



**INTESA SANPAOLO
VITA**

Single Solvency and Financial Condition Report

Intesa Sanpaolo Vita Insurance Group
31 December 2021

The Insurance Parent Company Intesa Sanpaolo Vita S.p.A.

Registered office: Corso Inghilterra, 3 – 10138 Turin

Administration offices: Viale Stelvio, 55/57 – 20159 Milan

Turin Companies Register No. 02505650370 – Share capital 320,422,508.00 euro fully paid up

Listed on the Register of Insurance and Reinsurance Companies at no. 1.00066

Parent Company of the Intesa Sanpaolo Vita Insurance Group, listed on the Register of Insurance Groups at no. 28

Company subject to management and coordination by Intesa Sanpaolo S.p.A.

CONTENTS

INTRODUCTION	5
SUMMARY OF CONTENTS	7
A. Activities and Results	17
A.1 Activities	17
A.2 Underwriting results	28
A.3 Investment results	39
A.4 Results of other activities	43
A.5 Other information	47
B. Governance system	49
B.1 General information about the Governance system	49
B.2 Competence and integrity requirements	98
B.3 Risk Management System, including the internal assessment of risk and solvency..	101
B.4 Internal controls system	148
B.5 Internal audit function	157
B.6 Actuarial Function	173
B.7 Outsourcing	176
B.8 Adequacy of the system of governance	180
B.9 Other information	180
C. Risk profile	183
C.1 Underwriting risk	186
C.2 Market risk	199
C.3 Credit risk	211
C.4 Liquidity risk	215
C.5 Operational risk	219
C.6 Other material risks	223
C.7 Other information	224
D. Valuation for solvency purposes	225
D.1 Assets	226
D.2 Technical provisions	246
D.3 Other liabilities	264
D.4 Alternative valuation methods	273
D.5 Other information	276
E. Capital management	277

E.1 Own funds.....	277
E.2 Solvency capital requirement and minimum capital requirement	292
E.3 Use of the share price risk submodule based on the duration in the SCR calculatation.....	304
E.4 Differences between the Standard Formula and the internal model	304
E.5 Failure to meet the MCR and SCR	304
E.6 Other information	304
Glossary and Acronyms	305
QRT Intesa Sanpaolo Vita Group.....	309
QRT Intesa Sanpaolo Vita S.p.A.....	319
QRT Intesa Sanpaolo Assicura S.p.A.	331
QRT Fideuram Vita S.p.A.	341
QRT Intesa Sanpaolo Life D.A.C.....	351
INTESA SANPAOLO RBM SALUTE S.P.A.	361
QRT CARGEAS ASSICURAZIONI S.P.A	371
INDEPENDENT AUDITORS REPORT	381

INTRODUCTION

This "Single Solvency and Financial Condition Report (the "Report") of the Intesa Sanpaolo Vita Insurance Group" (the "Insurance Group" or the "Group") was prepared in application of the following:

- the public reporting requirements in Articles 290-303 of Title I, Chapter XII of Commission Delegated Regulation 2015/35 of 10 October 2014 ("Commission Delegated Regulation"), supplementing Directive 2009/138/EC of the European Parliament and of the Council on the taking-up and pursuit of the business of Insurance and Reinsurance (the "Directive");
- Commission Implementing Regulation (EU) 2015/2452 laying down implementing technical standards with regard to the procedures, formats and templates of the solvency and financial condition report in accordance with the Directive;
- Regulation no. 33/2016 of IVASS (the Italian Insurance Regulator), on disclosures to the public and to IVASS, which contains additional provisions on the content of the solvency and financial condition report ("Solvency and Financial Condition Report") and on the periodic reports to IVASS ("Regular Supervisory Reports");
- Letter to the Market issued by IVASS on 28 March 2018, which takes into consideration the Assessment of the Solvency and Financial Condition Reporting published by EIOPA on 11 October 2017.
- IVASS Regulation no. 42/2018, on the external review of disclosures to the public.
- IVASS Regulation no. 46/2020 on the transparency of disclosures to the public, and undertakings of institutional insurance investors

Intesa Sanpaolo Vita S.p.A. is the Ultimate Italian Parent Company (hereinafter also referred to as "USCI") and the Parent Company of the Intesa Sanpaolo Vita Insurance Group (hereinafter also referred to as the "Insurance Group") which, as at 31 December 2021, consists of Intesa Sanpaolo Vita S.p.A., Intesa Sanpaolo Assicura S.p.A., Fideuram Vita S.p.A., Intesa Sanpaolo Life D.A.C., Intesa Sanpaolo RBM Salute S.p.A., Cargeas Assicurazioni S.p.A..

The main event in 2021 was the inclusion of Assicurazioni Vita S.p.A. (formerly Aviva Vita S.p.A.), BancAssurance Popolari S.p.A. and Lombarda Vita S.p.A. into the Intesa Sanpaolo Vita Insurance Group ("ISV Group"), following the acquisition by Intesa Sanpaolo S.p.A. of the group controlled by Unione di Banche Italiane S.p.A. (UBI Group) and the former's subsequent acquisition of 100% control over said companies.

As a result of the above-mentioned transaction, the Insurance Group decided to simplify its scope of consolidation through the merger of the companies Assicurazioni Vita S.p.A., BancAssurance Popolari S.p.A. and Lombarda Vita S.p.A. into Intesa Sanpaolo Vita S.p.A. on 31 December 2021.

This Report is accompanied by the reports of the auditing firm engaged by Insurance Group Companies to audit Section D "Valuation for solvency purposes" and sub-section E.1 "Own Funds" and to audit in limited form sub-section E.2 "Solvency Capital Requirement and Minimum Capital Requirement" according to the provisions of Article 47-septies(7) of the Private Insurance Code, and QRT S.02.01, S.23.01, S.25.01, S.25.02, S.25.03, S.28.02 in accordance with IVASS Regulation no. 42/2018.

It should further be noted that:

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- The Intesa Sanpaolo Vita Insurance Group prepares its consolidated financial statements in accordance with IAS/IFRS;
 - Intesa Sanpaolo Vita S.p.A., Intesa Sanpaolo Assicura S.p.A., Fideuram Vita S.p.A., Intesa Sanpaolo RBM Salute S.p.A., Cargeas Assicurazione S.p.A. and Intesa Sanpaolo Insurance Agency S.p.A. prepare Separate Financial Statements in accordance with local Italian accounting standards;
 - Intesa Sanpaolo Life D.A.C. prepares its annual financial statements in accordance with IAS/IFRS.

Therefore the amounts taken from the Group Financial Statements and from those of the Group Companies, as shown in this document, follow the above-mentioned accounting standards. Comparative information for 2020 is also included, in accordance with Article 293(2)(3)(4) of the Delegated Regulation.

This Report was approved by the Board of Directors of Intesa Sanpaolo Vita on 5 May 2022, as required by Article 47-decies of the Private Insurance Code.

Annexed to this document is the information on the Quantitative Reporting Template (hereinafter QRT) provided for in Article 4 of the Implementing Regulation (EU) 2015/2452 and subsequently amended by Implementing Regulation (EU) 2017/2189.

The report is published on the companies' websites, respectively:

- www.intesasanpaolovita.it
- www.intesasanpaoloassicura.com
- www.fideuramvita.it
- www.intesasanpaololife.ie
- www.intesasanpaolorbmsalute.com
- www.cargeas.it

SUMMARY OF CONTENTS

In relation to Article 292 of the Delegated Regulation, this report contains the main evidence on the:

- Action and Development Lines of the Business;
- Activities and results;
- Governance system;
- Risk profile;
- Valuation for solvency purposes;
- Management of the capital of the Group and of its member companies.

Action and Development Lines of the Business

The Intesa Sanpaolo Vita Group recorded a net profit attributable to the Group of 765.9 million euro, up 9.2% compared to the result of 701.1 million euro recorded as at 31 December 2020.

Against a backdrop of recovery in investor confidence and the relaxation of measures intended to contain the pandemic risk, the Group reported gross production of 20,231.3 million euro, down slightly by 2.5% compared to 20,751.8 million euro in the previous year, attributable to the increase in production related to unit-linked products of 2,529.2 million euro (up 26.7% compared to 2020), which only partially offset the reduction in gross premiums from traditional products of 3,115.3 million euro (down 34.4% compared to 2020).

However, the Life business was characterised both by growing profitability due to the increase in assets under management, which at 31 December 2021 amounted to 203,452.5 million euro compared to 202,339.8 million euro at the end of 2020 (+0.5%), and by the performance of financial markets, which led to higher revenues in terms of net commissions.

In the non-life segment, production amounted to 1,404.3 million euro, up from 1,336.7 million euro at 31 December 2020 (+5.1%). In particular, *non-motor* products performed well (up 11.8%) compared to the contraction of *motor* and credit-related products (-7.3% and -27.0% respectively). Growth in the non-life *non-motor* business is the result of the insurance group's strategic choice in this segment.

In terms of product strategy, initiatives to address the Covid 19 pandemic for personal-family and financial protection continued. At the same time, the development of the range continued, with special attention to the development of the offer for the corporate segment, to respond to the commitments of the business plan and to market demand, with an expanded product range being marketed by Intesa Sanpaolo Insurance Agency.

During 2021, the strategy also focused on optimising the configuration, quotation and sales processes for the XME Protection product. The new advisory engine was introduced to propose a pre-configured offer, created by also proposing banking options, and life cycle operations were strengthened through activation of the Upgrade (addition of Modules and Insureds) from May 2021 for the Off-Premises channel, from July for the Internet Banking Remote offer and from October on the App.

From the point of view of corporate structure, the Compagnie Assicurazioni Vita (formerly Aviva Vita), Lombarda Vita, BancaAssurance Popolari and CARGEAS Assicurazioni became part of the Insurance Group, as a result of the acquisition of UBI Banca - Unione di Banche Italiane S.p.A. by Intesa Sanpaolo S.p.A.

In order to integrate the Companies into the Group both from a corporate and operational point of view, the merger by incorporation of Aviva Vita, Lombarda Vita and Bancassurance Popolari into Intesa Sanpaolo Vita was completed on 31 December 2021.

With reference to the Group's governance areas, the guidelines developed during 2021 by the Insurance Group focussed on the following aspects:

- changing the management processes, with specific regard to the newly acquired Companies, to gradually align them to the internal control system in place in the Insurance Group, in view of the merger which became legally effective on 31 December 2021, for the life segment, of the three-year integration project of the subsidiary Intesa Sanpaolo RBM Salute, launched last year, and of the integration project of Cargeas Assicurazioni, launched during the second half of 2021;
- further strengthening the digitisation process in order to ensure the continuity of essential customer services and critical business processes. In the course of the year, a number of innovative App-based functions were completed and released for use by customers. The digitalisation issue is strategic and is also a pillar of the new 2022/25 Business Plan, and we will therefore continue in this direction in the coming years;
- the activities for the adoption of a Group-wide single integrated accounting system as part of the project to implement the IFRS17 accounting standard were completed, with the exception of Cargeas Assicurazioni for which the activities will be completed by the end of the first half of 2022.

Section A of this document illustrates the work done and the results achieved by the Group and by each company. The quantitative information required by the applicable Solvency regulations is each annual Financial Statements prepared in accordance with Italian accounting standards.

Summary information on companies included in the scope of consolidation

The following sections provide information on the subsidiaries included in the scope of consolidation and the results reported in their statutory accounts for the year ended 31 December 2021.

Intesa Sanpaolo Vita S.p.A. (Parent Company)

The Company's solid commercial performance was confirmed with results that were achieved amid the recovery of world equity markets, characterised by low volatility and favoured by the accommodating policies of Central Banks. In contrast, bond markets, already struggling with rate hike scenarios, suffered from rising inflation. Inflation-linked securities supported portfolios as they offered hedging against inflationary scenarios.

In this context, the Company:

- recorded gross life premiums of 8,911.2 million euro, compared to 13,235.6 million euro at the end of the previous year, a decrease of -33%;
- new life production amounted to 8,651.2 million euro compared to 12,951.2 million euro, down 33% compared to 31 December 2020.
- the composition of the investments portfolio for segregated accounts, after the merger of former UBI companies, maintained a considerable quota of fixed income securities issued by governments or government agencies (equal to 66.4% of total assets in segregated accounts).

-
- Operating expenses in the Life business amounted to 279.2 million euro compared to 340.2 million euro in the previous year, while in the non-life business they amounted to 0.1 million euro, similar to the previous year
 - This performance reflects a positive technical balance in the Life segments of 754,1 million euro, compared to 300,7 million euro in 2020. The technical contribution of the Non-Life business remained marginal, positive at 0.2 million euro (positive at 0.8 million euro in 2020).

Intesa Sanpaolo Life Dac

Intesa Sanpaolo Life Dac, an Irish company wholly controlled by Intesa Sanpaolo Vita and specialised in third party insurance products with a more strictly financial content, is a Company operating under the freedom to provide services in Italy. The Company is also authorised to conduct business in other countries of the European Union.

Gross premiums amounted to 5,513.1 million euro (3,800.1 million euro in 2020). Compared to the previous year, gross premiums and new production increased by 45% and 44% respectively. Production exclusively concerned unit-linked products.

Net profit for the year, determined in accordance with IAS/IFRS as required by Irish law, amounted to 192.5 million euro compared to 149.9 million euro in 2020.

Shareholders' equity at the end of 2021, including the aforementioned profit, amounted to 989.4 million euro. During the 2021 financial year, a dividend of approximately 100 million euro was paid to the parent company Intesa Sanpaolo Vita.

Intesa Sanpaolo Life has technical provisions and liabilities towards policyholders for products in its portfolio of 41,359.8 million euro (38,409.1 million euro at the end of 2020), entirely relating to unit-linked policies. The total amount of provisions increased by 8%, mainly due to the financial market performance.

Investments recorded under assets amounted to 41,427.5 million euro (38,384.2 million euro at the end of last year).

The number of contracts in portfolio as at 31 December 2021 was 658,002 (627,477 at the end of the previous year).

Intesa Sanpaolo Assicura S.p.A.

Intesa Sanpaolo Assicura, a wholly-owned subsidiary of Intesa Sanpaolo Vita, is the Company in the Group's non-life sector with products mainly aimed at protecting individuals and their wealth, distributed through the Intesa Sanpaolo Group's branches.

Gross premiums written amounted to 767.1 million euro (700.5 million euro at the end of 2020), up 9.5% on the previous year.

The claims ratio before reinsurance was 28% (31.9% at the end of the previous year). Specifically, it was 30.3% for accident insurance (31.2% at the close of 2020), 28.6% for health insurance (40.2% at the close of 2020), 26.8% for other property damage (27.2% at the close of 2020) and 77.5% for motor liability (74.3% at the close of 2020).

Overall, the claims ratio (net of reinsurance) for the period was 26%, an improvement on the 32% reported at the end of the previous year.

The technical account result for 2021 was a positive 261.9 million euro (173.1 million euro in 2020), mainly attributable to the higher premium contribution

Gross technical provisions amounted to 1,156.6 million euro (1,093.1 million euro at the end of 2020).

Net investment income amounted to 12.5 million euro, up on the previous year's net income of 11.9 million euro, mainly due to net income from the sale of investments of 10.8 million euro, compared with 1.4 million euro in the previous year

The performance of the financial markets led to the recognition of net value adjustments of 6.1 million euro, included in the balance shown above (reversals of value adjustments of 0.2 million euro in 2020).

A profit of 182.1 million euro was reported at year end compared to 121.2 million euro profit at the end of the previous year, significantly influenced by the technical result of the insurance business.

Shareholders' equity, including the result for the period, amounted to 509.2 million euro (526.5 million euro at the end of the previous year). During the 2021 financial year, a dividend of 200.2 million euro was paid to the parent company Intesa Sanpaolo Vita.

Intesa Sanpaolo RBM Salute S.p.A.

During 2021, the integration of RBM within the Intesa Sanpaolo Group continued and the first products were placed on the market using the Banca dei Territori distribution network.

Gross premiums written amounted to 509.4 million euro, up 3% on the previous year.

Technical provisions amounted to 268.8 million euro, and the result of financial operations was a negative -1.2 million euro, a decrease compared to the previous year

The loss for the year amounted to -325.7 million euro, while shareholders' equity, including the result for the period and the 450 million euro capital increase fully subscribed by Intesa Sanpaolo Vita, amounted to 492.6 million euro.

The result for the 2021 financial year is mainly attributable to the increase in the claims rate, both actual and prospective; in respect of the latter a provision for risks and charges of 170 million euro has been set aside in relation to a financial imbalance that is partly attributable to a greater use of benefits by policyholders at the end of the long lockdown periods.

The impact of new products distributed by Banca dei Territori continued to be very positive.

Cargeas Assicurazioni S.p.A.

CARGEAS Assicurazioni, a wholly-owned subsidiary of Intesa Sanpaolo Vita as of 27 May 2021, is a company active in the Group's non-life sector with products for motor vehicles, home, health, asset protection and coverage for small and medium-sized enterprises. The acquisition of 100% of the company's shares was finalised on 27 May 2021.

Gross premiums written amounted to 140.2 million euro, down 36.0% compared to the end of the previous year (219.9 million euro).

The technical result was a positive 49.4 million euro (positive 59.5 million euro at the end of 2020), with a combined ratio on retained business of 83% (73% at 30 December 2020).

Technical provisions amounted to 359.7 million euro, down 17% from 434.5 million euro at 31 December 2020.

The net result at the end of the 2021 financial year was a profit of 30.5 million euro; shareholders' equity, including the result for the period, amounted to 116.1 million euro compared to shareholders' equity at the beginning of the period of 125.9 million euro.

Fideuram Vita S.p.A.

the company's 2021 accounts showed a profit of 75.2 million euro compared to a profit of 58.1 million euro in the previous year.

Gross life premiums written amounted to 4,471.9 million euro, up 762.4 million euro on the same period last year (+20.6%); there was an increase in premiums from Class III contracts (+939.8 million euro) and a decrease in premiums from Class I contracts (-212 million euro);

New life production amounted to 4,419.2 million euro, up 21% compared to 31 December 2020;

The composition of the investment portfolio for the segregated accounts maintained a predominant share of securities issued by governments of countries in the Euro area or by supranational entities (in line with 31 December 2020);

Operating expenses amounted to 20.1 million euro compared to 22.2 million euro in the previous year.

This performance reflects a positive technical balance in the Life segments of 89,4 million euro, compared to 67.8 million euro in 2020.

With reference to the consolidated financial statements of the Insurance Group, prepared in accordance with IAS/IFRS, and to the separate financial statements prepared in accordance with Italian accounting standards, below are the main results for 2021:

(euro millions)				
Income Statement	2021	2020	Change	
Intesa Sanpaolo Vita Group				
Gross Written Premium	20,312.8	18,295.0	2,017.8	11.0%
Net Profit IAS/IFRS of Group	765.9	701.0	64.9	9.3%
Individual Balance Sheet				
Net Profit ISV	744.1	248.8	495.3	199.1%
Net Profit ISA	182.2	121.2	61.0	50.3%
Net Profit ISL	192.5	150.1	42.4	28.3%
Net Profit FV	75.2	58.1	17.1	29.4%
Net Profit RBM	-325.7	61.9	-387.6	-626.2%
Net Profit CARGEAS	30.5	40.4	-9.9	-24.5%

Group Data	2021	2020	Change	
Number of Life Contract	4,846,465	5,848,215	-1,001,750	-17.1%
Number of Non Life Contract	4,115,825	3,282,245	833,580	2.3%
Number of Human Resource	1,375	1,014	361	35.6%

Below are details of the main indicators relating to the Solvency regulations for the Group and for each company.

	Intesa Sanpaolo Vita	Intesa Sanpaolo Assicura	Fideuram Vita	Intesa Sanpaolo Life	Intesa Sanpaolo RBM Salute	Cargeas Assicurazioni	(euro millions) Intesa Sanpaolo Vita Insurance Group
A. Solvency Capital Requirement (SCR)	3,022.0	202.9	494.9	637.1	400.0	81.8	3,916.5
B. Minimum Capital Requirement (MCR)	1,359.9	91.3	222.7	281.1	100.0	36.8	2,097.4
C. Eligible Own Funds to meet the SCR	8,669.5	755.6	1,361.1	1,666.8	438.8	155.5	10,159.6
D. Eligible Own Funds to meet the MCR	7,643.1	755.6	1,254.9	1,666.8	378.8	155.5	9,129.9
C. / A. Ratio Eligible Own Funds on SCR	287%	372%	275%	262%	110%	190%	259%
D. / B. Ratio Eligible Own Funds on MCR	562%	828%	564%	593%	379%	422%	435%

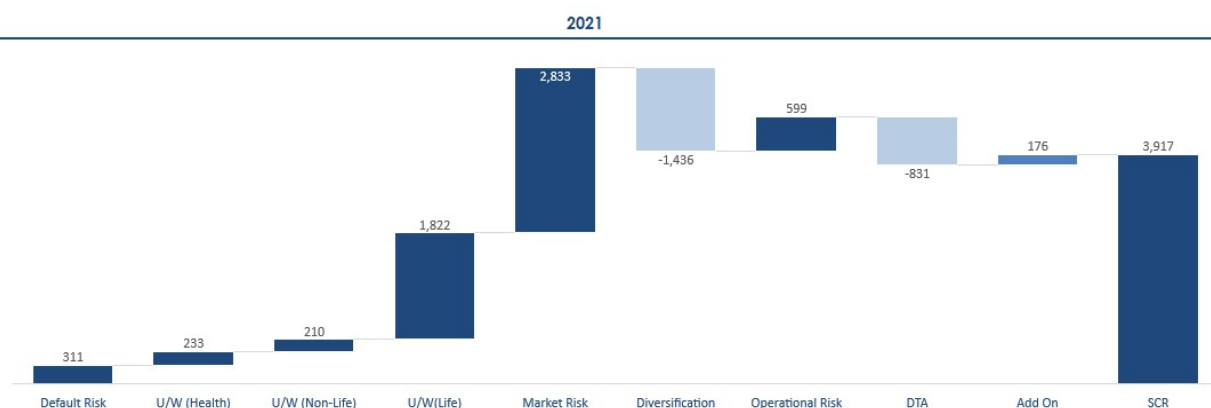
The Insurance Group's governance system is in proportion to the nature, extent and complexity of its business activities and relative risk profile, as indicated in more detail in Section B of this document.

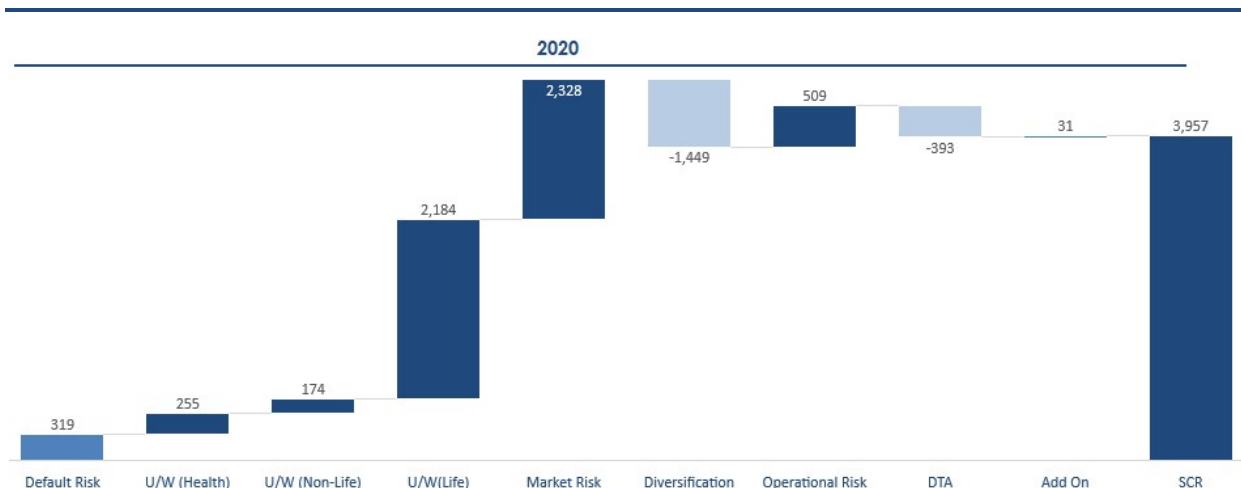
The Group's risk management system covers each insurance company, as described in **Section C**. The risk management system is formalised by means of the internal regulation policies issued by each company according to the guidelines of the Ultimate Italian Parent Company (hereinafter the USCI) in accordance with Article 30-bis(4) of the Private Insurance Code.

Special attention is paid to the major risks that could undermine the solvency of each company, or that could affect the objectives set by the Resolution on risk appetite. The main objective of the risk management system is to guarantee the capacity to fulfil obligations towards policyholders, beneficiaries, injured parties and stakeholders in general.

With reference to the risks measured for the purpose of quantifying the Insurance Group's regulatory capital requirement, the contribution of each risk compared to the total solvency capital requirement is shown below.

Composition of the solvency capital requirement (in millions of euro)





The solvency capital requirement of Insurance Group (SCR) at 31 December 2021 was 3,916.5 million euro.

The MCR is calculated on the basis of the provisions of Chapter VII of the Delegated Acts, and amounts to 2,097.4 million euro.

Evidence of levels of eligible own funds and the solvency capital requirement of the Insurance Group, with and without the Volatility Adjustment is reported below.

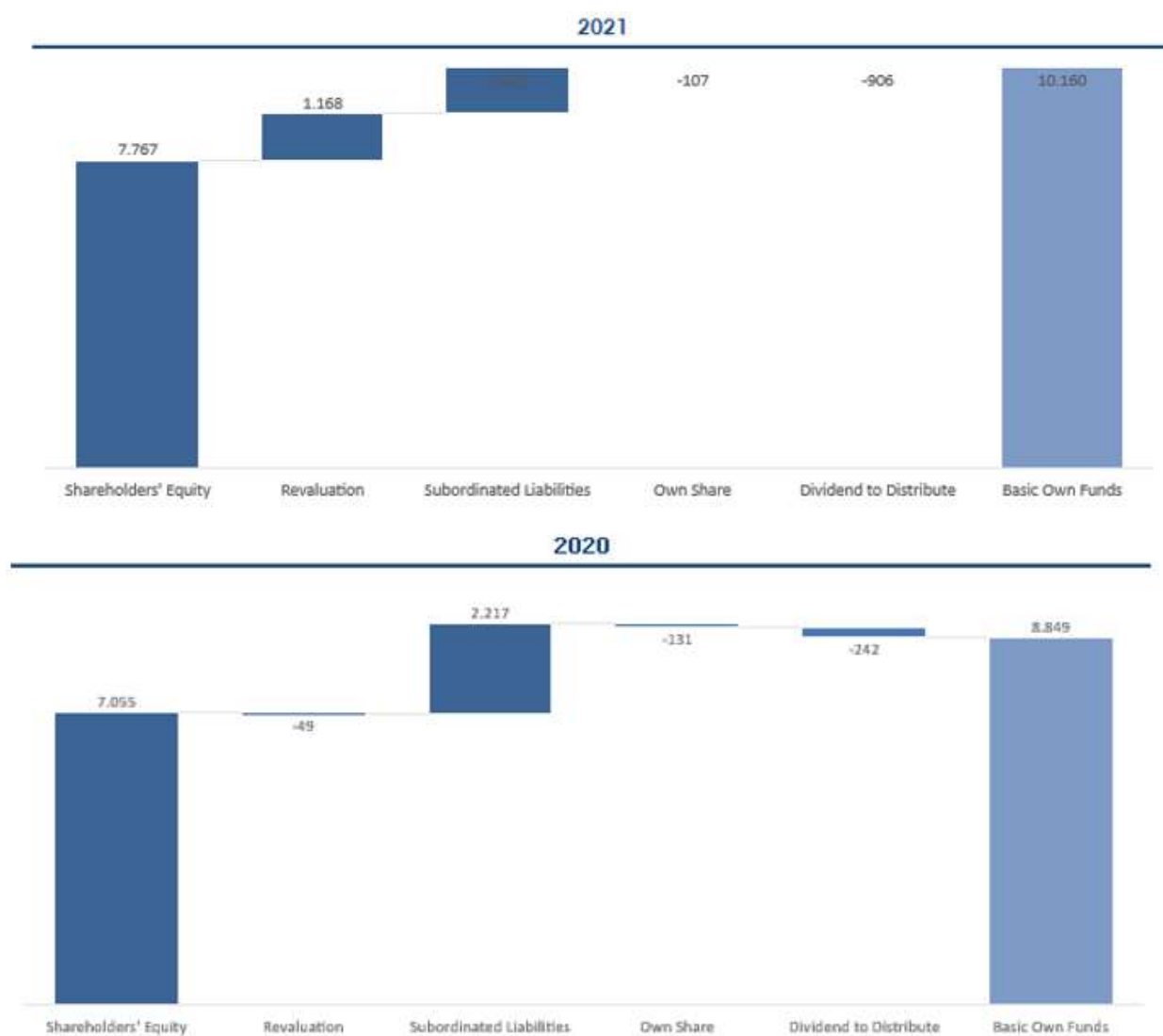
	(million euro)	
	No VA	VA
Eligible Own Funds	10,136.7	10,210.2
Solvency Capital Requirement	3,980.3	3,916.5
Solvency ratio	255%	261%

With reference to **Section D**, assets have been valued in accordance with IAS/IFRS, in line with the valuation approach referred to in Article 75 of Directive 2009/138/EC ("Directive").

To determine the own funds available to cover the solvency capital requirement, each company is required to prepare its own Solvency Report, according to the principles outlined above. This is different from the annual financial reports and is used to quantify the own funds to be included in the calculation of the solvency ratio of the Insurance Group and of the individual insurance companies.

The own funds of the Insurance Group compared to the shareholders' equity in the Consolidated Financial Statements of the Insurance Group at 31 December 2021 and at 31 December 2020 are represented below.

From Shareholders' Equity to Solvency II Own Funds (in millions of euro)



Section E, entitled "Capital Management", focuses on representing the solvency position of the Insurance Group and of each company in its consolidation perimeter.

Below is a comparison between Own Funds and the Solvency Capital Requirement of the Insurance Group at 31 December 2021 and at 31 December 2020.

Comparison between Own Funds and solvency capital requirements (in millions of euro)



The value of eligible own funds to cover the Solvency Capital Requirement (SCR) at Group level is equal to 10,210 million euro, of which 7,968 million euro classified as Tier 1 unrestricted, 793 million euro as Tier 1 restricted and 1,449 million euro as Tier 2.

Controls on tiering for the eligibility of own funds to cover the Solvency Capital Requirement did not identify the need to make reductions compared to the level of own funds available.

The value of eligible own funds to cover the Minimum Solvency Capital Requirement (MCR) at Group level is equal to 9,180 million euro, of which 7,968 million euro classified as Tier 1 unrestricted, 793 million euro as Tier 1 restricted and approximately 419 million euro as Tier 2.



A. ACTIVITIES AND RESULTS

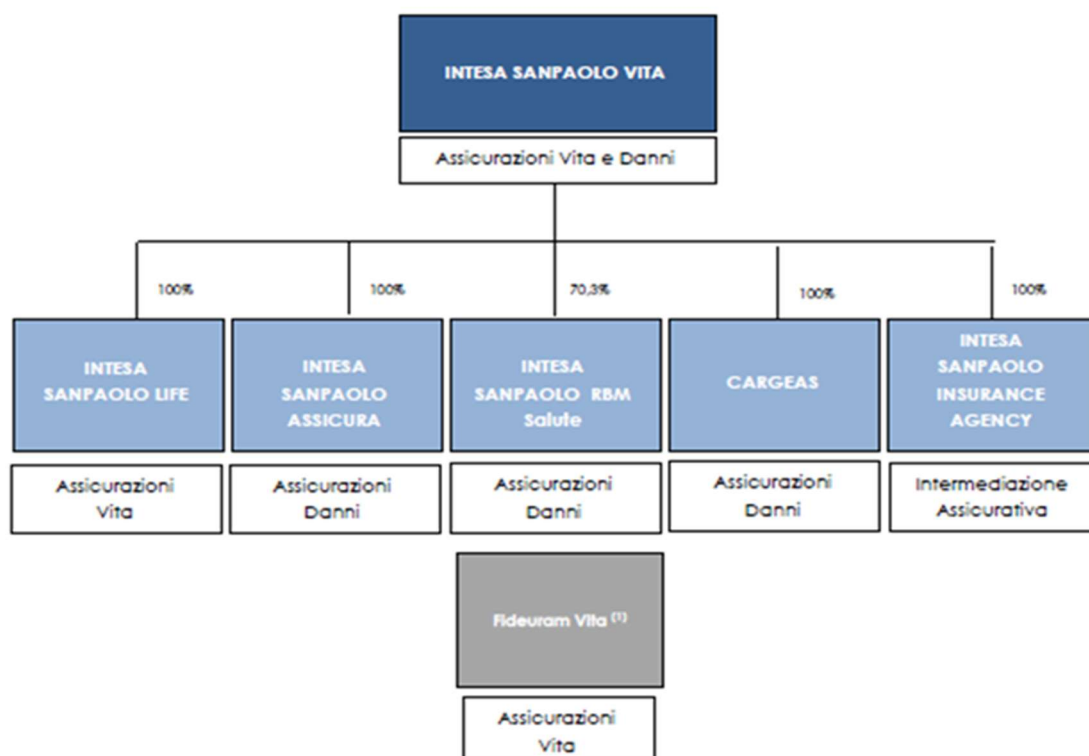
A.1 ACTIVITIES

Intesa Sanpaolo Vita Insurance Group

With reference to the QRT S.32.01 annexed to this Report, a list is given of the individual companies in the Insurance Group.

The Insurance Group is registered with the Register of Insurance Groups kept by IVASS (registration number 28).

The Group structure at 31 December 2021 is represented below:



1) The company is consolidated through unitary management, as it is managed and coordinated by Intesa Sanpaolo, parent company of Intesa Sanpaolo Vita (Article 96 of the Insurance Code Legislative Decree 209/2005).

In terms of management and coordination activities, the Insurance Parent Company provides the Group entities with strategic guidelines and governs the monitoring and supervising activities, to ensure sound and prudent management.

The Insurance Group operates in the Life insurance and Pension segments, with a leading position on the Italian market, as well as in the non-life segment, through its subsidiaries Intesa Sanpaolo Assicura, Intesa Sanpaolo RBM Salute and Cargeas Assicurazioni. The data for production referred to the 2021 financial year and compared with the previous financial year, prepared according to IAS/IFRS, are presented below.

Operational Data	2021	2020	Variazione	
Gross Written Premium Life	18,827.1	19,415.1	-588.0	-3.0%
- Insurance products without DPF	5,928.9	9,044.3	-3,115.4	-34.4%
- Insurance products with DPF	12,008.1	9,478.9	2,529.2	26.7%
- Financial products without DPF	890.1	891.9	-1.8	-0.2%
Non-life gross written premiums	1,404.3	1,336.7	67.6	5.1%
Life new business	18,334.2	18,106.6	227.6	1.3%
Net insurance benefits and claims	12,075.4	14,122.0	-2,046.6	-14.5%
Net production	6,258.8	3,984.6	2,274.2	57.1%

The parent company Intesa Sanpaolo Vita mainly works with the banking network of the Intesa Sanpaolo Group to market its own insurance, savings and investment products, as well as pension and creditor protection products, both through the traditional banking network and through Branches online.

Although on a marginal basis, the Company also has agreements in place for the management and sale of insurance-related savings and investment products, as well as pension products with Intermediaries not belonging to the Intesa Sanpaolo Group

In the course of 2021, following the transfer of branches from Intesa Sanpaolo to BPER Banca and Banca Popolare di Puglia e Basilicata, new management agreements were activated for keeping the products in the portfolios of the acquired companies.

Lastly, a new distributor was activated, Intesa Sanpaolo Insurance Agency, a multi-firm agency of the Insurance Group set up in 2020. It mainly targets medium-large companies offering non-standard insurance solutions from all the Group's Italian companies.

Fideuram Vita S.p.A. is assisted by a network of more than 6,600 private bankers in all regions and main cities of Italy, belonging to Fideuram, Sanpaolo Invest, IWBanck and Intesa Sanpaolo Private Banking, to distribute its products.

It also uses Intesa Sanpaolo Insurance Agency agents to distribute products designed to protect companies and their staff.

For the distribution of its products, Intesa Sanpaolo Assicura primarily uses the Branches network of the Intesa Sanpaolo Group Banca dei Territori.

The joint effort with Banca dei Territori to focus on the Protection of the banking network continued, supported by the professional development (with technical-specialist and in-depth training provided by Intesa Sanpaolo Assicura) of the "Protection Specialists", over two hundred professionals dedicated to providing timely and skilled support to branch managers.

Moreover, for the offer dedicated to more complex companies, from May 2021 the Company will be assisted by Intesa Sanpaolo Insurance Agency, an insurance agency offering "tailor-made" solutions to meet the complex needs of companies.

Lastly, the Company has management-only agreements with extracaptive intermediaries and with the financial Advisor network of Banca Fideuram and Intesa Sanpaolo Private Banking.

For the distribution of its products, Intesa Sanpaolo RBM Salute has mainly relied on the direct channel. As part of the ongoing integration of the company within the Group, there was significant growth in the banking channel, supported by synergies with the Intesa Sanpaolo group and which rose from 0.2% of the portfolio last year to almost 10.9%. At the same time, there was a decrease in the broker channel, which experienced a drop in premiums of -38%. The Agency channel performance was in line with last year.

Following the acquisition of Cargeas Assicurazioni in May 2021 by Intesa Sanpaolo Vita, the Company no longer carries out new business as its activities have been concentrated in Intesa Sanpaolo Assicura serving all branches of the Intesa Sanpaolo Group.

At 31 December 2021, the Group recorded a consolidated shareholders' equity of 7,762.6 million euro, including net profit of 596.7 million, compared to an opening equity of 8,051.3 million euro.

Pursuant to Article 8 of IVASS Regulation no. 30/2016 and, along with the central structures of Intesa Sanpaolo, the Insurance Group governs the intragroup transactions included in the Framework resolution of these transactions, updating a list of counterparties that also includes the associate companies of the Intesa Sanpaolo Group:

1. Insurance Group companies;
2. Companies controlled by Intesa Sanpaolo not belonging to the Insurance Group;
3. Companies that are associates of Intesa Sanpaolo not belonging to the Insurance Group.

According to the above-mentioned framework resolution, it should be noted that each Insurance Group company:

- carries out intragroup transactions in accordance with principles of sound and prudent management, and does not carry out any operation that could adversely affect the solvency of the Insurance Group and companies involved, or that could harm the interests of the insurance companies involved (Article 6(1));
- conducts intragroup operations under market conditions, as the carrying out of operations under non-market conditions is only permitted on an exceptional basis, under application of the regulations concerning operations to be reported to IVASS "in all circumstances" (Article 6(2));
- has, within its corporate governance system, adequate risk management and internal control systems, which must be structured both at individual company level and at group level, for the constant supervision of all intragroup operations (Article 7(1));
- adopts a specific framework resolution for intragroup operations – this is reviewed at least annually by the Management Board, and its object is to obtain a specific policy in line with the investments strategy and related policies, to define the terms and conditions of intragroup operations and to identify the criteria and categories of significance, highly significant and reportable transactions based on the potential impact on solvency and risk profile, and in relation to the type of operation and counterparty (Article 8);
- reports to IVASS, through the USCI Intesa Sanpaolo Vita, on "material" intragroup transactions on an annual basis, on "highly significant" transactions on a monthly basis, and on transactions "in all circumstances" as promptly as possible.

Intesa Sanpaolo Vita S.p.A.

Intesa Sanpaolo Vita S.p.A.

Company exercising the insurance business in the Life and Non-life segments

Share capital: euro 320,422,508.

Head office in Turin, Corso Inghilterra 3. Administration offices in Milan, Viale Stelvio 55/57.

Tax identification and registration with the Turin Companies Register, number: 02505650370.

A registered insurance and reinsurance company, number: 1.00066.

Parent Company of the Intesa Sanpaolo Vita Insurance Group.

For a graphic representation of Intesa Sanpaolo Vita's position within the Insurance Group, refer to the illustration of the Insurance Group structure, shown above.

Company subject to management and coordination by Intesa Sanpaolo S.p.A. ("Intesa Sanpaolo"), which holds 99.985% of the share capital. Intesa Sanpaolo, a listed company, has its head office in Turin, Piazza San Carlo 156, and a secondary office in Milan, Via Monte di Pietà 8. It is listed on the register of banks at no. 5361 and is the Parent Company of the Intesa Sanpaolo Banking Group.

The Supervisory Authority in charge is IVASS, headquartered in Rome, Via Del Quirinale 21 – 00187.

The firm responsible for the statutory auditing of the accounts is EY S.p.A., with registered office in Milan, Via Meravigli, 12.

Intesa Sanpaolo Vita operates nationwide, thanks to the retail network of the Intesa Sanpaolo Banking Group. Its offer is mainly directed to retail customers, households, and small and medium businesses. Through Fideuram Intesa Sanpaolo Private Banking, Intesa Sanpaolo Vita also offers its insurance services to private customers.

The company operates in the following areas of activity:

A. Non-life insurance obligations:

- Medical costs insurance;
- Income protection insurance.

B. Life insurance obligations:

- Insurance with profit participation;
- Index-linked and unit-linked insurance including policies with pension content;
- Other forms of Life insurance, namely pure risk products.

During 2021, the Company continued to focus on the objectives of the 2018/2021 Business Plan, guaranteeing the development of activities aimed at process efficiency and implementing requirements of changes to the regulatory framework.

Intesa Sanpaolo Vita reported a profit of 744.1 million euro at year end 2021, including dividends distributed by the subsidiaries Intesa Sanpaolo Assicura and Intesa Sanpaolo Life totalling approximately 300 million euro, compared to a profit of 316.2 million euro in the previous year.

As in previous years, the company carried out some ordinary transactions with companies in the Intesa Sanpaolo Group. These transactions took place under arm's-length conditions, based on reciprocal financial valuations. The company did not carry out any atypical or unusual transactions during the period, nor any intragroup, related party or third party transactions.

The following intragroup transactions were significant in 2021 for the purposes of IVASS Regulation no. 30/2016:

- distribution of an extraordinary reserve of 550.2 million euro to Intesa Sanpaolo;
- distribution agreements with Intesa Sanpaolo for 446 million euro.

Intesa Sanpaolo Assicura S.p.A.

Intesa Sanpaolo Assicura S.p.A.

Company exercising the insurance business in the Non-life segment.

Share capital: euro 27,912,258.

Head office and General Management in Turin, Corso Inghilterra 3. Administration offices in Turin, San Francesco 3, and in Milan, Viale Stelvio 55/57.

Tax identification and registration with the Turin Companies Register, number: 06995220016.

A registered insurance and reinsurance company, number: 1.00125.

Intesa Sanpaolo Assicura S.p.A. is wholly owned, directed and coordinated by Intesa Sanpaolo Vita S.p.A., and belongs to the Insurance Group.

For a graphic representation of Intesa Sanpaolo Vita S.p.A.'s position within the Insurance Group, refer to the illustration of the Insurance Group structure.

The Supervisory Authority in charge is IVASS, headquartered in Rome, Via Del Quirinale 21 – 00187.

The firm responsible for the statutory auditing of the accounts is EY S.p.A., with registered office in Milan, Via Meravigli, 12.

Intesa Sanpaolo Assicura operates nationwide, mainly through the branches of the Intesa Sanpaolo Group to distribute its own products.

In 2021, initiatives to address the Covid 19 pandemic for personal-family and financial protection continued.

In the "Motor" area, the initiative to facilitate and promote renewal (discount on RCA for the ViaggiaConMe Unlimited and Classica policies) was extended until the end of 2021 and the initiative to encourage green mobility (free bike assistance guarantee if you purchase the ViaggiaConMe a Consumo policy) until the end of 2022.

In the "No Motor" retail area, the offer dedicated to private customers was expanded in the XME Protezione according to the life cycle logic. In particular, in January, Intesa Sanpaolo Assicura's Health offer was replaced by the new Health range offered by Intesa Sanpaolo RBM Salute, which introduces various health modules that can be used via the support of an extensive network of affiliated healthcare facilities.

At the same time, the development of the "Imprese" range continued, with special attention to the development of the offer for the corporate segment, to respond to the commitments of the business plan and to market demand.

In the 'Business' area, the integration and strengthening of the protection offer continued. Two new products were launched in June: the Cyber Protection Business policy and the Directors' and Officers' Liability policy to offer business customers an increasingly comprehensive cover against industrial risks.

The year 2021 was mainly characterised by the project to integrate the UBI network into Intesa Sanpaolo following the merger in the first half of the year. Actions were carried out to facilitate the management of UBI Client portfolio (e.g. operational reporting of expiring policies and contact initiatives). A project was also launched with a broad commercial scope and high ESG implications: the 'Caring project'. This project, launched together with Intesa Sanpaolo, provides a comprehensive response to the needs of the most vulnerable population, the over-65s. The joint effort with Banca dei Territori to focus on the Protection of the banking network continued, supported by the professional development (with technical-specialist and in-depth training provided by Intesa Sanpaolo Assicura) of the "Protection Specialists", over two hundred professionals dedicated to providing timely and skilled support to branch managers.

Moreover, for the offer dedicated to more complex companies, from May 2021 the Company will be assisted by Intesa Sanpaolo Insurance Agency, a Group insurance agency and a subsidiary of Intesa Sanpaolo Vita S.p.A, offering "tailor-made" solutions to meet the complex needs of companies.

With regard to the main new products launched on the market, lines of action and business development, during the year initiatives to address the Covid 19 pandemic for personal-family and financial protection continued. At the same time, the development of the product range continued, with special attention to the development of the offer for the corporate segment, to respond to the commitments of the business plan and to market demand.

