basic assumptions which correspond to the company's 3-year business plans. Methods used for stress testing are based on an assumption that it is only the defined assumptions that are stressed in concrete scenarios which are changed while all other assumptions remain constant. Total results are summarized and processed by the Board of Directors at least once a year in connection with submission of ORSA report.

C.1 Underwriting risk

Underwriting risk represents the risk directly related to the insurance business. This includes the risk that premium payments will not sufficiently cover future claims and related costs, and the risk that reserves will not be sufficient to cover costs related to claims already incurred. Additionally, it includes the risk of extraordinary events like catastrophe scenarios and lapse risk.

The company assesses underwriting risk individually through underwriting process before an agreement with a customer is concluded. Continuous follow-up of development in profitability is carried out, including calculation and assessment of technical provisions.

Assessment of catastrophe risk is an important part of the company's risk management. The company's exposure to large risks is assessed against current reinsurance program in order to ensure that exposure to catastrophe risk is within defined framework.

Lapse risk is assessed not to be a significant risk for the company as the company underwrites insurance of business and public customers. The agreements are normally termed contracts, running until maturity unless extraordinary circumstances arise giving right to terminate contracts prematurely.

The company does not underwrite life insurance (with the exception of one-year life insurance), but a part of claims reserves is related to annuities related to health and non-life insurance products. These are split out into a module for life insurance and health insurance similar to life.

All business areas are reviewed on a regular basis according to internal reporting routines. Profitability within different lines of business and segments is assessed, and measures are implemented if certain lines of business/ segments are assessed not to contribute with adequate expected future profitability.

Courses and training in claims-reducing measures are carried out by the company's initiative. The company uses reinsurance largely to reduce risk. Reinsurance is used primarily within liens of business which are estimated to be most exposed to large claims. There are reinsurance agreements in place for all lines of business, limiting loss potential for catastrophic scenarios. Assessment of adequacy of the company's reinsurance programs is carried out at least annually.





The company is exposed to natural catastrophe events in Norway proportional to the company's market share of fire insurance amounts. The company's geographical concentration of exposure in Norway has therefore little significance for the company's natural catastrophe risk. The company participates in the reinsurance program of the Norwegian Natural Perils Pool.

The company also ensures that assets are sufficient to cover liabilities in all exposed currencies at all times. It is not desirable to expose insurance liabilities to unnecessary currency risk, therefore investments portfolio is calibrated on a quarterly basis so that assets correspond to liabilities within foreign currencies.

Solvency capital requirement for insurance risk was TNOK 2 459 092 per 31.12.2020 whereof capital requirement for health underwriting risk was TNOK 989 659, for non-life underwriting risk was TNOK 1 468 235 and for life underwriting risk was TNOK 1 198. Underwriting risk is primarily distributed between premium and reserves risk as well as catastrophe and lapse risk.

C.2 Market risk

Protector Forsikring is exposed to market risk: risk of loss in the market value of investment portfolio as a result of fluctuations in share prices, interests, credit spreads, exchange rates, property prices, prices of commodities and energy, and changes in technical provisions as a result of change in interest rates.

Protector Forsikring manages its investment according to "prudent person's" principles and within the quantitative framework defined in the investment management mandate approved by the Board of Directors. Requirements are defined among other things for exposure limits in the portfolio per assets class, individual issuers and rating. Investments portfolio is managed with respect to currency mix, and foreign exchange forwards are used for adjustment of currency mismatch between commitments and investment assets if needed.

Individual investments are analysed and assessed using defined criteria before investment decision is taken. Development in the market value and compliance with the quantitative requirements defined in the investments management mandate are monitored and reported on a regular basis. Capital requirement for market risk is calculated quarterly or in case of significant changes in risk profile.

Protector Forsikring uses put options in equities portfolio for further management of market risk related to the investments portfolio.

At the end of 2020 net investment portfolio totalled NOK 13,5 billion compared to NOK 10,9 billion a year ago. Per 31.12.2020 NOK 1,0 billion was invested in bond funds and the remaining portfolio was managed internally. Share of investments in equities was 13,5% of the total investment portfolio and interest-bearing investments constituted 86,5% at the end of 2020. Total credit risk in the portfolio is assessed at A- per 31.12.2020.