The company operates exclusively in the Non-life segment, in the following areas.

Non-life insurance obligations:

- Medical costs insurance;
- Income protection 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;
- Legal expenses insurance;
- Assistance;
- Miscellaneous financial loss.

There were no significant events that impacted the company's business during 2021. 2021 saw an increase in collected premiums, for a total of 767.1 million euro, up by 9.5% compared to the final figure for 2020 (700.5 million euro).

The increase in premiums issued was mainly due to Health and Accident products (+19.5% compared to 31 December 2020), Home and Family products (+19% compared to 31 December 2020) and Business products (up 37.6% compared to 31 December 2020), while premiums for Credit Protection products fell by -21.4%.

The Loss Ratio, which is a primary indicator of the cost effectiveness of the technical management of a non-life insurance undertaking, was equal to 26% in 2021, down by 6% compared to 32% in

2020. The group's Non-life company carried out various ordinary transactions with companies in the Intesa Sanpaolo Group. These transactions took place under arm's-length conditions, based on reciprocal financial valuations. The company did not carry out any atypical or unusual transactions during the period, nor any intragroup, related party or third party transactions.

The following intragroup transactions were relevant in 2021 for the purposes of IVASS Regulation no. 30/2016:

- payment of an extraordinary reserve equal to 200.1 million euro to Intesa Sanpaolo Vita;
- The payment to Intesa Sanpaolo SmartCare S.r.l of expenses relating to the inserts used in the "Viaggia con me" products package for an amount equal to 8.0 million euro ;
- the payment of some expenses relating to outsourced personnel from Intesa Sanpaolo Vita, for an amount equal to 4.9 million euro;
- the payment of some expenses relating to outsourced personnel from Intesa Sanpaolo, for an amount equal to 14.4 million euro;

Fideuram Vita S.p.A.

Fideuram Vita S.p.A.

Company exercising the insurance business in the Life segment.

Share capital: euro 357,446,836.

Head office in Rome, Via Ennio Quirino Visconti 80.

Tax identification and registration with the Rome Companies Register, number: 10830461009.

A registered insurance and reinsurance company, number: 1.00175.

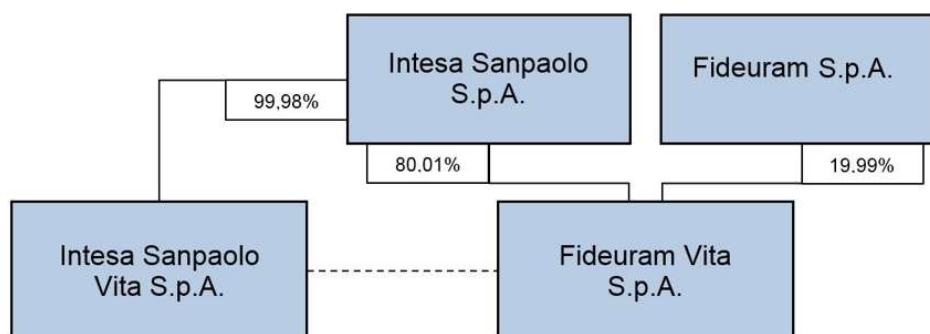
Fideuram Vita S.p.A. is held 80.01% by Intesa Sanpaolo S.p.A. and 19.99% by Fideuram-Intesa Sanpaolo Private Banking S.p.A., in brief Fideuram S.p.A.. Both companies have their registered office in Turin, Piazza San Carlo 156. The secondary office of Intesa Sanpaolo S.p.A. is in Milan, Via Monte di Pietà 8. The secondary office of Fideuram S.p.A. is in Milan, Via Montebello 18.

Fideuram Vita belongs to the Intesa Sanpaolo Vita Insurance Group, and is directed and coordinated by Intesa Sanpaolo Vita, as the Insurance Group Parent.

The Supervisory Authority in charge is IVASS, headquartered in Rome, Italy, in Via Del Quirinale 21 – 00187.

The firm responsible for the statutory auditing of the accounts is EY S.p.A., with registered office in Milan, Via Meravigli, 12.

Below is a graph illustrating the company's position within the Intesa Sanpaolo Group:



----- Fideuram Vita S.p.A. is part of the regulatory consolidation area of the Insurance Group, for the purposes of Article 96 of Legislative Decree 209/2005 – Private Insurance Code, although it has no participatory control by Intesa Sanpaolo Vita S.p.A.

Fideuram Vita S.p.A. operates nationwide, thanks to an extensive retail network of private bankers in every major Italian city and region, belonging to Fideuram - Intesa Sanpaolo Private Banking, Sanpaolo Invest, Intesa Sanpaolo Private Banking and IWBANK S.p.A..

Fideuram Vita operates exclusively in the Life segment, in segments I, III, V and VI (relating to life insurance, unit-linked and index-linked insurance, capitalisation and asset management), and offers the following solutions and products:

Life insurance obligations:

- Insurance with profit participation;
- Index-linked and unit-linked insurance including policies with pension content;
- Other life insurance.

Fideuram Vita S.p.A reported a net profit of 75.2 million at year end 2021, a result achieved amid the recovery of world equity markets, characterised by low volatility and favoured by the accommodating policies of Central Banks. In contrast, bond markets, already struggling with rate hike scenarios, suffered from rising inflation. Inflation-linked securities supported portfolios as they offered hedging against inflationary scenarios.

Fideuram Vita carried out various ordinary transactions with companies in the Intesa Sanpaolo Group. These transactions took place under arm's-length conditions, based on reciprocal financial valuations. The company did not carry out any atypical or unusual transactions during the period, nor any intragroup, related party or third party transactions.

The following intragroup transactions were significant in 2021 for the purposes of IVASS Regulation no. 30/2016:

- the sale of securities to counterparties of the Intesa Group on own account and on account of third parties for a total of 440 million euro and the opening and closing of a deposit with a company of the Intesa Sanpaolo Group as the counterparty, for a further 22.5 million euro;
- the signing of derivative contracts with an Intesa Group Bank counterparty to cover the exchange risk of managed pension funds, with a total notional value of 8,710.3 million euro;
- the signing of new policies with related parties of the Intesa Group, for 123.8 million euro;

Intesa Sanpaolo Life D.A.C.

Intesa Sanpaolo Life D.A.C. - Company operating in the Life insurance business.

Share capital: euro 625,000.

Head office in Dublin, 1st Floor, International House, 3 Harbourmaster Place, IFSC - Dublin D01 K8F1. Irish Companies Register number 284248.

Intesa Sanpaolo Life is owned entirely by Intesa Sanpaolo Vita S.p.A. and belongs to the Intesa Sanpaolo Vita Insurance Group.

For a graphic representation of the company's position within the Insurance Group, refer to the illustration of the Group structure, shown above.

The regulatory authority is the Central Bank of Ireland (CBI), New Wapping Street, North Wall Quay - Dublin 1.

The firm responsible for the statutory auditing of the accounts is EY Chartered Accountants and Statutory Audit Firm, EY Building, Harcourt Centre, Harcourt Street, Dublin 2.

The business of Intesa Sanpaolo Life is mainly focused on the retail of Unit Linked policies in Italy. Moreover, Intesa Sanpaolo Life is expanding the distribution of its policies in Spain, and continuing to explore other European countries.

The Company's only area of business pertains to unit-linked insurance contracts, i.e. Unit Linked Insurance.

During 2021, the main events affecting the Company were the following:

During the year ended, the subsidiary Intesa Sanpaolo Life reviewed and updated part of its retail offer.

In particular, in 2021 Intesa Sanpaolo Life issued a new insurance product and developed new internal funds that contributed to the range of funds offered as part of existing products.

The Insurance products are recognised in the financial statements, indicating the premiums, payments and change in technical provisions in profit and loss; the commission from acquisitions and collections is recognised in profit and loss in the year of accrual. Deferred acquisition costs mainly include expenses incurred for the undertaking in the portfolio of a particular type of long-term insurance contracts, that are amortised line by line for a period equal to the duration of each contract, which is less than ten years.

During 2021, Intesa Sanpaolo Life collected premiums of approximately 5.5 billion euro, mainly regarding unit-linked products, against early exits of 4.3 billion euro.

Intesa Sanpaolo Life carried out various ordinary financial transactions with companies in the Intesa Sanpaolo Group. These transactions took place under arm's-length conditions or in any case in compliance with regulations on related party transactions and based on reciprocal financial valuations.

During the reporting period, the Company carried out the following material intragroup transactions:

- the signing of 7 derivative contracts with an Intesa Group Bank counterparty, for a notional value equal to approximately 13.7 million euro;
- the payment of commission for outsourcing services, to counterparties of the Intesa Group, totalling approximately 539.5 million eu

Intesa Sanpaolo RBM Salute S.p.A.

Intesa Sanpaolo RBM Salute S.p.A.

Company exercising the insurance business in the Non-life segment.

Share capital: euro 269,000,000.

Registered office and general headquarters in Venice, Via Lazzari, 5. Administration offices in Milan, Viale Stelvio 55/57.

Tax identification and registration with the Venice Rovigo Companies Register, number 05796440963.

A registered insurance and reinsurance company, number: 1.00161.

Intesa Sanpaolo RBM Salute S.p.A. is controlled, managed and coordinated by Intesa Sanpaolo Vita S.p.A., that has a share equal to 70.3%, and belongs to the Insurance Group.

For a graphic representation of Intesa Sanpaolo RBM Salute S.p.A.'s position within the Insurance Group, refer to the illustration of the Insurance Group structure.

The Supervisory Authority in charge is IVASS, headquartered in Rome, Via Del Quirinale 21 – 00187.

The firm responsible for the statutory auditing of the accounts is EY S.p.A., with registered office in Milan, Via Meravigli, 12.

During 2021, Intesa Sanpaolo RBM Salute was confirmed as one of the main players in the healthcare sector. At present, ISP RBM provides insurance for the main Healthcare Funds and the biggest healthcare policies on the market.

As annual statistics from ANIA in the last few years show, Intesa Sanpaolo RBM Salute is the biggest growing operator in the healthcare segment, capable of acquiring a considerable market share in around ten years. This significant growth is due mostly to the combination of operating

excellence in claims management and insurance activities, as well as the innovative nature of products that, among others, provide insurance cover chiefly for "out of pocket" health expenses (and specifically dental treatments, high-level diagnostics, high-level specialisation treatments, appointments with specialists and medicines), traditionally excluded and/or considerably limited in the health insurance offered by "conventional" market players. In addition, Intesa Sanpaolo RBM Salute has developed a business model that strongly values the role of early diagnosis and prevention as a means of promoting the health of its insured customers, and also of reducing the onset of diseases and in particular noncommunicable diseases, also known as chronic diseases, that represent the main cause of death in western countries, thus avoiding higher costs of related treatment.

Cargeas Assicurazioni S.p.A.

Cargeas Assicurazioni S.p.A.

Company exercising the insurance business in the Non-life segment.

Share capital: euro 32,812,000.

Registered office and general headquarters in Milan, Via Tolmezzo, 15 - 20132 Milan.

Tax identification and registration with the Milan Companies Register, number 07951160154

A registered insurance and reinsurance company, number: 1.00064.

Cargeas Assicurazioni S.p.A. is wholly owned, directed and coordinated by Intesa Sanpaolo Vita S.p.A., and belongs to the Insurance Group.

For a graphic representation of Cargeas Assicurazioni S.p.A.'s position within the Insurance Group, please refer to the illustration of the Insurance Group structure.

The Supervisory Authority in charge is IVASS, headquartered in Rome, Via Del Quirinale 21 – 00187.

The firm responsible for the statutory auditing of the accounts is EY S.p.A., with registered office in Milan, Via Meravigli, 12.

Following the memorandum of understanding dated 8 February 2021 between BNP Paribas Cardif SA and Intesa Sanpaolo Vita S.p.A., the Intesa Group's insurance holding company, the transfer of the entire shareholding took place in 2021, following authorisation received from IVASS and notified to the market with Measure no. 0100029 of 11 May 2021. Thus, as of 27 May 2021, Cargeas became part of the Intesa Group.

During this year, two important events involved the Company's main banking distributor: the transfer of 587 bank branches from UBI Banca to Banca BPER, which became effective on 15 February 2021, and of 26 branches to Banca Popolare di Puglia e Basilicata, which became effective on 24 May. In addition, as of 14 April UBI Banca was merged into Banca Intesa.

As a result, new distribution agreements were concluded with BPER, under which Cargeas can continue to renew only its existing contracts: the Company will be able to offer new policies to the bank's customers who apply directly to Cargeas.

A similar agreement was signed with Banca Popolare della Puglia and Basilica.

Banca Intesa's bank branches will also continue to offer the renewal of existing policies to their customers.

The other banking and non-banking channels continued to operate steadily throughout 2021, offering both new policies and renewals of policies already issued. However, given the focus on

bank originated business brokered by the Group, distribution agreements with Banca BNL and with the network of City Agents are being terminated.

Regardless of the events surrounding the distribution agreements with its intermediaries, Cargeas guarantees and will continue to guarantee in the future the same level of service to all its customers, for the entire contractual duration of their current policies.

A.2 UNDERWRITING RESULTS

Intesa Sanpaolo Vita Insurance Group

With reference to the QRT S.05.01 annexed to this Report, which has been summarised and compared against the results for the previous year, please note the following:

- gross production for the year, net of reinsurance, totalled approximately 18,889.0 million euro for the Life Business and 1,119.9 million euro for the Non-life Business, giving a total of 20,088.7 million euro. The Life segment is predominantly made up of products linked to investment funds, unit-linked policies in particular, equal to 12,838.1 million euro corresponding to 67% of the entire amount, up on the previous year;
- the Claims portion (including payouts for coupon redemptions and other payments), of 19.2 billion euro, was up by 46.8% compared to the previous year. 50.5% relates mainly to segregated accounts, while 49.5% relates to products connected to unit-linked or pension policies;
- The change in other technical provisions decreased by 6,010 million euro; this is due to the combined effect of the increase in technical provisions, mainly caused by commercial performance and financial revaluation of the insured.
- the total expenses of the Insurance Group amounted to 1,334.5 million euro, which included 955.3 million euro for the Life Business and 395.7 million euro for the Non-life Business. This figure indicates an increase of approximately 15% compared to the previous year. These costs include agents' commission.

Below are the underwriting results divided by Solvency Line of business, as represented in the Quantitative Reporting Template S.05.01. prepared in accordance with Solvency Regulations (Delegated Acts, IVASS Regulations and published EIOPA interpretations), with a distinction made between the Life and Non-life businesses.

(euro thousands)

Line of Business	Premiums earned		Claims incurred		Changes in other technical provisions		Expenses incurred		Other expenses		Total underwriting performance	
	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020
Insurance with profit participation	5,864,430	6,914,292	-9,615,151	-6,452,571	2,269,850	-1,728,587	-250,601	-202,087				
Index-linked and unit-linked insurance	12,838,061	9,487,120	-9,499,770	-6,743,542	-8,360,697	-4,974,982	-655,369	-619,130	-7,799	-5,621	-7,198,951	-4,224,346
Other life insurance	186,423	280,357	-58,126	-37,749	131,376	-58,754	-41,578	-83,092				
Total amount	18,888,913	16,681,769	-19,173,047	-13,233,862	-5,959,471	-6,762,323	-947,548	-904,309	-7,799	-5,621		

(euro thousands)

Line of Business	Premiums earned		Claims incurred		Changes in other technical provisions		Expenses incurred		Other expenses		Total underwriting Result	
	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020
Medical expenses insurance	386,768	370,448	-504,610	-234,873	-52,008	-13,594	-64,715	-27,440				
Income protection insurance	328,267	245,092	-80,898	-69,366	2,105	-2,513	-116,959	-94,430				
Motor vehicle liability insurance	109,526	77,406	-60,982	-49,592	-	-	-32,686	-23,887				
Other motor insurance	24,596	13,767	-12,723	-5,868	-55	-25	-7,869	-3,825				
Marine, aviation and transport insurance	148	168	15	14	-	-	-27	-51				
Fire and other damage to property insurance	180,257	118,348	-31,467	-22,290	-784	-335	-84,313	-53,164	-16,521	-5,210	70,550	283,480
General liability insurance	84,695	60,985	-7,378	-8,120	-	-	-31,631	-20,439				
Credit and suretyship insurance	1,001	910	163	-1,756	-	-	-309	-95				
Legal expenses insurance	7,682	309	-655	125	-	-	-224	2,250				
Assistance	14,629	9,954	-344	-301	-	-	-7,463	-5,135				
Miscellaneous financial loss	62,173	46,002	-380	-84	-7	-	-16,467	-19,907				
Total amount	1,199,742	943,389	-699,259	-392,111	-50,749	-16,466	-362,663	-246,122	-16,521	-5,210		

The rest of this Section reports on the underwriting results of the individual companies as shown in each Quantitative Reporting Template (QRT S.05.01) and also the underwriting results reclassified to provide a comparison with the Separate Financial Statements prepared according to national accounting standards.

Intesa Sanpaolo Vita S.p.A.

Intesa Sanpaolo Vita confirmed a solid business performance for the year, reporting a profit of 744.1 million euro, including dividends distributed by the subsidiaries Intesa Sanpaolo Assicura and Intesa Sanpaolo Life totalling approximately 300 million euro, compared to a profit of 316.2 million euro in the previous year.

The result was achieved amid the recovery of world equity markets, characterised by low volatility and favoured by the accommodating policies of Central Banks. In contrast, bond markets, already struggling with rate hike scenarios, suffered from rising inflation. Inflation-linked securities supported portfolios as they offered hedging against inflationary scenarios.

In this respect, the Company's statutory accounts:

- posted gross life premiums of 8,911.2 million euro, compared to 13,235.6 million euro at the end of the previous year, a decrease of 33%;
- new life production amounted to 8,651.2 million euro compared to 12,951.2 million euro, down 33% compared to 31 December 2020.
- the composition of the investments portfolio for segregated accounts, after the merger of former UBI companies, maintained a considerable quota of fixed income securities issued by governments or government agencies (equal to 66.4% of total assets in segregated accounts).

With reference to the Group's governance areas, the guidelines developed during 2021 by the Company, also as Parent of the Insurance Group, focussed on the following aspects:

- changing the management processes, with specific regard to the newly acquired companies, to gradually align them to the internal control system in place in the Insurance Group, in view of the merger which became legally effective on 31 December 2021, for the life segment, of the three-year integration project of the subsidiary Intesa Sanpaolo RBM Salute, launched last year, and of the integration project of Cargeas Assicurazioni, launched during the second half of 2021;
- further strengthening the digitisation process in order to ensure the continuity of essential customer services and critical business processes. In the course of the year, a number of innovative App-based functions were completed and released for use by customers. The digitalisation issue is strategic and is also a pillar of the new 2022/25 Business Plan, and we will therefore continue in this direction in the coming years;
- the activities for the adoption of a Group-wide single integrated accounting system as part of the project to implement the IFRS17 accounting standard were completed, with the exception of Cargeas Assicurazioni for which the activities will be completed by the end of the first half of 2022;

Given the foregoing, Intesa Sanpaolo Vita:

- maintains its very important position in the domestic life market and, through its subsidiaries, continues to expand in the non-life market, also through the acquisition of Cargeas Assicurazioni S.p.A.;
- supports the network underpinning its commercial activity in a currently difficult market, also through promotional initiatives;

-
- continues to implement a risk reduction policy, constantly pursuing high levels of capital solvency.

The Company continued to focus on the 2018/2021 Business Plan indications, with the aim of becoming one of the top four non-life insurance companies in Italy and the top one for non-motor retail products.

In 2021 the process of integrating the companies Assicurazioni Vita S.p.A. (formerly Aviva Vita S.p.A.), BancAssurance Popolari S.p.A. and Lombarda Vita S.p.A. into the Intesa Sanpaolo Vita Insurance Group ("ISV Group") was completed, following the acquisition by Intesa Sanpaolo S.p.A. of the group controlled by Unione di Banche Italiane S.p.A. (UBI Group) and the former's subsequent acquisition of 100% control over said companies.

As a result of the above-mentioned transaction, the Insurance Group decided to simplify its scope of consolidation through the merger of the companies Assicurazioni Vita S.p.A., BancAssurance Popolari S.p.A. and Lombarda Vita S.p.A. into Intesa Sanpaolo Vita S.p.A. on 31 December 2021.

In addition, as a result of the merger, Intesa Sanpaolo Vita S.p.A. acquired 100% of the share capital of Intesa Sanpaolo Insurance Agency S.p.A. ("ISIA" or "Agency") held by BancAssurance Popolari S.p.A.

The streamlining resulting from the merger brings economic and strategic benefits and allows for cost synergies and advantages in terms of efficiency arising from the simplification of the ISV Group's corporate structure; it also fulfils the need to optimise support activities for the Intesa Sanpaolo S.p.A. Networks and other intermediaries, thus pursuing the objective of fully enhancing the Intesa Sanpaolo Group's distribution network and the insurance offer for customers.

Finally, this greater management efficiency of internal processes and in fulfilling all legal and regulatory obligations will be facilitated by the concentration in a single company of the activities carried out by Intesa Sanpaolo Vita S.p.A. and by the merged companies.

In order to further benefit from the distribution network of the Companies belonging to the former UBI Group, with special regard to the placement of non-life insurance products, on 27 May 2021, a further corporate transaction was finalised, involving the acquisition by Intesa Sanpaolo Vita S.p.A. of 100% of the share capital of Cargeas Assicurazioni S.p.A., a company active in the non-life insurance segment, previously 100% held by the BNP Paribas Group, through BNP Paribas Cardif S.A.

Cargeas Assicurazioni S.p.A. specialises in offering motor, property, health, credit protection, business and income protection insurance products, with around 600,000 customers exclusively in Italy. The Company placed the products mainly through the distribution channels of the UBI Group until the acquisition and integration of the latter into the Intesa Sanpaolo Group.

This transaction allows for a simplification of the business model offered by the branches of the Banca dei Territori Division, whose managers will be able to offer a single range of products to all customers regardless of their bank of origin; it will also lead to significant revenue synergies through the alignment with the Intesa Sanpaolo Group's penetration targets, and to cost synergies through increased efficiency of management processes.

The Company will continue to strive for the excellent commercial performance recorded in previous years, maintaining a robust financial position and performance, while also improving performance for customers. It will also make use of the distributor Intesa Sanpaolo Insurance Agency, a multi-firm agency of the Insurance Group set up in 2020 which mainly targets medium-large companies offering non-standard insurance solutions from all the Group's Italian Companies.

On 27 December 2021, the share capital increase for valuable consideration of the subsidiary Intesa Sanpaolo RBM Salute was completed to strengthen the Company's capital; the amount of the increase was 450.4 million euro which was fully subscribed by the Parent Company Intesa Sanpaolo Vita S.p.A.

Therefore, the shareholding previously held by Intesa Sanpaolo Vita S.p.A. increased from 50% + 1 share to 70.3% of the share capital.

Lastly, in February 2022, the Company's capital was further strengthened by means of a share capital increase of 150 million euro, which was also fully subscribed by Intesa Sanpaolo Vita S.p.A. Therefore, the controlling interest of Intesa Sanpaolo Vita S.p.A. increased to 73.8%.

In financial terms, the Company is continuing to pursue the goal of profitability in separate management, which is as consistent as possible with the return on assets profile and with the dynamics and characteristics of liabilities, over a long-term horizon. With a view to @align@ the management approach adopted, 2021 was characterised by an investment approach that saw the gradual increase of some positions in risky bond asset classes, in search of adequate return and during episodes of volatility on the market; there was some profit-taking with regard to some highly profitable equity investments.

In line with the Intesa Sanpaolo Group's strategic objectives, and the increasing significance of Environmental, Social and Governance matters in consumer preferences, and the plans of institutions and national and international regulators, the Company has continued to pursue its sustainability strategy, with concrete initiatives focussed on environmental, social and governance topics.

The average duration of the securities portfolio was 6.1 years. Regarding the allocation of government bonds per country, the mix was decidedly oriented in favour of Italian bonds, albeit with a slight increase the component of bonds issued by core countries (Europe, mainly securities issued by the French Treasury).

Premiums collected in the year for the Life business were equal to 8,905.2 million euro, down by 6% compared to the figure for 2020 (9,468.8 million euro). The figure for the non-life business fell by 15%, from 584.6 thousand euro to 496.0 thousand euro.

Expenses for claims, net of sums to pay, went up considerably. In 2021, an amount equal to 12,003.5 million euro was recognised, up by 17% compared to the figure of the previous year (10,242.1 million euro) for the life business. In the non-life business, this figure was negligible. Below are the underwriting results divided according to Solvency II Line of business represented in the QRT S.05.01. The company only performs its underwriting activity in the Republic of Italy.

(euro thousands)

Line of Business	Premiums earned		Claims incurred		Changes in other technical provisions		Expenses incurred		Other expenses		Total underwriting Result	
	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020
Insurance with profit participation	5,643,650	6,774,112	-9,123,017	-7,465,804	2,072,227	-265,829	-242,468	-180,723	-	-	-	-
Index-linked and unit-linked insurance	3,079,587	2,490,514	-2,824,259	-2,741,020	-1,477,294	54,653	-116,451	-83,890	-4,762	-3,857	-2,776,926	-1,313,431
Other life insurance	181,963	204,165	-56,242	-35,319	131,446	-566	-41,308	-59,867	-	-	-	-
Total amount	8,905,200	9,468,791	-12,003,518	-10,242,143	726,380	-211,742	-400,226	-324,480	-4,762	-3,857		

(euro thousands)

Line of Business	Premiums earned		Claims incurred		Changes in other technical provisions		Expenses incurred		Other expenses		Total underwriting Result	
	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020
Medical expenses insurance	3	3	-	-	-	-	-	-1	-	-	-	-
Income protection insurance	493	581	-103	-349	2	7	-212	-226	-	-	182	16
Total amount	496	584	-103	-349	2	7	-212	-227	-	-		

The underwriting result was calculated on the basis of the data in the QRT S.05.01 (Premiums for the period – Claims + Changes in technical provisions – Operating Costs) and partially represents the company's underwriting result. This highlights an underwriting result that takes into account the "Technical Interest" in the Life segment, and other "Expenses and Income" that were not included in the QRT S.05.01.

Underwriting result for the company, considering the QRT S.05.01 data:

	(euro thousands)	
	2021	2020
Net premiums	8,905,696	9,469,375
Claims incurred	-12,003,621	-10,241,795
Changes in technical provisions	726,382	-211,735
Operating cost	-405,200	-328,563
Underwriting Result (QRT S.05.01)	-2,776,744	-1,312,717

Details of the underwriting results are given below, to provide a representation comparable with the annual Financial statements prepared according to Italian accounting standards.

	(euro thousands)	
	2021	2020
Net premiums	8,905,696	9,469,375
Claims incurred	-12,003,621	-10,241,795
Changes in technical provisions	726,382	-211,735
Underwriting expenses	-159,355	-183,757
<i>Claims management expenses</i>	-4,702	-3,923
<i>Acquisition expenses</i>	-154,653	-179,835
Technical interest	2,535,914	1,282,698
Underwriting Result	5,015	114,786

Intesa Sanpaolo Assicura S.p.A.

2021 saw an increase in collected premiums, for a total of 767.1 million euro, up by 9.5% compared to the final figure for 2020 (700.5 million euro).

The increase in premiums issued was mainly due to Health and Accident products (+19.5% compared to 31 December 2020), Home and Family products (+19% compared to 31 December 2020) and Business products (up 37.6% compared to 31 December 2020), while premiums for Credit Protection products fell by -21.4%.

Claims-related expenses net of recoveries and the effects of reinsurance and the change in the claims provision rose from 186.6 million euro in 2020 to 176.2 million euro, an increase on the previous year. The ratio of claims to premiums for the period, net of reinsurance effects, was equal to 28.0%, against 31.9% in 2020.

Operating costs including purchase commission amounted to 239.5 million euro, an increase of approximately 1.2% on the previous year (236.7 million euro).

Below are the underwriting results divided according to Solvency II LoB represented in the QRT S.05.01.

(euro thousands)

Line of Business	Premiums earned		Claims incurred		Changes in other technical provisions		Expenses incurred		Other expenses		Total underwriting Result	
	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020
Medical expenses insurance	20,776	18,205	-4,404	-6,755	-1,406	-344	-4,652	-5,772				
Income protection insurance	285,498	245,101	-71,741	-69,715	2,103	-2,520	-97,951	-94,454				
Motor vehicle liability insurance	69,897	77,406	-43,730	-49,592	-	-	-21,206	-24,101				
Other motor insurance	12,870	13,767	-5,561	-5,868	-27	24.90	-3,961	-3,825				
Marine, aviation and transport insurance	87	168	-48	14	0	-	-39	-51				
Fire and other damage to property insurance	144,490	118,348	-19,366	-22,290	-679	-335	-64,373	-53,696	-4,962	-5,210	281,163	186,913
General liability insurance	70,372	60,985	-6,858	-8,120	-	-	-23,880	-20,690				
Credit and suretyship insurance	535	910	137	-1,756	-	0	5	-88				
Legal expenses insurance	984	309	-100	125	-	-	2,656	-3,711				
Assistance	10,898	9,954	-206	-301	-	-	-5,331	-5,135				
Miscellaneous financial loss	56,052	46,002	142	-84	7.41	-	-15,852	-19,946				
Total amount	672,460	591,155	-151,733	-164,342	-16	-3,223	-234,585	-231,467	-4,962	-5,210		

The underwriting result was calculated on the basis of the data in the QRT S.05.01 (Premiums for the period – Claims + Changes in technical provisions – Operating Costs).

Underwriting result for the company, considering the QRT S.05.01 data:

(euro thousands)

	2021	2020
Net premiums	672,460	591,155
Claims incurred	-151,733	-164,342
Changes in technical provisions	-16	-3,223
Operating cost	-239,547	-236,676
Underwriting Result (QRT S.05.01)	281,162	186,913

Details of the underwriting results are given below, to provide a representation comparable with the annual Financial statements prepared according to Italian accounting standards.

(euro thousands)

	2021	2020
Net premiums	672,460	591,155
Claims incurred	-151,733	-164,342
Changes in technical provisions	-16	-3,223
Underwriting expenses	-186,439	-186,644
<i>Claims management expenses</i>	-24,564	-22,219
<i>Acquisition expenses</i>	-161,875	-164,425
Underwriting Result	334,271	236,946

Fideuram Vita S.p.A.

With reference to the QRT S.05.01 annexed to this Report, which has been summarised and compared against the results for 2021, please note the following.

- gross life premiums written of 4,471.9 million euro increased by 762.4 million euro compared to the same period of the previous year (+20.6%), with growth in premiums written in class III (+939.8 million euro) and a decrease in premiums written in class I (-212 million euro);
- new life production amounted to 4,419.2 million, up 21% over 31 December 2020, overperforming the Italian Insurance Market, including companies with freedom to provide services, that recorded a 4.6% growth over the previous year;
- The composition of the investment portfolio for the segregated accounts maintained a predominant share of securities issued by governments of countries in the Euro area or by supranational entities (or 71.1% of total assets in the segregated accounts, in line with 31 December 2020);

Of significant relevance is the Company's strategic vision on value generation for customers and for the Group and in the ESG field, in line with the Sustainability Policy adopted by the Company, as well as the expansion of the offer of pure risk products for companies.

Claims paid, net of settlement costs, amounted to 2,914.2 million euro, an increase of 15.2%.

Sums paid and to pay, net of the amount payable by reinsurers, amounted to 2,869.3 million, increasing by 13.5% compared to 2020.

Operating expenses amounted to 20.1 million euro compared to 22.2 million euro in the previous year.

This performance reflects a positive technical balance in the Life segments of 89.4 million euro, compared to 67.8 million euro in 2020.

The total underwriting result amounted to -2,167.1 million euro and does not include the components of overall acquisition costs, other administrative expenses as well as the component generated by investments of the segregated accounts.

Below are the figures for Fideuram Vita S.p.A., separated according to area of Life business, for the underwriting results as presented in the QRT S.05.01.

Line of Business	Premiums earned		Claims incurred		Changes in other technical provisions		Expenses incurred		Other expenses		Total underwriting Result	
	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020
Insurance with profit participation	220,780	433,300	-492,134	-384,744	197,623	-139,811	-8,133	-8,890				
Index-linked and unit-linked insurance	4,245,529	3,271,116	-2,366,402	-2,133,056	-3,934,801	-1,910,416	-28,811	-30,210	-3,036	-2,701	-2,167,150	-902,581
Other life insurance	4,459	4,427	-1,883	-1,356	-70	63	-271	-303				
Total amount	4,470,768	3,708,843	-2,860,419	-2,519,156	-3,737,248	-2,050,164	-37,215	-39,403	-3,036	-2,701		

The underwriting result was calculated on the basis of the data in the QRT S.05.01 (Premiums for the period – Claims + Changes in technical provisions – Operating Costs).

Underwriting result for the company, considering the QRT S.05.01 data:

	(euro thousands)	
	2021	2020
Net premiums	4,470,769	3,708,843
Claims incurred	-2,860,420	-2,519,156
Changes in technical provisions	-3,737,248	-2,050,164
Operating cost	-40,252	-42,103
Underwriting Result (QRT S.05.01)	- 2,167,151	- 902,579

Details of the underwriting results are given below, to provide a representation comparable with the annual Financial statements prepared according to Italian accounting standards.

	(euro thousands)	
	2021	2020
Net premiums	4,470,769	3,708,843
Claims incurred	-2,860,420	-2,519,156
Changes in technical provisions	-3,737,248	-2,050,164
Underwriting expenses	-8,209	-10,947
<i>Claims management expenses</i>	-2,932	-4,966
<i>Acquisition expenses</i>	-5,277	-5,981
Technical interest	2,118,904	853,341
Underwriting Result	-16,204	-18,084

Intesa Sanpaolo Life D.A.C

The commercial offer of Intesa Sanpaolo Life, aimed mainly at Italian customers, refers to unit-linked policies.

During the year the Company's premium income amounted to 5,513.0 billion euro, up on the previous year (3,800.1 million euro). On the other hand, payments, mainly due to surrenders, amounted to 4,309.1 million euro, also up on the 3,276.3 million euro of the previous year.

Below is the underwriting result as presented in the QRT S.05.01:

(euro thousands)

Line of Business	Premiums earned		Claims incurred		Changes in other technical provisions		Expenses incurred		Total underwriting Result	
	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020
Index-linked and unit-linked insurance	5,512,945	3,800,108	-4,309,109	-3,276,304	-2,948,602	-849,511	-510,107	-500,552	-2,254,873	-826,260
Total amount	5,512,945	3,800,108	-4,309,109	-3,276,304	-2,948,602	-849,511	-510,107	-500,552	-2,254,873	-826,260

The underwriting result was calculated on the basis of the data in the QRT S.05.01 (Premiums for the period – Claims + Changes in technical provisions – Operating Costs).

(euro thousands)

	2021	2020
Net premiums	5,512,945	3,800,108
Claims incurred	-4,309,109	-3,276,304
Changes in technical provisions	-2,948,602	-849,511
Operating cost	-510,107	-500,552
Underwriting Result (QRT S.05.01)	-2,254,873	-826,260

Details of the underwriting results are given below, to provide a representation comparable with the annual IAS financial statements.

(euro thousands)

	2021	2020
Net fund margin	397,015	338,779
Acquisition expenses	-144,530	-138,485
Net deferred income	-1,368	2,162
Other	168	-240
Underwriting Result	251,284	202,216

Intesa Sanpaolo RBM Salute S.p.A.

Premium income increased by approximately 3% compared to the previous year, thanks to the synergies implemented after the company became part of the Intesa Sanpaolo Group, with the integration of the Company's health offering into the XME Protezione product and the new range of collective products distributed through the Banca dei Territori Division, which met with an excellent response from customers.

Collective policies remain strategic for the company, and a review of underwriting criteria is being implemented as of May 2020.

Gross premiums recognised, equal to 509.4 million euro - and referring nearly entirely to the health insurance segment, equal to 508.7 million euro - were up 3% compared to the previous year (495.3 million euro in 2020).

Claims-related expenses net of recoveries and the effects of reinsurance, rose from 235.3 million euro in 2020 to 506.6 million euro, an increase on the previous year.

Operating expenses amounted to 56.5 million euro, an increase compared to the previous year (21.7 million euro) due to the management of the integration process of Intesa Sanpaolo RBM Salute into the Intesa Sanpaolo Group, the strengthening of various Company structures and the increased incidence of commissions due to the use of the bank channel for the distribution of the new product created from the synergy with the Banca dei Territori Division.

Technical operations generated a negative result of 252 thousand euro (positive for 88.7 thousand euro at 31 December 2020), with a combined technical account ratio, net of reinsurance, of 150.9% (compared to 78.6% in 2020).

As regards the reinsurance policy, total premiums issued in 2021 went down (140 million euro compared to 142.3 million euro in the previous year), accounting for approximately 27% of gross premiums recognised. The result at 31 December 2021 recognised a revenue of 48.8 million euro, of which 48.7 million euro attributable to quota arrangements and 0.1 million euro for arrangements in excess of claims.

Details of the Company's underwriting results as presented in the Annual Report are presented below:

- earned premiums net of reinsurance;
- claims expenses net of reinsurance;
- changes in other technical items;
- operating expenses.

Below are the underwriting results divided according to line of business as represented in the QRT S.05.01. The Company only performs its underwriting activity in the Republic of Italy.

Line of Business	Premiums earned		Claims incurred		Changes in other technical		Expenses incurred		Other expenses		Total underwriting Result	
	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020
Medical expenses insurance	348,163	351,649	-493,071	-228,118	-50,602	-13,250	-56,527	-21,689	-	-	-252,037	88,592
Total amount	348,163	351,649	-493,071	-228,118	-50,602	-13,250	-56,527	-21,689	-	-	-252,037	88,592

The underwriting result was calculated on the basis of the data in the QRT S.05.01 (Premiums for the period – Claims + Changes in technical provisions – Operating Costs).

Underwriting result for the company, considering the QRT S.05.01 data:

(euro thousands)		
	2021	2020
Net premiums	348,163	351,649
Claims incurred	-493,071	-228,118
Changes in technical provisions	-50,602	-13,250
Operating cost	-56,527	-21,689
Underwriting Result (QRT S.05.01)	-252,037	88,592

Details of the underwriting results are given below, to provide a representation comparable with the annual Financial statements prepared according to Italian accounting standards.

	(euro thousands)	
	2021	2020
Net premiums	348,163	351,649
Claims incurred	-493,071	-228,118
Changes in technical provisions	-50,602	-13,250
Underwriting expenses	-42,024	-6,843
<i>Claims management expenses</i>	-12,554	-7,159
<i>Acquisition expenses</i>	-29,470	316
Underwriting Result	-237,534	103,438

Cargeas Assicurazioni S.p.A.

The underwriting result reported in the statutory accounts for the year ended 31 December 2021 saw an increase in premium income, for a total of 140.2 million euro, down by -36% compared to the final figure for 2020 (219.1 million euro).

The decrease in premiums written was due to the Parent Company's decision to channel the marketing of new insurance contracts to the subsidiary Intesa Sanpaolo Assicura S.p.A..

Distribution agreements were signed with Banca BPER and Banca Popolare di Puglia e Basilicata, the assignees of part of the bank branches formerly owned by UBI Banca; under said agreements only the renewal of existing contracts is permitted.

With regard to the other distribution channels, the following should be noted:

- growth in premium income (+21%) through the BNL channel, thanks to the contribution of the Home product;
- drop in premium income from the City Agent channel (-12%), due to the closure of some mandates and the end of the cooperation with bank branches.

The absence of new production combined with repayments made following early reimbursement of insured loans led to a negative balance of Credit Protection products.

Claims-related expenses net of recoveries and the effects of reinsurance and the change in the claims provision rose from 73.9 million euro in 2020 to 58.9 million euro, an increase on the previous year. The ratio of claims to premiums for the period, net of reinsurance effects, was equal to 33.2%, against 35.4% in 2020.

Operating expenses, including acquisition commissions, totalled 66.6 million euro, a decrease of 13% compared to the previous year (76.8 million euro), mainly due to the decrease in commissions related to the decrease in volumes offset by the increase in other operating expenses due to the charges for the ongoing integration of the Company into the Intesa Group.

The technical result net of investment profits was a positive 40.3 million euro (positive 54.6 million euro at the end of 2020) as a result of the above considerations.

Below are the underwriting results broken down according to line of business as represented in the QRT S.05.01 and the related components of the underwriting result as presented in the annual Accounts:

- earned premiums net of reinsurance;
- claims related charges;
- change in other technical provisions;

- operating expenses.

The Company only performs its underwriting activity in the Republic of Italy.

Line of Business	Premiums earned		Claims incurred		Changes in other technical		Expenses incurred		Other expenses		Total underwriting Result	
	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020	2021	2020
Medical expenses insurance	16,740	11,980	-7,136	-3,639	-	-	-3,535	-3,503	-	-	-	-
Income protection insurance	42,277	55,118	-9,053	-15,708	-	-	-18,796	-22,194	-	-	-	-
Motor vehicle liability insurance	39,629	53,919	-17,252	-25,197	-	-	-11,480	-10,064	-	-	-	-
Other motor insurance	11,727	14,795	-7,163	-8,042	-28	-45	-3,908	-3,924	-	-	-	-
Marine, aviation and transport insurance	61	53	62	-6	-	-	12	-31	-	-	-	-
Fire and other damage to property insurance	35,767	37,562	-12,101	-16,303	-104	-106	-19,941	-19,622	-11,560	-3,415	40,156	53,866
General liability insurance	14,322	14,436	-519	3,143	-	-	-7,751	-8,877	-	-	-	-
Credit and suretyship insurance	466	409	26	99	-	-	-314	-1,119	-	-	-	-
Legal expenses insurance	6,698	7,706	-555	-1,441	-	-	-2,880	-4,543	-	-	-	-
Assistance	3,731	4,226	-138	-239	-	-	-2,132	-2,981	-	-	-	-
Miscellaneous financial loss	6,121	8,654	-522	-1,437	-	-	-615	-5,799	-	-	-	-
Total amount	177,537	208,859	-54,351	-68,770	-132	-151	-71,339	-82,657	-11,560	-3,415		

The 25.5% decrease in the underwriting result with the figures reported in QRT S.05.01 (Earned premiums - Claims + Changes in technical provisions - Operating expenses) is mainly due to the decrease in earned premiums in 2021 compared to the previous year (-15%) reflecting the loss of portfolio by the Company. Management fees include the costs incurred in managing the portfolio.

The underwriting result was calculated on the basis of the data in the QRT S.05.01 (Premiums for the period – Claims + Changes in technical provisions – Operating Costs).

Underwriting result for the company, considering the QRT S.05.01 data:

	(euro thousands)	
	2021	2020
Net premiums	177,537	208,859
Claims incurred	-54,351	-68,770
Changes in technical provisions	-132	-151
Operating cost	-82,899	-86,072
Underwriting Result (QRT S.05.01)	40,156	53,866

Details of the underwriting results are given below, to provide a representation comparable with the annual Financial statements prepared according to Italian accounting standards.

	(euro thousands)	
	2021	2020
Net premiums	177,537	208,859
Claims incurred	-54,351	-68,770
Changes in technical provisions	-132	-151
Underwriting expenses	-28,802	-42,669
Claims management expenses	-4,322	-4,877
Acquisition expenses	-24,480	-37,792
Underwriting Result	94,253	97,269

A.3 INVESTMENT RESULTS

Intesa Sanpaolo Vita Insurance Group

The financial results of the Insurance Group's investment activity, recognised according to IAS/IFRS, are illustrated in the following table.

Performances relate to the Group's total investment portfolio and thus also includes assets relating to policies in which the risk is borne by the policyholders.

(euro thousands)				
Asset Class	2021	2020	Change	
Real estate investments	51	161	-110	-68%
Partecipations	-900	-651	-248	38%
Loans and receivables	7,409	733	6,676	>100%
Financial assets available-for-sale	2,378,559	1,889,229	489,330	26%
Financial assets held-for-trading	-98,284	-8,117	-90,167	>100%
Financial assets designates at fair value through profit or loss	5,198,972	1,408,321	3,790,652	<100%
Cash and cash equivalents	-4,625	-12,707	8,081	-64%
Financial liabilities held-for-trading	-21,846	18,583	-40,429	<100%
Financial liabilities designated at fair value through profit or loss	-4,512,694	-1,122,893	-3,389,801	>100%
Other financial liabilities	-79,363	-62,956	-16,407	26%
Total investments	2,867,278	2,109,702	757,576	36%

The closing balance of investment income from financial management, net of capital and financial charges, was 2,868 million euro, recording a 36% increase compared to the previous year's figure of 2,110 million euro.

The Group's investment operations carried out in 2021 were consistent with the guidelines defined by the Finance Policy of the Group Companies and, in particular, in compliance with the general principles of prudence and of promoting the quality of assets in the medium and long term.

The Group has continued to implement a policy aimed at limiting financial risk while maintaining a level of profitability appropriate to the commitments undertaken with policyholders.

Intesa Sanpaolo Vita S.p.A.

The financial results of the investment activity of Intesa Sanpaolo Vita are illustrated in the following table. These results are recognised according to national accounting standards based on which the annual Financial Statements are prepared.

Performances relate to the company's total investment portfolio and thus also include assets relating to unit-linked and index linked policies.

(euro thousands)			
Asset Class	2021	2020	
Total investments (Shareholder return)			
Government bonds	1,360,974	1,255,727	
Corporate bonds	439,321	247,108	
Equity	745,480	60,546	
Derivatives	-95,349	-21,080	
Other investments	-	-	
Total investments (Shareholder return)	2,450,426	1,542,301	
Total investments (Policyholder return)			
Government bonds	-14,194	19,282	
Corporate bonds	-567	7,225	
Equity	2,016,869	536,691	
Derivatives	-130,277	2,323	
Other investments	-	-	
Total investments (Policyholder return)	1,871,831	565,521	
Total investments	4,322,257	2,107,822	

The determining factor of the year's results was financial management, with income from investments, net of capital and financial charges amounting to 4,322.2 million euro, decreasing compared to the previous year (2,107.8 million euro). The most significant change was seen in the instruments linked to Class D investment products.

Evidence of the Investment results obtained is given below, as the difference between the income and expenses of investment activity.

(euro thousands)		
	2021	2020
Investment income and expense	4,247,793	2,119,409
Investment management expense	-73,577	-63,549
Technical interest	-2,535,914	-1,282,698
Investment Result	1,638,301	773,162

Intesa Sanpaolo Assicura S.p.A.

The financial results of the investment activity of Intesa Sanpaolo Assicura are illustrated in the following table. The information provided follows the national accounting standards used to prepare the annual Financial Statements.

(euro thousands)		
Asset Class	2021	2020
Government bonds	5,643	9,456
Corporate bonds	7,937	3,522
Equity	108	-65
Derivatives	-	-
Other investments	-	-
Total investments	13,688	12,913

The closing balance of investment income from financial management, net of capital and financial charges, was 13.7 million, up on 12.9 million in 2020.

Intesa Sanpaolo Assicura does not hold any investments in securitisations.

Evidence of the Investment results obtained is given below, as the difference between the income and expenses of investment activity.

	(euro thousands)	
	2021	2020
Investment income and expense	24,192	18,792
Investment management expense	-10,588	-5,892
Investment Result	13,603	12,900

Fideuram Vita S.p.A.

The financial results of the investment activity of Fideuram Vita are illustrated in the following table.

The information provided follows the national accounting standards used to prepare the annual Financial Statements.

Performances relate to the company's total investment portfolio and thus also include assets relating to unit-linked and pension fund policies.

The closing balance of investment income from financial management, net of capital and financial charges, was equal to 2,861 million euro.

	(euro thousands)	
Asset Class	2021	2020
Total investments (Shareholder return)		
Government bonds	132,730	125,515
Corporate bonds	11,763	20,034
Equity	5,640	-3,747
Investment funds Collective Investment Undertakings	5,685	11,360
Structured Bonds	2,928	2,674
Derivatives	-1,685	-8
Total investments (Shareholder return)	157,061	155,827
Total investments (Policyholder return)		
Government bonds	-4,893	28,216
Corporate bonds	226	6,854
Equity	391,383	64,070
Investment funds Collective Investment Undertakings	2,398,802	1,170,523
Structured Bonds	369	758
Derivatives	-82,268	56,725
Total investments (Policyholder return)	2,703,619	1,327,145
Total investments	2,860,679	1,481,629

Income from Class C net investments, made in relation to traditional policies and free assets, amounted to 148.8 million euro, slightly up (0.5%) over the previous year. The breakdown of this item is as follows:

- ordinary net income equal to 154.9 million, up by 12.7 million compared to 2020;
- net income equal to 4.5 million, down by 54.2% over the previous year;
- net value adjustments of -10.6 million euro.

Class D net income referring to assets underlying Unit-Linked policies and pension Funds, wholly attributable to insured, amounted to 2,037.8 million euro, including net gains realised and net gains from valuation. In 2020, this item was positive by 760.7 million euro.

Evidence of the investment results obtained is given below, as the difference between the income and expenses of investment activity.

	(euro thousands)	
	2021	2020
Investment income and expense	2,831,045	1,482,973
Investment management expense	-7,351	-9,125
Technical interest	-2,118,904	-853,341
Investment Result	704,791	620,507

Intesa Sanpaolo Life D.A.C.

The company's share of the return on investments was equal to 8.9 million euro. The result derives from a prudent policy of investing in secure short-term liquid assets with a high credit rating.

	(euro thousands)	
Asset Class	2021	2020
Policyholder Investment Return	1,688,526	271,302
Shareholder Investment Return	8,994	4,210
Total investments	1,697,520	275,512

Intesa Sanpaolo Life does not hold any investments in securitisations.

Intesa Sanpaolo RBM Salute S.p.A.

The financial results of the investment activity of Intesa Sanpaolo RBM Salute are illustrated in the following table. The information provided follows the national accounting standards used to prepare the annual Financial Statements.

	(euro thousands)	
Asset Class	2021	2020
Government bonds	288,815	67,613
Corporate bonds	-	-
Equity	50	-
Derivatives	-	-
Other investments	-	-
Total investments	288,865	67,613

The closing balance of investment income from financial management, net of capital and financial charges, was a negative 1.2 million, down on positive 0.4 million in 2020.

Intesa Sanpaolo RBM Salute does not hold any investments in securitisations.

Evidence of the Investment results obtained is given below, as the difference between the income and expenses of investment activity.

	(euro thousands)	
	2021	2020
Investment income and expense	-1,143	424
Investment management expense	-	-
Investment Result	-1,143	424

Cargeas Assicurazioni S.p.A.

The financial results of the investment activity of Cargeas Assicurazioni S.p.A are illustrated in the following table. They pertain to the national accounting standards used to prepare the annual Financial Statements according to the Italian GAAP.

(euro thousands)			
Asset Class		2021	2020
Government bonds		6,327	6,955
Corporate bonds		1,858	1,120
Equity		5,122	-882
Derivatives		-	-
Other investments		-	-
Total investments		13,307	7,192

The closing balance of investment income from financial management, net of capital and financial charges, was 13.3 million, up on 7.2 million in 2020.

Cargeas Assicurazioni S.p.A does not hold any investments in securitisations.

Evidence of the Investment results obtained is given below, as the difference between the income and expenses of investment activity.

(euro thousands)		
	2021	2020
Investment income and expense	13,307	7,192
Investment management expense	-1,254	-685
Investment Result	12,054	6,507

A.4 RESULTS OF OTHER ACTIVITIES

Intesa Sanpaolo Vita Insurance Group

The sources of revenues and costs of the Insurance Group not related to the underwriting and investment areas are recorded in the Other income/expenses, on the consolidated accounts.

This item amounted to 317.8 million euro (173.5 million euro at 31 December 2020) and mainly consisted of 227.9 million euro (144.3 million euro at 31 December 2020) of other technical income, mainly from management fees on unit-linked products and 76.1 million euro from foreign exchange differences on investments (15.9 million euro at 31 December 2020).

The item, amounting to 921.1 million euro (707.4 million euro at 31 December 2020), includes the net provisions for risks and charges of 5.7 million euro, the adjustments in the value of tangible and intangible assets of 13.9 million euro, the exchange differences to be recorded in the income statement of 3.2 million euro, plus other technical costs of 631.4 million euro. This last amount is mainly comprised of trail commission paid to the sales network.

(euro thousands)						
	Income		Expense		Result	
	2021	2020	2021	2020	2021	2020
Other income/expenses	317,760	173,541	-921,032	-707,381	-603,272	-533,840
Extraordinary income/ expense	-	-	-	-	-	-
Other activities	317,760	173,541	-921,032	-707,381	-603,272	-533,840

Intesa Sanpaolo Vita S.p.A.

The sources of income and costs of Intesa Sanpaolo Vita related to the underwriting and investment areas are recognised in the following items of the annual Financial Statements:

- Other income/expenses;
- Non-recurring income/expenses,

(euro thousands)

	Income		Expense		Result	
	2021	2020	2021	2020	2021	2020
Other income/expenses	-	-	-86,581	-70,225	-86,581	-70,225
Extraordinary income/ expense	37,510	2,855	-3,531	-9,940	33,979	-7,085
Other activities	37,510	2,855	-90,112	-80,165	-52,602	-77,310

Below is a summary of the company's financial performance:

(euro thousands)

Overall performance	2021	2020
Underwriting performance	-294,939	-108,308
Investment performance	1,202,301	474,149
Performance of other activities	-52,602	-77,310
Other P&L items	-1,378	-852
Taxes	-109,251	-38,389
Net result	744,131	249,290

Intesa Sanpaolo Assicura S.p.A.

The sources of income and costs of Intesa Sanpaolo Assicura related to the underwriting and investment areas are recognised in the following items of the annual Financial Statements:

- Other income/expenses;
- Non-recurring income/expenses.

(euro thousands)

	Income		Expense		Result	
	2021	2020	2021	2020	2021	2020
Other income/expenses	4,443	3,374	-8,103	-6,824	-3,660	-3,450
Extraordinary income/ expense	621	1,651	-307	-849	314	802
Other activities	5,064	5,025	-8,410	-7,673	-3,346	-2,648

Below is a summary of the company's financial performance:

(euro thousands)

Overall performance	2021	2020
Underwriting performance	520,710	423,590
Investment performance	13,603	12,900
Overhead and administrative expenses	-268,071	-259,089
Performance of other activities	-3,346	-2,648
Other P&L items	-260	-497
Taxes	-80,426	-53,074
Net result	182,211	121,182

Fideuram Vita S.p.A.

The sources of income and costs of Fideuram Vita not related to the underwriting and investment areas are recorded in the following items on the annual Financial reports:

- Other income/expenses;
- Non-recurring income/expenses.

(euro thousands)

	Income		Expense		Result	
	2021	2020	2021	2020	2021	2020
Other income/expenses	5,945	3,460	-13,442	-10,713	-7,497	-7,253
Extraordinary income/ expense	514	395	-579	-1,305	-65	-910
Other activities	6,459	3,855	-14,021	-12,018	-7,562	-8,163

Other income amounts to 5.9 million euro and relates mainly to amounts recovered from other Insurance Group companies for the cost of personnel on secondment. The item Other expenses amounts to -13.4 million euro and includes costs incurred for third parties of 5.8 million euro, interest payable on subordinated loans of 4.1 million euro, amortisation of intangible assets of 3.1 million euro, provisions for risks and charges of 0.5 million euro, bank interest expenses of 0.09 million euro, as well as other expenses for 0.013 million euro.

The result from non-recurring operations of -0.065 million euro is attributable to contingent gains of 0.505 million euro, extraordinary income from NAV differences of 0.009 million euro, contingent losses of -0.405 million euro and extraordinary expenses from NAV differences of -0.174 million euro.

The balance for the other income components is negative by -552 million euro, mainly attributable to the share of management costs deducted from the unit-linked policies, retroceded to the distributors. This item also includes the trail commission payable on certain profit-sharing policies, the management costs for Class D investments and other technical items.

Below is a summary of the company's financial performance:

(euro thousands)

Overall performance	2021	2020
Underwriting performance	-16,204	-18,082
Investment performance	704,791	620,507
Overhead and administrative expenses	-24,692	-22,032
Performance of other activities	-7,563	-8,163
Other P&L items	-552,222	-491,893
Taxes	-28,934	-22,240
Net result	75,176	58,098

Intesa Sanpaolo Life D.A.C

The sources of income and costs of Intesa Sanpaolo Life that are not related to the underwriting and investment areas are recognised in the residual items of the annual Financial Statements, and mainly refer to other expenses and non-technical income.

(euro thousands)		
	2021	2020
Operations expenses	-30,423	-29,088
Fund administration expenses	-8,995	-7,549
Other income and expenses	-606	582
Other P&L items	-2,417	2,018
Other technical income and expenses	-	-
Net result	-42,441	-34,037

Below is a summary of the company's financial performance:

(euro thousands)		
	2021	2020
Underwriting performance - local report	251,284	202,216
Investment performance	8,994	4,210
Other P&L items	-42,441	-34,036
Taxes	-27,718	-19,037
Net result	190,119	153,353

Intesa Sanpaolo RBM Salute S.p.A

The sources of income and costs of Intesa Sanpaolo RBM Salute related to the underwriting and investment areas are recognised in the following items of the annual Financial Statements:

- Other income/expenses;
- Non-recurring income/expenses.

(euro thousands)						
	Income		Expense		Result	
	2021	2020	2021	2020	2021	2020
Other income/expenses	1,725	39	-175,425	-535	-173,700	-496
Extraordinary income/ expense	2,061	14	-2,821	-196	-760	-182
Other activities	3,786	53	-178,246	-731	-174,460	-678

Below is a summary of the Company's financial performance:

(euro thousands)		
	2021	2020
Overall performance	2021	2020
Underwriting performance	-237,534	103,438
Investment performance	-1,143	424
Overhead and administrative expenses	-14,503	-14,846
Performance of other activities	-	-93
Other P&L items	-174,460	-678
Taxes	101,922	-26,380
Net result	-325,718	61,865

Cargeas Assicurazioni S.p.A.

The sources of income and costs of Cargeas Assicurazioni related to the underwriting and investment areas are recognised in the following items of the annual Financial Statements:

- Other income/expenses;

- Non-recurring income/expenses.

(euro thousands)

	Income		Expense		Result	
	2021	2020	2021	2020	2021	2020
Other income/expenses	1,478	760	-8,899	-4,284	-7,421	-3,523
Extraordinary income/ expense	1,551	2,228	-1,321	-969	231	2,228
Other activities	3,029	2,989	-10,220	-5,253	-7,191	-1,295

Below is a summary of the company's financial performance:

(euro thousands)

Overall performance	2021	2020
Underwriting performance	123,055	139,938
Investment performance	12,054	6,507
Overhead and administrative expenses	-82,778	-85,388
Performance of other activities	-7,191	-2,264
Other P&L items	-	-
Taxes	-14,638	-18,377
Net result	30,502	40,416

A.5 OTHER INFORMATION

With reference to the current market context related to the events in Russia and Ukraine, it should be noted that the Group does not hold significant exposures to these countries.

B. GOVERNANCE SYSTEM

B.1 GENERAL INFORMATION ABOUT THE GOVERNANCE SYSTEM

Intesa Sanpaolo Vita Insurance Group

The Ultimate Italian Parent Company ("USCI") manages and coordinates the other companies of the Insurance Group, in line with the general guidelines set by the Board of Directors of the USCI which reflect the requirements of current regulations. It also adopts risk management and internal control procedures that ensure the coordinated, unitary management of the various Insurance Group companies by providing them with instructions, also regarding the implementation of IVASS provisions, through specific instruments, such as the Regulations of the Insurance Group, the internal control policy of the Insurance Group and the application of the provisions in the Private Insurance Code and IVASS Regulation no. 22/2016.

In particular, the Regulations of the Insurance Group govern the procedures for management and coordination by Intesa Sanpaolo Vita S.p.A., as the USCI, over other Insurance Group companies.

The Insurance Group Regulations provide for the following in particular:

- strategic-economic control: with a view to promoting efficiency and realising the overall value of the Insurance Group, and of safeguarding its stability also in terms of the adequate availability of own funds for identified risks, and profitability, the USCI is required to put in place an Insurance Group planning process, preparing the "Group Plan" and "Group Budget", which include the plans and budgets of the individual companies, following the processes coordinated by the USCI;
- operational control: the aim is to standardise operations within the Insurance Group:
 - the USCI imposes internal regulations on the other Insurance Group companies for the implementation of measures issued by the Regulator regarding the Insurance Group, and checks that these measures are complied with;
 - with reference to the monitoring and control of all risks (underwriting, reserve, market, credit, liquidity, operational risk, risk of belonging to the Insurance Group, compliance and reputational risk) the Group's core functions (Audit, Compliance, Risk Management and Actuarial) help to put in place and maintain an internal control and risk management system at Group level;
 - for the production of data and information used in the supervision of the Insurance Group, the USCI assigns responsibility to its own Group Financial Reporting organisational unit;
 - for controls on financial data, the USCI acquires periodic information flows from Group companies, which are analysed and controlled by the USCI's Management Control and Planning function;
 - Group Regulatory Unit: the USCI is tasked with defining and circulating the "Insurance Group Governance Documents" (for example the "Policies" and "Guidelines), the "Rules"

and "Operational instructions", which contain binding regulatory provisions. These may refer to: (i) defining the objectives, roles, duties and responsibilities of each player in the principal business management processes, thus establishing the principles of relations between the central departments and the operational units of the Insurance Group; (ii) the types and characteristics of regular information flows between the Insurance Group companies and the USCI, which enable the latter to fulfil its role of managerial and supervisory guidance, governance and control; (iii) specific or generic regulatory issues; (iv) temporary or permanent measures, and (v) measures intended for individual entities or business units, or for the Insurance Group as a whole;

- specific obligations of the other Insurance Group companies, through a system of "pre-authorisations" from the USCI for certain transactions of Group Companies such as (i) changes to the articles of association and the granting of authorities to executive bodies, (ii) mergers and demergers, (iii) the acquisition and/or transfer of businesses, business units and legal relations en bloc; (iv) the acquisition, disposal and contribution of equity investments, (v) the election of the management boards and boards of statutory auditors, (vi) changes to the organisational structure;
- advance notifications and periodic information flows to the USCI from other Insurance Group companies regarding among other things (i) findings of the Regulator and significant events, (ii) meetings of the company bodies, (iii) activities concerning personnel management (iv) activities related to the collection of data for the calculation of the Solvency Capital Requirement at Insurance Group level and own funds eligible for its coverage, and for all the quantitative and qualitative reports required by the Solvency II regulation, and (v) approvals of policies based on the application of Group or regulatory policies.

The coordinated management of relevant issues within the Insurance Group, the effective control of internal risks, and an adequate level of internal discussion and communication is assured by the management committees (Coordination Committee, Controls Coordination Committee, Investment Committees and Alternative Investment Committee) and the board committees (Remuneration and Internal Control and Risks Committees) of the USCI. These committees, which are established by the Board of Directors of Intesa Sanpaolo Vita (which is responsible for the Group), are specialized in certain subjects. The number and type of their members are defined on the basis of specific requirements.

The USCI informs the other Insurance Group companies of:

- the strategic guidelines and other instructions to be followed by the Subsidiaries;
- the criteria for identifying, measuring, assessing, managing and controlling risks;
- the decisions taken on authorisations or opinions requested by the Insurance Group companies on specific matters;
- the changes to its own structure as regards functions, powers and offices, if they affect Insurance Group companies;
- any information of general significance for the Insurance Group or of specific interest for each company.

Insurance Group companies are required to:

- provide the USCI with all data and information deemed necessary or expedient in connection with the performance of its management and coordination duties, also for the fulfilment of legal or supervisory obligations of the Insurance Group;
- send the USCI the agenda of Board and shareholders' meetings and, on request, a copy of minutes of resolutions passed by corporate bodies;
- request preliminary opinions or authorisations to the USCI on the matters for which said obligation arises;
- abide by the rules, policies and controls established by the USCI;
- provide the USCI with all information which may be useful to establish Group policies with greater detail, guaranteeing consistency between the specific implementation of the USCI's instructions and the specific needs of other Insurance Group companies.

For the calculation of the Group capital requirement, the Insurance Group uses Method 1 (also known as the standard method) as provided for in Article 75 of the Directive of the European Parliament 138/2009. This calculates the solvency capital requirement based on the consolidated accounts data.

Using this method, the capital requirement is calculated as the difference between the eligible consolidated own funds and the Insurance Group capital requirement, calculated on the basis of the consolidated data.

To determine whether the consolidated requirement adequately reflects the Insurance Group risk profile, particular attention must be paid to cases in which a specific risk at Group level is not sufficiently covered by the Standard Formula, as it cannot be quantified.

The consolidated data includes:

- The proportional consolidation of the data of companies managed by a subsidiary together with the other companies not considered as such, if their liability is limited to the share of capital they hold;
- based on the adjusted equity method (Article 13 (3) of the Delegated Acts), the proportion of own funds for subsidiaries that are credit institutions, investment firms and financial institutions, managers of alternative investment funds and UCITS management companies, pension funds and unregulated financial services companies;
- the data for all the subsidiaries in accordance with Article 13 of the Delegated Acts, other than those listed in the above points.

The above data should be considered net of intragroup operations. The consolidated Insurance Group capital requirement is calculated as the sum of four components:

- the capital requirement calculated on the basis of the consolidated data;
- the proportion of the capital requirement pertaining to each subsidiary company;
- quota the proportion of the capital requirements of the other equity investments in credit firms, investment companies, financial entities, alternative investment funds and UCITS

management firms, pension funds, added to the notional capital requirements of unregulated firms providing financial services;

- of the capital requirement of the other related undertakings, including instrumental companies, other than those mentioned above.

In relation to the bases, methods and assumptions used at Group level for the solvency valuation of group assets and liabilities other than technical provisions, refer to section D of this Report.

Coordination between the executive and supervisory bodies and key functions

Coordination of the Board of Directors, Board of Statutory Auditors and Core Functions of the group is governed by the Insurance Group Regulations and related information flows among Group Core Functions and between these functions and the Board of Statutory Auditors and Board of Directors of the USCI.

The methods of sending communications between the Core Functions are agreed between the interested parties (for example through the email addresses of each Organizational Unit) and are such as to ensure the timeliness and traceability of the communication exchange; finally, sent documentation is archived and stored by the respective sending Organizational Unit.

The purpose of the Controls Coordination Committee is for the Core and Control Group Functions and the GAF Unit to share the most relevant information concerning the Group's control activities. The Board of Statutory Auditors receives all the information requested by the Corporate Affairs unit in relation to each matter of interest, inviting the competent Organizational Units to attend the meetings to provide information and clarifications in relation to requests.

As regards the main flows to the Board of Directors of the USCI by the Group's Core Functions, the following are sent:

- annual activity plans;
- reports on the activities carried out every year (annually by the Actuarial and Risk Management Functions) with evidence of any inefficiencies and/or weaknesses detected, the identification of any recommendations and areas for improvement regarding the internal control and risk management system and the monitoring of recommendations/findings formulated in previous periods;
- quarterly reports for the Actuarial and Risk Management Functions) reports on controls carried out, including monitoring of the plan of recommendations made in previous valuations and any new recommendations;
- urgently, information on particularly serious situations and any significant breach or discovered deficiency;

The Group's Core Functions manage and coordinate the Core Functions of the Group's Companies, so that activities carried out are such as to guarantee a consistent and coordinated approach within the Insurance Group.

Risk management for the Insurance Group is overseen by the Group Risk Management function, which guarantees a standard approach to audits and the development of operating synergies, as well as assessments of the Insurance Group.

Remuneration system and salary policies

The Insurance Group companies are required to implement, in addition to the Remuneration Policies of Intesa Sanpaolo Vita as Ultimate Parent Company (USCI) of the Insurance Group, also the governance regulation of the Parent Company Intesa Sanpaolo by setting out, where necessary, specific mechanisms that also take into account sector regulations and governance constraints, which, as far as the Insurance Group is concerned, are mainly contained in the provisions of IVASS Regulation no. 38/2018.

In drafting the Remuneration Policies document for the year 2021, account was also taken of the issuance of European Regulation 2019/2088 with regard to the sustainability risks of the remuneration system and a prudent approach was adopted in the distribution of dividends, the repurchase of treasury shares and in the recognition of variable remuneration components, in compliance with the recommendations received in 2020 from the Supervisory Authorities (i.e. IVASS, EIOPA, ESRB).

Remuneration policies play an important role in ensuring that adequate professional figures can be attracted and retained, in a competitive context; from a prudential point of view it is necessary to ensure that the Insurance Group Companies adopt remuneration systems that reflect sound, prudent management and avoid any incentives that may encourage excessive risk-taking behaviour.

The Remuneration Policies applied in 2021 were based on the following principles:

- **alignment of** management and personnel conduct towards the achievement of objectives within a framework of rules designed to control business risks, with the interests of all stakeholders, with a focus on creating value for shareholders, as well as on the social impact for communities;
- correlation between remuneration and risks undertaken, steering the behaviour of personnel towards achieving objectives in a framework of rules centred on the control of business risks; remuneration systems aligned with financial and non-financial risk management policies, in line with indications in the Insurance Group's Risk Appetite Framework; definition of a fixed component that is sufficiently high to enable the variable part to significantly decrease and reset to zero if certain conditions occur.
- **focus on medium and long term objectives** considering the Group risk tolerance, through incentive systems that target performance to an accrual period longer than a year;
- **merit** in terms of salary flexibility, in order to recognise bonuses related to achieving results and undertaking risks, competitiveness such as focussing on key resources and senior managers, and their competitive salary positioning in relation to the market;
- **fairness**, in terms of relating fixed remuneration to the level of responsibility, measured using the Global Banding system;
- **gender-neutrality** in terms of recognising equal pay for equal work, regardless of gender; attention to the gender pay gap and its evolution over time.
- **sustainability**, in order to reduce expenses from adopting the policy to within values compatible with available financial resources; selective measures for fixed remuneration based on market benchmarks;
- **meeting legal requirements**, conforming to international, European and national laws and regulations, with a focus on Key Personnel including Risk Takers and Core Functions

Remuneration policy of the Company's governing bodies

The members of the management and control bodies of the Insurance Group companies receive remuneration commensurate with the tasks and responsibilities entrusted to them.

The precise determination of the directors' remuneration is made with a view to harmonising it according to Group standards, taking into account parameters relating to the financial and economic size and organisational complexity of the company concerned, as well as other objective and qualitative elements, consisting of the nature of the activity carried out by the individual subsidiary and its operating risk profile.

Similar criteria are used in determining the remuneration of directors holding special offices pursuant to Article 2389 of the Italian Civil Code and similar foreign law provisions.

There are normally no variable remuneration components, nor performance-related incentive bonuses, profit-sharing clauses or rights to subscribe to shares at a predetermined price.

In general, there are no differences in the remuneration of directors, whether they are employees of the Group, professionals, independent contractors, etc. The remuneration of Group employees appointed as directors in subsidiaries is paid @to@ the company in which the employment contract is in force.

The remuneration of the members of the Board of Statutory Auditors of the companies is determined at the time of appointment for the entire term of office, pursuant to Article 2402 of the Italian Civil Code and in accordance with Article 51 of the Regulation, in a fixed amount per year.

The emolument to be paid to the statutory auditors is quantified by applying a calculation model, uniformly applied across the Group, which takes into consideration objective parameters, essentially the assets and revenues of the company concerned and which allows for the determination of precise remuneration amount.

As a rule, the members of the corporate bodies are entitled to reimbursement of the out-of-pocket expenses incurred in the performance of their office. Finally, a third party liability insurance policy ("D&O policy") is taken out for the directors and officers of the Insurance Group.

Staff segmentation

The Remuneration and Incentive Policies are based on staff segmentation logics in which merit, fairness and gender neutrality principles are applied in order to appropriately differentiate the total remuneration, and which provide for specific mechanisms for the payment of the remuneration according to the various *clusters* of staff. The staff breakdown into macro-segments also allows the remuneration and working conditions of employees to be taken into account both in the definition of policies within specific remuneration and incentive systems and in the adoption of remuneration decisions calibrated to each macro-segment.

In its capacity as USCI, Intesa Sanpaolo Vita shares the staff segmentation logic with its Parent Company Intesa Sanpaolo, by identifying three macro-segments:

- A. Key Personnel (including ISP Group *Risk Takers*);
- B. Middle Management (managers who are not identified as key personnel);
- C. Professional.

Remuneration components

The remuneration of staff (company staff) consists of a fixed component and a variable component.

Fixed component

The fixed component is the remuneration portion that is stable and irrevocable in nature and is determined on the basis of pre-established, non-discretionary criteria such as: the contractual classification, the role held, the responsibilities assigned, the specific experience and expertise gained by the employee.

The fixed component includes:

- the gross annual remuneration reflecting the level of professional experience and seniority of the staff;
- non-discretionary allowances not linked to any kind of performance indicator. This type refers to the following personnel categories:
 - the Heads of the Core Functions and the most senior personnel of the Core Functions in Italy;
 - expatriate staff to cover any cost, quality of life and/or salary differentials in the target market;
- allowances and/or remuneration for offices held on corporate bodies, provided that they are not passed on to the relevant company;
- benefits, if any, designed to increase employee motivation and loyalty and allocated on a non-discretionary basis. These may be contractual in nature (e.g. supplementary pensions, health care, etc.) or result from pay policy choices.

As regards the role allowances for core function heads and senior personnel, the *rationale* for their introduction lies in the need to ensure they receive an adequate overall remuneration, taking into account that the ratio of variable to fixed remuneration has been capped to 33% (cap) for these individuals.

The allowances granted to expatriate staff are aimed at guaranteeing equal net remuneration between the country of origin and that of destination, thus covering any differences in cost, quality of life and/or remuneration levels in the target market.

Variable component

The variable component is linked to personnel performance and is symmetrical with respect to the results actually achieved and the risks prudently assumed; it includes a **short-term annual variable component** (the Annual Incentive Schemes and the Variable Company Bonus (PAV)) and a **long-term variable component** which has the same duration as that of the ISP Group's Business Plan (the *Performance-based Option Plan* and the LECOIP Plan for Key Personnel, Middle Management and Professionals)

The separation of the variable remuneration component into a short-term and a long-term portion makes it possible both to consider performance objectives on the basis of a multi-year *accrual* period, and to take into account the multi-year strategic objectives set out in the Business Plan.

Pay mix

The term pay mix is intended to represent the weight, in terms of percentage of total remuneration, of the fixed and variable components, as described above.

In full compliance with the regulatory guidelines of the Intesa Sanpaolo Group, the Insurance Group adopts a pay mix that is appropriately "balanced" between the above components in order to:

- enable the flexible management of labour costs, as the variable portion can be significantly reduced and even become nil in relation to the results actually achieved in the relevant year;
- discourage conduct oriented to the achievement of short-term results, especially if it results from high risk-taking.

Ratio of variable to fixed remuneration

In order to achieve the above objectives, ex-ante maximum and balanced limits to variable remuneration have been established, through specific caps on bonus increases in relation to possible over-performance.

This cap to variable remuneration has been generally set at 100% of fixed remuneration, with the exception of the Heads of the Core Functions and the most senior personnel of the Core Functions of the Insurance Group and of the companies of the Insurance Group who are assigned a cap of 33% of fixed remuneration, also in accordance with the Regulation.

The cap on variable remuneration under the general criteria has been increased up to 200% of the fixed remuneration for Key Personnel also identified as Risk Takers of the Intesa Sanpaolo Group who are not part of the Corporate Control Functions and for specific and limited professional sectors and highly profitable business segments.

In calculating the variable remuneration, the following are relevant: the short-term component relating to the Incentive System and the Variable Company Bonus (PAV), the long-term component allocated through the Long-Term Incentive Plans, and any short-term and long-term components linked to continued service in the company (stability, non-competition, or exceptional agreements);

The increase in the cap of variable remuneration ensures, in any case, compliance with prudential regulations.

The **minimum conditions for activation of the Incentive Schemes** are required by the Regulator and are inspired by the principles of robust financial position, liquidity and financial sustainability of the variable remuneration component, which involve verifying the availability of sufficient economic-financial resources to meet the expenditure requirements.

Failure to meet even one of the above conditions will result in the non-activation of the Incentive Schemes for the Insurance Group personnel:

- **funding conditions** of the bonus pool, i.e. mechanisms to determine the amount of financial resources available to fund the incentive system that relates the amount to allocate to the incentive to the performance of the pre-defined conditions. The failure to fulfil even one of these condition means that the Intesa Sanpaolo Group bonus pool is not activated. The principle of financial sustainability is set out also at an individual Company level;
- **performance measurement** based on several dimensions, both through economic-financial KPIs (profitability, growth, productivity, and cost of risk/sustainability), and non-financial quantitative and qualitative KPIs (e.g. projects, managerial qualities, virtuous conduct aimed at achieving the Business Plan). For 2021, the cross-sectional ISP Group KPI 'Environmental, Social and Governance (ESG)' was identified as one of the strategic actions. In addition, a transversal KPI has been confirmed for Key Personnel of the Core Functions, again for 2021, represented by the objective of "Risk Culture - Promotion of awareness at all levels of the

organisation with respect to emerging risks with special focus on those related to technological innovation through information, awareness and training actions".

Furthermore, the 2021 Remuneration Policies provide for the application of deferral mechanisms, both with financial and non-financial instruments, of variable remuneration over a multi-year period, and the payment of the amounts deferred in subsequent years always occurs when the minimum regulatory conditions are met in addition to being subject to malus and clawback mechanisms.

With the aim of increasing awareness of the remuneration of the corporate bodies, the Heads of the Core Functions and key personnel as defined in the Regulation, more detailed disclosures are required for shareholders. IVASS must be sent quantitative data on the payments made to such personnel, according to the list of information contained in Annex 3 to the Regulation.

The Remuneration Report of the Insurance Group was prepared pursuant to Article 71(2) n) of the Regulation and meets the obligations of the combined provisions of Articles 93(6) and 59(1)(2) of the Regulation to report to the Shareholders' Meeting on 2021 Remuneration and Incentive Policies and on the adoption of these policies.

The Report was defined by the Board of Directors of the USCI on 5 May 2021 and submitted to the Shareholders' Meeting for approval on the same date.

Intesa Sanpaolo Vita, in its capacity as USCI, ensures that the remuneration policies of the other Insurance Group companies are coherent, and that they are suited to the profile of each company, checking their correct adoption; It also checks that all the Insurance Group companies comply with the provisions of IVASS Regulation no. 38/2018, including companies with head offices based overseas, compatibly with the regulatory framework of the foreign country.

Operations with shareholders and persons of influence

The Insurance Group and its Companies put in place and maintain a Policy to manage conflicts of interest, which is prepared on the basis of the nature, size and complexity of their individual businesses.

The Insurance Group Companies have internal procedures and internal regulations which are designed to identify and regulate operational situations that could give rise to potential conflicts of interest deriving from group relations, their own business relations, or those of Intesa Sanpaolo Group companies.

The Insurance Group also has its own procedure to manage related party transactions, and transactions with affiliates of the Insurance Group, and intragroup transactions; this procedure is coordinated, and reflects the regulations of the Parent Company Intesa Sanpaolo S.p.A.

The procedures are periodically reviewed by the Companies, which verify that they are effective and adequate, based on changes to the organisational structures and regulatory requirements.

Self-assessment of the management board

Article 71, paragraph 2 bb) of the IVASS Regulation 38/2018, in setting out the responsibilities of the management board of the USCI at an Insurance Group level with a view to improving the efficiency of the operational process as part of its strategic and organisational duties, and to assess the adequacy of the insurance companies' structure, requires the Board of Directors of the USCI to assess, at least once a year, the composition and efficient functioning of the executive

body of the USCI overall, and of its committees, expressing guidelines for the professional roles who should be included on the Board, also considering the group structure, and proposing any corrective actions. It also requires the Board to verify that there is a numerically adequate presence, in relation to the activity carried out, of independent members, i.e. those without executive powers and who supervise with autonomous judgement on the company affairs, with a view to ensure that they are carried out in the interests of the company and in line with the objectives of sound and prudent management.

For the above purposes, each Director of the USCI in office in 2021 was sent three questionnaires referring to the Board of Directors, the Internal Control and Risks Committee and the Remuneration Committee respectively, with questions on the role of the USCI of Intesa Sanpaolo Vita and the Insurance Group.

The replies to the questionnaires at an USCI level, processed in an aggregate and anonymous form:

(i) confirmed the following for 2021:

- the climate within the Board, the Internal Control and Risks Committee and the Remuneration Committee favoured an open, constructive debate among all members, and fostered the contribution of ideas from the diverse experiences, facilitating the adoption of broad-consensus decisions;
- the Board's decision-making process was fuelled by prompt, effective information flows, and was overall effective despite the remote participation methods largely used also in 2021 given the persistent health emergency and on a precautionary basis, and the minutes of all discussions and resolutions were considered to be complete and accurate.
- the size of the Board of Directors, the Remuneration Committee and the Internal Control and Risks Committee was such as to ensure effective functioning in relation to the complexity, size and objectives of the Company and Insurance Group;

(ii) an adequate personal contribution to board meetings by each Director, a good assessment of the value and quality of the overall performance of other members;

(iii) an adequate assessment of the strategic supervision function of the Board of Directors;

(iii) all members of the Board of Directors, the Remuneration Committee and Internal Control and Risks Committee carried out their duties diligently and independently.

(iv) all members of the Board of Directors, the Remuneration Committee and Internal Control and Risks Committee carried out their duties diligently and independently.

The analysis, which was presented to the Board of Directors on 18 March 2022, indicated that the overall framework was on average positive for 2021, with the composition, functioning and size of the Board of Directors, the Internal Control and Risks Committee and the Remuneration Committee at an USCI level considered to be adequate.

In the course of 2021, following the acquisition of the group headed by Unione di Banche Italiane S.p.A. ("UBI") by Intesa Sanpaolo S.p.A., the insurance companies Aviva Vita S.p.A. (later renamed Assicurazioni Vita S.p.A.), Lombarda Vita S.p.A. and Cargeas Assicurazioni S.p.A. (effective as of 1 April, 12 April and 27 May respectively) also became part of the Insurance Group (in addition to BancAssurance Popolari S.p.A. and Ubi Sicura S.p.A., later renamed Intesa Sanpaolo Insurance Agency S.p.A., which had already been merged into the Insurance Group in 2020).

During the reporting period, the process was started for the merger of the aforementioned Life Companies into Intesa Sanpaolo Vita S.p.A., proceeding, until completion of the transaction, to

comply with the obligations prescribed by insurance supervisory regulations, also with specific regard to corporate governance provisions in accordance with IVASS Regulation no. 38/2018, and the related resolutions by the respective corporate bodies.

Following IVASS authorisation to the merger received on 28 July 2021, Assicurazioni Vita S.p.A., Lombarda Vita S.p.A. and BancAssurance Popolari S.p.A. were merged into Intesa Sanpaolo Vita S.p.A. with effect from 31 December 2021. Following the merger Intesa Sanpaolo Insurance Agency S.p.A. came under the direct control of Intesa Sanpaolo Vita S.p.A.

Intesa Sanpaolo Vita S.p.A.

On the basis of the quantitative and qualitative parameters defined by IVASS, Intesa Sanpaolo Vita's corporate governance structure as USCI has been identified as the "enhanced" model, with consequent adoption of the measures associated with this option (including, in particular, the non-executive status of the Chairman of the Board of Directors, the setting up of board committees, the functioning of the Core Functions and the identification of their holders, as well as the adoption of a suitable remuneration system). The organisational structure of Intesa Sanpaolo Vita is defined in accordance with that of the Insurance Group, and confirms the differentiation between the core and control, staff and business functions.

The Company has adopted the conventional management and control model based on a Board of Directors and a Board of Statutory Auditors, in keeping with the provisions of Articles 2380 and following of the Civil Code.

The Board of Directors of Intesa Sanpaolo Vita in office since 17 March 2021 and until the approval of the Financial Statements at 31 December 2023 was formed of 9 members including a Chair, a Vice Chair and CEO and General Manager.

All the members of the Board Directors meet the integrity, professionalism and independence requirements stipulated by current legislation.

The Board of Directors of Intesa Sanpaolo Vita acts on behalf of the Group and is ultimately responsible for defining the strategies and guidelines concerning risk management and internal controls, and for ensuring that they are adequate and maintained over time in terms of their completeness, functionality and efficiency, in line with the size and specific operations of the Company, as well as the nature and intensity of the company's and Insurance Group's risks.

The Board of Directors of the company is ultimately responsible for compliance with directly applicable national and European legislative and regulatory provisions.

The Board of Directors of Intesa Sanpaolo Vita, also in a capacity as the USCI, within the scope of strategic and organisational governance duties, is solely responsible for the exercise of its powers with reference to:

- checking that the corporate governance system is consistent with the strategic objectives, risk appetite and risk tolerance limits, as established, and is able to capture any changes in the company risks and the interaction between them;
- periodic setting of the risk-adjusted objectives in compliance with the goal of protecting its assets and with the guidelines of the Intesa Sanpaolo Group implemented by Intesa Sanpaolo Vita and Insurance Group Companies;
- approval of annual reporting documents (quantitative and qualitative) required by the entry into force of the Solvency II Regulation;

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- approval of the Current and Forward-Looking Risk Assessment Report provided for by the Solvency II Directive.
 - approval of this Policy on investments of the Insurance Group, of the Framework Resolution on investments of Intesa Sanpaolo Vita, including the Policy on investments, the Policy on asset and liability management and Policy on liquidity risk management;
 - approval of the risk management and risk appetite policies and strategies of Intesa Sanpaolo Vita and of the Insurance Group, through the specific policies;
 - approval of the remuneration policies;
 - approval of the capital management policy;
 - approval of ESG investment policies;
 - a periodic review of results, including the results of stress tests, and periodic examination of the underlying risk profiles of Intesa Sanpaolo Vita and other Group Companies, which are communicated to Senior Management and to the independent Risk Management function;
 - gathering of information on the most significant critical aspects concerning risk management and internal control of Intesa Sanpaolo Vita and of the other Insurance Group Companies identified by the various bodies tasked with their monitoring and control;
 - timely assessment of said critical aspects and initiation of the necessary corrective measures by issuing directives. In urgent cases linked to situations that may compromise the solvency of the Company and Insurance Group and reaching company goals, the corrective actions are determined by the Senior Management of Intesa Sanpaolo Vita, also in a capacity as the USCI, provided that it duly informs the Board at a following meeting.

For instrumental purposes, in addition to said powers and responsibilities, the Board of Directors of Intesa Sanpaolo Vita, also in a capacity as the USCI:

- identifies the strategic guidelines and policy for the current and forward-looking risk assessments;
- ensures that the implementation of the Risk Appetite Framework is consistent with the approved risk appetite and tolerance threshold; periodically evaluates (at least once a year) the adequacy and effectiveness of the Risk Appetite Framework and compatibility between actual risk and risk targets;
- checks that Senior Management defines the structure of internal controls in line with the selected risk appetite, that the control functions have an adequate degree of autonomy within the organisational unit, and that adequate resources are provided for proper functioning;
- checks the definition of the organisational structure so that tasks and responsibilities are assigned clearly and appropriately and is informed of any organisational change and of the reasons that led to such change, ensuring that supervisory authorities are duly notified in the case of significant changes; is later informed of whether the expected improvements are achieved;
- ensures that adequate decision-making processes are adopted and formalised and that functions are segregated appropriately within the organisational structure;
- approves the system of delegating powers and responsibilities, making sure that it remains adequate over time, and provides for adequate contingency arrangements if it decides to reserve the delegated powers for itself;

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- is informed at least on a quarterly basis by the Chief Executive Officer about actions by proxy-holders concerning the most important transactions in terms of size and characteristics;
 - is informed, each quarter, about significant related party transactions carried out by Intesa Sanpaolo Vita;
 - promotes staff compliance with the principles of moral integrity and the ethical values of the Company formalised within the Code of Ethics, and fosters an "audit culture" so that all personnel are aware of the importance and usefulness of internal audits;
 - appoints and revokes:
 - the head of internal auditing (Audit),
 - the Chief Risk Officer also as the Head of the independent risk control function (Risk Management);
 - the Chief Compliance Officer also as the Head of the compliance function (Compliance), the head of AML, the head of the reporting of suspicious activity and as Data Protection Officer;
 - Head of the Actuarial Function;
 - approves the annual plan of action for the Compliance, Risk Management, Audit and Actuarial functions;
 - examines, at least once every six months, the reports on the work done by the Heads of the control functions, on the audits carried out;
 - sets out the main characteristics of the internal controls and risk management system, expressing its opinion on the overall adequacy thereof based on the reports prepared by the competent functions; These activities are carried out at least once a year;
 - makes sure that shortcomings and anomalies found as a result of the controls at the various levels are timely brought to its attention in order to give directives on the adequate corrective measures;
 - determines the measures to be adopted following any recommendations received, and identifies the measures to eliminate deficiencies found by the Audit function, ensuring that the necessary measures are implemented;
 - ensures continuous professional development which is extended also to the members of the body itself;
 - carries out, at least once a year, a review on the size, composition and operation of the management board as a whole, including its internal committees.

The principal role of the Chief Executive Officer and General Manager is to:

- implement the decisions about the corporate governance and risk management systems, taken by the Board of Directors, and to supervise the management of the business and all the Company's affairs, ensuring that this is conducted in accordance with the general management guidelines established by the Board of Directors;
- supervise the setting of the annual and multi-year plans and budgets to be submitted to the Board of Directors;

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- supervise the setting of the technical insurance policies to be submitted to the Board of Directors;
 - Propose business-related growth strategies;
 - present the Board of Directors with the matters for which it is responsible, and any other issues regarding the performance of the company, and formulate any proposals;
 - coordinate the Company's activities;
 - establish and maintain external, corporate, shareholder and industrial relations;
 - define, in detail, the organisational structure of the business, the duties and responsibilities of the basic operational units as well as the decision-making processes in accordance with the instructions given by the Board of Directors.

The Board of Statutory Auditors of Intesa Sanpaolo Vita S.p.A. in office at 31 December 2021 was appointed during the Shareholders' Meeting of 25 March 2019 and comprises 5 members, of whom 3 standing members, appointed by the Chair, and two substitute members, who all meet the requirements of integrity, professionalism and independence as required by current legislation.

The Board of Statutory Auditors of Intesa Sanpaolo Vita verifies the adequacy of the organisational, administrative and accounting structure of the Company, and its functioning.

Under the limits permitted by Law 183/2011, the Company has entrusted the functions of Supervisory Board to the Board of Statutory Auditors by including this provision in the Management, Organisation and Control Model drawn up pursuant to Legislative Decree 231/2001.

The Governance system of Intesa Sanpaolo Vita includes various permanent advisory committees and core functions, as provided for in current regulations (Legislative Decree 209/2005): Risk Management, Compliance, Actuarial, Audit Functions). In addition to these core functions is the additional control function responsible for AML (Anti-Money Laundering) controls.

There are 4 managerial committees and 2 board committees (responsible for the Group and for the individual Company).