Protector Forsikring's exposure to market risk comprised mainly exposure to equities, spread, concentration and currency risks per 31.12.2020. Total capital requirement for market risk was TNOK 843 072.

C.3 Credit risk

Credit risk is the risk of a rated counterparty defaulting on its commitments. Counterparty risk module covers exposure that is not covered in the spread risk module within market risk.

Protector Forsikring is exposed to counterparty risk mainly in connection to is reinsurance programs and bank deposits. The company has a minimum rating requirement for its reinsurers and bank in order to reduce risk related to counterparty risk. The company works with reinsurers which have a solid rating from internationally acknowledged rating agencies. Before contracts are concluded Protector Forsikring assesses business partners on an individual basis. Protector Forsikring's bank has a solid rating from various acknowledged rating agencies. Bank rating is monitored on a regular basis. Summary of risk assessment in relation to the company's defined limits is reported on a regular basis.

Capital requirement for counterparty risk was TNOK 102 368 per 31.12.2020.

C.4 Liquidity risk

Liquidity risk is the risk that the company is unable to meet its running commitments and/or to finance changes in the allocation of assets without incurring substantial additional costs in the form of a price decrease of assets that need to be realized (sold) or in form of an extra expensive financing. Liquidity risk is normally limited in non-life insurance companies. Premium income is paid in advance, and claims are paid out at a later point of time.

Protector Forsikring has routines for management of daily cash flows in order to manage and optimize liquidity. Liquidity management in a longer run is based on long-term strategic planning with respect to earnings, development of balance composition and solvency projections. The company manages its assets with respect to requirement for security, liquidity and risk diversification.

In case of large claims pay-outs are settled with reinsurers continuously. Further the company has allocated a part of its investments in liquid assets with high quality which provides possibility to match larger unplanned pay-outs. In order to manage liquidity in a longer run Protector Forsikring has prepared a list of management actions to raise additional financing if needed.

Liquidity risk is not quantified in Solvency II calculations of capital requirement.

C.5 Operational risk

Operational risk is the risk of losses as a result of insufficient or failing internal processes or systems, human errors or external events.

All managers in the company have responsibility for identification and management of operational risk in their own area of responsibility. Main risk factors are identified, assessed and reported on a regular basis through established processes and procedures. Internal control report identifying main





risks based on probability and consequence at company level is prepared at least annually based on internal control processes. With these processes and procedures as a starting point, risk-reducing measures are implemented if needed and followed up in connection with the established reporting routines. Significant deviations are registered in the deviations management database and are followed up on a regular basis.

Solvency capital requirement calculated under Solvency II rules constituted TNOK 255 760 per 31.12.2020.

C.6 Other material risks

The company has not identified other significant quantifiable risks in 2020.

C.7 Any other information

All significant risks related to the company's business are deemed described above.





D. Valuation for Solvency Purposes

The company's Solvency II balance is valued at market value, ref Solvency II Directive 2009/138/EC article 75, 1(a) and (b) with respect to requirement for valuation of:

- technical provisions as specified in article 76-81;
- assets and liabilities other than technical provisions as specified in Delegated Regulation 2015/35, article 9-16.

Guarantee scheme for Solvency II reporting purposes is reported according to 19.06.2014 clarification from the Norwegian Financial Supervisory Authority.

The company's assessment is that statutory balance mainly consists of assets and liabilities accounted for at market value with exceptions as described below. Need to change valuation methods and need to take into account any clarifications and/ or feedback from the Norwegian Financial Supervisory Authority is assessed at every reporting.

D.1 Assets

Summary of the company's Solvency II balance compared to statutory balance is provided in Table 5.

Table 5 Overview of the company's assets in Solvency II and statutory balance per 31.12.2020

Assets	Solvency II	Statutory accounts
Total assets, whereof:	16 713 342	16 750 250
Intangible assets	0	57 931
Investments	13 481 802	13 488 170
Reinsurers' share of gross technical provisions	1 704 076	1 931 140
Other assets	1 527 464	1 273 009

The company's investment portfolio constituted the largest share (81%) of the company's total assets. Investments portfolio in Protector Forsikring's statutory accounts is accounted for at market value based on reports from asset managers. These values are used for Solvency II balance.