Management committees:

- A Coordination Committee, which meets in two sessions (Insurance Group, Insurance Group Products and Intesa Sanpaolo Vita), usually once every two months, and whose mandate is to:
 - facilitate interaction and communication between the departments of Intesa Sanpaolo Vita and the Insurance Group companies at the highest level, in order to coordinate the key decisions of the Insurance Group and to monitor the economic performance of the Group;
 - approve the products plan of the Insurance Group and substantial changes to it;
 - discuss proposals for determining company strategies and for monitoring the company's economic trends, as well as discussing the structure of new products, monitoring their launch plan, and for defining, prioritising and verifying the progress of key projects.
- an Investment Committee which meets in three sessions (Insurance Group Investment Strategies, ALM and Investments and Corporate Bond & Emerging Market Investments) usually at least once every two months, with the respective objectives of:

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- helping to outline investment strategies for the Insurance Group that the individual companies will adopt in their own specific strategies, though operating and tactical choices discussed by their respective Investment Committees;
 - suggesting and defining the investment strategies and financial policies, to propose, in conjunction with the Delegated Manager, as well as the guidelines for tactical operations to be submitted for approval by the Board of Directors;
 - monitoring the limits regulated by the Policies on investments of the Insurance Group and individual Companies including the Policy for sustainable and socially responsible investments based on ESG (Environmental, Social and Governance) and SRI (Sustainable and Responsible Investments) principles, regarding ESG principles and analysing any deviations and exceptions.
- Controls Coordination Committee, a body with an information and advisory role that operates to consolidate the coordination and the mechanisms of inter-functional cooperation as part of the internal controls system of the Insurance Group. The Committee meets usually on a quarterly basis but it may also be convened by the Head of the Audit Function whenever necessary.
 - The Alternative Investment Committee which supports the Board of Directors of the USCI in formulating guidelines on alternative investments and on identifying related monitoring tools for Intesa Sanpaolo Vita and Fideuram Vita. The Committee usually meets on a quarterly basis but it may also be convened by the Chair, whenever necessary.

Members of the Insurance Group session of the Coordination Committee:

- for Intesa Sanpaolo Vita:
 - Chief Executive Officer and General Manager;
 - Heads of the Core Functions;
 - Heads of the first-line Organisational Units;
 - Head of Organisation;
 - Deputy General Managers (Heads of Coordination Areas Life and Non-Life Companies)
- Managing Directors and General Managers and Chief Executive Officers of the Insurance Group Companies.

The Insurance Group Products session of the Coordination Committee is attended by:

- for Intesa Sanpaolo Vita:
 - Heads of the Core Functions: Risk Management, Actuarial function and Compliance
 - Head of Finance;
 - Head of Sales Area;
 - Chief Financial Officer
 - Deputy General Managers (Heads of Coordination Areas Life and Non-Life Companies)
- Managing Directors and General Managers and Chief Executive Officers of the Insurance Group Companies.

The Intesa Sanpaolo Vita session of the Coordination Committee is attended by:

- Chief Executive Officer and General Manager;
- Heads of the Core Functions;
- Heads of the first-line and staff Organisational Units;
- Head of Organisation;
- Deputy General Manager (Head of Coordination Area Life Companies).

The Insurance Group Investment Strategies session of the Investment Committee is attended by:

- for Intesa Sanpaolo Vita:
 - Chief Executive Officer and General Manager;
 - *Chief Risk Officer*;
 - Head of Life Risk Management;
 - Chief Financial Officer;
 - Head of Finance;
 - Head of Investments;
 - Deputy General Managers (Heads of Coordination Areas Life and Non-Life Companies)
- Managing Directors and General Managers and Chief Executive Officers of Intesa Sanpaolo Assicura, Intesa Sanpaolo Life and Fideuram Vita.

The ALM Investment session of the Investment Committee is attended by:

- for Intesa Sanpaolo Vita:
 - Chief Executive Officer and General Manager;
 - Chief Risk Officer;
 - Head of Life Risk Management;
 - Chief Financial Officer;
 - Head of Finance;
 - Investment managers for all business lines;
 - Head of Actuarial;
 - Head of ALM;
 - Head of the Actuarial Function;
 - Head of Sales Area;
 - Deputy General Managers (Heads of Coordination Areas Life and Non-Life Companies)
- Chief Executive Officer and General Manager of Intesa Sanpaolo Assicura;
- Head of the Investments Division of Eurizon Capital.

Members of the Corporate Bond & Emerging Market Investment session of the Investment Committee:

- for Intesa Sanpaolo Vita:
 - Chief Executive Officer and General Manager;
 - Chief Risk Officer;
 - Chief Financial Officer;
 - Head of Finance;
 - Investment managers for the concerned business lines
 - Head of Life Risk Management;
 - Deputy General Managers (Heads of Coordination Areas Life and Non-Life Companies)
- Head of the Financial and Market Risks Head Office Department of the Parent Company Intesa Sanpaolo;
- Chief Executive Officer and General Manager of Intesa Sanpaolo Assicura;
- Chief Executive Officer and General Manager of Fideuram Vita.

Members of the Controls Coordination Committee:

- Head of Audit;
- *Chief Risk Officer;*
- *Chief Compliance Officer;*
- Head of Life Risk Management;
- Head of GAF and Regulatory Agenda;
- Head of Organisation;
- Head of the Actuarial Function;
- Financial Reporting Officer (currently the Chief Financial Officer).

The Alternative Investment Committee is attended by:

- for Intesa Sanpaolo Vita:
 - Chief Executive Officer and General Manager;
 - Chief Risk Officer;
 - Chief Financial Officer;
 - Head of Finance;
 - Head of Investments in the concerned LoB;
 - Head of Line I and Property Investments;
 - Head of Life Risk Management;
 - Deputy General Manager (Head of Coordination Area Life Companies).
- for Fideuram Vita:
 - Chief Executive Officer and General Manager;

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- Head of Risk Management;
 - CEO and General Manager of Eurizon Capital Real Asset SGR;
 - Head of Financial and Market Risks and Intesa Sanpaolo Chief Lending Officer Chief Governance Area Representative.

The Board Committees are the Remuneration Committee and the Internal Control and Risks Committee.

The Remuneration Committee comprising three non-executive members of Board of Directors, the majority of whom independent pursuant to Article 2387 of the Civil Code, and from among whom the Chair will be elected, is responsible for advising the Board of Directors on the remuneration policies for corporate bodies and personnel of the Company and Insurance Group.

The Remuneration Committee is attended by representatives of the Company, of the other companies in the Insurance Group or of the Parent Company Intesa Sanpaolo, if considered helpful in fulfilling the Committee's functions regarding each item on the agenda.

Meetings of the Remuneration Committee are held at intervals determined according to a calendar based on the work needed to carry out the committee's tasks, but at least twice a year, in order to provide advice and suggestions on any revisions to the remuneration policies, and to provide adequate information on how the policies are to be applied, to be included in the annual report to the ordinary shareholders' meeting of the Italian companies of the Insurance Group.

The Internal Control and Risks Committee, comprising three members, from whom the Chair is elected, monitors the functioning of the internal controls system and the efficiency and functioning of the process to manage financial, technical and operational risks of Intesa Sanpaolo Vita and the Insurance Group, and also advises the Board of Directors (with the aim of increasing the effectiveness of its strategic supervision functions with regard to risk governance and management); the Committee meets in separate sessions, one dedicated to the risks of the Company and Insurance Group and one dedicated to internal control of the Company and Insurance Group.

The Committee pays particular attention to the work necessary for the Board to correctly determine the Risk Appetite Framework (RAF) and the risk governance policies, and in order to effectively fulfil its additional duties relating to risks, as provided for under current regulations. Its duties include examining, advising and proposing. It supports the Board of Directors in understanding the control of risks and the implementation of the RAF of the Company and of the Insurance Group in exercising the functions of strategic supervision regarding the governance and management of risk.

The Internal Control and Risks Committee also assists the Board of Directors:

- in approving proposals for risk mitigation, resulting from the Risk Assessment;
- in defining and approving the ORSA, helping to ensure that it is consistent with the RAF;
- in preparing the risk reports to be sent to the regulatory bodies.

The Internal Control and Risks Committee usually meets on a monthly basis but it may also be convened by the Chair of the Committee at any time, whenever necessary. A schedule of the meetings based also on the schedule of the meetings of the Board of Directors is prepared at the beginning of every year.

An additional part of the corporate governance system is composed of the five core and control functions, established by applicable regulations: Risk Management, Compliance, Actuarial, Audit and AML (Anti-Money Laundering).

These functions are independent and play a leading role in overseeing the correct operation of corporate mechanisms. They are called upon to ascertain that the system of rules and procedures that Intesa Sanpaolo Vita has put in place is adequate to ensure the monitoring of identified risks and can thus protect the interests of all stakeholders.

These functions are separate in organisational terms; the respective roles and responsibilities are described in the Organisational code and in more detail in the respective Policies.

Their main tasks are detailed below:

The Audit function: is tasked with assessing the completeness, operation, effectiveness and adequacy of the Internal Controls System with regard to the nature of the activity and risk levels, and assessing the need for adjustments, also by providing support and advice to other business units.

The Audit function is independent, also hierarchically, from the operating organisational units. Those tasked with the activity are ensured - for the purpose of carrying out the relevant checks - access to all hard copy and electronic documents and to the company structures subject to audit, as well as to information for control on the correct performance of the outsourced activities. The Unit must also have organic ties with the other Core Functions tasked with internal control. The assigned structure must be appropriate to the scope, complexity of the activity and development objectives of the Company in terms of human and technological resources.

The Head of the Audit function presents the audit plan to the Board of Directors, on an annual basis. The audit plan also takes into account any input from the Board of Directors. The Head of the Audit Function can also include areas of investigation in the Audit plan, to guarantee the independence of the internal audit process.

The Board of Directors is regularly updated about the work done, and on any progress in corrective actions implemented by the relevant units.

The audits are concluded with a follow-up on the effectiveness of the adjustments made to the Internal Control System.

The Risk Management function: supports Senior Management in determining and implementing the Risk Management System, and contributes to the internal risk and solvency assessment based on the Risk Appetite Framework, by identifying business risks, measuring the effects and performing all controls within its remit, and liaising with the other Core Functions to coordinate the risk management-related company departments, in compliance with the rules imposed by the supervisory bodies.

The Risk Management structure is independent, also hierarchically, from the operations structures. Risk Management, with the support of Actuarial, helps to define the risk management policy and determines the criteria and the methods for measuring risk, as well as the outcome of the assessments, which are sent to the executive body (for further details, please see the Risk Management Regulation and the Rules (ORSA):

The Chief Risk Officer is the Head of the Risk Management Function.

The Compliance function: evaluates the adequacy and effectiveness of organisational and control measures adopted to prevent compliance risk and proposes organisational and procedural changes to ensure adequate risk oversight.

Compliance risk is the risk of receiving judicial or administrative penalties, suffering losses or reputational damage as a consequence of violations of directly applicable laws, regulations and European regulations, or rulings of the Supervisory Authorities or governance tools, such as articles of association, codes of conduct or corporate governance codes; In addition, it represents the risk arising from unfavourable changes to the legal framework or legal guidance. The Compliance Function is independent and hierarchically separate from operational functions.

The *Chief Compliance Officer* is the Head of the Compliance Function.

The Chief Compliance Officer was appointed by the management board, with the prior approval of the relevant functions of the Parent Company Intesa Sanpaolo and also holds the position of AML officer and Data Protection Officer (DPO) within Intesa Sanpaolo Vita.

The Data Protection Officer (DPO) informs and advises the Controller, and staff carrying out data processing activities; he/she oversees compliance with Regulation (EU) 2016/679 ("GDPR") and the controller's policies on data protection, including the allocation of authorities, training and guidance for data processing personnel and related control activities; if required, the DPO also provides an opinion on the data protection impact assessment required by Article 35 of the GDPR, and oversees the assessment process; he/she cooperates with the regulatory authority and acts as a point of contact for data processing issues, including the pre-assessment required by Article 36 of the GDPR also carrying out consultations on other issues as necessary; he/she keeps Data Processing Records.

The overall architecture of the risk management and control system regarding privacy is set out in the Guidelines of the Parent Company Intesa Sanpaolo, which establish - for Insurance Group Companies - a decentralised "coordination and control" model, also governed by the Guidelines of the Intesa Sanpaolo Vita Insurance Group. This model requires each Group Company to appoint its own DPO, who reports functionally to the DPO of Intesa Sanpaolo Vita in its capacity as Ultimate Italian Parent Company. The DPO of Intesa Sanpaolo Vita provides management and coordination for all Insurance Group Companies.

He also reports functionally to the Data Protection Officer. of the Parent Company Intesa Sanpaolo. Within this model, the DPO of Intesa Sanpaolo Vita:

- carries out management and coordination activities;
- oversees direct relations with the DPOs of Insurance Group Companies;
- issues instructions and guidelines to the Insurance Group Companies.

The Chief Compliance Officer is responsible for the AML (Anti-money Laundering) function, and also Reports Suspicious Activity (SOS).

The AML function carries out all activities necessary to asses and manage money laundering, terrorist financing, embargo violation and corruption risk, assisting the corporate bodies and Senior Management in carrying out functions required under applicable law.

The Anti-money laundering function mainly carries out the following duties:

- monitors the risk of money laundering, terrorist financing, embargo violation and risk of corruption, and in this context, the suitability of the internal controls system and procedures adopted;
- carries out AML steering and coordination activities in the Group;
- advises corporate functions on anti-money laundering, anti-corruption, combating terrorism and managing embargoes

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- verifies that the company's procedures are consistent with the aim of preventing and combating breaches of applicable external and internal regulations, and in particular:
 - reviews level one suspicious activity reporting, and prepares cases for final evaluation by the Head of Suspicious Activity Reporting;
 - prepares adequate information flows for the corporate bodies of the Company and other entities involved;
 - ensures information required by legislation is correctly entered in the AUI (Single Electronic Archive);
 - prepares an adequate training plan to ensure the continual professional development of personnel and staff, assisted by other company functions responsible for training;
 - sends aggregate data on the above records to the FIU (Financial Information Unit) each month;
 - carries out second level controls, in particular on operating entities
 - carries out Enhanced Due Diligence;
 - reports to the Parent Company Intesa Sanpaolo;
 - as regards new products, assists relevant functions in advance, in order to identify adequate controls to monitor and mitigate the risk of money laundering and terrorist financing (AML Clearing);
 - assesses the residual risk profile regarding money laundering, terrorist financing and breaches of embargoes based on the "AML and CTF Risk Assessment" methodology, coordinating activities also at a Group level.
 - oversees, for all Group companies, the regulatory area across the Insurance Group in relation to Legislative Decree 231/2001.

The Actuarial Department's main tasks are as follows:

- coordinates the calculation of Solvency II provisions;
- ensures the adequacy of the underlying methodologies and models, as well as the assumptions on which the calculation is based;
- assesses the sufficiency and quality of the data used in the calculation of technical provisions;
- compares the Best Estimates against experiential data;
- informs the Board of Directors about the reliability and adequacy of the calculation of the technical provisions;
- gives an opinion on the overall underwriting policy and on the adequacy of reinsurance arrangements;
- contributes to the effective implementation of the risk management system as per Article 30-bis of Italian Legislative Decree 209/2005, with specific reference to the modelling of risks underlying the calculation of capital requirements and the internal risk and solvency assessment referred to in Article 30-ter of Italian Legislative Decree 209/2005; supervises the calculation of technical provisions in the two cases provided for by Article 36-duodecies of Italian Legislative Decree 209/2005;
- assessing the adequacy of the individual reserves, in accordance with IVASS provision no. 53/2016;

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- assessing the cohesion between the amounts of the reserves calculated according to the valuation criteria applicable to the statutory accounts and the calculation of the Solvency II technical provisions.

The company has assessed its Governance system as being adequate, compared to the nature, scope and complexity of the risks of the company's activities in 2021.

Coordination between the executive and supervisory bodies and key functions

In compliance with the Policy on the Internal Control system of Intesa Sanpaolo Vita, the core and control functions (Audit, Risk Management, Compliance, AML and Actuarial Function) are separated by operational Organisational Units and from each other, in organisational terms, to guarantee their independence, directly reporting to the Board of Directors on activities carried out.

The heads of the core functions are members of the Coordination Committee and Controls Coordination Committee.

Core and control functions are coordinated, through the involvement of the functions in the Controls Coordination Committee, and through the exchange of information flows. The auditing firm, the Board of Statutory Auditors, the Supervisory Body and the Administration and Finance Governance (GAF) and Regulatory Agenda Organisational Unit also come under the scope of the internal control system Policy of Intesa Sanpaolo Vita, as participants in the system of controls.

The information that these functions send to the Board of Directors regarding planned audits and outcomes is governed by the policies for the control functions. These reports are mainly carried out using the dashboard of critical issues and the periodic report to the Board of Directors.

Each control function performs its activities through a dedicated department.

All personnel of key company departments have adequate specialist expertise and are periodically updated by attending training courses, to allow them to carry out their controls and audits.

These core functions inform and support the Boards of directors and auditors mainly by proactively participating in the above committees and by providing reports which focus on describing the plan of action, the activities performed, and the outcomes.

In the specific case of coordination between the executive and supervisory bodies and the risk management, compliance, internal audit and actuarial functions, the procedure of direct reporting to the Board of Directors by the internal audit function, is the main system used. Also in this case, the reports focus on a description of the plan of action, the activities performed, and the outcomes.

With regard to Solvency II, the Head of the Actuarial function reports at least once a year to the Board of Directors, expressing an opinion on the adequacy of the technical provisions, the underwriting and reserving policy, and the reinsurance arrangements.

During 2021, the scope of the Insurance Group was further expanded as a result of the inclusion of the following Companies:

- Aviva Vita S.p.A. S.p.A. (later renamed Assicurazioni Vita S.p.A.), which became part of the Group with effect from 1 April 2021;

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- Lombarda Vita S.p.A., which became part of the Group with effect from 12 April 2021;
 - Cargeas Assicurazioni S.p.A, which became part of the Group with effect from 27 May 2021.
- Assicurazioni Vita S.p.A., Lombarda Vita S.p.A. and BancAssurance Popolari S.p.A. were merged into Intesa Sanpaolo Vita with effect from 31 December 2021.

In January, the Welfare Imprese unit was eliminated following the inclusion of Intesa Sanpaolo Insurance Agency (previously Ubi Sicura) into the Insurance Group in 2020.

In April 2021:

- responsibility for activities relating to the regulatory monitoring under Legislative Decree 231/2001 was reallocated from the "Group Compliance and Specialist Controls" unit to the "AML" unit.

In June:

- The first line Personnel Units Change Management and Sustainability and the unit reporting to the Chief Financial Officer were reorganised to move the Procurement Unit from the former to the second
- the "Operations and Organisation Area" was reorganised and renamed "Operations and Information Systems Area", in view of the centralisation within Intesa Sanpaolo Vita of the information systems management activities of Intesa Sanpaolo Assicura S.p.A. and Intesa Sanpaolo RBM Salute S.p.A. and of the activities previously carried out by the Information Systems Department of Intesa Sanpaolo S.p.A. for the non-life business.

In September:

- two new coordination areas were created, reporting to the Managing Director and General Manager of USCI, known as the "Life Companies Coordination Area" and the "Non-Life Companies Coordination Area", to supervise and coordinate, in terms of results and in accordance with the policies in place within the Insurance Group, the activities of the Group companies engaged in the life and non-life businesses respectively. The relevant responsibilities were entrusted to two Deputy Directors-General
- the 'Product Actuarial' unit (previously in the 'Finance and Actuarial' area) was placed in the 'Commercial Area';
- the second-line organisational 'Actuarial' unit was relocated from the 'Finance and Actuarial Area' to the Chief Financial Officer Area,
- the "Securities Portfolio Administration and Treasury" unit and the units reporting to it were reorganised within the Chief Financial Officer's structure into a unit called "Securities Back Office". At the same time, the activities related to the securities middle office and treasury were moved to the 'Finance Area'.

Remuneration system and remuneration policies

The remuneration system and remuneration policies of Intesa Sanpaolo Vita are in line with the principles described in the section on the Insurance Group.

The Remuneration Report of Intesa Sanpaolo Vita S.p.A. meets the obligations in Article 5(2)(l) and 42 of the Regulation, as well as Article 59 of the Regulation on reporting to the Shareholders' Meeting concerning 2021 Remuneration and Incentive Policies and the adoption of 2020 Remuneration Policies.

The Remuneration Report was defined on 5 May 2021 by the Board of Directors and approved by Shareholders' Meeting held on the same date.

Operations with shareholders and persons of influence

Intesa Sanpaolo Vita has agreements in place with the majority shareholder Intesa Sanpaolo for the retailing of insurance products, and outsourcing agreements for services related to corporate protection, human resources, risk management, external relations, corporate affairs and equity investments.

The Company did not carry out any major transactions during the year with any persons that exercise a considerable influence on the company or with the members of the management, executive or supervisory boards.

Self-assessment of the management board

To ensure the sound, prudent management of the Company, in particular the effective functioning of its management board, the members of the Board of Directors must meet the integrity, professionalism and independence requirements as contained in the current provisions of law and regulations and the articles of association.

To ensure these requirements were met, including those concerning what is known as the "interlocking ban" (in Article 36 of Decree Law 201/2011, converted with amendments by Law no. 214/2011), on 17 March 2021, the Board of Directors initially assessed the eligibility of newly appointed Directors Luigi Maranzana (Chairman), Nicola Maria Fioravanti (Chief Executive Officer and General Manager), Elio Fontana (Deputy Chairman of the Board of Directors), Giuseppe Attanà, Paolo Baessato, Maria Anna Angela Vincenza Costanza, Chiara Frigerio, Rossella Leidi and Antonio Nucci (Directors).

The Supervisory Authorities were notified of all assessments.

In connection with these assessments all the Directors accepted an obligation to keep the Company regularly updated on any changes in their situations. As no notifications have been received, all members of the Board of Directors are currently considered to meet the requirements to hold that office.

The self-assessment of the Board and the assessment by its internal committees is generally based on a specific analysis of the board's functions, and the work it has actually done during the year. This may be based on quantitative data relating to the number, frequency and duration of its meetings, the recurrence of any topics dealt with and the quantitative information emerging from the documents prepared for examination by the board, as well as the discussions held during the meetings.

It is also necessary to consider whether there is a structured, transparent system of circulating information, and regular flows of communication to enable the board members to have full, constant visibility of all the work overseen by the Board of Directors and Committees.

For this purpose, during 2021 each Director in office was sent three questionnaires referring respectively to the Board of Directors, the Internal Control and Risks Committee and the Remuneration Committee. The questionnaires were prepared on the basis that the individual contribution of each director and the frequency of their attendance at meetings are crucial factors with regard to the objective of taking informed, shared decisions.

The replies to the questionnaires, processed in an aggregate and anonymous form:

(i) confirmed the following for 2021:

- the climate within the Board, the Internal Control and Risks Committee and the Remuneration Committee favoured an open, constructive debate among all members, and fostered the contribution of ideas from the diverse experiences, facilitating the adoption of broad-consensus decisions;
- the Board's decision-making process was fuelled by prompt, effective information flows, despite the remote participation methods largely used also in 2021 given the persistent health emergency and on a precautionary basis, and the minutes of all discussions and resolutions were considered to be complete and accurate.
- the size of the Board of Directors, the Remuneration Committee and the Internal Control and Risks Committee was such as to ensure effective functioning in relation to the complexity, size and objectives of the Company;

(ii) an adequate personal contribution to board meetings by each Director, a good assessment of the value and quality of the overall performance of other members;

(iii) an adequate assessment of the strategic supervision function of the Board of Directors;

(iii) all members of the Board of Directors, the Remuneration Committee and Internal Control and Risks Committee carried out their duties diligently and independently.

(iv) all members of the Board of Directors, the Remuneration Committee and Internal Control and Risks Committee carried out their duties diligently and independently.

The analysis, which was presented to the Board of Directors on 18 March 2022, indicated that the overall framework is positive and once again for 2021 the assessment of the composition, functioning and size of the Board of Directors, the Internal Control and Risks Committee and the Remuneration Committee was considered to be adequate.

Intesa Sanpaolo Assicura S.p.A.

The organisational structure of Intesa Sanpaolo Assicura is defined in accordance with that of the Insurance Group, and confirms the differentiation between the control, staff and business functions.

The Company has adopted the conventional management and control model based on a Board of Directors and a Board of Statutory Auditors, in keeping with the provisions of Articles 2380 and following of the Civil Code.

The Board of Directors of Intesa Sanpaolo Assicura appointed by the ordinary Shareholders' meeting of 16 March 2021 and in office until the approval of the Financial Statements at 31

December 2023 comprises 8 members including a Chair and a CEO, who also holds the office of General Manager.

The Managing Director and General Manager is also the Head of the Non-Life Companies Coordination Area set up in USCI.

All the members of the Board of Directors and the General Manager meet the integrity, professionalism and independence requirements stipulated by current legislation.

The Board of Directors of Intesa Sanpaolo Assicura is ultimately responsible for defining the strategies and guidelines concerning risk management and internal controls, and for ensuring that they are adequate and maintained over time in terms of their completeness, functionality and efficiency, in line with the size and specific operations of the company, as well as the nature and intensity of the company's risks. These powers also extend to the outsourced activities.

The Board of Directors of the company is ultimately responsible for compliance with directly applicable national and European legislative and regulatory provisions.

The Board of Directors of di Intesa Sanpaolo Assicura operates, at a company and not at an Insurance Group level, with the same powers and responsibilities as the corresponding body within the Parent Company.

The principal role of the Chief Executive Officer and General Manager is to:

- supervise the management of the company and all the affairs of the Company, representing it before the Market, Institutions and Regulators, conducting relations with the other Intesa Sanpaolo Group Companies;
- ensure that the Company's financial, commercial and risk targets are met by defining the commercial, technical insurance, pricing and personnel coordination policies, assuring service quality and business development.

The Board of Statutory Auditors of Intesa Sanpaolo Assicura, in office at 31 December 2021 was appointed by the Shareholders' Meeting of 18 March 2019 and comprises 5 members, of whom 3 standing members, appointed by the Chair, and two substitute members, who all meet the requirements of integrity, professionalism and independence as required by current legislation.

The Board of Statutory Auditors of Intesa Sanpaolo Assicura verifies the adequacy of the organisational, administrative and accounting structure of the Company, and its functioning.

Under the limits permitted by Law 183/2011, the Company has entrusted the functions of Supervisory Board to the Board of Statutory Auditors by including this provision in the Management, Organisation and Control Model drawn up pursuant to Legislative Decree 231/2001.

Intesa Sanpaolo Assicura's Governance system is the "enhanced" one and does not provide for the establishment of its own board committees, as it can make use of those established within the Insurance Group, without necessarily having to replicate them within the individual Company; in particular, the Company relies on:

- the Internal control and risks Committee established at an Insurance Group level with the USCI (being suitable for adequate oversight of the specific risk profile of Intesa Sanpaolo Assicura): the Board of Directors, in compliance with Article 17 paragraph 3 of IVASS Regulation no. 38/2018, has appointed one of its members, suitably competent in the field and without delegated powers, to monitor the activities, adequacy and proper functioning of the risk management system, in order to report its findings to the Board of Directors, which is ultimately responsible for it;
- the Remuneration Committee, set up within the Insurance Group within the USCI.

There are 3 advisory committees:

- the Management Committee, whose objective is to discuss proposals for determining company strategies and for monitoring the company's economic trends, as well as discussing the structure of new products, monitoring their launch plan, and for defining, prioritising and verifying the progress of key projects;
- the Investment Committee, whose aim is to discuss the investment strategies and financial policies that were defined in the Group Investment Strategies session of the USCI's Investment Committee. It suggests, in conjunction with the Delegated Manager, the guidelines for tactical operations to be submitted for approval by the Board of Directors.
- The Risks Committee, which is responsible for supporting Senior Management in defining the Company's risk profiles and the related economic capital levels, monitoring the risk profiles on the basis of data reported by the relevant departments and supporting Senior Management in establishing any corrective strategies and sharing the financial, operational and technical assumptions for the Solvency II processes.

Members of the Management Committee:

- for Intesa Sanpaolo Assicura:
 - Chief Executive Officer and General Manager;
 - Heads of the Core Functions;
 - Heads of the first-line Organisational Units;
 - Data Protection Officer.
- for Intesa Sanpaolo Vita:
 - Chief Financial Officer;
 - Head of the Operations and Organisation Area;
 - Head of Organisation;
 - Head of Planning and Control of Intesa Sanpaolo Assicura;
 - Head of Personnel, Change Management and Sustainability.

Members of the Investment Committee:

- for Intesa Sanpaolo Assicura:
 - Chief Executive Officer and General Manager;
 - Head of the Actuarial Function;
 - Head of Risk Management.

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- for Intesa Sanpaolo Vita:
 - Head of the Risk Management Organisational Unit;
 - Chief Financial Officer;
 - Head of Finance and Actuarial Area;
 - Head of Investments;
 - Head of Line I and Property Investments;
 - Head of ALM and Capital Management.

Members of the Risks Committee:

- for Intesa Sanpaolo Assicura:
 - Chief Executive Officer and Director-General;
 - Heads of the Core Functions;
 - Head of Complaints and Litigation;
 - Head of Motor policies;
 - Head of the Actuarial and Reinsurance Department;
 - Head of RE/CPI policies and digital channels;
 - Head of SME and corporate development policies;
 - Head of Operations.
- for Intesa Sanpaolo Vita:
 - Head of Risk Management;
 - Head of Investments;
 - Chief Financial Officer;
 - Head of Finance and Actuarial Area;
 - Data Protection Officer.

In addition, the CEO and General Manager also attend the Insurance Group sessions of the following committees of the USCI: Coordination Committee – Insurance Group and Insurance Group Products session, Investment Committee - Insurance Group Investment Strategies session, ALM and Investments session, Corporate Bond & Emerging Markets Investment session and the USCI's board committees.

The Company has outsourced the activities of the core functions to Intesa Sanpaolo Vita, as the USCI. Please see the contents of the section on the USCI.

The company has assessed its Governance system as being adequate, compared to the nature, scope and complexity of the risks of the company's activities in 2021.

Coordination between the executive and supervisory bodies and key functions

The Company considers the governance of information flows as a fundamental factor, so that it may achieve efficient management and effective controls, and value the different levels of responsibility within the company organisation. The Company ensures the constant, timely and extensive distribution of information among corporate bodies, board committees, core functions, functions that carry out control activities and other entities concerned, complying with the various competences of bodies with supervision and control functions.

The Board of Directors acknowledges the importance of risk and control management, and from this perspective, it ensures constant and worthwhile interaction, also through the activities of its committees with entities concerned and in particular with the Core and Control Functions.

The Chairman of the Board of Directors ensures that board activities take place guaranteeing appropriate communication flows regarding the times and contents, with the Core Functions, Board Committees and managerial committees. Adequate minutes are taken of board meetings, which report on evidence presented and analysed, discussions taking place, decisions taken, actions to take and updates concerning previous decisions made.

The Management Board is assisted by the Core Functions that take part in board meetings, if requested, considering the specific issues addressed. The Board is also advised on individual matters concerning the internal control system.

Changes to the system of Governance

During 2021 the following changes were made to the company's governance system:

- Pursuant to the provisions of Article 46 of IVASS Regulation No. 40/2018, as per further FAQs issued by IVASS, as of March 2021 the preparation of the Annual Report on the control of distribution networks has been assigned to the Compliance Function.

In June:

- the second-level organisational unit "Information Systems" was eliminated in light of the establishment within Intesa Sanpaolo Vita S.p.A. of an "IT Pole" also supporting Intesa Sanpaolo Assicura;
- the "Operational Monitoring and Testing" organisational unit, previously reporting to the Head of Operations, was placed as a second-line unit reporting to the "Operations" unit;
- the claims control activities carried out by staff reporting to the Head of "Claims and Litigation" have been reallocated to the second line unit "Operational Technical Supervision", reporting to the first level organisational unit "Claims and Litigation".

In September, the new Head of the Risk Management Function was appointed.

Other aspects of the governance system (Committees, roles of administration and control bodies and core functions) have remained unchanged.

Remuneration system and remuneration policies

The remuneration system and remuneration policies of Intesa Sanpaolo Assicura are in line with the principles described in the section on the Insurance Group.

The Remuneration Report of Intesa Sanpaolo Assicura meets the obligations in Article 5(2)(I) and 42 of the Regulation, as well as Article 59 of the Regulation on reporting to the Shareholders' Meeting concerning 2020 Remuneration and Incentive Policies and the adoption of 2020 Remuneration Policies.

The Remuneration Report was defined on 19 May 2021 by the Board of Directors and approved by Shareholders' Meeting held on the same date.

Operations with shareholders and persons of influence

Intesa Sanpaolo Assicura has:

- with the sole shareholder Intesa Sanpaolo Vita: - outsourcing agreements for the supply of services concerning procurement (Management of purchases of goods and services), Legal and Corporate Affairs, Administration, Management Control, Taxation, Securities and Treasury, Personnel Development and Administration, Personnel Safety, Finance/Investments, Complaints' Management, Organisation, Reinsurance Accounting, General and Support Services, CPI and CQS Portfolio Management, Regulations and Trade Union Relations, Organic Cost Planning, Data Office, ALM, GAF, Management of environmental obligations, IT Security, Management of the Data Protection Officer's obligations, Distribution Monitoring, Capital Management, Tax Controls, Analytics, Performance Monitoring, Studies, Cost Management, Information Systems, besides the control functions already described;
- with its indirect parent company Intesa Sanpaolo - outsourcing agreements for the supply of services relating to Internal Communication, Cybersecurity and Business Continuity Management, Property and Logistics, Operations, Organisation and General Services, Development Policies and Learning Academy, External Relations, Human Resources, Safety, Information Systems, Transformation Center, Company Protection; as well as insurance product distribution agreements.

The Company has not carried out any major transactions during the year with any persons that exercise a considerable influence on the Company or with the members of the executive, management or supervisory bodies.

Self-assessment of the management board

To ensure the sound, prudent management of the company, in particular the effective functioning of its management board, the members of the Board of Directors must meet the integrity, professionalism and independence requirements as contained in the current provisions of law and regulations.

To ensure these requirements were met, including those concerning what is known as the "interlocking ban" (Article 36 of Decree Law 201/2011, converted with amendments by Law no. 214/2011), on 16 March 2021, the Board of Directors in office carried out an annual assessment of the eligibility of its members, with a positive outcome, notified to the Supervisory Authority;

In connection with these assessments all the Directors accepted an obligation to keep the Company regularly updated on any changes in their situations. As no notifications have been

received, all members of the Board of Directors are currently considered to meet the requirements to hold that office.

Secondly, the self-assessment of the Board and the assessment by its internal committees is generally based on a specific analysis of the board's functions, and the work it has actually done during the year. This may be based on quantitative data relating to the number, frequency and duration of its meetings, the recurrence of any topics dealt with and the quantitative information emerging from the documents prepared for examination by the board, as well as the discussions held during the meetings.

It is also necessary to consider whether there is a structured, transparent system of circulating information, and regular flows of communication to enable the board members to have full, constant visibility of all the work done by the Board of Directors.

For this purpose, during 2021 each director in office was sent a questionnaire prepared on the basis that the individual contribution of each director and the frequency of their attendance at meetings are crucial factors with regard to the objective of taking informed, shared decisions.

The answers to the questions, which were collected in aggregate, anonymized form, confirmed that, for 2021:

- the climate within the Board favoured an open, constructive debate among all members, and fostered the contribution of ideas from the diverse experiences, facilitating the adoption of broad-consensus decisions;
- the Board's decision-making process was fuelled by prompt, effective information flows and the minutes of all discussions and resolutions are considered to be complete and accurate;
- the adoption of alternative methods, required by the Covid-19 health emergency, proved suitable to ensure active participation in meetings (the frequency of which has also increased compared to 2020) and full understanding of the topics to be discussed, as well as to allow informed and knowledgeable resolutions to be made;
- the participation of the Company's Core Functions Holders in Board meetings was particularly appreciated, as it fostered a greater and more informed knowledge of corporate risks;
- as part of the Training Plan for Directors, there was a widespread demand for in-depth knowledge of the insurance, *bancassurance* and financial markets topics and an interest in analysing *trends* in the insurance industry.

The analysis, which was presented to the Board of Directors on 17 March 2022, therefore indicated that the overall framework is positive and once again for 2021 the assessment of the composition, functioning and size of the Board of Directors was considered to be adequate.

Fideuram Vita S.p.A.

The organisational structure of Fideuram Vita is defined in accordance with that of the Insurance Group, and confirms the differentiation between the core, staff and business functions.

The Company has adopted the conventional management and control model based on a Board of Directors and a Board of Statutory Auditors, in keeping with the provisions of Articles 2380 and following of the Civil Code.

The Board of Directors appointed during the Shareholders' meeting held on 15 March 2019 and in office until the approval of the Financial Statements at 31 December 2021 comprises 8 members including a Chair, a Vice Chair, a CEO who also holds the office of General Manager.

The Managing Director and General Manager is also the Head of the Life Companies Coordination Area set up in USCI.

All the members of the Board of Directors and the General Manager meet the integrity, professionalism and independence requirements stipulated by current legislation.

The Board of Directors is ultimately responsible for defining the strategies and guidelines concerning risk management and internal controls, and for ensuring that they are adequate and maintained over time in terms of their completeness, functionality and efficiency, in line with the size and specific operations of the company, as well as the nature and intensity of the company's risks. These powers also extend to the outsourced activities.

The Board of Directors of Fideuram Vita operates, at a company and not at an Insurance Group level, with the same powers and responsibilities as the corresponding body within the Parent Company.

It has no internal committees. The Board of Directors has delegated part of its powers to the Chief Executive Officer and the General Director, and determines their powers.

The principal role of the Chief Executive Officer and General Manager is to:

- supervise the management of the company and all the affairs of the Company, representing it before the Market, Institutions and Regulators, conducting relations with the other Intesa Sanpaolo Group Companies;
- ensure that the company's financial, commercial and risk targets are met by defining the commercial, technical insurance, pricing and personnel coordination policies, assuring service quality and business development.

The Board of Statutory Auditors of Fideuram Vita comprises 5 members, of whom 3 standing members including the Chair, and 2 substitute members. They all meet the requirements of integrity, professionalism and independence as stipulated by current legislation.

The Board of Statutory Auditors of Fideuram Vita verifies the adequacy of the organisational, administrative and accounting structure of the Company, and its functioning.

The Board of Statutory Auditors was appointed at the Shareholders' Meeting on 15 March 2019 and was in office until approval of the Financial Statements at 31 December 2021.

Under the limits permitted by Law no. 183/2011, the Company has assigned the Board of Statutory Auditors the prerogatives previously held by the Supervisory Body under Legislative Decree 231/2001.

Fideuram Vita's has adopted an "enhanced" governance system and does not envisage the establishment of its own internal committees, as it relies on the Internal Control and Risk Committee and the Remuneration Committee, which are also established at group level within the USCI. In line with regulatory provisions, the Company has appointed a member of the Board of Directors, adequately competent in risk matters and without delegated powers to monitor the activities, adequacy and proper functioning of the risk management system.

The following management advisory committees are in place:

- the Management Committee, which shares proposals for company strategies and the monitoring of the Company's economic performance, and also for the definition, priorities and

analysis of the progress of main project initiatives. It is also competent for sharing the structure of new products for Product Oversight Governance (POG) purposes, and supports the CEO and General Manager in approving the products plan and substantial changes to it

- the Investment Committee which provides an opinion on the structuring and definition of investment and financial policies, formulating proposals on the operational guidelines to be approved by the Board of Directors. During annual planning, it proposes the capital and income forecasts which may be reviewed during the year. Based on the guidance approved by the Board of Directors, the Committee proposes the performance of activities related to operational and tactical ALM, by implementing investments and monitoring the ALM position of the Company;
- the Risks Committee, which is responsible for supporting Senior Management in defining the Company's risk profiles and the related economic capital levels, monitoring the risk profiles on the basis of data reported by the relevant departments and supporting Senior Management in establishing any corrective strategies.

Members of the Management Committee:

- for Fideuram Vita:
 - Chief Executive Officer and General Manager;
 - Heads of the Core Functions
 - Head of AML;
 - Customer Relations Manager;
 - Head of Sales;
 - Head of the Actuarial, Calculation Processes and Product Development Department;
 - Head of Technical Management;
- for Intesa Sanpaolo Vita:
 - Head of Personnel, Change Management and Sustainability;
 - Head of the Operations and Organisation Area;
 - Head of Organisation;
 - Chief Financial Officer;
 - Head of Planning and Management Control.

The Management Committee is chaired by the CEO and General Manager, and meets at least once every two months.

Members of the Investment Committee:

- for Fideuram Vita:
 - Chief Executive Officer and General Manager;
 - Head of Risk Management;

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- Head of the Actuarial, Calculation Processes and Product Development Department;
 - Head of the Actuarial Function;
 - Head of Managed Products of Fideuram Investimenti;
 - for Intesa Sanpaolo Vita:
 - Chief Financial Officer
 - Head of Planning and Management Control Intesa Sanpaolo Vita and Fideuram Vita
 - Head of Finance and Actuarial Area
 - Head of Line I and Property Investments
 - Head of Managed Products of Fideuram Investimenti

The Investment Committee is chaired by the CEO and General Manager, and meets at least once every three months.

Members of the Risks Committee:

- Chief Executive Officer and General Manager;
- Heads of the Core Functions
- Head of AML;
- Head of Technical Management;
- Head of the Actuarial, Calculation Processes and Product Development Department;
- Head of Sales;
- Customer Relations Manager;
- Chief Financial Officer of Intesa Sanpaolo Vita

The Risks Committee is chaired by the CEO and General Manager, and meets at least once every three months.

In addition, the CEO and General Manager of Fideuram Vita also attend the Insurance Group sessions of the following committees of the USCI: Coordination Committee - Insurance Group and Insurance Group Products session, Investment Committee - Insurance Group Investment Strategies session and board committees of the USCI.

The Company has outsourced the activities of the core functions to Intesa Sanpaolo Vita, as the USCI. Please see the contents of the section on the USCI.

The company has assessed its Governance system as being adequate, compared to the nature, scope and complexity of the risks of the company's activities in 2021.

Coordination between the executive and supervisory bodies and key functions

The Company considers the governance of information flows as a fundamental factor, so that it may achieve efficient management and effective controls, and value the different levels of responsibility within the company organisation. The Company ensures, as required by the Company's Regulations, the constant, timely and extensive distribution of information among corporate bodies, board committees, core functions, functions that carry out control activities and other entities concerned, as well as supplementary pension products, complying with the various competences of bodies with supervision and control functions.

The Board of Directors acknowledges the importance of risk and control management, and from this perspective, it ensures constant and worthwhile interaction, also through the activities of its committees with entities concerned and in particular with the Core and Control Functions.

The Chairman of the Board of Directors ensures that board activities take place guaranteeing appropriate communication flows regarding the times and contents, with the Core Functions, Board Committees and managerial committees. Adequate minutes are taken of board meetings, which report on evidence presented and analysed, discussions taking place, decisions taken, actions to take and updates concerning previous decisions made.

The Management Board is assisted by the Core Functions that take part in board meetings, if requested, considering the specific issues addressed. The Board is also advised on individual matters concerning the internal control system.

Changes to the system of Governance

During 2021 the following changes were made to the company's governance system:

- Pursuant to the provisions of Article 46 of IVASS Regulation No. 40/2018, as per further FAQs issued by IVASS, as of March 2021 the preparation of the Annual Report on the control of distribution networks has been assigned to the Compliance Function;
- the new Head of the Actuarial Function and the new Head of the Customer Relations Unit were appointed.

Other aspects of the governance system (Committees, roles of administration and control bodies and core functions) have remained unchanged.

Remuneration system and remuneration policies

The remuneration system and remuneration policies of Fideuram Vita are in line with the principles described in the section on the Insurance Group.

The Remuneration Report of Intesa Fideuram Vita meets the obligations in Article 5(2)(l) and 42 of the Regulation, as well as Article 59 of the Regulation on reporting to the Shareholders' Meeting concerning 2021 Remuneration and Incentive Policies and the adoption of 2020 Remuneration Policies.

The Remuneration Report was defined on 17 May 2021 by the Board of Directors and approved by Shareholders' Meeting held on the same date.

Operations with shareholders and persons of influence

Fideuram Vita has:

- outsourcing agreements in place with the USCI Intesa Sanpaolo Vita (which has no majority shareholdings in Fideuram Vita but which exercises management and coordination) for the supply of services concerning Procurement, Support for management, Regulations and trade union relations, Planning and organic costs, Personnel management, GAF, Corporate Secretarial activities, Personnel Security and Management of the Environmental Officer's obligations, Management of the DPO Officer's obligations, Anti-money laundering, Finance and Investments related to separate management assets and own portfolio, Capital Management, IT Security, Information Systems, Taxation and Tax Controls, Actuarial Models Management, Sustainability, Organisation, Statutory Reserves, Financial Reporting and Solvency, Securities and Treasury, Data Office, Cost Management, Technical Accounting, General Accounting, Planning and Management Control, as well as the control functions already described;
- agreements in place with the shareholder Intesa Sanpaolo Private Banking, for the distribution of insurance products;
- outsourcing agreements in place with the shareholder Intesa Sanpaolo for the supply of services relating to Procurement, Cybersecurity and Business Continuity Management, Property and Logistics, Operations, Organisation and General Services, Development Policies and Learning Academy, Safety, Information Systems, Transformation Center, Company Protection, Human Resources, *Risk Management*.