Reinsurers' share of the company's technical provisions constituted 10% of total assets. Solvency II value of reinsurers' share of technical provisions deviates from statutory values due to recalculation of these to market value by discounting and with respect to expected profit in future premiums, ref Solvency II Directive, Article 81. Reinsurers' share of gross technical provisions with volatility adjustment equal to zero is TNOK 1 714 425.

Other assets in Solvency II balance includes among other things own shares accounted for at market value. Market value of own shares was TNOK 254 455 per 31.12.2020.

Intangible assets have 0 Solvency II value, ref Delegated Regulation 2015/35, article 2, pct 2.





D.2 Technical provisions

Best estimate of claims provisions are equal to claims provisions for own account at valuation date as follows from «Best Estimate» valuation. In connection to Solvency II valuation of claims provisions, provisions are discounted on the basis of expected line of business-specific run-off pattern and relevant interest rate yield curve for different countries/ currencies where the company has claims provisions. As a starting point regulatory framework allows also for a different valuation of nominal amounts. This has been discussed but assessed that there is a direct relationship between expected values and amounts accounted for in statutory accounts so that no other adjustments of claims provisions than discounting are taken.

It is assumed that statutory claims provisions including unallocated loss adjustment expenses (ULAE) will be adequate for covering liabilities related to claims payments and claims handling costs for claims incurred at calculation date. Volatility adjusted risk free interest rate curve is applied per 31.12.2020. It is assumed that interest yield curves are adequate and provide a correct picture of future inflation. The effect of the volatility adjustment is provided in chapters D1, D2, E1, E2. The same payments pattern as used for calculation of claims provisions is used for discounting.

Uncertainty related to claims provisions comprises mainly assumptions about future run-off patterns. The same line of business-specific run-off patterns are used both for valuation in statutory accounts and for discounting for solvency purposes. For individual lines of business the company has no sufficiently long run-off history for estimation of future run-off pattern based on own experience only. This is especially the case for "new" lines of business or lines of business in "new countries" where it is initially assumed future run-off pattern corresponding to experienced run-off pattern in Norway until own data is assessed to be sufficient.

Best estimate of premiums provisions is calculated per Solvency II line of business by using calculation method taking into account future premiums (which include unearned premiums and other future premiums that the company has committed itself to) and expected future claims and costs that are related to these premiums. This results in premiums provisions being significantly lower in Solvency II valuation than statutory valuation where technical premiums provisions are equal to unearned premium.

It is assumed that the company's estimate of future claims and costs form a realistic view of the future in valuation of premiums provisions.

Uncertainty related to premiums provisions comprises mainly assumptions about expected future profitability (combined ratio) which is estimated per line of business. Even if uncertainty related to estimated combined ratio at company's level is lower, uncertainty is significant per line of business which may be of essential importance in valuation of premium provisions for solvency purpose.

Risk margin is calculated by calculating future SCR given a hypothetical run-off of the company, for every year until all claims are expected to be fully paid, and capital cost related to having capital requirement for the company in run-off, given a 6% cost of capital.





Uncertainty related to risk margin comprises both assumptions about future run-off patterns and assumptions about future expected profitability, with assumption about future run-off pattern estimated to have the largest significance.

Risk margin is calculated for solvency purpose and does not exist in in statutory accounts.

Overview of net claims and premiums provisions and risk margin is provided in Table 6.

Table 6 Net provisions for claims, premiums and risk margin per line of business

	BE reserves,	net	Risk margin
Insurance class	Claims	Premiums	
Medical expenses	271 739	22 092	13 782
Income protection	507 984	43 237	18 671
Workers' compensation	1 906 506	-25 799	185 369
Motor vehicle liability	691 819	107 869	58 813
Other motor	180 843	145 384	18 633
Marine, aviation and transport	9 155	-1 020	298
Fire and other damage to property	1 585 805	480 187	65 007
General liability	739 969	104 808	40 963
Miscelaneous financial loss	601	-913	49
Annuities from non-life insurance related to health	669 764	0	118 000
Annuities from non-life insurance related to non-life	39 555	0	331
Life insurance	118 790	56 927	5 838
Totalt	6 722 529	932 771	525 754

Total net best estimate with volatility adjustment equal to zero is TNOK 7 719 172.

Total difference between net Solvency II claims provisions and claims provisions in statutory accounts was TNOK 66 789. Expected profit in future premiums was in total TNOK 285 975 per 31.12.2020.