Self-assessment of the management board

To ensure the sound, prudent management of the company, in particular the effective functioning of its management board, the members of the Board of Directors must meet the integrity, professionalism and independence requirements as contained in the current provisions of law and regulations.

To ensure these requirements were met, including those concerning what is known as the "interlocking ban" (Article 36 of Decree Law 201/2011, converted with amendments by Law no. 214/2011), on 8 April 2021, the Board of Directors in office carried out an annual assessment of the eligibility of its members, with a positive outcome, notified to the Supervisory Authority.

In connection with these assessments all the Directors accepted an obligation to keep the Company regularly updated on any changes in their situations. As no notifications have been received, all members of the Board of Directors are currently considered to meet the requirements to hold that office.

The self-assessment of the Board and the assessment by its internal committees is generally based on a specific analysis of the board's functions, and the work it has actually done during the year. This may be based on quantitative data relating to the number, frequency and duration of its meetings, the recurrence of any topics dealt with and the quantitative information emerging from the documents prepared for examination by the board, as well as the discussions held during the meetings.

It is also necessary to consider whether there is a structured, transparent system of circulating information, and regular flows of communication to enable the board members to have full, constant visibility of all the work done by the Board of Directors.

For the above reasons, each Director in office in 2021 received a questionnaire for an analytical self-assessment concerning 2020, as in depth as possible, based on international methodologies and best practices.

In particular, the self-assessment process comprises a procedure which entailed:

- the USCI's Corporate Organisational Unit preparing the questionnaire, with sections for self-analysis of the structure, functioning, efficiency and areas for improvement of the board, identifying conventional parameters in order to measure the degree of adequacy, priorities of any corrective actions and identify directors' perception of the analysis elements in the questionnaire;
- sharing the questionnaire with the Chairman;
- individual Directors compiling the questionnaire anonymously, with the chance to make observations or recommendations;
- the quantitative and qualitative analysis of replies, by the Chairman, assisted by the Secretary of the Board of Directors;
- sending the questionnaire analysis results to all Board Directors and Auditors, and presenting the analyses carried out to the Board meeting of 16 March 2022;
- the Board of Directors giving an opinion on the composition and functioning of the Board, overall.

Intesa Sanpaolo Life D.A.C

The organisational structure of Intesa Sanpaolo Life is defined in accordance with that of the Insurance Group, and confirms the differentiation between the control, staff and business functions.

The insurance company is an Irish law company (New Companies Act 2014) and is licensed and regulated by the Central Bank of Ireland.

At 31 December 2021, the Board of Directors of Intesa Sanpaolo Life comprised seven members (one executive director, three independent non-executive directors and three group non-executive directors).

All the members of the Board of Directors meet the integrity, professionalism and independence requirements stipulated by current legislation.

The Board of Directors of Intesa Sanpaolo Life is ultimately responsible for defining the strategies and guidelines concerning the business, risk management and internal controls, to ensure they are adequate and maintained over time in terms of their completeness, functionality and efficiency, in line with the size and specific operations of the Company, as well as the nature and intensity of the company's risks. These powers also extend to the outsourced activities.

The Board of Directors of the company is ultimately responsible for compliance with directly applicable national and European legislative and regulatory provisions.

In fulfilling its mandate the Board of Directors is assisted by various board committees, each of which has its own roles and responsibilities which are reviewed at least once a year. In any case, the Board of Directors is kept updated at all times on the work of each committee, in reports which allow it to maintain appropriate supervision. Each committee is chaired by an independent, non-executive director appointed by the Board of Directors.

The Board of Directors of Intesa Sanpaolo Life has formed the following internal committees:

- Audit & Reporting (Audit & Reporting Committee): this committee has a preparatory, advisory role, assisting the Board of Directors with the process of financial reporting, the accuracy and integrity of the company's financial statements; It supervises the internal control systems and activities in relation to events that expose the company to significant risks and exercises its duty to make recommendations to the Board on the options available to it regarding the external auditors (hiring auditors, determining their fees, supervising their work and terminating the contract if necessary). It also supervises the financial reporting process, provides analysis to the Board of Directors, monitors the work of the company's internal audit function, and receives reports. The Audit & Reporting Committee has its own operations committee, named the IT & Cyber Committee, tasked with preparing, monitoring and proposing mitigation solutions in the ICT security and Cyber risk environment;
- Investment & Product Committee: it proposes the policies for managing investment risk and investments in derivatives, to the Board of Directors and ensures that the investments, both those of the company and those relating to unit-linked and index-linked policies, are managed in accordance with these policies. In submitting the approval of products to the Board of Directors, the Committee gives an opinion on the adequacy of the product in meeting product governance regulations issued by the applicable authorities, with particular care taken to review and identify any impacts of a material nature that can affect the *modus vivendi* of the Company. The Investments and Products Committee has set up another two operational committees: an Operational Investment Committee which is responsible for implementing the policies of the Board of Directors and the strategy relating to investments by the company, as well as a Products Committee (OPGC) which has to implement the product governance policies authorised by the Board of Directors and by the Investment & Product Committee in accordance with European, Italian and Spanish regulations on product governance, and the regulations of the local regulator;
- Risk & Compliance Committee: advises the Board of Directors on the efficiency of the strategies and policies, the degree of risk appetite and tolerance which is appropriate in view of the future strategy and financial positioning of the company. The Committee also supervises compliance with the applicable regulations, the company's AML programme, and compliance with *data protection* laws.

The Remuneration Committee of the Parent Company also evaluates the remuneration of the CEOs of the Insurance Group companies, both Italian and foreign, thus including Intesa Sanpaolo Life, and checks that the remuneration policies adopted by the insurance Group companies are cohesive. The appointment of the key personnel of the company, and the members of the board of directors, is made under recommendation of the committees of the Intesa Sanpaolo Group and of the Insurance Group but the resolution is made by the Company.

The Board of Directors has put in place an effective Risk Management system which is supervised by the Head of Risk Management (CRO). The Head of Risk Management (CRO) is an employee of the company who reports directly to the Board of Directors. Assisted by a Risk Management team, the CRO ensures that the risk management system is an integral part of the company's strategy and decision-making processes. The key responsibilities include assisting the Board of Directors in relation to:

- preparation of the risks register;
- maintaining the definition of the risk appetite;
- elaborating appropriate risk management policies;

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- management of the ORSA process;
 - risk monitoring and reporting;
 - calculation of the Solvency Capital Requirement and the Minimum Capital Requirement.

The Head of Risk Management (CRO) attends the meetings of the Risk & Compliance Committee. The CRO also attends, as permanent attendee, the meetings of the Investment & Product Committee and the Audit & Reporting Committee.

The main activities of the Head of Risk Management (CRO) are summarised in this function's Terms of Reference.

The Compliance Function plays a fundamental role in ensuring that the company complies with the regulatory and legal requirements specific to Ireland, and in general, that it complies with the laws in countries in which it invests its policies in order to ensure that the business objectives are reached in accordance with all legal requirements. In addition to oversight of company compliance, the Compliance function supervises AML/CTF activities and ensures the conformity of corporate conduct to Fatca\CRS regulations. The overall architecture of the risk management and control system regarding privacy is overseen by the Compliance Function, with the head that is also the Data Protection Officer.

The Compliance Function is part of the second line of defence of the Company's governance and control model.

The Head of Compliance (HoC) attends the meetings of the Risk & Compliance Committee. He/she also takes part as Chairman of meetings of the Products sub-committee (OPGC) and on request attends the meetings of the Investment & Product Committee and Audit & Reporting Committee.

The main activities of the Head of Compliance (HoC) are summarised in this function's Terms of Reference.

The head of the Actuarial Function is supervised directly by the Board of Directors in order to guarantee independence in control activities. The roles and responsibilities are in line with the structure in force at the Parent Company and correspond to the specific requirements of the Local Regulator.

The Head of Actuarial Function performs their duties in accordance with the Solvency II regulations. The Head of the Actuarial Function produces a report at least once a year for the Board of Directors (the Actuarial Function Report which includes the Actuarial Report on Technical Provisions). The report summarises all the main activities overseen by the Actuarial Function, including, where necessary, identifying any shortcomings in the governance system. It also provides recommendations on how these deficiencies can be resolved. The main activities of the Actuarial Function are summarised in the function's Terms of Reference (they correspond to the provisions of the Domestic Actuarial Regime) and include an assessment of the adequacy of the models and data used to calculate the Technical Provisions (Actuarial Report on Technical Provisions), and provide an opinion on the underwriting, reinsurance and ORSA process of the Company.

In addition, the Head of Actuarial gives an annual Actuarial Opinion on Technical Provisions to the Central Bank of Ireland, which contains an opinion about the adequacy of the technical provisions according to Solvency II.

The head of the Actuarial Function is supervised directly by the Board of Directors in order to guarantee independence in control activities. The roles and responsibilities are in line with the structure in force at the Parent Company and correspond to the specific requirements of the Local Regulator.

Internal Audit holds the critical role of the third line of defence in implementing the three lines of the governance and control model.

Audit operations have been outsourced to the Insurance parent company. The company guarantees an efficient, independent Audit function through the supervision of the Board of Directors, especially through the directions indicated by the Audit and Reporting Committee. The Head of the Audit Function is a permanent attendee at the meetings of the Audit and Reporting Committee, and regularly meets its Chair (an independent non-executive director), at separate meetings. The Head of the Audit Function presents the annual audit plan to the Board of Directors. The audit plan also takes into account any input from the Board of Directors. The Head of the Audit Function can also include areas of investigation in the Audit plan, to guarantee the independence of the internal audit process.

The Audit & Reporting Committee and the Board of Directors are regularly updated on the work done and on the progress of any corrective actions implemented by the relevant units.

The company has assessed its Governance system as being adequate, compared to the nature, scope and complexity of the risks of the company's activities in 2021.

Coordination between the executive and supervisory bodies and key functions

The Company considers the governance of information flows as a fundamental factor, so that it may achieve efficient management and effective controls, and value the different levels of responsibility within the company organisation. The Company ensures, as required by the Company's Regulations, the constant, timely and extensive distribution of information among corporate bodies, board committees, core functions, functions that carry out control activities and other entities concerned, as well as supplementary pension products, complying with the various competences of bodies with supervision and control functions.

The Board of Directors acknowledges the importance of risk and control management, and from this perspective, it ensures constant and worthwhile interaction, also through the activities of its committees with entities concerned and in particular with the Core and Control Functions.

The Chairman of the Board of Directors ensures that board activities take place guaranteeing appropriate communication flows regarding the times and contents, with the Core Functions, Board Committees and managerial committees. Adequate minutes are taken of board meetings, which report on evidence presented and analysed, discussions taking place, decisions taken, actions to take and updates concerning previous decisions made.

The Management Board is assisted by the Core Functions that take part in board meetings, if requested, considering the specific issues addressed. The Board is also advised on individual matters concerning the internal control system.

Changes to the system of Governance

The company did not make any substantial changes to its governance system during the period.

Remuneration system and remuneration policies

The remuneration system and remuneration policies of Intesa Sanpaolo Life are in line with the principles described in the section on the Insurance Group.

Operations with shareholders and persons of influence

Intesa Sanpaolo Life has outsourcing agreements with the parent company Intesa Sanpaolo Vita for the supply of services concerning application user licences and audit activities.

The company did not carry out any major transactions during the year 2020 with any persons that exercise a considerable influence on the company or with the members of the management, executive or supervisory boards.

Self-assessment of the management board

The 2021 assessment of the Board of Directors was conducted by an independent, external company, in compliance with indications in the Corporate Governance Code. The Chairman, assisted by the external company, will present the results to the Board in the first half of 2020. Overall the assessment of previous years was positive, with minor aspects for improvement, in the governance plan.

Intesa Sanpaolo RBM Salute S.p.A.

The organisational structure of Intesa Sanpaolo RBM Salute is defined in accordance with that of the Insurance Group, and confirms the differentiation between the control, staff and business functions.

The Company has adopted the conventional management and control model based on a Board of Directors and a Board of Statutory Auditors, in keeping with the provisions of Articles 2380 and following of the Civil Code.

The Board of Directors of Intesa Sanpaolo RBM Salute appointed by the ordinary Shareholders' meeting of 24 January 2022 and in office until the approval of the Financial Statements at 31 December 2023 comprises 7 members including a Chair and a CEO, who also holds the office of General Manager.

All the members of the Board of Directors and the General Manager meet the integrity, professionalism and independence requirements stipulated by current legislation.

The Board of Directors of Intesa Sanpaolo RBM Salute is ultimately responsible for defining the strategies and guidelines concerning risk management and internal controls, and for ensuring that they are adequate and maintained over time in terms of their completeness, functionality and efficiency, in line with the size and specific operations of the company, as well as the nature and intensity of the company's risks. These powers also extend to the outsourced activities.

The Board of Directors of the company is ultimately responsible for compliance with directly applicable national and European legislative and regulatory provisions.

The Board of Directors of Intesa Sanpaolo RBM Salute operates, at a company and not at an Insurance Group level, with the same powers and responsibilities as the corresponding body within the Parent Company.

The principal role of the Chief Executive Officer and General Manager is to:

- supervise the management of the company and all the affairs of the Company, representing it before the Market, Institutions and Regulators, conducting relations with the other Intesa Sanpaolo Group Companies;
- ensure that the Company's financial, commercial and risk targets are met by defining the commercial, technical insurance, pricing and personnel coordination policies, assuring service quality and business development.

The Board of Statutory Auditors of Intesa Sanpaolo RBM Salute, in office at 31 December 2021 was appointed during the Shareholders' Meeting of 11 May 2020 and comprises 5 members, of whom 3 standing members, appointed by the Chair, and two substitute members, who all meet the requirements of integrity, professionalism and independence as stipulated by current legislation.

The Board of Statutory Auditors of Intesa Sanpaolo RBM Salute verifies the adequacy of the organisational, administrative and accounting structure of the Company, and its functioning.

Under the limits permitted by Law no. 183/2011, the Company has assigned the Board of Statutory Auditors the prerogatives previously held by the Supervisory Body under Legislative Decree 231/2001.

Intesa Sanpaolo RBM Salute's Governance system is the "enhanced" one and does not provide for the establishment of its own board committees, as it can make use of those established within the Insurance Group, without necessarily having to replicate them within the individual Company; in particular, the Company relies on:

- the Internal control and risks Committee established at an Insurance Group level with the USCI (being suitable for adequate oversight of the specific risk profile of Intesa Sanpaolo RBM Salute): the Board of Directors, in compliance with Article 17 paragraph 3 of IVASS Regulation no. 38/2018, has appointed one of its members, suitably competent in the field and without delegated powers, to monitor the activities, adequacy and proper functioning of the risk management system, in order to report its findings to the Board of Directors, which is ultimately responsible for it;
- the Remuneration Committee, set up within the Insurance Group within the USCI.

There are 3 advisory committees:

- the Management Committee, whose objective is to discuss proposals for determining company strategies and for monitoring the company's economic trends, as well as discussing the structure of new products, monitoring their launch plan, and for defining, prioritising and verifying the progress of key projects;
- the Outsourcing Monitoring Committee, which is responsible for assisting the CEO in monitoring the progress of contractual SLAs with intragroup and non-group outsourcers and analysing the cases of any KPIs that are not met, evaluating the related remediation plan.
- the Risks Committee, which is responsible for assisting the CEO in defining the Company's risk profiles and the related economic capital levels, monitoring the risk profiles on the basis of data reported by the relevant departments and supporting Senior Management in establishing any corrective strategies.

Members of the Management Committee:

- for Intesa Sanpaolo RBM Salute:
 - Chief Executive Officer and General Manager;
 - Heads of the Core Functions;
 - Heads of the first-line Organisational Units
- for Intesa Sanpaolo Vita:
 - Head of the Operations and Organisation Area;
 - Head of Organisation;
 - Head of Legal and Corporate Affairs and Complaints;
 - Head of Personnel, Change Management and Sustainability.

The following are on the Outsourcing Monitoring Committee:

- for Intesa Sanpaolo RBM Salute:
 - Chief Executive Officer and General Manager;
 - Head of Administration, Planning and Control;
 - Head of Operations;
 - Head of Outsourcing Oversight;
 - Head of Portfolio;
 - Head of Claims.
- Chief Information Officer and Chief Operating Officer of Previmedical;
- Organisation of Intesa Sanpaolo Vita.

Members of the Risks Committee:

- Chief Executive Officer and Director-General;
- Heads of the Core Functions;
- Heads of the first-line Organisational Units;

In addition, the CEO and General Manager also attend the Insurance Group sessions of the following committees of the USCI: Coordination Committee - Insurance Group and Insurance Group Products session, board committees of the USCI.

The Company has outsourced the activities of the core functions to Intesa Sanpaolo Vita, as the USCI. Please see the contents of the section on the USCI.

The Company has deemed its *governance* system to be compliant with the principles set out in the Guidelines on the Corporate Governance System of Intesa Sanpaolo RBM Salute S.p.A. and, taking into account the improvement actions undertaken with regard to the internal control system, the organisational structure and the risk management system, close to adapting it to the nature, scope and complexity of the risks inherent in the activities carried out by the company in the financial year 2021.

Coordination between the executive and supervisory bodies and key functions

The Company considers the governance of information flows as a fundamental factor, so that it may achieve efficient management and effective controls, and value the different levels of responsibility within the company organisation. As required by Company Regulations, the Company ensures the constant, timely and extensive distribution of information among corporate bodies, board committees, core functions, functions that carry out control activities and other entities concerned, complying with the various competences of bodies with supervision and control functions.

The Board of Directors acknowledges the importance of risk and control management, and from this perspective, it ensures constant and worthwhile interaction, also through the activities of its committees with entities concerned and in particular with the Core and Control Functions.

The Chairman of the Board of Directors ensures that board activities take place guaranteeing appropriate communication flows regarding the times and contents, with the Core Functions, Board Committees and managerial committees. Adequate minutes are taken of board meetings, which report on evidence presented and analysed, discussions taking place, decisions taken, actions to take and updates concerning previous decisions made.

The Management Board is assisted by the Core Functions that take part in board meetings, if requested, considering the specific issues addressed. The Board is also advised on individual matters concerning the internal control system.

Changes to the system of Governance

The changes to the organisational structure in 2021, which are described below, pertain to:

- the elimination of the second line unit 'ICT', in light of:
 - i) the establishment within Intesa Sanpaolo Vita S.p.A. (hereinafter also referred to as "Intesa Sanpaolo Vita"), as the Ultimate Italian Parent Company of the Intesa Sanpaolo Vita Insurance Group, of an "IT Pole" which will also support the Company through application and technological upgrades for *business* development purposes and to ensure optimal service levels to customers, distributors and *back office* users;
 - ii) the consequent outsourcing of the related activities to Intesa Sanpaolo Vita, pursuant to a specific service agreement, as set forth in item 6 below;
- the establishment of two new third-line units reporting to the second-line "Claims" unit, called "Claims settlement management" and "Operational Technical Supervision" (responsible for managing the specialist physicians, the joint commissions with the main funds and for monitoring the main *key performance indicators (KPIs)* of the Claims unit), which would take over the management of the network, previously allocated to the Claims unit, following the internalisation of the complex claims management activities previously carried out by an *outsourcer*, as from March 2021;
- the creation of a new second-line unit called "Customer Management", reporting to the first-line "Operations" unit, with the aim of strengthening supervision of issues relating to the protection of interests and the quality of customer relations; the unit is dedicated to monitoring

the effectiveness of processes for resolving issues highlighted by customers through internal, benchmark and customer satisfaction analysis and feedback.

Remuneration system and remuneration policies

The remuneration system and remuneration policies of Intesa Sanpaolo RBM Salute in line with the principles described in the section on the Insurance Group.

The Remuneration Report of Intesa Fideuram Vita meets the obligations in Article 5(2)(l) and 42 of the Regulation, as well as Article 59 of the Regulation on reporting to the Shareholders' Meeting concerning 2021 Remuneration and Incentive Policies and the adoption of 2020 Remuneration Policies.

The Remuneration Report was defined on 18 May 2021 by the Board of Directors and approved by the Shareholders' Meeting held on the same date.

Operations with shareholders and persons of influence

Intesa Sanpaolo RBM Salute has:

- outsourcing agreements in place with the majority shareholder Intesa Sanpaolo Vita for the supply of services relating to Procurement (Management of goods and services' procurement), Legal & Corporate Affairs, Complaints Management, Organisation, Securities Management, IT Security management, Human Resources management, Personnel Safety management, as well as the activities of the control functions as already described;
- outsourcing agreements in place with the indirect parent company Intesa Sanpaolo for the supply of services relating to Internal Communication, Cybersecurity and Business Continuity Management, Property and Logistics, Operations, Organisation and General Services, Development Policies and Learning Academy, External Relations, Human Resources, Safety, Information Systems, Transformation Center, Company Protection.

Self-assessment of the management board

To ensure the sound, prudent management of the company, in particular the effective functioning of its management board, the members of the Board of Directors must meet the integrity, professionalism and independence requirements as contained in the current provisions of law and regulations.

To ensure these requirements were met, including those concerning what is known as the "interlocking ban" (Article 36 of Decree Law 201/2011, converted with amendments by Law no. 214/2011), the Board of Directors in office since 24 January 2022 assessed, during the board meetings of 11 February 2022 and 17 March 2022, the eligibility of newly appointed members, with a positive outcome, notified to the Supervisory Authority.

In connection with these assessments all the Directors accepted an obligation to keep the Company regularly updated on any changes in their situations. As no notifications have been received, all members of the Board of Directors are currently considered to meet the requirements to hold that office.

Secondly, the self-assessment of the Board and the assessment by its internal committees is generally based on a specific analysis of the board's functions, and the work it has actually done

during the year. This may be based on quantitative data relating to the number, frequency and duration of its meetings, the recurrence of any topics dealt with and the quantitative information emerging from the documents prepared for examination by the board, as well as the discussions held during the meetings.

It is also necessary to consider whether there is a structured, transparent system of circulating information, and regular flows of communication to enable the board members to have full, constant visibility of all the work done by the Board of Directors.

For the above purposes, a questionnaire relating to the year 2021 was sent to each Director appointed on 24 January 2022 who held office for at least part of the year 2021, prepared along the same lines as the questionnaire relating to 2020 and therefore taking into account that:

- the individual contribution of each director and the frequency of their attendance at meetings are crucial factors with regard to the objective of taking informed, shared decisions;
- in view of the continuing health emergency caused by Covid-19, board meetings were mainly held remotely and continued to deal with some items on the agenda without illustrating them but rather responding to questions and requests for clarification submitted in advance by the Directors and Statutory Auditors.

In particular, the self-assessment process comprises a procedure, completed on 17 March 2022, which entailed:

- the USCI's Corporate Organisational Unit preparing the questionnaire, with sections for self-analysis of the structure, functioning, efficiency and areas for improvement of the board, by identifying conventional parameters in order to measure the degree of adequacy, priorities of any corrective actions and identify directors' perception of the analysis elements in the questionnaire;
- sharing the questionnaire with the Chairman;
- individual Directors compiling the questionnaire anonymously, with the chance to make observations or recommendations;
- the quantitative and qualitative analysis of replies, by the Chairman, assisted by the Secretary of the Board of Directors;
- sending the questionnaire analysis results to all Board Directors and Auditors, and presenting the analyses carried out to the Board meeting of 17 March 2022;
- the Board of Directors giving an opinion on the composition and functioning of the Board, overall.

Cargeas Assicurazioni S.p.A.

The organisational structure of Cargeas is defined in accordance with the organisational structure of the Insurance Group and the USCI, which have been entrusted with some operational activities through specific service contracts.

The structure has a clear division and appropriate separation of responsibilities of bodies and functions, as shown by the company's organisation chart and function chart.

The organisational structure is defined in such a way that tasks and responsibilities are clearly and appropriately allocated and any significant organisational changes and their underlying reasons are communicated to the Supervisory Authority; adequate decision-making processes are

adopted and formalised and the functions are segregated appropriately within the organisational structure.

On the basis of the Company's structure and risk/complexity profile, following the self-assessment process carried out pursuant to IVASS Letter to the Market of 5 July 2018, Cargeas has identified, by merely applying the quantitative parameter, an "enhanced" corporate governance structure, as defined and qualified in the aforementioned Letter to the market, also choosing, as permitted under said letter, to make use of the controls set up within the USCI without necessarily having to replicate them at the individual Company level.

Therefore, Cargeas has adopted the following organisational model:

- the Chairman of the Board of Directors of the Company has a non-executive role and does not perform management functions;
- the establishment of Core Functions in the form of a specific organisational unit;

from an organisational point of view, the Company benefited from its being part of the Insurance Group, which allowed it not to set up the Internal Control and Risk Committee and the Remuneration Committee, since these functions are carried out by the corresponding Group Committees set up within the USCI. Since the internal control and risk committee has not been established, the Company has identified a member of the Board responsible for risk in order to adequately monitor the specific risk profile of the subsidiary.

The Governance system comprises 3 advisory committees:

- The Management Committee, whose objective is to discuss proposals for determining company strategies and for monitoring the company's economic trends, as well as for prioritising and verifying the progress of key projects;
- The Investment Committee, whose aim is to discuss the investment strategies and financial policies that were defined in the Group Investment Strategies session of the Intesa Sanpaolo Vita Investment Committee. It suggests, in conjunction with the Delegated Manager, the guidelines for tactical operations to be submitted for approval by the Board of Directors.
- The Risks Committee, which is responsible for supporting the CEO in defining the Company's risk profiles and the related economic capital levels, monitoring the risk profiles on the basis of data reported by the relevant departments and supporting Senior Management in establishing any corrective strategies and sharing the financial, operational and technical assumptions for the Solvency II processes.

Members of the Management Committee:

- Chief Executive Officer and General Manager;
- Heads of the Core Functions;
- Heads of the first-line Organisational Units

Members of the Investment Committee:

- Chief Executive Officer and General Manager
- Head of Administration and Reporting
- Risk Management Manager
- Head of Actuarial Function

Members of the Risks Committee:

- Chief Executive Officer and Director-General;
- Heads of the Core Functions;
- Heads of the Organisational Units Technical Management and Operations and Administration and Reporting.

In addition, the CEO and General Manager also attend the Insurance Group sessions of the following committees of the USCI: Coordination Committee - Insurance Group and Insurance Group Products session.

The Company has outsourced the activities of the core functions to Intesa Sanpaolo Vita, as the USCI. Please see the contents of the section on the USCI.

The company has assessed its Governance system as being adequate, compared to the nature, scope and complexity of the risks of the company's activities in 2020.

Coordination between the executive and supervisory bodies and key functions

The Company considers the governance of information flows as a fundamental factor, so that it may achieve efficient management and effective controls, and value the different levels of responsibility within the company organisation. As required by Company Regulations, the Company ensures the constant, timely and extensive distribution of information among corporate bodies, board committees, core functions, functions that carry out control activities and other entities concerned, complying with the various competences of bodies with supervision and control functions.

The Board of Directors acknowledges the importance of risk and control management, and from this perspective, it ensures constant and worthwhile interaction, also through the activities of its committees with entities concerned and in particular with the Core and Control Functions.

The Chairman of the Board of Directors ensures that board activities take place guaranteeing appropriate communication flows regarding the times and contents, with the Core Functions, Board Committees and managerial committees. Adequate minutes are taken of board meetings, which report on evidence presented and analysed, discussions taking place, decisions taken, actions to take and updates concerning previous decisions made.

The Management Board is assisted by the Core Functions that take part in board meetings, if requested, considering the specific issues addressed. The Board is also advised on individual matters concerning the internal control system.

Changes to the system of Governance

Changes to the organisational structure in 2021 were designed to bring the Company closer to the organisational model of the USCI and of the other Insurance Group companies, with a simplification that involved the gradual outsourcing to the USCI of Purchasing, Cost Management, GAF, Investments, Performance Monitoring, Planning and Control and General Services activities and the consequent elimination of the Organisational Units dedicated to those activities.

Remuneration system and remuneration policies

The remuneration system and remuneration policies of Cargeas Assicurazione for 2021 have been aligned with the principles described in the section on the Insurance Group, as of its inclusion within the Group.

The Remuneration Report of Cargeas Assicurazioni meets the obligations in Article 5(2)(l) and 42 of the Regulation, as well as Article 59 of the Regulation on reporting to the Shareholders' Meeting concerning 2021 Remuneration and Incentive Policies and the adoption of 2020 Remuneration Policies.

The Remuneration Report was defined on 27 May 2021 by the Board of Directors and approved by the Shareholders' Meeting held on the same date.

Operations with shareholders and persons of influence

During the financial year, transactions with related parties took place at arm's length and were carried out by the Company in compliance with supervisory regulations.

Self-assessment of the management board

To ensure the sound, prudent management of the company, in particular the effective functioning of its management board, the members of the Board of Directors must meet the integrity, professionalism and independence requirements as contained in the current provisions of law and regulations.

To ensure these requirements were met, including those concerning what is known as the "interlocking ban" (Article 36 of Decree Law 201/2011, converted with amendments by Law no. 214/2011), the Board of Directors in office since 11 May 2020 assessed, on the same date, the eligibility of newly appointed members, with a positive outcome, notified to the Supervisory Authority.

In connection with these assessments all the Directors accepted an obligation to keep the Company regularly updated on any changes in their situations. As no notifications have been received, all members of the Board of Directors are currently considered to meet the requirements to hold that office.

Secondly, the self-assessment of the Board and the assessment by its internal committees is generally based on a specific analysis of the board's functions, and the work it has actually done during the year. This may be based on quantitative data relating to the number, frequency and duration of its meetings, the recurrence of any topics dealt with and the quantitative information emerging from the documents prepared for examination by the board, as well as the discussions held during the meetings.

It is also necessary to consider whether there is a structured, transparent system of circulating information, and regular flows of communication to enable the board members to have full, constant visibility of all the work done by the Board of Directors.

For this purpose, each Director was sent a questionnaire for the period from 27 May to 31 December 2021, i.e. from the date of their appointment. The questionnaire was prepared on the basis that the individual contribution of each Director and the frequency of their attendance at meetings are crucial factors with regard to the objective of taking informed, shared decisions.

The answers to the questions, which were collected in aggregate, anonymized form, have confirmed that, for the reporting period:

the climate within the Board of Directors favoured an open, constructive debate among all members, and fostered the contribution of ideas from the diverse experiences, facilitating the adoption of broad-consensus decisions;

- the Board's decision-making process was fuelled by prompt, effective information flows and the minutes of all discussions and resolutions are considered to be complete and accurate;
- the adoption of alternative methods, required by the Covid-19 health emergency, was considered suitable to ensure active participation in meetings and full understanding of the topics to be discussed, as well as to allow informed resolutions to be made;
- the training sessions, provided pursuant to Article 5(2)(v) of IVASS Regulation no. 38/2018, were appreciated in terms of frequency, duration, trainers and the topics addressed.

The analysis, which was presented to the Board of Directors on 15 March 2022, therefore indicated that the overall framework is positive and the assessment of the composition, functioning and size of the Board of Directors was considered to be adequate.

B.2 COMPETENCE AND INTEGRITY REQUIREMENTS

Intesa Sanpaolo Vita Insurance Group

During the Board meeting on 4 August 2021 Intesa Sanpaolo Vita approved the "Policy for identifying and assessing the eligibility for office requirements", also drawn up for the USCI pursuant to art. 71(2)(p) of IVASS Regulation no.38/2018

This policy governs the terms and conditions under which the Company carries out its assessment of fitness for office:

- of individuals in roles of administration, management and control;
- of board committee members;
- of the managers and staff of the Core Functions (Audit, Risk Management, Compliance, Actuarial) of ISV and the ISV Group;
- of the Head of the Anti money-laundering Function;
- of the Head of suspicious activity reporting;
- of the Chief Risk Officer and the Chief Compliance Officer where appointed;
- of the Data Protection Officer (DPO)
- of the Retail manager, where appointed;

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- of any other key ISV and ISV Group personnel that may be identified (where key means personnel capable of significantly affecting the risk profile of ISV and the ISV Group);
 - of the Heads of pension schemes;
 - of the representative Bodies of open-end collective undertakings.

For all of these roles, the Policy provides for specific criteria of integrity, professionalism and independence to be submitted for assessment by the Board of Directors at the time of appointment and subsequently at least once a year or in the event of change in the situations covered by the declaration.

The Group Companies implemented this document during the course of their board meetings.

Intesa Sanpaolo Vita S.p.A.

See above.

Intesa Sanpaolo Assicura S.p.A.

At the board meeting on 16 March 2021, Intesa Sanpaolo Assicura S.p.A. adopted its "Policy for identifying and assessing fitness for office requirements", prepared in accordance with Article 5(2)(n) of IVASS Regulation no. 38/2018, after implementing the same Policy issued by the USCI in accordance with Article 71(2)(p) of the same regulation.

These policies are issued and reviewed at least once a year.

Refer to the details of the section on the Insurance Group.

Fideuram Vita S.p.A.

During the board meeting of 15 March 2021, Fideuram Vita implemented the "Policy for identifying and assessing fitness for office requirements" of Intesa Sanpaolo Vita as the USCI and adopted its own "Policy for identifying and assessing fitness for office requirements".

These policies are issued and reviewed at least once a year.

Refer to the details of the section on the Insurance Group.

Intesa Sanpaolo Life D.A.C.

The rules on assessing the criteria for fitness for office are prepared in accordance with the instructions contained in the code of corporate governance, and with the same document issued by Intesa Sanpaolo Vita, Parent Company of the Insurance Group, which has been adopted by the Board of Directors of Intesa Sanpaolo Life.

These rules conform to the Fitness and Probity Standards of the Central Bank of Ireland. The policy is reviewed and approved by the Board of Directors at least once a year.

According to the Central Bank of Ireland, the specific expertise required for key functions depends on the role, but will traditionally relate to some or all of the following areas:

- the insurance and financial market;

-
- strategy and business models;
 - governance systems;
 - actuarial and financial analysis;
 - the regulatory framework and legal requirements.

The Central Bank of Ireland requires due diligence on all persons within the Company who hold key positions, and reserves the power to approve their appointments, continually check requirements and declare a loss of eligibility.

Under Irish law, due diligence is intended to demonstrate that persons in key positions:

- are competent and capable;
- are honest and conduct themselves in an ethical, honourable way;
- are financially stable.

CBI has approved the appointments of all the managers of key functions and senior managers.

For further details refer to the section on the Insurance Group.

Intesa Sanpaolo RBM Salute S.p.A.

At the board meeting on 16 March 2021, Intesa Sanpaolo RBM Salute adopted its "Policy for identifying and assessing fitness for office requirements", prepared in accordance with Article 5(2)(n) of IVASS Regulation no. 38/2018, after implementing the same Policy issued by the USCI in accordance with Article 71(2)(p) of the same regulation.

These policies are issued and reviewed at least once a year.

Refer to the details of the section on the Insurance Group.

Cargeas Assicurazioni S.p.A.

At the board meeting on 27 May 2021, Cargeas adopted its "Policy for identifying and assessing fitness for office requirements", prepared in accordance with Article 5(2)(n) of IVASS Regulation no. 38/2018, after implementing the same Policy issued by the USCI in accordance with Article 71(2)(p) of the same regulation.

These policies are issued and reviewed at least once a year.

Refer to the details of the section on the Insurance Group

B.3 RISK MANAGEMENT SYSTEM, INCLUDING THE INTERNAL ASSESSMENT OF RISK AND SOLVENCY

Intesa Sanpaolo Vita Insurance Group

Risk management process, and role of the risk management function

The system of risk management and control for the whole of the Insurance Group conforms to the requirements of supervisory insurance regulations and is consistent with the corresponding regulations on the control system, of the parent company Intesa Sanpaolo, which define the reference principles and responsibilities of the corporate bodies, and those of the audit functions which help to ensure that the system of internal controls operates correctly. The process of managing the risks of the Insurance Group is governed in line with the self-assessment of risk profile and risk appetite (Risk Appetite Framework or RAF). The Level 1 documentation referred to above is complemented by the Operational Policies and Guidelines concerning the management of all the risks to which the Insurance Group is exposed.

Intesa Sanpaolo Life adopted them as a reference for the definition of its own company guidelines in this area, in accordance with applicable regulations, reporting any incompatibility to the USCI with regulations in the country where it does business.

There are four main phases in the Insurance Group's risk management process:

1. Risk identification and assessment;
2. Risk management;
3. Monitoring risk exposure;
4. Reporting.

The first main phase, specifically the Risk Assessment, gives Senior Management an immediate overview of the risk exposure, which can guide their decision-making processes and help to define the priority actions, also in terms of strategic planning.

There are 4 phases of the risk assessment process, which are carried out at least once a year (or when specific events occur):

- Analysis: this includes all activities to obtain information, identify and record risks with the association of an Owner and involvement of other Specialist Functions¹ to identify and assess risk profiles that are directly supervised.
- Assessment: this includes a self-assessment in terms of probability, impact and risk mitigation by the risk Owner. In this phase, the Owner identifies any actions to implement or implemented, to mitigate risk;

¹ The term "Specialist Functions" means the Functions in charge of managing some specific risks, i.e. second level Core Functions, the DPO, the IT Security and AML Function, as governed by company regulations.

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- Validation: this includes the phase where the risk Owner assesses the result of the analysis and the Risk Management Function works with other Core Functions to verify whether the assessment result is aligned with their evidence;
 - Risk Map: this includes activities to prepare a report on the risk exposure of each Insurance Group Company and the Group as a whole.

The risk assessment process also includes the hard-to-quantify risks considered to be significant for the Company and mitigation actions may be proposed.

Once the risks have been identified, the Insurance Group obtains documents for each risk to determine procedures for managing each one, together with the operational tolerance limits.

On conclusion of the Risk Assessment process, the Group manages identified risks by following the conditions and tolerance limits stated in the Policies, which constitute the risk management framework.

The final phase involves monitoring and quantification of the risks.

The monitoring process provides for the constant application of stress tests. The stress tests consist of a set of techniques used by the Companies to:

- measure their vulnerability to extraordinary yet plausible events;
- allow Senior Management to understand the relationship between the risk assumed and the risk appetite, as well as the adequacy of available capital.

Should the results of the stress tests show that there is potential non-compliance with the minimum regulatory requirements and/or that the controls for each risk are inadequate, the Internal Control and Risks Committee will suggest improvements in order to consolidate the capital stability to the Board of Directors of the company concerned, also considering solvency at Group level.

In addition to this activity, there is a structured information gathering process, which is necessary to calculate the indicators and parameters defined for the size of the risk according to the Risk Appetite Framework, which is intended to control the Limits and Early Warnings.

The risk management process is an integral part of the organisation and decision-making processes of the Insurance Group and of each company, as it is prepared in accordance with the internal risk assessment and solvency process, and with the Risk Appetite Framework.

With regard to the roles and responsibilities of the Risk Management function, see the contents of paragraph B.1 of this report.

Internal risk and solvency assessment

The new prudential regulations which entered into force on 1 January 2016 are based on three pillars. They require companies in the second pillar to perform a self-assessment of risks, both current and forward-looking, in order to determine a governance system which allows the effective and efficient management and control of risks, by tasking the Supervisory Body with the assessment, through the Supervisory Review Process, of the reliability and consistency of the results and by adopting, where needed, the appropriate corrective measures. The main objective of ORSA is to ensure that the companies adopt processes to assess all the current and forward-looking risks of their business and determine the corresponding hedging capital in line with the strategic and Risk Appetite objectives.

The internal risk and solvency assessment is carried out through the ORSA process, which has been adopted by the Insurance Group and is split into 2 preliminary transverse activities, and five separate, specific phases.

The preliminary activities are:

- defining the Risk Appetite Framework: Intesa Sanpaolo Vita sets out above all the standards to guide the Insurance Group in taking on risks and monitoring them in order to ensure a continuous and excellent service toward customers and to create value for all *stakeholders*.
- defining the methodologies for risk and capital measurement: the methods used to measure risks are defined and proposed, along with the risk and capital measurement and control models and systems needed to address unexpected losses. The proposed methodologies are consistent and comply with the requirements set out by current supervisory regulations.

The detailed phases are as follows:

- identifying and monitoring risks: in order to evaluate the risk profile, the Companies of the Intesa Sanpaolo Vita Group must identify all the risks to which the individual company and the entire Insurance Group is or may be exposed. This identification is aimed at:
 - building an effective risk management system to support the achievement of the company goals while protecting policyholders;
 - determining the risk capital both for regulatory and internal purposes and to assess capital adequacy;
 - performing the internal assessment of the risk profile with regard to that underlying the standard formula.
- Self-assessment: the objective of this phase is to assess the regulatory capital requirement and the economic capital considering all the relevant risks to which Intesa Sanpaolo Vita and the Insurance Group companies are exposed, and taking into account the strategic and business objectives. Unlike the Pillar 1 requirements, the assessment includes also any material risks not considered in Pillar I and requests a forward-looking internal assessment of risk and solvency.
- Capital adequacy assessment: the objective of this phase is to assess the capital adequacy in terms of own funds at individual and consolidated level compared to the level of risk assumed. The phase to determine the available own funds and to compare it with the economic capital is broken down in the following sub-phases:
 - determination of available own funds;
 - assessment of capital adequacy.
- Preparation and approval of the ORSA Report: Intesa Sanpaolo Vita documents the findings of the ORSA process for all Insurance Group companies in a single report. The "Consolidated internal risk and solvency assessment document" is a consolidated document (supervisory report on the internal risk and solvency assessment) covering the internal risks and solvency assessment carried out at an Insurance Group level and at the level of some Insurance Group subsidiaries at the same date and in the same reporting period;
- Independent review of the ORSA process: the ORSA process is included in the audit and is periodically audited by Audit. The results of the audits are submitted to the Board of Directors in the periodic reports, and used by it for the process assessment and challenge activity.

In relation to the measurable risks, the Standard formula parameters proposed in the Solvency II regulations are currently considered to be adequate for this purpose, except for the operational risks. However, controls are in place for all risks.

In this regard, Intesa Sanpaolo Assicura S.p.A., in accordance with the Supervisory Authorities, assessed the advisability of adopting specific parameters (USP), to calculate the capital requirement for pricing and reserving risk. In this regard, the Company has received authorisation from the Supervisory Authority to use company-specific parameters to calculate the capital requirement for the pricing and reserving risk sub-modules; at the same time, Intesa Sanpaolo Vita received authorisation to use the Group's specific parameters. The results of the assessment of the capital requirement, calculated using the specific parameters, are reported in the risk profile chapter.

The companies have also put in place controls to cover all business risks, including forward-looking, and with a view to safeguarding of assets.

Within the ORSA process, the Board of Directors of the USCI, the Senior Management of the USCI and the Internal Control and Risks Committee of the USCI have a fundamental role.

The USCI Board of Directors, in its remit also for the Group: determines and is responsible for the adequacy and effectiveness of the risk management system as part of which it approves the risk management strategy, the risk appetite of the Group, the risk management policies and related limits.

With specific reference to the ORSA process, the Board of Directors sets out and approves the relative Policy, ensures their timely adaptation to significant changes in strategic policies, organisational arrangements and the business environment and promotes full use of the ORSA results for strategic purposes and in the decisions implemented by Group Companies. In addition, the USCI Board of Directors, on the proposal of the USCI Internal Control and Risks Committee:

- determines the Risk Appetite of the Group in line with its global solvency needs, identifying the types of risk it will assume, consistently establishing the relative risk tolerance limits of the Group, which it reviews at least one once a year;
- approves the Insurance Group Risk Map;
- approves the methodologies to measure, review, manage and control significant risks, contained in the Policies on their management;
- ensures that the Group level risk management policy is implemented consistently and continuously within the Group, taking into account the structure, size and specificity, as well as the risks of each Group Company and the mutual interdependencies;
- critically assesses the outcome of the Risk Assessment process and monitors the follow-up actions to be taken based on its outcome;
- approves the level of regulatory capital and current and forward-looking economic capital quantified based on the risks identified in the risk map;
- approves the level of current and forward-looking own funds to hedge all the risks identified in the risk map;
- assesses the ORSA process with the support of the core functions;
- approves the ORSA Report expressing a final opinion on the current and forward-looking capital adequacy supported by the relevant reasons;

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- approves the capital needs plans and resolves upon the capitalisation measures and other corrective/mitigation measures to protect current and forward-looking capital adequacy.

USCI Senior Management, in its remit also for the Group, is responsible for the overall implementation, maintenance and monitoring of the corporate governance system at Group level, consistent with the Directives of the Board of Directors and in compliance with the roles and tasks attributed to it.

With reference to the internal assessment of the Group's risk and solvency:

- circulates the Policies on risk management and is responsible for their implementation;
- critically assesses the outcome of the Risk Assessment process and monitors the follow-up actions to be taken based on its outcome;
- implements the internal risk assessment and Group solvency policy, contributing to ensuring the definition of operating limits and ensuring the prompt verification of the limits themselves, as well as the monitoring of risk exposure and compliance with Group tolerance limits.

The USCI Internal Control and Risks Committee, in its remit also for the Group, assists the USCI Board of Directors in determining the guidelines of the internal control and risk management system at Group level, in the periodic verification of its adequacy and its effective functioning, and in the identification and management of the main business risks. Furthermore, it controls the specific risk profile of Group Companies.

With specific reference to the ORSA process, the Internal Control and Risks Committee:

- takes steps to ensure the full use of the results of the ORSA for the strategic and decision-making purposes of Group Companies;
- assesses the proposals to submit to the Board of Directors for final approval on:
 - ORSA process description;
 - risk appetite level;
 - risk map;
 - current and forward-looking capital level;
 - level of own funds to cover current and forward-looking capital - ORSA Report.

The Risk Committee periodically analyses the results of monitoring the regulatory requirements both in current and forward-looking terms and of the stress tests submitted by Risk Management.

The Functions involved in the ORSA evaluations include the Actuarial Function with regard to sharing and contributing to stress tests and sensitivity analyses.

The internal risk assessment is prepared annually, and is examined and approved by the Board of Directors of the USCI.

The assessment of the capital requirement during the period of the analysis is measured by considering the forward-looking exposure to a potentially broader risk perimeter than Pillar I, the stress tests and the impacts in terms of value and capital used in commercial strategies.

Furthermore, the following is taken into account:

- any scheduled issue of capital;
- maturity, including both contractual maturity and any other earlier repayment or surrender opportunity, of the own-fund items;

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- the effects that any issue, surrender or repayment or other measurement changes of an own-fund item can have under the applicable capital management system;
 - the extent to which the company is based on own-fund items subject to provisional measures;
 - application of the dividend distribution policy and how it affects own funds.

The multi-year capital management plan is defined in line with the strategic objectives of the Insurance Group and in coordination with the Strategic ALM and Capital Management Department, which liaises with the Capital & Liquidity Management and Recovery Plan Unit of the parent company Intesa Sanpaolo.

The capital requirement is assessed for the Insurance Group and on an individual basis, taking into account the risk tolerance thresholds identified in the RAF and the forward-looking risk and solvency assessment according to ORSA standards and strategic planning.

During the year the following are periodically monitored:

- the cohesion between the strategic plan, the performance of the business and the profitability of the companies and at an Insurance Group level;
- the cohesion of the assumptions underlying the capital management plan and the related actions, compared to the ordinary performance at Insurance Group level;
- the maintaining of management solvency levels and of the capital management plan based on the sensitivity and stress tests.

Intesa Sanpaolo Vita S.p.A.

Risk management processes, and role of the risk management function

The process of managing the risks of Intesa Sanpaolo Vita is governed in line with the self-assessment of its risk profile and risk appetite (Risk Appetite Framework or RAF). The Level 1 documentation referred to above is complemented by the Operational Rules and Guidelines concerning the management of all the risks to which the Company is exposed.

There are four main phases in the risk management process:

- Risk identification and assessment;
- Risk management;
- Monitoring risk exposure;
- Reporting.

The first major phase gives Senior Management an immediate overview of the risk exposure, which can guide their decision-making processes and help to define the priority actions, also in terms of strategic planning.

There are 4 phases of the risk assessment process, which are carried out at least once a year (or when specific events occur):

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- Analysis: this includes all activities to obtain information, identify and record risks with the association of an Owner and involvement of other Specialist Functions² to identify and assess risk profiles that are directly supervised.
 - Assessment: this includes a self-assessment in terms of probability, impact and risk mitigation by the risk Owner. In this phase, the Owner identifies any actions to implement or implemented, to mitigate risk;
 - Validation: this includes the phase where the risk Owner assesses the result of the analysis and the Risk Management Function works with other Core Functions to verify whether the assessment result is aligned with their evidence;
 - Risk Map: this includes activities to prepare a report on the risk exposure of each Insurance Group Company and the Group as a whole.

The risk assessment process also includes the hard-to-quantify risks considered to be significant for the Company and risk mitigation actions may be proposed.

On conclusion of the risk assessment process, the Group manages each risk by following the conditions and tolerance limits stated in the Rules, which constitute the risk management framework.

The final phase involves monitoring and quantification of the risks.

The monitoring process provides for the constant application of stress tests. The stress tests consist of a set of techniques used by the Company to:

- measure their vulnerability to extraordinary yet plausible events;
- allow senior management to understand the relation between the risk taken on and its *risk appetite*, in addition to the adequacy of the available capital.

Should the results of the stress tests show that there is potential non-compliance with the minimum regulatory requirements and/or that the controls for each risk are inadequate, the Risk Committee will suggest improvements in order to consolidate the capital stability to the Board of Directors of the company concerned, also considering solvency at Insurance Group level.

In addition to this activity, there is a structured information gathering process, which is necessary to calculate the indicators and parameters defined for the size of the risk according to the Risk Appetite Framework, which is intended to control the Limits and Early Warnings.

Within the Risk Appetite Framework the Insurance Group has imposed early-warning thresholds on the main risk factors. The main limits relate to the following risks:

- Solvency: the levels of solvency ratio and the levels of individual risk types, in relation to Own Funds;
- Liquidity: the level of highly liquid securities, cash flow matching and the insurance liquidity coverage ratio;
- Investments;
- Operational risks: the level of operational losses.

² The term "Specialist Functions" means the Functions in charge of managing some specific risks, i.e. second level Core Functions, the DPO, the IT Security and AML Function, as governed by company regulations.

The “prudent person” principle

Depending on the nature, scope and complexity of the risks of its business, the Company will set investment policies for all its assets, in line with the prudent person principle.

Financial portfolio management must be aimed at the following:

- the general criteria of prudence and promoting quality of assets;
- profitability assessment, adequately taking into consideration all related market, credit, concentration and liquidity risks;
- Enhancement of risk diversification factors;
- An asset allocation objective that adequately reflects the time frame of the liability and the economic returns hoped for by the Company.

The Company's Policy on investments is consistent with its strategy and risk policies, and take into account the risk appetite, risk tolerance and the possibility of identifying, measuring, monitoring and managing the risks involved with each type of asset.

The Policy on investments is adopted by taking into account that the assets covering the technical provisions are adequate considering the nature of the risks and the obligations, and the duration of the liabilities, in the best interests of all policyholders, customers, beneficiaries and anyone entitled to insurance benefits.

The investment policy defines the composition of the medium-to-long-term investment portfolio, indicating the security, quality, liquidity, profitability and availability level for the entire asset portfolio.

With regard to details of how the company meets its obligation to invest all assets in accordance with the “prudent person” principle, it should be noted that asset investment activities are not done in consideration of the direct, immediate obligations towards the insured parties and therefore they are not subject to the limitations included in the rules on separate management. At the same time, the capital profitability enhancement targets must be met.

The setting of operational limits for this type of activity is based on the principle that, with a view to the prudent management of assets and the solvency of the company, the share of assets needed to cover the economic capital must be invested in highly solvent, highly liquid assets, and only a surplus can be directed towards higher-risk investments.

The use of derivatives must be consistent with the principles of sound and prudent management, with a view to mitigating risks. It must take place in alignment with the Company's financial situation and operating performance.

Assessing the appropriateness of credit ratings

In order to measure the credit rating of assets in the company's portfolios, apart from the ratings given by the main rating agencies (Standard & Poor's, Moody's and Fitch Ratings), priority is given to an internal assessment done by the company itself in accordance with the internal models of the Parent Company Intesa Sanpaolo.

This internal assessment is done for all issuers towards whom there is a significant exposure.

The process of defining internal ratings is described in more detail in the Investment Rules.

Assessments of credit rating are used where required by the Solvency II Regulations (i.e. spread and counterparty risks). The Company carries out formal checks on all flows of information

regarding credit ratings received from external bodies. The Risk Management operating system also involves a process of user authorisation, following each rating update received from an external body.

The outsourcing agreements with rating agencies providing the company with credit ratings do not contain any limitations on the reporting of external rating information or on the ECAI selected in the quantitative reporting models.

Considerations on the extrapolation of the risk-free rate and volatility adjustment

The company has fulfilled the regulatory requirements regarding application of the volatility adjustment:

- by defining the scope of application of the VA;
- by preparing a liquidity plan;
- by conducting a quantitative analysis to support the use of the VA.

With reference to the extrapolation of the risk-free rate, with and without the volatility adjustment mentioned in Article 44, 2a) of Directive 2009/138/EC, please note that the rates curve published by EIOPA has been used.

Risk Free Rate at 31/12/2021		
Tenor	NO VA	VA
1	-0.59%	-0.56%
2	-0.40%	-0.37%
3	-0.25%	-0.22%
4	-0.15%	-0.12%
5	-0.08%	-0.05%
6	-0.03%	0.00%
7	0.03%	0.06%
8	0.09%	0.12%
9	0.15%	0.18%
10	0.21%	0.24%
11	0.25%	0.28%
12	0.30%	0.33%
13	0.35%	0.38%
14	0.38%	0.41%
15	0.40%	0.43%
16	0.41%	0.44%
17	0.41%	0.44%
18	0.41%	0.44%
19	0.43%	0.46%
20	0.46%	0.49%
21	0.50%	0.53%
22	0.55%	0.58%
23	0.61%	0.64%
24	0.67%	0.70%
25	0.74%	0.77%
26	0.81%	0.83%
27	0.87%	0.90%
28	0.94%	0.97%
29	1.01%	1.03%
30	1.07%	1.10%

The table below shows the impact of zeroing the VA, which is indicated in terms of a change in own funds and in terms of the solvency ratio, in order to verify any non-compliance with the threshold of 100%, as a result of the zeroing.

	(million euro)	
	No VA	VA
Eligible Own Funds	8 600.7	8 669.5
Solvency Capital Requirement	3 122.3	3 022.0
Solvency ratio	275%	287%

The Solvency Ratio without the application of the VA remains above the minimum threshold and limits provided for in the Risk Appetite Framework.

Internal solvency risk assessment

The main objective of ORSA is to ensure that the companies adopt processes to assess all the current and forward-looking risks of their business and determine the corresponding hedging capital in line with the strategic and RAF objectives.

In detail, the Company, by executing the ORSA process, aims to:

- assess, at least on a yearly basis, the risk profile both in the short and long term in line with the time horizon considered for strategic planning (including the capital management plan). This assessment comprises the so-called Pillar 2 risks;
- assess the significance of the deviation between the risk profile and assumptions underlying the calculation of the regulatory capital;
- assess the overall solvency needs considering the planning time horizon, ensuring compliance at all times with requirements in terms of the regulatory capital and RAF;
- make available the ORSA results to Senior Management in order to allow their use in the operating and strategic decision-making processes (e.g. capital management, planning, budgeting, product development, investments, etc.).

The risk management process is an integral part of the organisation and decision-making processes of the company, as it is prepared in accordance with the ORSA process, and with the Risk Appetite Framework.

The internal solvency risk assessment is carried out through the ORSA process, which has been adopted by Intesa Sanpaolo Vita and by the Insurance Group and is split into 2 preliminary transverse activities, and 5 separate, specific phases.

The preliminary activities are:

- defining the Risk Appetite Framework: Intesa Sanpaolo Vita sets out above all the standards to guide the Insurance Group in taking on risks and monitoring them in order to ensure a continuous and excellent service toward customers and to create value for all stakeholders.
- defining the methodologies for risk and capital measurement: the methods used to measure risks are defined and proposed, along with the risk and capital measurement and control models and systems needed to address unexpected losses. The proposed methodologies are consistent and comply with the requirements set out by current supervisory regulations.

The detailed phases are as follows:

- identifying and monitoring risks: to assess the individual and Group risk profile, Intesa Sanpaolo Vita must identify all the risks to which the individual company and the entire Insurance Group is or may be exposed. This identification is aimed at:
 - building an effective risk management system to support the achievement of the company goals while protecting policyholders;
 - determining the risk capital both for regulatory and internal purposes and to assess capital adequacy;
 - performing the internal assessment of the risk profile with regard to that underlying the standard formula.
- Self-assessment: the objective of this phase is to assess the regulatory capital requirement and the economic capital considering all the relevant risks to which Intesa Sanpaolo Vita and the

Insurance Group companies are exposed, and taking into account the strategic and business objectives. Unlike the Pillar 1 requirements, the assessment includes also any material risks not considered in Pillar I and requests a forward-looking internal assessment of risk and solvency.

- Capital adequacy assessment: the objective of this phase is to assess the capital adequacy in terms of own funds at individual and consolidated level compared to the level of risk assumed. The phase to determine the available own funds and to compare it with the economic capital is broken down in the following sub-phases:
 - determination of available own funds;
 - assessment of capital adequacy.
- Preparation and approval of the ORSA Report: Intesa Sanpaolo Vita documents the findings of the ORSA process for all Insurance Group companies in a single report. The "Single internal risk and solvency assessment document" is a consolidated document (supervisory report on the internal risk and solvency assessment) covering the internal risks and solvency assessment carried out at group level and at the level of some group subsidiaries at the same date and in the reporting period.
- Independent review of the ORSA process: the ORSA process is included in the audit scope, and is periodically audited by the Audit function. The results of the audits are submitted to the Board of Directors in the periodic reports, and used by it for the process assessment and challenge activity.

In relation to the measurable risks, the Standard formula parameters proposed in the Solvency II regulations are currently considered to be adequate for this purpose, except for the operational risks. However, controls are in place for all risks. The company has also put in place controls to cover all business risks, including forward-looking, and with a view to safeguarding of assets.

Within the ORSA process, the Board of Directors, the Senior Management of the Company and the Internal Control and Risks Committee of the Company have a fundamental role.

The Board of Directors of the Company determines and is responsible for the adequacy and effectiveness of the risk management system as part of which it approves the risk management strategy, the risk appetite of Intesa Sanpaolo Vita, the risk management policies and related limits.

With specific reference to the ORSA process, the Board of Directors sets out and approves the relative Policy, ensures timely adaptation to significant changes in strategic policies, organisational arrangements and the business environment and promotes full use of the ORSA results for strategic purposes and in the decisions implemented by the Company. Moreover, the Board of Directors, on the proposal of the Internal Control and Risks Committee:

- determines the Risk Appetite in line with its global solvency needs, identifying the types of risk it will assume, consistently establishing the relative risk tolerance limits of the Company, which it reviews at least once a year;
- approves the risks map of Intesa Sanpaolo Vita;
- approves the methodologies to measure, review, manage and control significant risks, contained in the Policies on their management;
- ensures that the risk management policy is implemented consistently and continuously within the Company, taking into account its structure, size and specificity, as well as the risks and the mutual interdependencies;
- critically assesses the outcome of the Risk Assessment process and monitors the follow-up actions to be taken based on its outcome;

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- approves the level of regulatory capital and current and forward-looking economic capital quantified based on the risks identified in the risk map;
 - approves the level of current and forward-looking own funds to hedge all the risks identified in the risk map;
 - assesses the ORSA process with the support of the core functions;
 - approves the ORSA Report expressing a final opinion on the current and forward-looking capital adequacy supported by the relevant reasons;
 - approves the capital needs plans and resolves upon the capitalisation measures and other corrective/mitigation measures to protect current and forward-looking capital adequacy.

With reference to the internal risk and solvency assessment, Senior Management:

- circulates the rules on risk management and is responsible for their implementation;
- critically assesses the outcome of the Risk Assessment process and monitors the follow-up actions to be taken based on its outcome;
- implements the internal risk assessment and solvency policy of the Company, contributing to ensuring the definition of operating limits and ensuring the prompt verification of the limits themselves, as well as the monitoring of risk exposure and compliance with the tolerance limits of the Company.

The Internal Control and Risks Committee assists the Board of Directors in determining the guidelines of the internal control and risk management system, in the periodic verification of its adequacy and its effective functioning, and in the identification and management of the main business risks. Moreover, it monitors the specific risk profile of the Company.

With specific reference to the ORSA process, the Internal Control and Risks Committee:

- takes steps to ensure the full use of the results of the ORSA for strategic and decision-making purposes of the Company;
- assesses the proposals to submit to the Board of Directors for final approval on:
 - ORSA process description;
 - risk appetite level;
 - risk map;
 - methodologies for measuring, assessing, managing and controlling risks;
 - stress test methodologies;
 - level of current and forward-looking economic capital;
 - level of own funds to cover current and forward-looking capital - ORSA Report.

The Internal Control and Risks Committee periodically analyses the results of economic capital monitoring, the regulatory requirements both in current and forward-looking terms and of the stress tests submitted by Risk Management.

The Functions involved in the ORSA evaluations include the Actuarial Function with regard to sharing and contributing to stress tests and sensitivity analyses.

The internal risk assessment is prepared annually, and is examined and approved by the Board of Directors of the Company.

For the assessment of solvency using the standard formula and in the internal risk assessment, the Company assures the quality of the data used in the calculation processes.

To guarantee the quality of data the Company has set up a data quality management framework in accordance with the Solvency II requirements. The framework is designed to ensure ongoing compliance with the data quality requirements contained in the European standards on the appropriateness, completeness and accuracy of information. European regulations require that Companies adopt processes and procedures aimed at ensuring that the data used to calculate provisions comply with these standards.

The Company aims to ensure an adequate level of oversight of the entire data production/transformation process starting from when the data is produced through to its transformation and inclusion in the reporting systems. For this purpose, the Company implements a monitoring and diagnosis system to recognise and resolve any irregularities through appropriate corrective actions.

Specifically, the Data Governance system is established to ensure compliance with the following requirements:

- Governability: the data, the aggregation and perimeter definition procedures, and the extraction, recording, transformation and loading procedures of the data in archives are documented and classified to ensure traceability and monitoring;
- Usability: accessibility of information by users is ensured through adequate instruments for the activities carried out;
- Integrity and confidentiality: data must be protected against unauthorised access in order to protect their accuracy, completeness and absence of tampering in compliance with applicable internal and external regulations;
- Availability: availability of data, when required by company processes, and availability of the resources needed for the purpose is ensured in compliance with the provisions in the document "Insurance Group Business Continuity Guidelines";
- Retention and filing: specific data conservation procedures are provided for each data category ensuring the availability of the information in compliance with current regulations and any specific requirements expressed by users;
- Adaptability: the data are generated and aggregated to provide adequately address the internal and external information needs and the development of the company.

In compliance with the regulatory provisions, data quality must be assessed according to the following dimensions (or "quality standards"):

- Accuracy: the data must be input without errors and omissions in a consistent and timely manner for the purposes for which it is processed. By way of example, the controls on the structure of the information flow (presence of the primary key and mandatory data, presence of duplicate records, etc.) and on the requirements of timeliness in the provision of data can be considered accuracy controls;
- Completeness: the data must have sufficient granularity and historical depth for the purposes for which it is processed. For example, the assessment of completeness requires the implementation of periodic procedures to ascertain that no data have been excluded. From a technical point of view, to ensure the completeness of the individual data flow, mechanisms are to be put in place to prevent deliberate or accidental causes, such as abnormal interruptions of IT procedures, from resulting in the production of incomplete data;

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- Appropriateness: the data must be directly related to the purposes for which it is processed. For example, the assessment of the appropriateness requires procedures for the periodic review of compliance of the data with company needs including through performance controls, comparisons with benchmarks or balancing of data with certified sources.

The Data Quality process (or Data Quality Management) is aimed at pursuing the objectives of accuracy, completeness and appropriateness of data as set out by European and Italian regulations. It involves the following four main phases:

- Definition of data;
- Assessment of data quality;
- Identification and resolution of irregularities;
- Monitoring and reporting.

Internal risk and solvency assessment

The internal risk management process for Intesa Sanpaolo Vita is conducted in accordance with the Insurance Group process. Reference is therefore made to the details of the paragraph on the Insurance Group

Intesa Sanpaolo Assicura S.p.A.

Risk management process, and role of the risk management function

The process of managing the risks of the Intesa Sanpaolo Assicura is governed in line with the self-assessment of risk profile and risk appetite (Risk Appetite Framework or RAF). The Level 1 documentation referred to above is complemented by the Operational Rules and Guidelines concerning the management of all the risks to which the Company is exposed.

There are four main phases in the risk management process:

- Risk identification and assessment;
- Risk management;
- Monitoring risk exposure;
- Reporting.

The first major phase gives Senior Management an immediate overview of the risk exposure, which can guide their decision-making processes and help to define the priority actions, also in terms of strategic planning.

There are 4 phases of the risk assessment process, which are carried out at least once a year (or when specific events occur):

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- Analysis: this includes all activities to obtain information, identify and record risks with the association of an Owner and involvement of other Specialist Functions³ to identify and assess risk profiles that are directly supervised.
 - Assessment: this includes a self-assessment in terms of probability, impact and risk mitigation by the risk Owner. In this phase, the Owner identifies any actions to implement or implemented, to mitigate risk;
 - Validation: this includes the phase where the risk Owner assesses the result of the analysis and the Risk Management Function works with other Core Functions to verify whether the assessment result is aligned with their evidence;
 - Risk Map: this includes activities to prepare a report on the risk exposure of each Insurance Group Company and the Group as a whole.

The risk assessment process also includes the hard-to-quantify risks considered to be significant for the Company and risk mitigation actions may be proposed.

On conclusion of the risk assessment process, the Group manages each risk by following the conditions and tolerance limits stated in the Rules, which constitute the risk management framework.

The final phase involves monitoring and quantification of the risks.

The monitoring process provides for the constant application of stress tests. The stress tests consist of a set of techniques used by the Company to:

- measure their vulnerability to extraordinary yet plausible events;
- allow senior management to understand the relation between the risk taken on and its risk appetite, in addition to the adequacy of the available capital.

Should the results of the stress tests show that there is potential non-compliance with the minimum regulatory requirements and/or that the controls for each risk are inadequate, the Risk Committee will suggest improvements in order to consolidate the capital stability to the Board of Directors of the company concerned, also considering solvency at Insurance Group level.

In addition to this activity, there is a structured information gathering process, which is necessary to calculate the indicators and parameters defined for the size of the risk according to the Risk Appetite Framework, which is intended to control the Limits and Early Warnings.

Within the Risk Appetite Framework the Insurance Group has imposed early-warning thresholds on the main risk factors. The main limits relate to the following risks:

- Solvency: the levels of solvency ratio and the levels of individual risk types, in relation to Own Funds;
- Liquidity: the level of highly liquid securities, cash flow matching and the insurance liquidity coverage ratio;
- investments;
- operational risks: the level of operational losses.

³ The term "Specialist Functions" means the Functions in charge of managing some specific risks, i.e. second level Core Functions, the DPO, the IT Security and AML Function, as governed by company regulations.

The “prudent person” principle

Depending on the nature, scope and complexity of the risks of its business, the Company will set investment policies for all its assets, in line with the prudent person principle.

Financial portfolio management must be aimed at the following:

- the general criteria of prudence and promoting quality of assets;
- profitability assessment, adequately taking into consideration all related market, credit, concentration and liquidity risks;
- Enhancement of risk diversification factors;
- An asset allocation objective that adequately reflects the time frame of the liability and the economic returns hoped for by the Company.

The Company's Policy on investments is consistent with its strategy and risk policies, and take into account the risk appetite, risk tolerance and the possibility of identifying, measuring, monitoring and managing the risks involved with each type of asset.

The use of derivatives must be consistent with the principles of sound and prudent management, with a view to mitigating risks. It must take place in alignment with the Company's financial situation and operating performance, and strictly adhere to the provisions of IVASS Regulation no. 24/2016.

Assessing the appropriateness of credit ratings

In order to measure the credit rating of assets in the company's portfolios, apart from the ratings given by the main rating agencies (Standard & Poor's, Moody's and Fitch Ratings), priority is given to an internal assessment done by the company itself in accordance with the internal models of the Parent Company Intesa Sanpaolo.

This internal assessment is done for all issuers towards whom there is a significant exposure.

The process of defining internal ratings is described in more detail in the Investment Rules.

Assessments of credit rating are used where required by the Solvency II Regulations (i.e. spread and counterparty risks). The Company carries out formal checks on all flows of information regarding credit ratings received from external bodies. The Risk Management operating system also involves a process of user authorisation, following each rating update received from an external body.

The outsourcing agreements with rating agencies providing the company with credit ratings do not contain any limitations on the reporting of external rating information or on the ECAI selected in the quantitative reporting models.

Considerations on the extrapolation of the risk-free rate and volatility adjustment

The Company does not apply the volatility adjustment to the calculation of insurance liabilities.

Below is the valuation regarding the extrapolation of the risk free rate without the volatility adjustment mentioned in Article 44, paragraph 2a, of Directive 2009/138/EC. The curve corresponds to the EIOPA curve.

Risk Free Rate at 31/12/2021	
Tenor	NO VA
1	-0.59%
2	-0.40%
3	-0.25%
4	-0.15%
5	-0.08%
6	-0.03%
7	0.03%
8	0.09%
9	0.15%
10	0.21%
11	0.25%
12	0.30%
13	0.35%
14	0.38%
15	0.40%
16	0.41%
17	0.41%
18	0.41%
19	0.43%
20	0.46%
21	0.50%
22	0.55%
23	0.61%
24	0.67%
25	0.74%
26	0.81%
27	0.87%
28	0.94%
29	1.01%
30	1.07%

Internal solvency risk assessment

The main objective of ORSA is to ensure that the companies adopt processes to assess all the current and forward-looking risks of their business and determine the corresponding hedging capital in line with the strategic and RAF objectives. In detail, the Company, by executing the ORSA process, aims to:

- assess, at least on a yearly basis, the risk profile both in the short and long term in line with the time horizon considered for strategic planning (including the capital management plan). This assessment comprises the so-called Pillar 2 risks;

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- assess the significance of the deviation between the risk profile and assumptions underlying the calculation of the regulatory capital;
 - assess the overall solvency needs considering the planning time horizon, ensuring compliance at all times with requirements in terms of the regulatory capital and RAF;
 - make the results of ORSA available to Senior Management, so they may be used in operating and strategic decision-making processes (e.g. capital management, planning, budget process, product development, investments, etc.).

The risk management process is an integral part of the organisation and decision-making processes of the company, as it is prepared in accordance with the ORSA process, and with the Risk Appetite Framework process.

The internal solvency risk assessment is carried out through the ORSA process, which has been adopted by Intesa Sanpaolo Assicura and by the Insurance Group and is split into 2 preliminary transverse activities, and 5 separate, specific phases.

The preliminary activities are:

- defining the Risk Appetite Framework: Intesa Sanpaolo Assicura follows the general principles defined by the parent company for the acceptance and monitoring of risks, in order to ensure a continuous and excellent service toward customers and to create value for all stakeholders;
- defining the methodologies for risk and capital measurement: the methods to measure risks are defined and proposed, along with the risk and capital measurement and control models and systems needed to address unexpected losses. The proposed methodologies are consistent and comply with the requirements set out by current supervisory regulations.

The detailed phases are as follows:

- identifying and monitoring risks: to assess the individual and Insurance Group risk profile, Intesa Sanpaolo Assicura must identify all the risks to which the individual company and the entire Insurance Group is or may be exposed. This identification is aimed at:
 - building an effective risk management system to support the achievement of the company goals while protecting policyholders;
 - determining the risk capital both for regulatory and internal purposes and to assess capital adequacy;
 - performing the internal assessment of the risk profile with regard to that underlying the standard formula.
- Self-Assessment: the objective of this phase is to assess the regulatory capital requirement and the economic capital considering all the relevant risks to which Intesa Sanpaolo Assicura and the Insurance Group companies are exposed, and taking into account the strategic and business objectives. Unlike the Pillar 1 requirements, the assessment includes also any material risks not considered in Pillar I and requires a forward-looking internal assessment of risk and solvency.
- Capital adequacy assessment: the objective of this phase is to assess the capital adequacy in terms of own funds compared to the level of risk assumed. The phase to determine the available own funds and to compare it with the economic capital is broken down in the following subphases:
 - determination of available own funds;
 - assessment of capital adequacy.

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- preparation and approval of the ORSA Report: Intesa Sanpaolo Assicura contributes to the results of the ORSA process which are contained in a single report. The "Single internal risk and solvency assessment report" is a consolidated document (supervisory report on the internal risk and solvency assessment) covering the internal risks and solvency assessment carried out at Insurance Group level and at the level of some group subsidiaries at the same date and in the same reporting period;
 - independent review of the ORSA process: the ORSA process is included in the audit scope, and is periodically audited by the Audit function. The results of the audits are submitted to the Board of Directors in the periodic reports, and used by it for the process assessment and challenge activity.

In this regard, Intesa Sanpaolo Assicura S.p.A., in accordance with the Supervisory Authorities, assessed the advisability of adopting specific parameters (USP), to calculate the capital requirement for pricing and reserving risk. In this regard, the Company has received authorisation from the Supervisory Authority to use company-specific parameters to calculate the capital requirement for the pricing and reserving risk sub-modules; at the same time, Intesa Sanpaolo Vita received authorisation to use the Group's specific parameters. The results of the assessment of the capital requirement, calculated using the specific parameters, are reported in the risk profile chapter.

In relation to the other risk types, the standard formula parameters proposed in the Solvency II Directive are currently considered to be adequate for this purpose, except for the operational risks. However, controls are in place for all risks. The company has also put in place controls to cover all business risks, including forward-looking, and with a view to safeguarding of assets.

Within the ORSA process, the Board of Directors, the Senior Management of the Company and the Internal Control and Risks Committee of the USCI have a fundamental role.

With specific reference to the ORSA process, the Board of Directors sets out and approves the policy for the current and forward-looking risk assessments, ensures their timely adaptation to significant changes in strategic policies, organisational arrangements and the business environment and promotes full use of the ORSA results for strategic purposes and in the decisions implemented by the Company. In addition, the Board of Directors:

- determines the Risk Appetite in line with its global solvency needs, identifying the types of risk it will assume, consistently establishing the relative risk tolerance limits of the Company, which it reviews at least once a year;
- approves the Company's risks map;
- approves the methodologies to measure, review, manage and control significant risks, contained in the Policies on their management;
- ensures that the risk management policy is implemented consistently and continuously within the Company, taking into account its structure, size and specificity, as well as the risks and the mutual interdependencies;
- critically assesses the outcome of the Risk Assessment process and monitors the follow-up actions to be taken based on its outcome;
- approves the level of regulatory capital and current and forward-looking economic capital quantified based on the risks identified in the risk map;
- approves the level of current and forward-looking own funds to hedge all the risks identified in the risk map;

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- assesses the ORSA process with the support of the core functions;
 - approves the results of the ORSA process, expressing a final opinion on the current and forward-looking capital adequacy supported by the relevant reasons;
 - approves the capital needs plans and resolves upon the capitalisation measures and other corrective/mitigation measures to protect current and forward-looking capital adequacy.

With reference to the internal risk and solvency assessment, Senior Management:

- circulates the Policies on risk management and is responsible for their implementation;
- critically assesses the outcome of the Risk Assessment process and monitors the follow-up actions to be taken based on its outcome;
- implements the internal risk assessment and solvency policy of the Company, contributing to ensuring the definition of operating limits and ensuring the prompt verification of the limits themselves, as well as the monitoring of risk exposure and compliance with the tolerance limits of the Company.

The Internal Control and Risks Committee of the USCI assists the Board of Directors in determining the guidelines of the internal control and risk management system, in the periodic verification of its adequacy and its effective functioning, and in the identification and management of the main business risks. Moreover, it monitors the specific risk profile of the Company.

With specific reference to the ORSA process, the Risk Committee:

- takes steps to ensure the full use of the results of the ORSA for strategic and decision-making purposes of the Company;
- assesses the proposals to submit to the Board of Directors for final approval on:
 - ORSA process description;
 - risk appetite level;
 - risk map;
 - methodologies for measuring, assessing, managing and controlling risks;
 - stress test methodologies;
 - level of current and forward-looking economic capital;
 - level of own funds to cover current and forward-looking capital - ORSA Report.

The Risk Committee periodically analyses the results of monitoring the economic capital and regulatory requirements both in current and forward-looking terms and of the *stress tests* submitted by Risk Management.

The Functions involved in the ORSA evaluations include the Actuarial Function with regard to sharing and contributing to stress tests and sensitivity analyses.

The internal risk assessment is prepared annually, and is examined and approved by the Board of Directors of the Company.

For the assessment of solvency using the standard formula and in the internal risk assessment, the Company assures the quality of the data used in the calculation processes.

To guarantee the quality of data the Company has set up a data quality management framework in accordance with the Solvency II requirements. The framework is designed to ensure ongoing compliance with the data quality requirements contained in the European standards on the

appropriateness, completeness and accuracy of information. European regulations require that Companies adopt processes and procedures aimed at ensuring that the data used to calculate provisions comply with these standards.

The Company aims to ensure an adequate level of oversight of the entire data production/transformation process starting from when the data is produced through to its transformation and inclusion in the reporting systems. For this purpose, the Company implements a monitoring and diagnosis system to recognise and resolve any irregularities through appropriate corrective actions.

Specifically, the Data Governance system is established to ensure compliance with the following requirements:

- governability: the data, the aggregation and perimeter definition procedures, and the extraction, recording, transformation and loading procedures of the data in archives are documented and classified to ensure traceability and monitoring;
- usability: accessibility of information by users is ensured through adequate instruments for the activities carried out;
- integrity and confidentiality: data must be protected against unauthorised access in order to protect their accuracy, completeness and absence of tampering in compliance with applicable internal and external regulations;
- availability: availability of data, when required by company processes, and availability of the resources needed for the purpose is ensured in compliance with the provisions in the document "Insurance Group Business Continuity Guidelines";
- conservation and archiving of data: specific data conservation procedures are provided for each data category ensuring the availability of the information in compliance with current regulations and any specific requirements expressed by users;
- adaptability: the data are generated and aggregated to provide adequately address the internal and external information needs and the development of the company.

In compliance with the regulatory provisions, data quality must be assessed according to the following dimensions (or "quality standards"):

- accuracy: the data must be input without errors and omissions in a consistent and timely manner for the purposes for which it is processed. By way of example, the controls on the structure of the information flow (presence of the primary key and mandatory data, presence of duplicate records, etc.) and on the requirements of timeliness in the provision of data can be considered accuracy controls;
- completeness: the data must have sufficient granularity and historical depth for the purposes for which it is processed. For example, the assessment of completeness requires the implementation of periodic procedures to ascertain that no data have been excluded. From a technical point of view, to ensure the completeness of the individual data flow, mechanisms are to be put in place to prevent deliberate or accidental causes, such as abnormal interruptions of IT procedures, from resulting in the production of incomplete data;
- appropriateness: the data must be directly related to the purposes for which it is processed. For example, the assessment of the appropriateness requires procedures for the periodic review of compliance of the data with company needs including through performance controls, comparisons with benchmarks or balancing of data with certified sources.

The Data Quality process (or Data Quality Management) is aimed at pursuing the objectives of accuracy, completeness and appropriateness of data as set out by European and Italian regulations. It involves the following four main phases:

- definition of data;
- assessment of data quality;
- identification and resolution of irregularities;
- monitoring and reporting.

Internal risk and solvency assessment

The internal risk management process for Intesa Sanpaolo Assicura is conducted in accordance with the Insurance Group process. Refer to the details of the section on the Insurance Group.

Fideuram Vita S.p.A.

Risk management process, and role of the risk management function

The process of managing the risks of the company Fideuram Vita is governed in line with the self-assessment of the risk profile and risk appetite (Risk Appetite Framework or RAF). The Level 1 documentation referred to above is complemented by the Operational Rules and Guidelines concerning the management of all the risks to which the Company is exposed.

There are four main phases in the risk management process:

- Risk identification and assessment;
- Risk management;
- Monitoring risk exposure;
- Reporting.

The first major phase gives Senior Management an immediate overview of the risk exposure, which can guide their decision-making processes and help to define the priority actions, also in terms of strategic planning.

There are 4 phases of the risk assessment process, which are carried out at least once a year (or when specific events occur):

- Analysis: this includes all activities to obtain information, identify and record risks with the association of an Owner and involvement of other Specialist Functions⁴ to identify and assess risk profiles that are directly supervised.

⁴ The term "Specialist Functions" means the Functions in charge of managing some specific risks, i.e. second level Core Functions, the DPO, the IT Security and AML Function, as governed by company regulations.

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- Assessment: this includes a self-assessment in terms of probability, impact and risk mitigation by the risk Owner. In this phase, the Owner identifies any actions to implement or implemented, to mitigate risk;
 - Validation: this includes the phase where the risk Owner assesses the result of the analysis and the Risk Management Function works with other Core Functions to verify whether the assessment result is aligned with their evidence;
 - Risk Map: this includes activities to prepare a report on the risk exposure of each Insurance Group Company and the Group as a whole.

The risk assessment process also includes the hard-to-quantify risks considered to be significant for the Company and risk mitigation actions may be proposed.

On conclusion of the risk assessment process, the Group manages each risk by following the conditions and tolerance limits stated in the Rules, which constitute the risk management framework.

The final phase involves monitoring and quantification of the risks.

The monitoring process provides for the constant application of stress tests. The stress tests consist of a set of techniques used by the Company to:

- measure their vulnerability to extraordinary yet plausible events;
- allow senior management to understand the relation between the risk taken on and its risk appetite, in addition to the adequacy of the available capital.

Should the results of the stress tests show that there is potential non-compliance with the minimum regulatory requirements and/or that the controls for each risk are inadequate, the Risk Committee will suggest improvements in order to consolidate the capital stability to the Board of Directors of the company concerned, also considering solvency at Insurance Group level.

In addition to this activity, there is a structured information gathering process, which is necessary to calculate the indicators and parameters defined for the size of the risk according to the Risk Appetite Framework, which is intended to control the Limits and Early Warnings.

Within the Risk Appetite Framework the Insurance Group has imposed early-warning thresholds on the main risk factors. The main limits relate to the following risks:

- Solvency: the levels of solvency ratio and the levels of individual risk types, in relation to Own Funds;
- Liquidity: the level of highly liquid securities, cash flow matching and the insurance liquidity coverage ratio;
- Investments;
- Operational risks: the level of operational losses.

The “prudent person” principle

Depending on the nature, scope and complexity of the risks of its business, the Company will set investment policies for all its assets, in line with the prudent person principle.

Financial portfolio management must be aimed at the following:

- the general criteria of prudence and promoting quality of assets;
- profitability assessment, adequately taking into consideration all related market, credit, concentration and liquidity risks;

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- Enhancement of risk diversification factors;
 - An asset allocation objective that adequately reflects the time frame of the liability and the economic returns hoped for by the Company.

The Company's Policy on investments is consistent with its strategy and risk policies, and take into account the risk appetite, risk tolerance and the possibility of identifying, measuring, monitoring and managing the risks involved with each type of asset.

The Policy on investments is adopted by taking into account that the assets covering the technical provisions are adequate considering the nature of the risks and the obligations, and the duration of the liabilities, in the best interests of all policyholders, customers, beneficiaries and anyone entitled to insurance benefits.

The investment policy defines the composition of the medium-to-long-term investment portfolio, indicating the security, quality, liquidity, profitability and availability level for the entire asset portfolio.

With regard to details of how the company meets its obligation to invest all assets in accordance with the "prudent person" principle, it should be noted that asset investment activities are not done in consideration of the direct, immediate obligations towards the insured parties and therefore they are not subject to the limitations included in the rules on separate management. At the same time, the capital profitability enhancement targets must be met.

The setting of operational limits for this type of activity is based on the principle that, with a view to the prudent management of assets and the solvency of the company, the share of assets needed to cover the economic capital must be invested in highly solvent, highly liquid assets, and only a surplus can be directed towards higher-risk investments.

The use of derivatives must be consistent with the principles of sound and prudent management, with a view to mitigating risks. It must take place in alignment with the Company's financial situation and operating performance.

Assessing the appropriateness of credit ratings

In order to measure the credit rating of assets in the company's portfolios, apart from the ratings given by the main rating agencies (Standard & Poor's, Moody's and Fitch Ratings), priority is given to an internal assessment done by the company itself in accordance with the internal models of the Parent Company Intesa Sanpaolo.

This internal assessment is done for all issuers towards whom there is a significant exposure.

The process of defining internal ratings is described in more detail in the Investment Rules.

Assessments of credit rating are used where required by the Solvency II Regulations (i.e. spread and counterparty risks). The Company carries out formal checks on all flows of information regarding credit ratings received from external bodies. The Risk Management operating system also involves a process of user authorisation, following each rating update received from an external body.

The outsourcing agreements with rating agencies providing the company with credit ratings do not contain any limitations on the reporting of external rating information or on the ECAI selected in the quantitative reporting models.

Considerations on the extrapolation of the risk-free rate and volatility adjustment

The company has fulfilled the regulatory requirements regarding application of the volatility adjustment:

- by defining the scope of application of the VA;
- by preparing a liquidity plan;
- by conducting a quantitative analysis to support the use of the VA.

With reference to the extrapolation of the risk-free rate, with and without the volatility adjustment mentioned in Article 44, 2a) of Directive 2009/138/EC, please note that the rates curve published by EIOPA has been used.

Risk Free Rate at 31/12/2021		
Tenor	NO VA	VA
1	-0.59%	-0.56%
2	-0.40%	-0.37%
3	-0.25%	-0.22%
4	-0.15%	-0.12%
5	-0.08%	-0.05%
6	-0.03%	0.00%
7	0.03%	0.06%
8	0.09%	0.12%
9	0.15%	0.18%
10	0.21%	0.24%
11	0.25%	0.28%
12	0.30%	0.33%
13	0.35%	0.38%
14	0.38%	0.41%
15	0.40%	0.43%
16	0.41%	0.44%
17	0.41%	0.44%
18	0.41%	0.44%
19	0.43%	0.46%
20	0.46%	0.49%
21	0.50%	0.53%
22	0.55%	0.58%
23	0.61%	0.64%
24	0.67%	0.70%
25	0.74%	0.77%
26	0.81%	0.83%
27	0.87%	0.90%
28	0.94%	0.97%
29	1.01%	1.03%
30	1.07%	1.10%

The table below shows the impact of zeroing the VA, which is indicated in terms of a change in own funds and in terms of the solvency ratio, in order to verify any non-compliance with the threshold of 100%, as a result of the zeroing.

	(million euro)	
	No VA	VA
Eligible Own Funds	1,357.0	1,361.0
Solvency Capital Requirement	499.0	495.0
Solvency ratio	272%	275%

The Solvency Ratio without the application of the VA remains above the minimum threshold and limits provided for in the Risk Appetite Framework.

Internal solvency risk assessment

The main objective of ORSA is to ensure that the companies adopt processes to assess all the current and forward-looking risks of their business and determine the corresponding hedging capital in line with the strategic and RAF objectives.

In detail, the Company, by executing the ORSA process, aims to:

- assess, at least on a yearly basis, the risk profile both in the short and long term in line with the time horizon considered for strategic planning (including the capital management plan). This assessment comprises the so-called Pillar 2 risks;
- assess the significance of the deviation between the risk profile and assumptions underlying the calculation of the regulatory capital;
- assess the overall solvency needs considering the planning time horizon, ensuring compliance at all times with requirements in terms of the regulatory capital and RAF;
- make available the ORSA results to Senior Management in order to allow their use in the operating and strategic decision-making processes (e.g. capital management, planning, budgeting, product development, investments, etc.).

The risk management process is an integral part of the organisation and decision-making processes of the company, as it is prepared in accordance with the ORSA process, and with the Risk Appetite Framework.

The internal solvency risk assessment is carried out through the ORSA process, which has been adopted by Fideuram Vita and by the Insurance Group and is split into 2 preliminary transverse activities, and 5 separate, specific phases.

The preliminary activities are:

- defining the Risk Appetite Framework: Fideuram Vita, in conjunction with the general guidelines of the Insurance Group for undertaking and monitoring risks, has the objective of continually guaranteeing an excellent service for customers and of creating value for all stakeholders;
- defining the methodologies for risk and capital measurement: the methods used to measure risks are defined and proposed, along with the risk and capital measurement and control models and systems needed to address unexpected losses. The proposed methodologies are consistent and comply with the requirements set out by current supervisory regulations.

The detailed phases are as follows:

- identifying and monitoring risks: to assess the risk profile, Fideuram Vita has to identify all risks which the individual Company is or could be exposed to. This identification is aimed at:
 - building an effective risk management system to support the achievement of the company goals while protecting policyholders;
 - determining the risk capital both for regulatory and internal purposes and to assess capital adequacy;
 - performing the internal assessment of the risk profile with regard to that underlying the standard formula.
- Self-assessment: the objective of this phase is to assess the regulatory capital requirement and the economic capital considering all the relevant risks to which Fideuram Vita is exposed taking into account the strategic and business objectives. Unlike the Pillar 1 requirements, the assessment includes also any material risks not considered in Pillar I and requires a forward-looking internal assessment of risk and solvency.
- Capital adequacy assessment: the objective of this phase is to assess the capital adequacy in terms of own funds at individual and consolidated level compared to the level of risk assumed. The phase to determine the available own funds and to compare it with the economic capital is broken down in the following sub-phases:
 - determination of available own funds;
 - assessment of capital adequacy.
- Preparation and approval of the ORSA Report: Intesa Sanpaolo Vita documents the findings of the ORSA process for all Insurance Group companies in a single report. The "Single internal risk and solvency assessment document" is a consolidated document (supervisory report on the internal risk and solvency assessment) covering the internal risks and solvency assessment carried out at group level and at the level of some group subsidiaries at the same date and in the reporting period.
- Independent review of the ORSA process: the ORSA process is included in the audit scope, and is periodically audited by the Audit function. The results of the audits are submitted to the Board of Directors in the periodic reports, and used by it for the process assessment and challenge activity.

In relation to the measurable risks, the Standard formula parameters proposed in the Solvency II regulations are currently considered to be adequate for this purpose, except for the operational risks. However, controls are in place for all risks. The company has also put in place controls to cover all business risks, including forward-looking, and with a view to safeguarding of assets.

Within the ORSA process, the Board of Directors, the Senior Management of the Company and the Internal Control and Risks Committee of the USCI have a fundamental role.