Receivables stemming from reinsurance agreements constitute of difference between technical provisions at gross level and technical provisions calculated for own account and are assumed to apply to technical claims and premiums provisions, and not relevant for risk margin.

Amount receivable in accordance with reinsurance agreements for claims was TNOK 1 661 203 per 31.12.2020. Amount receivable in accordance with reinsurance agreements for premiums was TNOK 975 644 per 31.12.2020.





D.3 Other liabilities

Table 7 provides an overview of other liabilities with valuation different from statutory balance.

Table 7 Overview of other liabilities per 31.12.2020

Other liabilities	Solvency II	Statutory accounts
Total liabilities, whereof:	13 679 018	13 719 778
Financial derivatives	55 009	61 402
Reinsurance payables	1 214 922	1 272 422
Subordinated debt	1 492 419	1 473 035
Other liabilities	846 090	769 180

In Solvency II valuation of liabilities related to reinsurance the liabilities are discounted in line with expected branch-specific run-off patterns for corresponding claims reserves and relevant interest rate yield curves for different countries/currencies.

Issued subordinated loans are accounted for at amortized cost in statutory accounts and reported at market value in Solvency II balance.

Other liabilities include among other things guarantee scheme which is reclassified from shareholders capital to liabilities ref 19.06.2014 clarification from the Norwegian Financial Supervisory Authority.

Deferred tax is assessed to be accounted for at market value as a starting point and constituted TNOK 124 472 per 31.12.2020.

D.4 Alternative methods for valuation

The company does not use alternative valuation methods.

D. Any other information

All significant information is deemed provided above.





E. Capital Management

E.1 Own funds

The main purpose of capital management is to support the strategy of Protector Forsikring and ensure that the company is well capitalized in order to resist downturn in macro economy and/or downturn in the company's business. Protector Forsikring's capital projections are based on company's 3-year strategic plans and are updated on a regular basis as a part of the company's ORSA process. Overview of the company's available and eligible capital for coverage of solvency capital requirement and minimum capital requirement per 31.12.2020 and 31.12.2019 is provided in Table 8.

Table 8 Overview of available and eligible capital 2020-2019 ²		
Available own funds to meet the SCR and MCR	31.12.2020	31.12.2019
Tier 1 - unrestricted	2 462 858	1 752 996
Tier 1 - restricted	349 734	351 551
Tier 2	1 212 838	988 851
Sum tilgjengelig ansvarlig kapital til dekning av SCR	4 025 429	3 093 398
Eligible own funds to meet the SCR		
Tier 1 - unrestricted	2 462 858	1 752 996
Tier 1 - restricted	349 734	351 551
Tier 2	1 001 427	862 886
Sum tellende ansvarlig kapital til dekning av SCR	3 814 019	2 967 433
Eligible own funds to meet the MCR		
Tier 1 - unrestricted	2 462 858	1 752 996
Tier 1 - restricted	349 734	351 551
Tier 2	180 257	155 319
Sum tellende ansvarlig kapital til dekning av MCR	2 992 848	2 259 867

Total available capital was TNOK 4 025 429 per 31.12.2020 compared to TNOK 3 093 398 year before. Increase is driven mainly by a good investment result in 2020. Unrestricted Tier 1 capital is reduced with NOK 3 dividend per share (TNOK 246 859 in total).

The company has issued in Q4 a subordinated loan in Tier 2 capital with a nominal value of TNOK 500 00 and bought back TNOK 269 000 of the existing Tier 2 subordinated loan at nominal value.

Protector Forsikring had no Tier 3 capital per 31.12.2020. In case the company incurs a significant economic loss this will give rise to a deferred tax asset. The deferred tax asset would be utilized given that the company will continue as going concern after the incurred loss. In most of cases the deferred tax asset could be classified as Tier 3 capital and used in calculation of solvency capital with the limitations which are defined in the solvency regulatory framework.

² 2019 recalculated with volatility adjustment for comparative purposes



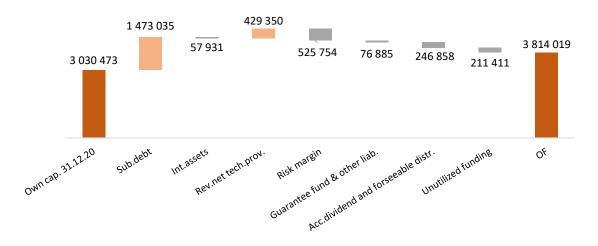
Table 9 shows available and eligible capital with volatility adjustment equal to zero.