With specific reference to the ORSA process, the Board of Directors sets out and approves the policy for the current and forward-looking risk assessments, ensures their timely adaptation to significant changes in strategic policies, organisational arrangements and the business environment and promotes full use of the ORSA results for strategic purposes and in the decisions implemented by the Company. In addition, the Board of Directors:

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- determines the Risk Appetite in line with its global solvency needs, identifying the types of risk it will assume, consistently establishing the relative risk tolerance limits of the Company, which it reviews at least once a year;
 - approves the Company's risks map;
 - approves the methodologies to measure, review, manage and control significant risks, contained in the Policies on their management;
 - ensures that the risk management policy is implemented consistently and continuously within the Company, taking into account its structure, size and specificity, as well as the risks and the mutual interdependencies;
 - critically assesses the outcome of the Risk Assessment process and monitors the follow-up actions to be taken based on its outcome;
 - approves the level of regulatory capital and current and forward-looking economic capital quantified based on the risks identified in the risk map;
 - approves the level of current and forward-looking own funds to hedge all the risks identified in the risk map;
 - assesses the ORSA process with the support of the core functions;
 - approves the results of the ORSA process, expressing a final opinion on the current and forward-looking capital adequacy supported by the relevant reasons;
 - approves the capital needs plans and resolves upon the capitalisation measures and other corrective/mitigation measures to protect current and forward-looking capital adequacy.

With reference to the internal risk and solvency assessment, Senior Management:

- circulates the Policies on risk management and is responsible for their implementation;
- critically assesses the outcome of the Risk Assessment process and monitors the follow-up actions to be taken based on its outcome;
- implements the internal risk assessment and solvency policy of the Company, contributing to ensuring the definition of operating limits and ensuring the prompt verification of the limits themselves, as well as the monitoring of risk exposure and compliance with the tolerance limits of the Company.

The Internal Control and Risks Committee of the USCI assists the Board of Directors in determining the guidelines of the internal control and risk management system, in the periodic verification of its adequacy and its effective functioning, and in the identification and management of the main business risks. Moreover, it monitors the specific risk profile of the Company.

With specific reference to the ORSA process, the Risk Committee:

- takes steps to ensure the full use of the results of the ORSA for strategic and decision-making purposes of the Company;
- assesses the proposals to submit to the Board of Directors for final approval on:
 - ORSA process description;
 - risk appetite level;
 - risk map;
 - methodologies for measuring, assessing, managing and controlling risks;

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- stress test methodologies;
 - level of current and forward-looking economic capital;
 - level of own funds to cover current and forward-looking capital - ORSA Report.

The Risk Committee periodically analyses the results of monitoring the economic capital and regulatory requirements both in current and forward-looking terms and of the *stress tests* submitted by Risk Management.

The Functions involved in the ORSA evaluations include the Actuarial Function with regard to sharing and contributing to stress tests and sensitivity analyses.

The internal risk assessment is prepared annually, and is examined and approved by the Board of Directors of the Company.

For the assessment of solvency using the standard formula and in the internal risk assessment, the Company assures the quality of the data used in the calculation processes.

To guarantee the quality of data the Company has set up a data quality management framework in accordance with the Solvency II requirements. The framework is designed to ensure ongoing compliance with the data quality requirements contained in the European standards on the appropriateness, completeness and accuracy of information. European regulations require that Companies adopt processes and procedures aimed at ensuring that the data used to calculate provisions comply with these standards.

The Company aims to ensure an adequate level of oversight of the entire data production/transformation process starting from when the data is produced through to its transformation and inclusion in the reporting systems. For this purpose, the Company implements a monitoring and diagnosis system to recognise and resolve any irregularities through appropriate corrective actions.

Specifically, the Data Governance system is established to ensure compliance with the following requirements:

- Governability: the data, the aggregation and perimeter definition procedures, and the extraction, recording, transformation and loading procedures of the data in archives are documented and classified to ensure traceability and monitoring;
- Usability: accessibility of information by users is ensured through adequate instruments for the activities carried out;
- Integrity and confidentiality: data must be protected against unauthorised access in order to protect their accuracy, completeness and absence of tampering in compliance with applicable internal and external regulations;
- Availability: availability of data, when required by company processes, and availability of the resources needed for the purpose is ensured in compliance with the provisions in the document "Insurance Group Business Continuity Guidelines";
- Retention and filing: specific data conservation procedures are provided for each data category ensuring the availability of the information in compliance with current regulations and any specific requirements expressed by users;
- Adaptability: the data are generated and aggregated to provide adequately address the internal and external information needs and the development of the company.

In compliance with the regulatory provisions, data quality must be assessed according to the following dimensions (or "quality standards"):

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- Accuracy: the data must be input without errors and omissions in a consistent and timely manner for the purposes for which it is processed. By way of example, the controls on the structure of the information flow (presence of the primary key and mandatory data, presence of duplicate records, etc.) and on the requirements of timeliness in the provision of data can be considered accuracy controls;
 - Completeness: the data must have sufficient granularity and historical depth for the purposes for which it is processed. For example, the assessment of completeness requires the implementation of periodic procedures to ascertain that no data have been excluded. From a technical point of view, to ensure the completeness of the individual data flow, mechanisms are to be put in place to prevent deliberate or accidental causes, such as abnormal interruptions of IT procedures, from resulting in the production of incomplete data;
 - Appropriateness: the data must be directly related to the purposes for which it is processed. For example, the assessment of the appropriateness requires procedures for the periodic review of compliance of the data with company needs including through performance controls, comparisons with benchmarks or balancing of data with certified sources.

The Data Quality process (or Data Quality Management) is aimed at pursuing the objectives of accuracy, completeness and appropriateness of data as set out by European and Italian regulations. It involves the following four main phases:

- Definition of data;
- Assessment of data quality;
- Identification and resolution of irregularities;
- Monitoring and reporting.

Internal risk and solvency assessment

The internal risk and solvency process of Fideuram Vita is conducted in accordance with the Insurance Group process. Refer to the details of the section on the Insurance Group.

Intesa Sanpaolo Life D.A.C.

Risk management process, and role of the risk management function

As regards Intesa Sanpaolo Life, the Risk Management function of the Parent Company: i) provides its Irish counterpart with the principles used to draw up the internal regulations, methodologies and verification methods used, to ensure that risk is managed and measured in the same way, and ii) check that these regulations are implemented, by attending the Risk & Compliance Committee, as a permanent attendee, so that it can analyse and discuss the main risk control dynamics, in view of decisions to be taken by the Management Board.

Activities are regularly coordinated, partly through the use of common systems to standardise the management of financial and operational risks.

Internal risk and solvency assessment

The internal risk management process for Intesa Sanpaolo Life is conducted in accordance with the Insurance Group process. Refer to the section on the Insurance Group. In addition to the Group reports, Intesa Sanpaolo Life provides an annual ORSA report at company level. This is based on the reports prepared by the Insurance Group, investigates the specific risks of the Irish company and includes the analysis required by the regulations and the country guidelines.

Intesa Sanpaolo RBM Salute S.p.A.

Risk management process, and role of the risk management function

The process to integrate the Company in the Insurance Group began, with effect from 11 May 2020, in order to guarantee a gradual alignment of Intesa Sanpaolo RBM Salute to the standards of the Intesa Sanpaolo Vita Group, above all with reference to the Risk Management System and Risk Management process.

The risk management process of the Company Intesa Sanpaolo RBM Salute is governed in line with the self-assessment of risk profile and risk appetite (Risk Appetite Framework or RAF). The Level 1 documentation referred to above is complemented by the Operational Rules and Guidelines concerning the management of all the risks to which the Company is exposed.

There are four main phases in the risk management process:

1. Risk identification and assessment;
2. Risk management;
3. Monitoring risk exposure;
4. Reporting.

The first major phase gives Senior Management an immediate overview of the risk exposure, which can guide their decision-making processes and help to define the priority actions, also in terms of strategic planning.

There are 4 phases of the risk assessment process, which are carried out at least once a year (or when specific events occur):

- Analysis: this includes all activities to obtain information, identify and record risks with the association of an Owner and involvement of other Specialist Functions⁵ to identify and assess risk profiles that are directly supervised.
- Assessment: this includes a self-assessment in terms of probability, impact and risk mitigation by the risk Owner. In this phase, the Owner identifies any actions to implement or implemented, to mitigate risk;

⁵ The term "Specialist Functions" means the Functions in charge of managing some specific risks, i.e. second level Core Functions, the DPO, the IT Security and AML Function, as governed by company regulations.

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- Validation: this includes the phase where the risk Owner assesses the result of the analysis and the Risk Management Function works with other Core Functions to verify whether the assessment result is aligned with their evidence;
 - Risk Map: this includes activities to prepare a report on the risk exposure of each Insurance Group Company and the Group as a whole.

The risk assessment process also includes the hard-to-quantify risks considered to be significant for the Company and risk mitigation actions may be proposed.

On conclusion of the risk assessment process, the Group manages each risk by following the conditions and tolerance limits stated in the Rules, which constitute the risk management framework.

The final phase involves monitoring and quantification of the risks.

The monitoring process provides for the constant application of stress tests. The stress tests consist of a set of techniques used by the Company to:

- measure their vulnerability to extraordinary yet plausible events;
- allow senior management to understand the relation between the risk taken on and its risk appetite, in addition to the adequacy of the available capital.

Should the results of the stress tests show that there is potential non-compliance with the minimum regulatory requirements and/or that the controls for each risk are inadequate, the Risk Committee will suggest improvements in order to consolidate the capital stability to the Board of Directors of the company concerned, also considering solvency at Insurance Group level.

In addition to this activity, there is a structured information gathering process, which is necessary to calculate the indicators and parameters defined for the size of the risk according to the Risk Appetite Framework, which is intended to control the Limits and Early Warnings.

Within the Risk Appetite Framework the Insurance Group has imposed early-warning thresholds on the main risk factors. The main limits relate to the following risks:

- Solvency: the levels of solvency ratio and the levels of individual risk types, in relation to Own Funds;
- Liquidity: cash flow matching;
- sustainability of earnings; the combined ratio level;
- the level of operational losses.

The “prudent person” principle

Depending on the nature, scope and complexity of the risks of its business, the Company will set investment policies for all its assets, in line with the prudent person principle.

Financial portfolio management must be aimed at the following:

- the general criteria of prudence and promoting quality of assets;
- profitability assessment, adequately taking into consideration all related market, credit, concentration and liquidity risks;

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- Enhancement of risk diversification factors;
 - An asset allocation objective that adequately reflects the time frame of the liability and the economic returns hoped for by the Company.

The Company's Policy on investments is consistent with its strategy and risk policies, and take into account the risk appetite, risk tolerance and the possibility of identifying, measuring, monitoring and managing the risks involved with each type of asset.

The use of derivatives must be consistent with the principles of sound and prudent management, with a view to mitigating risks. It must take place in alignment with the Company's financial situation and operating performance, and strictly adhere to the provisions of IVASS Regulation no. 24/2016.

Assessing the appropriateness of credit ratings

In order to measure the credit rating of assets in the company's portfolios, apart from the ratings given by the main rating agencies (Standard & Poor's, Moody's and Fitch Ratings), priority is given to an internal assessment done by the company itself in accordance with the internal models of the Parent Company Intesa Sanpaolo.

This internal assessment is done for all issuers towards whom there is a significant exposure.

The process of defining internal ratings is described in more detail in the Investment Rules.

Assessments of credit rating are used where required by the Solvency II Regulations (i.e. spread and counterparty risks). The Company carries out formal checks on all flows of information regarding credit ratings received from external bodies. The Risk Management operating system also involves a process of user authorisation, following each rating update received from an external body.

The outsourcing agreements with rating agencies providing the company with credit ratings do not contain any limitations on the reporting of external rating information or on the ECAI selected in the quantitative reporting models.

Considerations on the extrapolation of the risk-free rate and volatility adjustment

The Company does not apply the volatility adjustment to the calculation of insurance liabilities.

Below is the valuation regarding the extrapolation of the risk free rate without the volatility adjustment mentioned in Article 44, paragraph 2a, of Directive 2009/138/EC. The curve corresponds to the EIOPA curve.

Risk Free Rate at 31/12/2021	
Tenor	NO VA
1	-0.59%
2	-0.40%
3	-0.25%
4	-0.15%
5	-0.08%
6	-0.03%
7	0.03%
8	0.09%
9	0.15%
10	0.21%
11	0.25%
12	0.30%
13	0.35%
14	0.38%
15	0.40%
16	0.41%
17	0.41%
18	0.41%
19	0.43%
20	0.46%
21	0.50%
22	0.55%
23	0.61%
24	0.67%
25	0.74%
26	0.81%
27	0.87%
28	0.94%
29	1.01%
30	1.07%

Internal solvency risk assessment

The main objective of ORSA is to ensure that the companies adopt processes to assess all the current and forward-looking risks of their business and determine the corresponding hedging capital in line with the strategic and RAF objectives. In detail, the Company, by executing the ORSA process, aims to:

- assess, at least on a yearly basis, the risk profile both in the short and long term in line with the time horizon considered for strategic planning (including the capital management plan). This assessment comprises the so-called Pillar 2 risks;
- assess the significance of the deviation between the risk profile and assumptions underlying the calculation of the regulatory capital;
- assess the overall solvency needs considering the planning time horizon, ensuring compliance at all times with requirements in terms of the regulatory capital and RAF;

-
- make the results of ORSA available to Senior Management, so they may be used in operating and strategic decision-making processes (e.g. capital management, planning, budget process, product development, investments, etc.).

The risk management process is an integral part of the organisation and decision-making processes of the company, as it is prepared in accordance with the ORSA process, and with the Risk Appetite Framework process.

The internal solvency risk assessment is carried out through the ORSA process, which has been adopted by Intesa Sanpaolo Assicura and by the Insurance Group and is split into 2 preliminary transverse activities, and 5 separate, specific phases.

The preliminary activities are:

- defining the Risk Appetite Framework: Intesa Sanpaolo Assicura follows the general principles defined by the parent company for the acceptance and monitoring of risks, in order to ensure a continuous and excellent service toward customers and to create value for all stakeholders;
- defining the methodologies for risk and capital measurement: the methods to measure risks are defined and proposed, along with the risk and capital measurement and control models and systems needed to address unexpected losses. The proposed methodologies are consistent and comply with the requirements set out by current supervisory regulations.

The detailed phases are as follows:

- identifying and monitoring risks: to assess the individual and Insurance Group risk profile, Intesa Sanpaolo Assicura must identify all the risks to which the individual company and the entire Insurance Group is or may be exposed. This identification is aimed at:
 - building an effective risk management system to support the achievement of the company goals while protecting policyholders;
 - determining the risk capital both for regulatory and internal purposes and to assess capital adequacy;
 - performing the internal assessment of the risk profile with regard to that underlying the standard formula.
- Self-Assessment: the objective of this phase is to assess the regulatory capital requirement and the economic capital considering all the relevant risks to which Intesa Sanpaolo RBM Salute and the Insurance Group companies are exposed, and taking into account the strategic and business objectives. Unlike the Pillar 1 requirements, the assessment includes also any material risks not considered in Pillar I and requires a forward-looking internal assessment of risk and solvency.
- Capital adequacy assessment: the objective of this phase is to assess the capital adequacy in terms of own funds compared to the level of risk assumed. The phase to determine the available own funds and to compare it with the economic capital is broken down in the following subphases:
 - determination of available own funds;
 - assessment of capital adequacy.
- preparation and approval of the ORSA Report: Intesa Sanpaolo Assicura contributes to the results of the ORSA process which are contained in a single report. The "Single internal risk and solvency assessment report" is a consolidated document (supervisory report on the internal risk and solvency assessment) covering the internal risks and solvency assessment carried out

at Insurance Group level and at the level of some group subsidiaries at the same date and in the same reporting period;

- independent review of the ORSA process: the ORSA process is included in the audit scope, and is periodically audited by the Audit function. The results of the audits are submitted to the Board of Directors in the periodic reports, and used by it for the process assessment and challenge activity.

As regards the assessment of the adequacy of the standard formula to represent its risk profile, the standard formula parameters proposed in the Solvency II Directive are currently considered to be adequate for this purpose, except for the operational risks. However, controls are in place for all risks. The company has also put in place controls to cover all business risks, including forward-looking, and with a view to safeguarding of assets.

Within the ORSA process, the Board of Directors, the Senior Management of the Company and the Internal Control and Risks Committee of the USCI have a fundamental role.

With specific reference to the ORSA process, the Board of Directors sets out and approves the policy for the current and forward-looking risk assessments, ensures their timely adaptation to significant changes in strategic policies, organisational arrangements and the business environment and promotes full use of the ORSA results for strategic purposes and in the decisions implemented by the Company. In addition, the Board of Directors:

- determines the Risk Appetite in line with its global solvency needs, identifying the types of risk it will assume, consistently establishing the relative risk tolerance limits of the Company, which it reviews at least once a year;
- approves the Company's risks map;
- approves the methodologies to measure, review, manage and control significant risks, contained in the Policies on their management;
- ensures that the risk management policy is implemented consistently and continuously within the Company, taking into account its structure, size and specificity, as well as the risks and the mutual interdependencies;
- critically assesses the outcome of the Risk Assessment process and monitors the follow-up actions to be taken based on its outcome;
- approves the level of regulatory capital and current and forward-looking economic capital quantified based on the risks identified in the risk map;
- approves the level of current and forward-looking own funds to hedge all the risks identified in the risk map;
- assesses the ORSA process with the support of the core functions;
- approves the results of the ORSA process, expressing a final opinion on the current and forward-looking capital adequacy supported by the relevant reasons;
- approves the capital needs plans and resolves upon the capitalisation measures and other corrective/mitigation measures to protect current and forward-looking capital adequacy.

With reference to the internal risk and solvency assessment, Senior Management:

- circulates the Policies on risk management and is responsible for their implementation;

-
- critically assesses the outcome of the Risk Assessment process and monitors the follow-up actions to be taken based on its outcome;
 - implements the internal risk assessment and solvency policy of the Company, contributing to ensuring the definition of operating limits and ensuring the prompt verification of the limits themselves, as well as the monitoring of risk exposure and compliance with the tolerance limits of the Company.

The Internal Control and Risks Committee of the USCI assists the Board of Directors in determining the guidelines of the internal control and risk management system, in the periodic verification of its adequacy and its effective functioning, and in the identification and management of the main business risks. Moreover, it monitors the specific risk profile of the Company.

With specific reference to the ORSA process, the Risk Committee:

- takes steps to ensure the full use of the results of the ORSA for strategic and decision-making purposes of the Company;
- assesses the proposals to submit to the Board of Directors for final approval on:
 - ORSA process description;
 - risk appetite level;
 - risk map;
 - methodologies for measuring, assessing, managing and controlling risks;
 - stress test methodologies;
 - level of current and forward-looking economic capital;
 - level of own funds to cover current and forward-looking capital - ORSA Report.

The Risk Committee periodically analyses the results of monitoring the economic capital and regulatory requirements both in current and forward-looking terms and of the *stress tests* submitted by Risk Management.

The Functions involved in the ORSA evaluations include the Actuarial Function with regard to sharing and contributing to stress tests and sensitivity analyses.

The internal risk assessment is prepared annually, and is examined and approved by the Board of Directors of the Company.

For the assessment of solvency using the standard formula and in the internal risk assessment, the Company assures the quality of the data used in the calculation processes.

To guarantee the quality of data the Company has set up a data quality management framework in accordance with the Solvency II requirements. The framework is designed to ensure ongoing compliance with the data quality requirements contained in the European standards on the appropriateness, completeness and accuracy of information. European regulations require that Companies adopt processes and procedures aimed at ensuring that the data used to calculate provisions comply with these standards.

The Company considers information to be of primary importance for the organisation and for the pursuit of the strategic and business objectives; in this regard, the Company outlined a data governance system aimed at ensuring a high level of quality and monitoring of the entire data production/transformation process, starting from generation, through subsequent transformations and up to the supply of target systems.

Specifically, the Data Governance system is established to ensure compliance with the following requirements:

- governability: the data, the aggregation and perimeter definition procedures, and the extraction, recording, transformation and loading procedures of the data in archives are documented and classified to ensure traceability and monitoring;
- usability: accessibility of information by users is ensured through adequate instruments for the activities carried out;
- integrity and confidentiality: data must be protected against unauthorised access in order to protect their accuracy, completeness and absence of tampering in compliance with applicable internal and external regulations;
- availability: availability of data, when required by company processes, and availability of the resources needed for the purpose is ensured in compliance with the provisions in the document "Insurance Group Business Continuity Guidelines";
- conservation and archiving of data: specific data conservation procedures are provided for each data category ensuring the availability of the information in compliance with current regulations and any specific requirements expressed by users;
- adaptability: the data are generated and aggregated to provide adequately address the internal and external information needs and the development of the company.

In compliance with the regulatory provisions, data quality must be assessed according to the following dimensions (or "quality standards"):

- accuracy: the data must be input without errors and omissions in a consistent and timely manner for the purposes for which it is processed. By way of example, the controls on the structure of the information flow (presence of the primary key and mandatory data, presence of duplicate records, etc.) and on the requirements of timeliness in the provision of data can be considered accuracy controls;
- completeness: the data must have sufficient granularity and historical depth for the purposes for which it is processed. For example, the assessment of completeness requires the implementation of periodic procedures to ascertain that no data have been excluded. From a technical point of view, to ensure the completeness of the individual data flow, mechanisms are to be put in place to prevent deliberate or accidental causes, such as abnormal interruptions of IT procedures, from resulting in the production of incomplete data;
- appropriateness: the data must be directly related to the purposes for which it is processed. For example, the assessment of the appropriateness requires procedures for the periodic review of compliance of the data with company needs including through performance controls, comparisons with benchmarks or balancing of data with certified sources.

The Data Quality process (or Data Quality Management) is aimed at pursuing the objectives of accuracy, completeness and appropriateness of data as set out by European and Italian regulations. It involves the following four main phases:

- definition of data;
- assessment of data quality;
- identification and resolution of irregularities;
- monitoring and reporting.

Internal risk and solvency assessment

The internal risk management process for Intesa Sanpaolo RBM Salute is conducted in accordance with the Group process. Refer to the details of the section on the Insurance Group.

Cargeas Assicurazioni S.p.A.

Risk management process, and role of the risk management function

The project to integrate Cargeas Assicurazioni S.p.A., began in 2021; said company was fully acquired by Intesa Sanpaolo Vita in May 2021. Within the project, a specific sub-project is planned to progressively integrate and standardise Cargeas' risk management systems with respect to the Insurance Group's standards.

The process of managing the risks of Cargeas Assicurazioni is governed in line with the self-assessment of risk profile and risk appetite (Risk Appetite Framework or RAF).

There are four main phases in the risk management process:

1. Risk identification and assessment;
2. Risk management;
3. Monitoring risk exposure;
4. Reporting.

The first major phase gives Senior Management an immediate overview of the risk exposure, which can guide their decision-making processes and help to define the priority actions, also in terms of strategic planning.

There are 4 phases of the risk assessment process, which are carried out at least once a year (or when specific events occur):

- Analysis: this includes all activities to obtain information, identify and record risks with the association of an Owner and involvement of other Specialist Functions⁶ to identify and assess risk profiles that are directly supervised.
- Assessment: this includes a self-assessment in terms of probability, impact and risk mitigation by the risk Owner. In this phase, the Owner identifies any actions to implement or implemented, to mitigate risk;
- Validation: this includes the phase where the risk Owner assesses the result of the analysis and the Risk Management Function works with other Core Functions to verify whether the assessment result is aligned with their evidence;
- Risk Map: this includes activities to prepare a report on the risk exposure of each Insurance Group Company and the Group as a whole.

⁶ The term "Specialist Functions" means the Functions in charge of managing some specific risks, i.e. second level Core Functions, the DPO, the IT Security and AML Function, as governed by company regulations.

The risk assessment process also includes the hard to quantify risks considered significant for the Company.

On conclusion of the risk assessment process, the Group manages each risk by following the conditions and tolerance limits stated in the Rules, which constitute the risk management framework.

The final phase involves monitoring and quantification of the risks.

The monitoring process provides for the constant application of stress tests. The stress tests consist of a set of techniques used by the Company to:

- measure their vulnerability to extraordinary yet plausible events;
- allow senior management to understand the relation between the risk taken on and its risk appetite, in addition to the adequacy of the available capital.

Should the results of the stress tests show that there is potential non-compliance with the minimum regulatory requirements and/or that the controls for each risk are inadequate, the Risk Committee will suggest improvements in order to consolidate the capital stability to the Board of Directors of the company concerned, also considering solvency at Insurance Group level.

In addition to this activity, there is a structured information gathering process, which is necessary to calculate the indicators and parameters defined for the size of the risk according to the Risk Appetite Framework, which is intended to control the Limits and Early Warnings.

Within the Risk Appetite Framework the Insurance Group has imposed early-warning thresholds on the main risk factors. The main limits relate to the following risks:

- Solvency: the levels of solvency ratio and the levels of individual risk types, in relation to Own Funds;
- Liquidity: the level of highly liquid securities, cash flow matching and the insurance liquidity coverage ratio;
- investments;
- operational risks: the level of operational losses.

The “prudent person” principle

Depending on the nature, scope and complexity of the risks of its business, the Company will set investment policies for all its assets, in line with the prudent person principle.

Financial portfolio management must be aimed at the following:

- the general criteria of prudence and promoting quality of assets;
- profitability assessment, adequately taking into consideration all related market, credit, concentration and liquidity risks;
- Enhancement of risk diversification factors;
- An asset allocation objective that adequately reflects the time frame of the liability and the economic returns hoped for by the Company.

The Rules on the Company's investments are consistent with its strategy and risk policies, and take into account the risk appetite, risk tolerance and the possibility of identifying, measuring, monitoring and managing the risks involved with each type of asset.

The use of derivatives must be consistent with the principles of sound and prudent management, with a view to mitigating risks. It must take place in alignment with the Company's financial situation and operating performance, and strictly adhere to the provisions of IVASS Regulation no. 24/2016.

Assessing the appropriateness of credit ratings

In order to measure the credit rating of assets in the company's portfolios, apart from the ratings given by the main rating agencies (Standard & Poor's, Moody's and Fitch Ratings), priority is given to an internal assessment done by the Ultimate Italian Parent Company (USCI) Intesa Sanpaolo Vita S.p.A, in accordance with the internal models of the Parent Company Intesa Sanpaolo.

This internal assessment is done for all issuers towards whom there is a significant exposure.

The process of defining internal ratings is described in more detail in the Investment Rules.

Assessments of credit rating are used where required by the Solvency II Regulations (i.e. spread and counterparty risks). The Company carries out formal checks on all flows of information regarding credit ratings received from external bodies. The Risk Management operating system also involves a process of user authorisation, following each rating update received from an external body.

The outsourcing agreements with rating agencies providing the company with credit ratings do not contain any limitations on the reporting of external rating information or on the ECAI selected in the quantitative reporting models.

Considerations on the extrapolation of the risk-free rate and volatility adjustment

The Company does not apply the volatility adjustment to the calculation of insurance liabilities.

Below is the valuation regarding the extrapolation of the risk free rate without the volatility adjustment mentioned in Article 44, paragraph 2a, of Directive 2009/138/EC. The curve corresponds to the EIOPA curve.

Risk Free Rate at 31/12/2021	
Tenor	NO VA
1	-0.59%
2	-0.40%
3	-0.25%
4	-0.15%
5	-0.08%
6	-0.03%
7	0.03%
8	0.09%
9	0.15%
10	0.21%
11	0.25%
12	0.30%
13	0.35%
14	0.38%
15	0.40%
16	0.41%
17	0.41%
18	0.41%
19	0.43%
20	0.46%
21	0.50%
22	0.55%
23	0.61%
24	0.67%
25	0.74%
26	0.81%
27	0.87%
28	0.94%
29	1.01%
30	1.07%

Internal solvency risk assessment

The main objective of ORSA is to ensure that the companies adopt processes to assess all the current and forward-looking risks of their business and determine the corresponding hedging capital in line with the strategic and RAF objectives. In detail, the Company, by executing the ORSA process, aims to:

- assess, at least on a yearly basis, the risk profile both in the short and long term in line with the time horizon considered for strategic planning (including the capital management plan). This assessment comprises the so-called Pillar 2 risks;
- assess the significance of the deviation between the risk profile and assumptions underlying the calculation of the regulatory capital;
- assess the overall solvency needs considering the planning time horizon, ensuring compliance at all times with requirements in terms of the regulatory capital and RAF;

-
- make the results of ORSA available to Senior Management, so they may be used in operating and strategic decision-making processes (e.g. capital management, planning, budget process, product development, investments, etc.).

The risk management process is an integral part of the organisation and decision-making processes of the company, as it is prepared in accordance with the ORSA process, and with the Risk Appetite Framework process.

The internal solvency risk assessment is carried out through the ORSA process, which has been adopted by Intesa Sanpaolo Assicura and by the Insurance Group and is split into 2 preliminary transverse activities, and 5 separate, specific phases.

The preliminary activities are:

- defining the Risk Appetite Framework: Intesa Sanpaolo Assicura follows the general principles defined by the parent company for the acceptance and monitoring of risks, in order to ensure a continuous and excellent service toward customers and to create value for all stakeholders;
- defining the methodologies for risk and capital measurement: the methods to measure risks are defined and proposed, along with the risk and capital measurement and control models and systems needed to address unexpected losses. The proposed methodologies are consistent and comply with the requirements set out by current supervisory regulations.

The detailed phases are as follows:

- identifying and monitoring risks: to assess the individual and Insurance Group risk profile, Intesa Sanpaolo Assicura must identify all the risks to which the individual company and the entire Insurance Group is or may be exposed. This identification is aimed at:
 - building an effective risk management system to support the achievement of the company goals while protecting policyholders;
 - determining the risk capital both for regulatory and internal purposes and to assess capital adequacy;
 - performing the internal assessment of the risk profile with regard to that underlying the standard formula.
- Self-Assessment: the objective of this phase is to assess the regulatory capital requirement and the economic capital considering all the relevant risks to which Cargeas and the Insurance Group companies are exposed, and taking into account the strategic and business objectives. Unlike the Pillar 1 requirements, the assessment includes also any material risks not considered in Pillar I and requires a forward-looking internal assessment of risk and solvency.
- Capital adequacy assessment: the objective of this phase is to assess the capital adequacy in terms of own funds compared to the level of risk assumed. The phase to determine the available own funds and to compare it with the economic capital is broken down in the following subphases:
 - determination of available own funds;
 - assessment of capital adequacy.
- preparation and approval of the ORSA Report: Intesa Sanpaolo Assicura contributes to the results of the ORSA process which are contained in a single report. The "Single internal risk and solvency assessment report" is a consolidated document (supervisory report on the internal risk and solvency assessment) covering the internal risks and solvency assessment carried out

at Insurance Group level and at the level of some group subsidiaries at the same date and in the same reporting period;

- independent review of the ORSA process: the ORSA process is included in the audit scope, and is periodically audited by the Audit function. The results of the audits are submitted to the Board of Directors in the periodic reports, and used by it for the process assessment and challenge activity.

As regards the assessment of the adequacy of the standard formula to represent its risk profile, the standard formula parameters proposed in the Solvency II Directive are currently considered to be adequate for this purpose, except for the operational risks. However, controls are in place for all risks. The company has also put in place controls to cover all business risks, including forward-looking, and with a view to safeguarding of assets.

Within the ORSA process, the Board of Directors, the Senior Management of the Company and the Internal Control and Risks Committee of the USCI have a fundamental role.

With specific reference to the ORSA process, the Board of Directors sets out and approves the policy for the current and forward-looking risk assessments, ensures their timely adaptation to significant changes in strategic policies, organisational arrangements and the business environment and promotes full use of the ORSA results for strategic purposes and in the decisions implemented by the Company. In addition, the Board of Directors:

- determines the Risk Appetite in line with its global solvency needs, identifying the types of risk it will assume, consistently establishing the relative risk tolerance limits of the Company, which it reviews at least once a year;
- approves the Company's risks map;
- approves the methodologies to measure, review, manage and control significant risks, contained in the Policies on their management;
- ensures that the risk management policy is implemented consistently and continuously within the Company, taking into account its structure, size and specificity, as well as the risks and the mutual interdependencies;
- critically assesses the outcome of the Risk Assessment process and monitors the follow-up actions to be taken based on its outcome;
- approves the level of regulatory capital and current and forward-looking economic capital quantified based on the risks identified in the risk map;
- approves the level of current and forward-looking own funds to hedge all the risks identified in the risk map;
- assesses the ORSA process with the support of the core functions;
- approves the results of the ORSA process, expressing a final opinion on the current and forward-looking capital adequacy supported by the relevant reasons;
- approves the capital needs plans and resolves upon the capitalisation measures and other corrective/mitigation measures to protect current and forward-looking capital adequacy.

With reference to the internal risk and solvency assessment, Senior Management:

- circulates the Policies on risk management and is responsible for their implementation;

-
- critically assesses the outcome of the Risk Assessment process and monitors the follow-up actions to be taken based on its outcome;
 - implements the internal risk assessment and solvency policy of the Company, contributing to ensuring the definition of operating limits and ensuring the prompt verification of the limits themselves, as well as the monitoring of risk exposure and compliance with the tolerance limits of the Company.

The Internal Control and Risks Committee of the USCI assists the Board of Directors in determining the guidelines of the internal control and risk management system, in the periodic verification of its adequacy and its effective functioning, and in the identification and management of the main business risks. Moreover, it monitors the specific risk profile of the Company.

With specific reference to the ORSA process, the Risk Committee:

- takes steps to ensure the full use of the results of the ORSA for strategic and decision-making purposes of the Company;
- assesses the proposals to submit to the Board of Directors for final approval on:
 - ORSA process description;
 - risk appetite level;
 - risk map;
 - methodologies for measuring, assessing, managing and controlling risks;
 - stress test methodologies;
 - level of current and forward-looking economic capital;
 - level of own funds to cover current and forward-looking capital - ORSA Report.

The Risk Committee periodically analyses the results of monitoring the economic capital and regulatory requirements both in current and forward-looking terms and of the *stress tests* submitted by Risk Management.

The Functions involved in the ORSA evaluations include the Actuarial Function with regard to sharing and contributing to stress tests and sensitivity analyses.

The internal risk assessment is prepared annually, and is examined and approved by the Board of Directors of the Company.

For the assessment of solvency using the standard formula and in the internal risk assessment, the Company assures the quality of the data used in the calculation processes.

To guarantee the quality of data the Company has set up a data quality management framework in accordance with the Solvency II requirements. The framework is designed to ensure ongoing compliance with the data quality requirements contained in the European standards on the appropriateness, completeness and accuracy of information. European regulations require that Companies adopt processes and procedures aimed at ensuring that the data used to calculate provisions comply with these standards.

The Company aims to ensure an adequate level of oversight of the entire data production/transformation process starting from when the data is produced through to its transformation and inclusion in the reporting systems. For this purpose, the Company implements a monitoring and diagnosis system to recognise and resolve any irregularities through appropriate corrective actions.

Specifically, the Data Governance system is established to ensure compliance with the following requirements:

- governability: the data, the aggregation and perimeter definition procedures, and the extraction, recording, transformation and loading procedures of the data in archives are documented and classified to ensure traceability and monitoring;
- usability: accessibility of information by users is ensured through adequate instruments for the activities carried out;
- integrity and confidentiality: data must be protected against unauthorised access in order to protect their accuracy, completeness and absence of tampering in compliance with applicable internal and external regulations;
- availability: availability of data, when required by company processes, and availability of the resources needed for the purpose is ensured in compliance with the provisions in the document "Insurance Group Business Continuity Guidelines";
- conservation and archiving of data: specific data conservation procedures are provided for each data category ensuring the availability of the information in compliance with current regulations and any specific requirements expressed by users;
- adaptability: the data are generated and aggregated to provide adequately address the internal and external information needs and the development of the company.

In compliance with the regulatory provisions, data quality must be assessed according to the following dimensions (or "quality standards"):

- accuracy: the data must be input without errors and omissions in a consistent and timely manner for the purposes for which it is processed. By way of example, the controls on the structure of the information flow (presence of the primary key and mandatory data, presence of duplicate records, etc.) and on the requirements of timeliness in the provision of data can be considered accuracy controls;
- completeness: the data must have sufficient granularity and historical depth for the purposes for which it is processed. For example, the assessment of completeness requires the implementation of periodic procedures to ascertain that no data have been excluded. From a technical point of view, to ensure the completeness of the individual data flow, mechanisms are to be put in place to prevent deliberate or accidental causes, such as abnormal interruptions of IT procedures, from resulting in the production of incomplete data;
- appropriateness: the data must be directly related to the purposes for which it is processed. For example, the assessment of the appropriateness requires procedures for the periodic review of compliance of the data with company needs including through performance controls, comparisons with benchmarks or balancing of data with certified sources.

The Data Quality process (or Data Quality Management) is aimed at pursuing the objectives of accuracy, completeness and appropriateness of data as set out by European and Italian regulations. It involves the following four main phases:

- definition of data;
- assessment of data quality;
- identification and resolution of irregularities;
- monitoring and reporting.

Internal risk and solvency assessment

The internal risk management process for Cargeas Assicurazioni is conducted in accordance with the Insurance Group process. Refer to the details of the section on the Insurance Group.

B.4 INTERNAL CONTROLS SYSTEM

Intesa Sanpaolo Vita Insurance Group

The internal control system of the Insurance Group involves all the company structures and every member of staff, each within his/her own field of competence and responsibility, in order to ensure constant and effective monitoring of risks.

The Board of Directors of Intesa Sanpaolo Vita, responsible for the Group, is in charge of the Group's internal control and checks that the Senior Management of the USCI implements the system correctly, assessing its adequacy and proper functioning and ensuring that the main risks of the Group are adequately identified and managed.

The Senior Management of Intesa Sanpaolo Vita, including with reference to the role of the USCI, ensures that staff are made aware of their own role and responsibilities so as to be effectively engaged in controls understood to be an integral part of their activity. For this purpose, it ensures that the system of authorities is formalised and is known by staff, as well as the procedures governing the allocation of tasks, the operational processes and the reporting channels. It also verifies the exercise of the powers assigned to legal representatives in the course of major transactions in terms of dimensions and characteristics they conducted with the powers granted to them.

The Insurance Group's Internal Controls System is structured on multiple levels.

- **Level I Control** - line controls: consist in the checks carried out both by those who perform a given activity and by those who are responsible for supervision, generally within the same organizational unit. These are the checks carried out by the production units themselves or embedded in the automated procedures or those carried out as part of the back-office activity. These are an essential part of the Internal Controls System and require the development and rooting of a "culture of control" in order to ensure the achievement of company goals. The operational and business departments are directly responsible for the risk management process; during the course of their daily operations, these units – in cooperation with the level II functions and, where applicable, the Organisation function – must identify, measure, evaluate, monitor, control, mitigate and communicate the risks arising from ordinary business operations, in accordance with the risk management process. The organizational units must comply with the operational limits imposed upon them by the risk objectives and by the procedures for risk management governed in the relevant internal documentation. These controls must be provided for and described in the procedure and set out in the mapping of the processes.
- **Level II Control** - risk monitoring: these are specific activities assigned to independent bodies other than the organisational units; their aim is to ensure inter alia:
 - correct implementation of the risk management process;
 - the conformity of the company's operations to the regulations, including the self-governance rules, and helping to set the methods for measuring risks, checking compliance

with the limits assigned to the different organizational units and checking consistency of the activities with objectives and risk levels set by the competent company bodies. Specifically, this level includes controls on the risks identified in the risk map resulting from the Risk Assessment process (for example, underwriting risks, credit risks, asset-related and investment risks, operational risks and reputational risks and compliance risks. This group of checks comprises activities carried out by functions such as: the Risk Management, Actuarial, AML, Compliance, Tax controls and GAF and Regulatory Agenda Functions. The Actuarial Function is tasked with the control and supervision of the calculations of the Solvency II technical provisions and assesses the activities carried out by the actuarial units.

- **Level III Control** - internal audit (hereinafter "Audit"): activities to assess whether the Internal Controls System (including the level I and level II controls) are complete, functional and adequate. These activities are identified as controls aimed at identifying violations of procedures and regulations and at periodically assessing whether the organisational structure is complete, adequate and reliable.

Some organisational units, as in the case of the Specialist Functions defined in the Integrated Internal Controls System Regulation of Intesa Sanpaolo, may identify, in the course of their activities, risks and/or shortcomings deemed to be significant for the solvency and/or reputation of the company and Insurance Group by carrying out specific control tasks. In order to set up an integrated and cohesive controls system, the organisational units carry out their functions considering not only the actual corporate situation of the USCI, but also the Insurance Group's overall operating activity and the risks to which it is exposed.

They monitor any risks identified in compliance with the rules approved by the management board on specific risks at a Group level (e.g., underwriting and reserving, liquidity etc.). If critical aspects are identified, they are reported to the control functions and Senior Management according to the procedures and conditions for the preparation of systematic reports.

In addition to the Level 1, 2 and 3 controls mentioned above, in relation to the core business, the following activities are also the subject of specific risk observing:

- Planning and management control;
- Data quality;
- Purchasing cycle, financial reporting, taxation and supervision of the Insurance Group
- IT Security and Business Continuity.

The Insurance Group encourages a favourable control environment, which is a set of behaviours and actions that testify to the importance attached to internal control by the company organisation - this is a prerequisite for its effectiveness and is based on:

- Integrity and ethical values;
- dissemination of regulations applicable to the group;
- control activity and segregation of tasks;
- timely and reliable financial reporting to stakeholders and availability of all the information necessary to evaluate the trend in the company's business, as produced by the standard accounting and management processes and by the ancillary information systems that ensure compliance with data quality standards, which require accuracy, completeness, timeliness, cohesion, transparency and relevance.

This information is brought to the attention of the Board of Directors of companies periodically, with varying levels of detail, in the form of financial and income schedules that summarise management performance.

All the information to be disclosed externally is assessed and authorised in advance by the Unit tasked with producing it. Specifically, financial information must be assessed by those in charge of drawing up accounting documents.

This system ensures the continuous integrity, completeness and correctness of the stored data and of the represented information also for the purpose of enabling a reconstruction of the activity, and the identification of the persons in charge, while ensuring that recorded information can be checked easily.

Implementation of the compliance audit function

For details of the implementation of the compliance audit function, refer to the following sections in relation to the individual Insurance Group companies.

At an Insurance Group level, the organisational model will vary depending on the organisational structure of each Company. In line with provisions in IVASS Regulation no. 38/2018, with effect from 1 July 2019 the Compliance Function of each company was set up. The compliance activities for Intesa Sanpaolo and Fideuram Vita are carried out by Intesa Sanpaolo Vita under an outsourcing agreement. With reference to Intesa Sanpaolo RBM Salute, compliance activities were outsourced to the Compliance Function of Intesa Sanpaolo Vita, with effect from 19 May 2020. At Intesa Sanpaolo Life and Cargeas Assicurazioni, a local Compliance Function is present. The Compliance organisational units of the Chief Compliance Officer of Intesa Sanpaolo Vita carry out management and coordination, activities, also by issuing the instructions of the Supervisory Authorities.

Each company in the Insurance Group implements the *Compliance Function Policy of the Insurance Group Intesa Sanpaolo Vita and the Compliance Rulebook of the Insurance Group*, adapting them where necessary to the specific context and provisions of local laws.

Intesa Sanpaolo Vita S.p.A.

Internal control system

Refer to the section on the Insurance Group.

Implementation of the compliance audit function

Intesa Sanpaolo Vita recognises the strategic importance of controlling compliance risk, in the firm belief that respect for regulations and fair business dealings are fundamental aspects of the insurance business.

The insurance Group compliance guidelines were approved by the Board of Directors of the Company. They identify not only the general principles that apply to the Insurance Group but also the roles, responsibilities, duties, operational processes, methods and reporting procedures regarding the management of compliance risk. The Compliance Rulebook of the Insurance Group completes the regulatory framework on compliance methodology.

The Chief Compliance Officer, who is responsible for coordinating the AML and Compliance Functions, the latter divided into the Group Compliance and Specialist Oversight and Life and Non-Life Products Compliance organisational units (the "CCO units"), directly reports to the Board

of Directors, in the same way as the organisational model for the control functions of the parent company Intesa Sanpaolo.

The Compliance Function is responsible for carrying out a risk-based assessment of the adequacy of the procedures, processes, policies and internal organisation, in order to prevent compliance risk.

The methodology used to manage compliance risk, which is also defined at Insurance Group level, provides for the need to grade the duties of the compliance function in accordance with the regulations requiring specialised forms of control, based on the various regulatory areas involved in the company's business.

The Compliance Function still has the ultimate responsibility for defining the methods used to assess compliance risk, to identify the right procedures to prevent and manage this risk, and to check that they are adequate.

For all other applicable regulatory areas with potential compliance risks, for which Specialist Functions have been identified with the necessary expertise, compliance oversight duties have been assigned to these functions, save for the responsibility of the Compliance Function to:

- establish assessment methodologies and mitigation procedures for compliance risk, in collaboration with the Specialist Functions;
- make an independent assessment on compliance risk and the adequacy of oversight adopted by the Specialist Functions for their mitigation;
- give Company Bodies, in periodic reports, an overall view of areas at most risk, overseen by the Specialist Functions.

Based on this model, the Compliance Risk Assessment (CRA) is prepared annually, to measure compliance risk by assessing the risks and oversights on an aggregate basis for each applicable direct and indirect regulatory area.

The aggregate assessment of the risks and oversight leads to the formation of a ranking of regulatory areas, which is used to define and prioritise the assessments.

Moreover, IVASS Regulation no. 38/2018 does not rule out any regulatory area from the activities of the Compliance Function, that may take action if it considers significant compliance risks are present.

With regard to compliance risk, the Compliance Function also continuously identifies the regulations applicable to the Company and assesses the adequacy of the controls on Compliance risk (which are identified in the various regulatory areas within its remit), by planning activities in advance, and by performing specific activities in sensitive areas.

The Compliance Function also proposes organisational changes and consolidation of oversight in order to mitigate Compliance risk, and continuously assesses the adequacy of procedures being issued.