Table 9 Overview of available and eligible capital 2020-2019 with volatility adjustment equal to zero

Solvency capital	31.12.2020	31.12.2019
Tilgjengelig ansvarlig kapital til dekning av SCR og MCR	3 952 035	3 032 994
Tellende ansvarlig kapital til dekning av SCR	3 743 763	2 910 788
Tellende ansvarlig kapital til dekning av MCR	2 920 019	2 200 140

Figure 5 provides reconciliation between the company's shareholders equity and Solvency II capital.

Figure 5 Overview of Solvency II capital compared to shareholders equity in statutory accounts



Main differences arise due to:

- Difference in valuation of assets and liabilities in Solvency II balance compared to statutory accounts as described above;
- Inclusion of subordinated debt as capital available for covering of solvency capital requirement and minimum capital requirement.
- Dividend which is taken into account in solvency capital calculation per 31.12.





E.2 Solvency Capital Requirement and Minimum Capital Requirement

Overview of the company's solvency capital requirement and its composition and minimum capital requirement calculated using Solvency II standard formula per 31.12.2020 and 31.12.2019 is provided in Table 10.

Table 10 Composition of Solvency II capital requirement and minimum capital requirement³

Solvency capital requirement (SCR)	31.12.2020	31.12.2019
Total market risk	843 072	538 012
Total counterparty default risk	102 368	61 662
Total life underwriting risk	1 198	0
Total health underwriting risk	989 659	1 099 976
Total non-life underwriting risk	1 468 235	1 248 236
Diversification	-1 137 872	-993 288
Basic Solvency Capital Requirement	2 266 660	1 954 598
Total capital requirement for operational risk	255 760	258 708
Loss-absorbing capacity of deferred taxes	-519 565	-487 534
Total solvency capital requirement	2 002 854	1 725 772

Protector Forsikring does not use any simplifications nor any company-specific parameters for calculation of solvency capital requirement.

The company uses applicable solvency capital requirement for calculation of lower and upper boundaries for minimum capital requirement. For calculation of minimum capital requirement for non-life insurance (inc. health-related insurance) written premiums for own account per line of business during last 12 months before reporting date are used as well as best estimate for claims provisions for own account per line of business at reporting date. Each of these amounts are multiplied by defined percentage parameters, and sum yields minimum capital requirement based on premium income and claims provisions for non-life insurance (inc. health-related insurance). In addition, minimum capital requirement is calculated for lines of business defined as life insurance (group life and annuities related to helse and non-life insurance). Calculation of the component related to life insurance includes best estimate of claims provisions for own account at reporting date and the total risk sum at reporting date. Risk sum is the amount which the company will pay in case of death of the insured, reduced by receivables in accordance with the company's reinsurance agreements. Each of these amounts are multiplied by defined percentage parameters, and sum yields minimum capital requirement for life insurance (limited within lower and upper boundaries for minimum capital requirement).

Total solvency capital requirement per 31.12.2020 was TNOK 2 002 854 compared to TNOK 1 725 772 year before. Increase is driven by higher reserves for own account as a result of the company's growth and reduced reinsurance share as well as higher market risk due to growth in the investment portfolio and change in risk profile.

³ 2019 recalculated with volatility adjustment for comparative purposes



Table 11 shows solvency capital requirement and minimum capital requirement with volatility adjustment equal to zero.

Table 11 Overview of solvency capital requirement and minimum capital requirement 2020-2019 with volatility adjustment equal to zero

Capital requirement	31.12.2020	31.12.2019
Solvenskapitalkrav	2 009 133	1 733 288
Minstekapitalkrav	904 110	779 980

E.3 Use of duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement

The company does not use duration-based submodule for equities risk in calculation of solvency capital requirement.

E.4 Differences between the standard formula and any internal module used

The company does not use internal models.

E.5 Non-compliance with the Minimum Capital Requirement and non-compliance with the Solvency Capital Requirement

The company complies fulfils minimum and solvency capital requirement.

E.6 Any other information

All significant information about the company's capital per 31.12.2020 is deemed provided above.