It prepares company policies in its area of responsibility, required by applicable legislation. Drafts reports on specific issues (e.g. Opinion on Remuneration and Incentive Policies and Report on the Control of Distribution Networks)

The Compliance Function supervises and takes part in Product Governance (POG) activities, with the aim of consolidating protection of the insured, guaranteeing the product's conformity to a

pre-defined customer target, from as early on as the product launch and design phase. Pursuant to Article 5 of IVASS Regulation 45/2020, it carries out checks and analyses on the correct definition and effectiveness of all stages of the approval and review procedure for each product, including information on the insurance products developed, the distribution strategy, and the direct distribution carried out by the company, highlighting any critical issues. As part of the POG Process, the Compliance Function also clears policies, checking that the pre-contract and contract documentation, commercial manuals and advertising material reflect the indications of regulations.

Lastly, the participation of the Compliance Function in company projects is particularly important in terms of the prior management of compliance risk, and of providing special support and advice. Of special note the project activities in the ESG area.

Intesa Sanpaolo Assicura S.p.A.

Internal control system

The Board of Directors is responsible for the company's internal control and risk management system and checks that Senior Management implements the system correctly, assessing its adequacy and proper functioning and ensuring that the main business risks are adequately identified and managed.

The Senior Management of Intesa Sanpaolo Assicura guarantees that personnel are made aware of their roles and responsibilities. For this purpose, it ensures that the system of authorities is formalised and is known by staff, as well as the procedures governing the allocation of tasks, the operational processes and the reporting channels.

The internal control system for Intesa Sanpaolo Assicura is developed in accordance with the Group process. Refer to the details of the section on the Insurance Group.

Implementation of the compliance audit function

Intesa Sanpaolo Assicura recognises the strategic importance of controlling compliance risk, in the firm belief that respect for regulations and fair business dealings are fundamental aspects of the insurance business.

The Compliance Function of Intesa Sanpaolo Vita carries out compliance activities on behalf of Intesa Sanpaolo Assicura under an outsourcing agreement, save for the appointment of the Compliance Function in the Owner's Company.

The Compliance policy of Intesa Sanpaolo Assicura is prepared in accordance with the same document issued by the Intesa Sanpaolo Vita Insurance Group, updated at least annually and approved by the Board of Directors.

The purpose of the Policy is to provide a comprehensive reference model for the control of regulatory compliance, by outlining all the roles and responsibilities of the company departments involved in Compliance activities. The Compliance Rulebook of the Insurance Group completes the regulatory framework on compliance methodology.

For details of the roles, responsibilities and Compliance process, refer to the section on Intesa Sanpaolo Vita as the compliance audit function of Intesa Sanpaolo Assicura is implemented in the same way.

Fideuram Vita S.p.A.

Internal control system

The Board of Directors is responsible for the company's internal control and risk management system and checks that Senior Management implements the system correctly, assessing its adequacy and proper functioning and ensuring that the main business risks are adequately identified and managed.

The Senior Management of Fideuram Vita guarantees that the personnel are made aware of their roles and responsibilities. For this purpose, it ensures that the system of authorities is formalised and is known by staff, as well as the procedures governing the allocation of tasks, the operational processes and the reporting channels.

The internal control system for Fideuram Vita is developed in accordance with the Group process. Refer to the details of the section on the Insurance Group.

Implementation of the compliance audit function

Fideuram Vita recognises the strategic importance of controlling the compliance risk, in the firm belief that respect for regulations and fair business dealings are fundamental aspects of the insurance business.

The Compliance Function of Intesa Sanpaolo Vita carries out compliance activities on behalf of Fideuram Vita under an outsourcing agreement, save for the appointment of the Compliance Function in the Owner's Company.

The Compliance policy of Fideuram Vita is prepared in accordance with the same document issued by the Intesa Sanpaolo Vita Insurance Group, updated at least annually and approved by the Board of Directors.

The purpose of the Compliance Policy is to provide a comprehensive reference model for the control of regulatory compliance, by outlining all the roles and responsibilities of the company departments involved in Compliance activities. The Compliance Rulebook of the Insurance Group completes the regulatory framework on compliance methodology.

For details of the roles, responsibilities and Compliance process, refer to the section on Intesa Sanpaolo Vita as the compliance audit process for Fideuram Vita is implemented in the same way.

Intesa Sanpaolo Life D.A.C.

Internal control system

The Board of Directors is responsible for the company's internal control and risk management system and checks that Senior Management implements the system correctly, assessing its

adequacy and proper functioning and ensuring that the main business risks are adequately identified and managed.

The Senior Management of Intesa Sanpaolo Life guarantees that personnel are made aware of their roles and responsibilities. For this purpose, it ensures that the system of authorities is formalised and is known by staff, as well as the procedures governing the allocation of tasks, the operational processes and the reporting channels.

The internal control system for Intesa Sanpaolo Life is conducted in accordance with the Group process and the local laws and regulations. Refer to the details of the section on the Insurance Group.

Implementation of the compliance audit function

Intesa Sanpaolo Life recognises the strategic importance of controlling the compliance risk, in the firm belief that respect for regulations and fair business dealings are fundamental aspects of the insurance business.

The Compliance policy of Intesa Sanpaolo Life is prepared in accordance with the same document of the Insurance Group, is updated at least annually and adopted by the Board of Directors.

The purpose of the Compliance Policy is to provide a comprehensive reference model for the control of regulatory compliance, by outlining all the roles and responsibilities of the company departments involved in Compliance activities. The Compliance Rulebook of the Company, drawn up according to the Compliance Rulebook of the Insurance Group, completes the regulatory framework on compliance methodology.

The Head of Compliance, who is responsible for coordinating the AML and Data Protection functions, reports directly to the Board of Directors, in the same way as the organisational model for the control functions of the parent company Intesa Sanpaolo Vita, in its capacity as USCI.

The Compliance Function is responsible for carrying out a risk-based assessment of the adequacy of the procedures, processes, policies and internal organisation, in order to prevent compliance risks.

The methodology used to manage compliance risk, which is also defined at Insurance Group level, provides for the need to grade the duties of the compliance function in accordance with the regulations requiring specialised forms of control, based on the various regulatory areas involved in the company's business.

The Compliance Function still has the ultimate responsibility for defining the methods used to assess compliance risk, to identify the right procedures to prevent and manage this risk, and to check that they are adequate.

For all other applicable regulatory areas with potential compliance risks, for which Specialist Functions have been identified with the necessary expertise, compliance oversight duties have been assigned to these functions, save for the responsibility of the Compliance Function to:

- establish assessment methodologies and mitigation procedures for compliance risk, in collaboration with the Specialist Functions;
- make an independent assessment on compliance risk and the adequacy of oversight adopted by the Specialist Functions for their mitigation;
- give Company Bodies, in periodic reports, an overall view of areas at most risk, overseen by the Specialist Functions.

Based on this model, the Compliance Risk Assessment is prepared annually, to measure compliance risk by assessing the risks and oversights on an aggregate basis for each applicable direct and indirect regulatory area.

The aggregate assessment of the risks and oversight leads to the formation of a ranking of regulatory areas, which is used to define and prioritise the assessments.

With regard to compliance risk, the Compliance Function also continuously identifies the regulations applicable to the Company and assesses the adequacy of the controls on Compliance risk (which are identified in the various regulatory areas within its remit), by planning activities in advance, and by performing specific activities in sensitive areas.

The Compliance Function also proposes organisational and procedural proposals aimed at adapting the controls on Compliance risk, and continuously assesses the adequacy of procedures awaiting issue.

The Compliance Function takes part in Product Governance (POG) activities, with the aim of consolidating protection of the insured, guaranteeing the product's conformity to a pre-defined customer target, from as early on as the product launch and design phase. As part of the POG Process, the Compliance Function also clears policies, checking that the pre-contract and contract documentation, commercial manuals and advertising material reflect the indications of regulations.

Lastly, the participation of the Compliance Function in company projects is particularly important in terms of the prior management of compliance risk, and of providing special support and advice.

Intesa Sanpaolo RBM Salute S.p.A.

Internal control system

The Board of Directors is responsible for the company's internal control and risk management system and checks that Senior Management implements the system correctly, assessing its adequacy and proper functioning and ensuring that the main business risks are adequately identified and managed.

The Senior Management of Intesa Sanpaolo RBM Salute guarantees that personnel are made aware of their roles and responsibilities. For this purpose, it ensures that the system of authorities is formalised and is known by staff, as well as the procedures governing the allocation of tasks, the operational processes and the reporting channels.

The internal control system for Intesa Sanpaolo RBM Salute is conducted in accordance with the Group process. Refer to the details of the section on the Insurance Group.

Implementation of the compliance audit function

Intesa Sanpaolo RBM Salute recognises the strategic importance of controlling the compliance risk, in the firm belief that respect for regulations and fair business dealings are fundamental parts of the insurance business.

The Compliance Function of Intesa Sanpaolo Vita carries out compliance activities on behalf of Intesa Sanpaolo RBM Salute, under an outsourcing agreement, from when the Company joined the Insurance Group in May 2020, save for the appointment of the Head of the Core Function in the Owner's Company.

The Compliance policy of Intesa Sanpaolo RBM Salute is prepared in accordance with the same document issued by the Intesa Sanpaolo Vita Insurance Group, updated at least annually and approved by the Board of Directors.

The purpose of the Compliance Policy is to provide a comprehensive reference model for the control of regulatory compliance, by outlining all the roles and responsibilities of the company departments involved in Compliance activities. The Compliance Rulebook of the Insurance Group completes the regulatory framework on compliance methodology.

For details of the roles, responsibilities and Compliance process, refer to the section on Intesa Sanpaolo Vita as the compliance audit function of Intesa Sanpaolo RBM Salute is implemented in the same way.

Cargeas Assicurazioni S.p.A.

Internal control system

The Board of Directors is responsible for the company's internal control and risk management system and checks that Senior Management implements the system correctly, assessing its adequacy and proper functioning and ensuring that the main business risks are adequately identified and managed.

The Senior Management of Cargeas Assicurazioni S.p.A. guarantees that the personnel are made aware of their roles and responsibilities. For this purpose, it ensures that the system of authorities is formalised and is known by staff, as well as the procedures governing the allocation of tasks, the operational processes and the reporting channels.

The internal control system for Cargeas Assicurazioni S.p.A. is conducted in accordance with the Group process. Refer to the details of the section on the Insurance Group.

Implementation of the compliance audit function

As part of the overall internal controls system, the Board of Directors considers the dissemination, within the company, of a culture of compliance as a general priority, along with general principles of fair treatment, good faith and transparency in relations with the insured. In this perspective, the activity of the Compliance Function is essential for continually identifying applicable regulations and assessing their impact on company processes and procedures, in order to assess and guarantee the adequacy of compliance risk oversight.

The Compliance Function operates as provided for in the specific policy approved by the Board of Directors of the Company, which specify in detail the responsibilities, duties, operational processes, methods and reporting procedures regarding the management of compliance risk.

The Compliance Function is tasked with monitoring compliance risk management, adopting a risk-based approach, ensuring, among others, compliance with regulations on transparency and

the fair treatment of insured, pre-contract and contract information and the proper performance of contracts, with specific reference to claims and, more generally, to the protection of insured customers and other persons entitled to insurance benefits, also in terms of conflicts of interest.

The Function periodically reports to the Board of Directors and prepares an annual activity plan, indicating actions to carry out, considering any shortcomings identified in previous controls, any new compliance risks the Company is exposed to and any specific activities which are particularly at-risk.

The Compliance Function takes part in Product Governance (POG) activities, with the aim of consolidating protection of the insured, guaranteeing the product's conformity to a pre-defined customer target, from as early on as the product launch and design phase.

B.5 INTERNAL AUDIT FUNCTION

Intesa Sanpaolo Vita Insurance Group

The mission assigned to the Audit Function (the "Function") is to "Ensure a constant, independent and impartial assessment activity on the adequacy and efficiency of the internal controls system and its suitability to ensure the effectiveness and efficiency of business processes, the protection of corporate assets and of the Insurance Group, the reliability and integrity of financial and management information, compliance of the activity with current regulations, directives and company procedures.

Assure the regular assessment and monitoring of the additional components of the group's corporate governance system.

Provide advice to the Group's corporate functions, including through participation in projects in order to create added value and improve the effectiveness of control processes, risk and compliance management, and governance.

Oversee the system of internal controls and the other elements of the group's corporate governance system, by providing governance and guidance for the relevant local audit departments.

Support the company governance and ensure Senior Management, company bodies and competent institutions (IVASS, Bank of Italy, etc.) receive timely and systematic disclosures on the state of the controls system, on the results of the activities carried out and on the progress of corrective actions.

Internal auditing is done by the Audit function of the Intesa Sanpaolo Vita Insurance Group as the ultimate Italian parent company, it reports functionally to the Chief Audit Officer of the parent company Intesa Sanpaolo.

The Head of the Audit Function of the Intesa Sanpaolo Vita Insurance Group coordinates the Controls Coordination Committee, a body with an information and advisory role that operates to consolidate the coordination and the mechanisms of inter-functional cooperation as part of the internal controls system of the Insurance Group.

Intesa Sanpaolo Vita S.p.A.

The Audit Function of the Company comprises a specific Organisational Unit, directly reporting to the Board of Directors and has appointed the Head of the function.

The mission assigned to the Audit Function is to ensure a constant, independent and impartial assessment of the adequacy and efficiency of the internal controls system, and make sure that it guarantees the effectiveness and efficiency of business processes, the protection of assets and of the Insurance Group and the reliability and integrity of financial and management information, while ensuring that all activities comply with current regulations, directives and company procedures.

The Audit function provides support and advice to other company functions, participating in projects to create added value, improve the effectiveness of the control processes and maintain their adequacy to the development of structures and internal processes. The function also supports the company governance and provides Senior Management, company bodies and institutions such as IVASS and the Bank of Italy with timely and systematic disclosures on the state of the controls system, the results of the activities and on the progress of corrective actions.

The Head of the Audit Function produces an annual action plan for the Board of Directors.

The annual plan takes into account the evidence provided during the Controls Coordination Committee meeting by the control functions and the level of attention required from the various processes/Organisational Units depending on the risk level.

The Head is tasked with assigning processes and/or entities the corresponding level of attention based on elements that are as objective as possible. Planning is therefore based on the analysis and assessment of the potential risks carried out through risk assessment methods, the processing of indicators relating to the operations of the Company to identify potentially abnormal transactions and/or situations or through a comparative examination of the information and findings continuously collected from the Organisational Units.

The results of audit activities are presented in audit reports, prepared according to a standard format and containing suggestions for eliminating the deficiencies found. The recipients of the audit reports are the Organisational Units of the Company, specifically the audited units, and Senior Management.

The submission of the report is the start of a process that sheds light on the causes of any irregularities and identifies, schedules and implements corrective actions. For this purpose, the Audit function will meet with the management of the audited unit in an exit meeting, as well as the other business units that were involved in identifying and developing all the corrective actions. At the end of the meeting a draft plan for the development of corrective actions to be submitted to the Board of Directors is formalised and the latter is tasked with determining the measures to be taken. The actions will then be used by the Audit function to update their reports, the dashboard (which contains all the audit points highlighted during the activity, and the actions planned to remedy them), and for the follow-up actions.

Checks on the corrective actions proposed by the Audit Function during its interventions are carried out quarterly. The follow-up activity carried out consists of a written report with the summary of the interventions implemented to eliminate any findings during the audit and those not yet implemented. The report will identify the reasons for any delay in implementing corrective measures by the stated deadline.

With regard to audit reporting activities, the Head of the Audit Function will report:

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- quarterly, to the Internal Control and Risks Committee, the Board of Statutory Auditors and the Board of Directors on the results and recommendations in relation to audits conducted in the period;
 - every six months, to the Internal Control and Risks Committee, the Board of Statutory Auditors and the Board of Directors (every three months to the Audit & Reporting Committee of Intesa Sanpaolo Life) on the activity carried out in the period, providing written results of its audits, identifying discrepancies and highlighting the improvement actions adopted or to be adopted;
 - urgently to the Board of Directors and Board of Statutory Auditors (Audit & Reporting Committee for Intesa Sanpaolo Life) on any particularly serious situations, breaches or deficiencies;
 - during periodic meetings, it reports to the Supervisory Body, in the event of interventions concerning compliance risks;
 - every year, to the administrative body, Senior Management and the control body with regard to the activities carried out on anti-money laundering and terrorist financing and the related results, without prejudice to the principle of confidentiality on reports of suspicious transactions;
 - every year to the Heads of Open-end Pension Funds, on the activity carried out in the period, providing written results of its audits, identifying discrepancies and highlighting the improvement actions adopted or to be adopted;
 - the Parent Company Intesa Sanpaolo, sending the documents according to the procedures and timing set out in the relevant operational guide.
 - reports to the other control functions by sending extracts of reports on its audit activities, and a Dashboard at least every six months;
 - if there is a need to inform IVASS in response to tangible evidence of serious violations that could significantly prejudice the sound and prudent management of the Company, the Audit function will implement the provisions of internal procedures, informing the Chair of the Board of Directors and the Chair of the Board of Statutory Auditors.

The Audit Function has links with all other Core and Control Functions of the Company and of the Insurance Group entities; it will exchange information either through specific meetings and by sending documentation and reports, attending discussion groups with the supervisory functions, or by sitting on committees.

The Audit function will agree with the Board of Statutory Auditors (Audit & Reporting Committee for Intesa Sanpaolo Life) on an independent form of collaboration designed to ensure that all relevant information about the results of the audits is promptly transmitted, to guarantee continuous updates on the supervision of the internal controls system.

Considering the responsibilities assigned to the Supervisory Body by the Board of Directors and the professional contents of the activities that characterise it, the Body, in carrying out its monitoring and control tasks, is supported by the Head of the Audit function.

Lastly, the function maintains relations with the auditing firm.

Independence and objectivity

The Audit function will report directly to the Company's Board of Directors and is independent from the operational units. The Audit function reports in functional but not hierarchical terms to the head of the Audit function of the Insurance Group.

The Head of the Audit Function discusses the mission of internal auditing and the mandatory elements of the Internal Professional Practices Framework with Senior Management and the Board of Directors.

The internal audit Policy describes how the Company's Audit Function maintains the required independence.

The Audit function has the following characteristics:

- an organisational structure that guarantees its independence and autonomy so that its objective judgement is not compromised;
- free access to all company structures and to the documentation related to the audited business area, including information instrumental to the assessment of the adequacy of the controls on the outsourced company functions;
- organic links with all the centres in charge of internal control functions; quantitatively and qualitatively adequate human and technological resources to continuously carry out checks, analyses and other tasks necessary to fulfil its mandate;
- sufficient knowledge to assess the risks of fraud and the way in which these are managed by the organisation, however it is not necessary for the Department to have the knowledge of those whose primary responsibility is the invest identification and investigation of fraud.

The independent action of the Audit function is also ensured by the Head who:

- has specific expertise and professionalism and meets the eligibility requirements for the position to carry out the activity, as governed by the Rules adopted pursuant to article 25(1)(l) of IVASS Regulation no. 38/2018;
- is appointed or revoked by the Board of Directors, having consulted the Board of Statutory Auditors, which sets the tasks, powers, responsibilities and reporting procedures to the Board;
- has no hierarchical and functional relations with the audited areas;
- reports its activity directly to the Board of Directors and to the Board of Statutory Auditors;
- confirms to the Board of Directors, at least on an annual basis, the organizational independence of the internal audit activity;
- informs the Board of Directors of any interference in determining the scope or objective of internal audits, in carrying out the work, in disclosing the results and discussing the implications;
- if independence and objectivity has been compromised or appears to be compromised, it will inform the relevant parties of the circumstances of these influences;
- If there are any breaches of the code of ethics or standards that may affect the scope or work done during the internal audit activity, it will disclose any non-conformities and their impact, to Senior Management and to the Board of Directors.

The Audit function is staffed by people with the necessary skills, abilities and knowledge to conduct their work competently and professionally.

According to the current regulations (IVASS Regulation no.38/2018 Article 25), Audit personnel have been included in the company's "Policy on fitness for office and requirements" in terms of integrity, professionalism and independence to be assessed. Therefore, each year, the Board of Directors will assess whether the Audit team meets these requirements.

Intesa Sanpaolo Assicura S.p.A.

The Audit Function of the Company comprises a specific Organisational Unit, directly reporting to the Board of Directors and has appointed the Head of the function. The relevant activities of the Function are carried out by Intesa Sanpaolo Vita under a specific outsourcing agreement.

The mission assigned to the Audit Function is to ensure a constant, independent and impartial assessment of the adequacy and efficiency of the internal controls system, and make sure that it guarantees the effectiveness and efficiency of business processes, the protection of assets and of the Insurance Group and the reliability and integrity of financial and management information, while ensuring that all activities comply with current regulations, directives and company procedures.

The Audit function provides support and advice to other company functions, participating in projects to create added value, improve the effectiveness of the control processes and maintain their adequacy to the development of structures and internal processes. The function also supports the company governance and provides Senior Management, company bodies and institutions such as IVASS and the Bank of Italy with timely and systematic disclosures on the state of the controls system, the results of the activities and on the progress of corrective actions.

The Head of the Audit Function produces an annual action plan for the Board of Directors.

The annual plan takes into account the evidence provided during the Controls Coordination Committee meeting of the USCI by the control functions and the level of attention required from the various processes/Organisational Units depending on the risk level.

The Head is tasked with assigning processes and/or entities the corresponding level of attention based on elements that are as objective as possible. Planning is therefore based on the analysis and assessment of the potential risks carried out through risk assessment methods, the processing of indicators relating to the operations of the Company to identify potentially abnormal transactions and/or situations or through a comparative examination of the information and findings continuously collected from the Organisational Units.

The results of audit activities are presented in audit reports, prepared according to a standard format and containing suggestions for eliminating the deficiencies found. The recipients of the audit reports are the Organisational Units of the company, specifically the audited units, and Senior Management.

The submission of the report is the start of a process that sheds light on the causes of any irregularities and identifies, schedules and implements corrective actions. For this purpose, the Audit function will meet with the management of the audited unit in an exit meeting, as well as the other business units that were involved in identifying and developing all the corrective actions. At the end of the meeting a draft plan for the development of corrective actions to be submitted to the Board of Directors is formalised and the latter is tasked with determining the measures to be taken. The actions will then be used by the Audit function to update their reports, the dashboard (which contains all the audit points highlighted during the activity, and the actions planned to remedy them), and for the follow-up actions.

Checks on the corrective actions proposed by the Audit Function during its interventions are carried out quarterly. The follow-up activity carried out consists of a written report with the summary of the interventions implemented to eliminate any findings during the audit and those not yet implemented. The report will identify the reasons for any delay in implementing corrective measures by the stated deadline.

With regard to audit reporting activities, the Head of the Audit Function will report:

- quarterly, to the Internal Control and Risks Committee of the USCI and the Board of Directors on the results and recommendations in relation to audits conducted in the period;
- every six months to the Internal Control and Risks Committee of the USCI, the Board of Statutory Auditors and Board of Directors on the activity carried out in the period, providing written results of its audits, identifying discrepancies and highlighting the improvement actions adopted or to be adopted;
- urgently to the Board of Directors and Board of Statutory Auditors on any particularly serious situations, breaches or deficiencies;
- during periodic meetings, it reports to the Supervisory Body, in the event of interventions concerning compliance risks;
- every year, to the administrative body, Senior Management and the control body with regard to the activities carried out on anti-money laundering and terrorist financing and the related results, without prejudice to the principle of confidentiality on reports of suspicious transactions;
- the parent company Intesa Sanpaolo, by ending the documents according to the procedures and timing set out in the relevant operational guide;
- reports to the other control functions by sending extracts of reports on its audit activities, and a Dashboard at least every six months;
- if there is a need to inform IVASS in response to tangible evidence of serious violations that could significantly prejudice the sound and prudent management of the Company, the Audit function will implement the provisions of internal procedures, informing the Chair of the Board of Directors and the Chair of the Board of Statutory Auditors.

The Audit Function has links with all other Core and Control Functions of the Company and of the Insurance Group entities; it will exchange information either through specific meetings and by sending documentation and reports, attending discussion groups with the supervisory functions, or by sitting on committees.

The Audit function will agree with the Board of Statutory Auditors on an independent form of collaboration designed to ensure that all relevant information about the results of the audits is promptly transmitted, to guarantee continuous updates on the supervision of the internal controls system.

Considering the responsibilities assigned to the Supervisory Body by the Board of Directors and the professional contents of the activities that characterise it, the Body, in carrying out its monitoring and control tasks, is supported by the Head of Audit.

The function also maintains relations with the auditing firm.

Independence and objectivity

The Audit function will report directly to the Company's Board of Directors and is independent from the operational units. The company's audit function reports in functional but not hierarchical terms to the head of the Audit function of the Insurance Group.

The Head of the Audit Function discusses the mission of internal auditing and the mandatory elements of the Internal Professional Practices Framework with Senior Management and the Board of Directors.

The internal audit Policy describes how the Company's Audit Function maintains the required independence.

The Audit function has the following characteristics:

- an organisational structure that guarantees its independence and autonomy so that its objective judgement is not compromised;
- free access to all company structures and to the documentation related to the audited business area, including information instrumental to the assessment of the adequacy of the controls on the outsourced company functions;
- organic links with all the centres in charge of internal control functions;
- quantitatively and qualitatively adequate human and technological resources to continuously carry out checks, analyses and other tasks necessary to fulfil its mandate;
- sufficient knowledge to assess the risks of fraud and the way in which these are managed by the organisation, however it is not necessary for the Department to have the knowledge of those whose primary responsibility is the invest identification and investigation of fraud.

The independent action of the Audit function is also ensured by the Head who:

- has specific expertise and professionalism and meets the eligibility requirements for the position to carry out the activity, as governed by the Rules adopted pursuant to article 25(1) of IVASS Regulation no. 38/2018;
- is appointed or revoked by the Board of Directors, having consulted the Board of Statutory Auditors, which sets the tasks, powers, responsibilities and reporting procedures to the Board;
- has no hierarchical and functional relations with the audited areas;
- reports its activity directly to the Board of Directors and to the Board of Statutory Auditors;
- confirms to the Board of Directors, at least on an annual basis, the organizational independence of the internal audit activity;
- informs the Board of Directors of any interference in determining the scope or objective of internal audits, in carrying out the work, in disclosing the results and discussing the implications;
- if independence and objectivity has been compromised or appears to be compromised, it will inform the relevant parties of the circumstances of these influences;
- If there are any breaches of the code of ethics or standards that may affect the scope or work done during the internal audit activity, it will disclose any non-conformities and their impact, to senior management and to the Board of Directors.

The Audit function is staffed by people with the necessary skills, abilities and knowledge to conduct their work competently and professionally.

According to current regulations (IVASS Regulation 38/2018 Article 25), Audit personnel have been identified based on the company's "Policy on fitness for office and requirements" in terms of meeting requirements of integrity, professionalism and independence. Therefore, each year, the Board of Directors will assess whether the Audit team meets these requirements.

Fideuram Vita S.p.A.

The Audit Function of the Company comprises a specific Organisational Unit, directly reporting to the Board of Directors and has appointed the Head of the function. The relevant activities of the Function are carried out by Intesa Sanpaolo Vita under a specific outsourcing agreement.

The mission assigned to the Audit Function is to ensure a constant, independent and impartial assessment of the adequacy and efficiency of the internal controls system, and make sure that it guarantees the effectiveness and efficiency of business processes, the protection of assets and of the Insurance Group and the reliability and integrity of financial and management information, while ensuring that all activities comply with current regulations, directives and company procedures.

The Audit function provides support and advice to other company functions, participating in projects to create added value, improve the effectiveness of the control processes and maintain their adequacy to the development of structures and internal processes. The function also supports the company governance and provides Senior Management, company bodies and institutions such as IVASS and the Bank of Italy with timely and systematic disclosures on the state of the controls system, the results of the activities and on the progress of corrective actions.

The Head of the Audit Function produces an annual action plan for the Board of Directors. The annual plan takes into account the evidence provided during the Controls Coordination Committee meeting of the USCI by the control functions and the level of attention required from the various processes/Organisational Units depending on the risk level.

The Head is tasked with assigning processes and/or entities the corresponding level of attention based on elements that are as objective as possible. Planning is therefore based on the analysis and assessment of the potential risks carried out through risk assessment methods, the processing of indicators relating to the operations of the Company to identify potentially abnormal transactions and/or situations or through a comparative examination of the information and findings continuously collected from the Organisational Units.

The results of audit activities are presented in audit reports, prepared according to a standard format and containing suggestions for eliminating the deficiencies found. The recipients of the audit reports are the Organisational Units of the Company, specifically the audited units, and Senior Management.

The submission of the report is the start of a process that sheds light on the causes of any irregularities and identifies, schedules and implements corrective actions. For this purpose, the Audit function will meet with the management of the audited unit in an exit meeting, as well as the other business units that were involved in identifying and developing all the corrective actions. At the end of the meeting a draft plan for the development of corrective actions to be submitted to the Board of Directors is formalised and the latter is tasked with determining the measures to be taken. The actions will then be used by the Audit function to update their reports, the dashboard (which contains all the audit points highlighted during the activity, and the actions planned to remedy them), and for the follow-up actions.

Checks on the corrective actions proposed by the Audit Function during its interventions are carried out quarterly. The follow-up activity carried out consists of a written report with the summary of the interventions implemented to eliminate any findings during the audit and those not yet implemented. The report will identify the reasons for any delay in implementing corrective measures by the stated deadline.

With regard to audit reporting activities, the Head of the Audit Function will report:

- quarterly, to the Internal Control and Risks Committee of the USCI, the Board of Statutory Auditors and the Board of Directors on the results and recommendations in relation to audits conducted in the period;
- every six months to the Internal Control and Risks Committee of the USCI, the Board of Statutory Auditors and Board of Directors on the activity carried out in the period, providing written results of its audits, identifying discrepancies and highlighting the improvement actions adopted or to be adopted;
- urgently to the Board of Directors and Board of Statutory Auditors on any particularly serious situations, breaches or deficiencies;
- during periodic meetings, it reports to the Supervisory Body, in the event of interventions concerning compliance risks;
- every year, to the administrative body, Senior Management and the control body with regard to the activities carried out on anti-money laundering and terrorist financing and the related results, without prejudice to the principle of confidentiality on reports of suspicious transactions;
- every year to the Heads of Open-end Pension Funds, on the activity carried out in the period, providing written results of its audits, identifying discrepancies and highlighting the improvement actions adopted or to be adopted;
- the Parent Company Intesa Sanpaolo, sending the documents according to the procedures and timing set out in the relevant operational guide.
- reports to the other control functions by sending extracts of reports on its audit activities, and a Dashboard at least every six months;
- if there is a need to inform IVASS in response to tangible evidence of serious violations that could significantly prejudice the sound and prudent management of the Company, the Audit function will implement the provisions of internal procedures, informing the Chair of the Board of Directors and the Chair of the Board of Statutory Auditors.

The Audit Function has links with all other Core and Control Functions of the Company and of the Insurance Group entities; it will exchange information either through specific meetings and by sending documentation and reports, attending discussion groups with the supervisory functions, or by sitting on committees.

The Audit function will agree with the Board of Statutory Auditors on an independent form of collaboration designed to ensure that all relevant information about the results of the audits is promptly transmitted, to guarantee continuous updates on the supervision of the internal controls system.

Considering the responsibilities assigned to the Supervisory Body by the Board of Directors and the professional contents of the activities that characterise it, the Body, in carrying out its monitoring and control tasks, is supported by the Head of the Audit function.

Lastly, the function maintains relations with the auditing firm.

Independence and objectivity

The Audit function will report directly to the company's Board of Directors and is independent from the operational units. The company's audit function reports in functional but not hierarchical terms to the head of the Audit function of the Insurance Group.

The Head of the Audit Function discusses the mission of internal auditing and the mandatory elements of the Internal Professional Practices Framework with Senior Management and the Board of Directors.

The internal audit Policy describes how the Company's Audit Function maintains the required independence.

The Audit function has the following characteristics:

- an organisational structure that guarantees its independence and autonomy so that its objective judgement is not compromised;
- free access to all company structures and to the documentation related to the audited business area, including information instrumental to the assessment of the adequacy of the controls on the outsourced company functions;
- organic links with all the centres in charge of internal control functions;
- quantitatively and qualitatively adequate human and technological resources to continuously carry out checks, analyses and other tasks necessary to fulfil its mandate;
- sufficient knowledge to assess the risks of fraud and the way in which these are managed by the organisation, however it is not necessary for the Department to have the knowledge of those whose primary responsibility is the invest identification and investigation of fraud.

The independent action of the Audit function is also ensured by the Head who:

- has specific expertise and professionalism and meets the eligibility requirements for the position to carry out the activity, as governed by the Rules adopted pursuant to article 25(1) of IVASS Regulation no. 38/2018;
- is appointed or revoked by the Board of Directors, having consulted the Board of Statutory Auditors, which sets the tasks, powers, responsibilities and reporting procedures to the Board;
- has no hierarchical and functional relations with the audited areas;
- reports its activity directly to the Board of Directors and to the Board of Statutory Auditors;
- confirms to the Board of Directors, at least on an annual basis, the organizational independence of the internal audit activity;
- informs the Board of Directors of any interference in determining the scope or objective of internal audits, in carrying out the work, in disclosing the results and discussing the implications;
- if independence and objectivity has been compromised or appears to be compromised, it will inform the relevant parties of the circumstances of these influences;
- If there are any breaches of the code of ethics or standards that may affect the scope or work done during the internal audit activity, it will disclose any non-conformities and their impact, to Senior Management and to the Board of Directors.

The Audit function is staffed by people with the necessary skills, abilities and knowledge to conduct their work competently and professionally.

According to current regulations (IVASS Regulation 38/2018 Article 25), Audit personnel have been identified based on the company's "Policy on fitness for office and requirements" in terms of meeting requirements of integrity, professionalism and independence. Therefore, each year, the Board of Directors will assess whether the Audit team meets these requirements.

Intesa Sanpaolo Life D.A.C.

The Audit function of Intesa Sanpaolo Vita performs audit activities for Intesa Sanpaolo Life, under an outsourcing agreement.

Refer to the information given in the section on Intesa Sanpaolo, in accordance with the applicable regulations.

Independence and objectivity

The company's audit operations have been outsourced to the USCI, through its Audit function, under an outsourcing agreement. Refer to the section on Intesa Sanpaolo Vita.

Intesa Sanpaolo RBM Salute S.p.A.

The Audit Function of the Company comprises a specific Organisational Unit, directly reporting to the Board of Directors and has appointed the Head of the function. The relevant activities of the Function are carried out by Intesa Sanpaolo Vita under a specific outsourcing agreement.

The mission assigned to the Audit Function is to ensure a constant, independent and impartial assessment of the adequacy and efficiency of the internal controls system, and make sure that it guarantees the effectiveness and efficiency of business processes, the protection of assets and of the Insurance Group and the reliability and integrity of financial and management information, while ensuring that all activities comply with current regulations, directives and company procedures.

The Audit function provides support and advice to other company functions, participating in projects to create added value, improve the effectiveness of the control processes and maintain their adequacy to the development of structures and internal processes. The function also supports the company governance and provides Senior Management, company bodies and institutions such as IVASS and the Bank of Italy with timely and systematic disclosures on the state of the controls system, the results of the activities and on the progress of corrective actions.

The Head of the Audit Function produces an annual action plan for the Board of Directors. The annual plan takes into account the evidence provided during the Controls Coordination Committee meeting of the USCI by the control functions and the level of attention required from the various processes/Organisational Units depending on the risk level.

The Head is tasked with assigning processes and/or entities the corresponding level of attention based on elements that are as objective as possible. Planning is therefore based on the analysis and assessment of the potential risks carried out through risk assessment methods, the processing of indicators relating to the operations of the Company to identify potentially abnormal transactions and/or situations or through a comparative examination of the information and findings continuously collected from the Organisational Units.

The results of audit activities are presented in audit reports, prepared according to a standard format and containing suggestions for eliminating the deficiencies found. The recipients of the audit reports are the Organisational Units of the Company, specifically the audited units, and Senior Management.

The submission of the report is the start of a process that sheds light on the causes of any irregularities and identifies, schedules and implements corrective actions. For this purpose, the Audit function will meet with the management of the audited unit in an exit meeting, as well as the other business units that were involved in identifying and developing all the corrective actions. At the end of the meeting a draft plan for the development of corrective actions to be submitted to the Board of Directors is formalised and the latter is tasked with determining the measures to be taken. The actions will then be used by the Audit function to update their reports, the dashboard (which contains all the audit points highlighted during the activity, and the actions planned to remedy them), and for the follow-up actions.

Checks on the corrective actions proposed by the Audit Function during its interventions are carried out quarterly. The follow-up activity carried out consists of a written report with the summary of the interventions implemented to eliminate any findings during the audit and those not yet implemented. The report will identify the reasons for any delay in implementing corrective measures by the stated deadline.

With regard to audit reporting activities, the Head of the Audit Function will report:

- quarterly, to the Internal Control and Risks Committee of the USCI, the Board of Statutory Auditors and the Board of Directors on the results and recommendations in relation to audits conducted in the period;
- every six months to the Internal Control and Risks Committee of the USCI, the Board of Statutory Auditors and Board of Directors on the activity carried out in the period, providing written results of its audits, identifying discrepancies and highlighting the improvement actions adopted or to be adopted;
- urgently to the Board of Directors and Board of Statutory Auditors on any particularly serious situations, breaches or deficiencies;
- during periodic meetings, it reports to the Supervisory Body, in the event of interventions concerning compliance risks;
- every year, to the administrative body, Senior Management and the control body with regard to the activities carried out on anti-money laundering and terrorist financing and the related results, without prejudice to the principle of confidentiality on reports of suspicious transactions;
- the Parent Company Intesa Sanpaolo, sending the documents according to the procedures and timing set out in the relevant operational guide.
- reports to the other control functions by sending extracts of reports on its audit activities, and a Dashboard at least every six months;
- if there is a need to inform IVASS in response to tangible evidence of serious violations that could significantly prejudice the sound and prudent management of the Company, the Audit function will implement the provisions of internal procedures, informing the Chair of the Board of Directors and the Chair of the Board of Statutory Auditors.

The Audit Function has links with all other Core and Control Functions of the Company and of the Insurance Group entities; it will exchange information either through specific meetings and by sending documentation and reports, attending discussion groups with the supervisory functions, or by sitting on committees.

The Audit function will agree with the Board of Statutory Auditors on an independent form of collaboration designed to ensure that all relevant information about the results of the audits is promptly transmitted, to guarantee continuous updates on the supervision of the internal controls system.

Considering the responsibilities assigned to the Supervisory Body by the Board of Directors and the professional contents of the activities that characterise it, the Body, in carrying out its monitoring and control tasks, is supported by the Head of the Audit function.

The function also maintains relations with the auditing firm.

Independence and objectivity

The Audit function will report directly to the Company's Board of Directors and is independent from the operational units. The company's audit function reports in functional but not hierarchical terms to the head of the Audit function of the Insurance Group.

The Head of the Audit Function discusses the mission of internal auditing and the mandatory elements of the Internal Professional Practices Framework with Senior Management and the Board of Directors.

The internal audit Policy describes how the Company's Audit Function maintains the required independence.

The Audit function has the following characteristics:

- an organisational structure that guarantees its independence and autonomy so that its objective judgement is not compromised;
- free access to all company structures and to the documentation related to the audited business area, including information instrumental to the assessment of the adequacy of the controls on the outsourced company functions;
- organic links with all the centres in charge of internal control functions;
- quantitatively and qualitatively adequate human and technological resources to continuously carry out checks, analyses and other tasks necessary to fulfil its mandate;
- sufficient knowledge to assess the risks of fraud and the way in which these are managed by the organisation, however it is not necessary for the Department to have the knowledge of those whose primary responsibility is the invest identification and investigation of fraud.

The independent action of the Audit function is also ensured by the Head who:

- has specific expertise and professionalism and meets the eligibility requirements for the position to carry out the activity, as governed by the Rules adopted pursuant to article 25(1) of IVASS Regulation no. 38/2018;
- is appointed or revoked by the Board of Directors, having consulted the Board of Statutory Auditors, which sets the tasks, powers, responsibilities and reporting procedures to the Board;
- has no hierarchical and functional relations with the audited areas;
- reports its activity directly to the Board of Directors and to the Board of Statutory Auditors;
- confirms to the Board of Directors, at least on an annual basis, the organizational independence of the internal audit activity;

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- informs the Board of Directors of any interference in determining the scope or objective of internal audits, in carrying out the work, in disclosing the results and discussing the implications;
 - if independence and objectivity has been compromised or appears to be compromised, it will inform the relevant parties of the circumstances of these influences;
 - If there are any breaches of the code of ethics or standards that may affect the scope or work done during the internal audit activity, it will disclose any non-conformities and their impact, to senior management and to the Board of Directors.

The Audit function is staffed by people with the necessary skills, abilities and knowledge to conduct their work competently and professionally.

According to current regulations (IVASS Regulation 38/2018 Article 25), Audit personnel have been identified based on the company's "Policy on fitness for office and requirements" in terms of meeting requirements of integrity, professionalism and independence. Therefore, each year, the Board of Directors will assess whether the Audit team meets these requirements.

Cargeas Assicurazioni S.p.A.

Following the Company joining the Intesa Sanpaolo Vita Insurance Group, the Board of Directors of the Company, in the meeting of 27 May 2021, resolved to set up the Audit Function, as a specific Organisational Unit; at the board meeting of 24 June 2021, it has also appointed the Head of the Function.

The mission assigned to the Audit Function is to ensure a constant, independent and impartial assessment of the adequacy and efficiency of the internal controls system, and make sure that it guarantees the effectiveness and efficiency of business processes, the protection of assets and of the Insurance Group and the reliability and integrity of financial and management information, while ensuring that all activities comply with current regulations, directives and company procedures.

The Audit function provides support and advice to other company functions, participating in projects to create added value, improve the effectiveness of the control processes and maintain their adequacy to the development of structures and internal processes. The function also supports the company governance and provides Senior Management, company bodies and institutions such as IVASS and the Bank of Italy with timely and systematic disclosures on the state of the controls system, the results of the activities and on the progress of corrective actions.

The Head of the Audit Function produces an annual action plan for the Board of Directors.

The annual plan takes into account the evidence provided during the Controls Coordination Committee meeting of the USCI by the control functions and the level of attention required from the various processes/Organisational Units depending on the risk level.

The Head is tasked with assigning processes and/or entities the corresponding level of attention based on elements that are as objective as possible. Planning is therefore based on the analysis and assessment of the potential risks carried out through risk assessment methods, the processing of indicators relating to the operations of the Company to identify potentially abnormal transactions and/or situations or through a comparative examination of the information and findings continuously collected from the Organisational Units.

The results of audit activities are presented in audit reports, prepared according to a standard format and containing suggestions for eliminating the deficiencies found. The recipients of the

audit reports are the Organisational Units of the company, specifically the audited units, and Senior Management.

The submission of the report is the start of a process that sheds light on the causes of any irregularities and identifies, schedules and implements corrective actions. For this purpose, the Audit function will meet with the management of the audited unit in an exit meeting, as well as the other business units that were involved in identifying and developing all the corrective actions. At the end of the meeting a draft plan for the development of corrective actions to be submitted to the Board of Directors is formalised and the latter is tasked with determining the measures to be taken. The actions will then be used by the Audit function to update their Audit reports and for the follow-up actions.

Checks on the corrective actions proposed by the Audit Function during its interventions are carried out quarterly. The follow-up activity carried out consists of a written report with the summary of the interventions implemented to eliminate any findings during the audit and those not yet implemented. The report will identify the reasons for any delay in implementing corrective measures by the stated deadline.

With regard to audit reporting activities, the Head of the Audit Function will report:

- quarterly, to the Internal Control and Risks Committee of the USCI and the Board of Directors on the results and recommendations in relation to audits conducted in the period;
- every six months to the Internal Control and Risks Committee of the USCI, the Board of Statutory Auditors and Board of Directors on the activity carried out in the period, providing written results of its audits, identifying discrepancies and highlighting the improvement actions adopted or to be adopted;
- urgently to the Board of Directors and Board of Statutory Auditors on any particularly serious situations, breaches or deficiencies;
- during periodic meetings, it reports to the Supervisory Body, in the event of interventions concerning compliance risks;
- every year, to the administrative body, Senior Management and the control body with regard to the activities carried out on anti-money laundering and terrorist financing and the related results, without prejudice to the principle of confidentiality on reports of suspicious transactions;
- the parent company Intesa Sanpaolo, by sending the documents according to the procedures and timing set out in the relevant operational guide;
- reports to the other control functions by sending extracts of reports on its audit activities at least every six months;
- if there is a need to inform IVASS in response to tangible evidence of serious violations that could significantly prejudice the sound and prudent management of the Company, the Audit function will implement the provisions of internal procedures, informing the Chair of the Board of Directors and the Chair of the Board of Statutory Auditors.

The Audit Function has links with all other Core and Control Functions of the Company and of the Insurance Group entities; it will exchange information either through specific meetings and by sending documentation and reports, attending discussion groups with the supervisory functions, or by sitting on committees.

The Audit function will agree with the Board of Statutory Auditors on an independent form of collaboration designed to ensure that all relevant information about the results of the audits is

promptly transmitted, to guarantee continuous updates on the supervision of the internal controls system.

Considering the responsibilities assigned to the Supervisory Body by the Board of Directors and the professional contents of the activities that characterise it, the Body, in carrying out its monitoring and control tasks, is supported by the Head of Audit.

The function also maintains relations with the auditing firm.

Independence and objectivity

The Audit function will report directly to the Company's Board of Directors and is independent from the operational units. The company's audit function reports in functional but not hierarchical terms to the head of the Audit function of the Insurance Group.

The Head of the Audit Function discusses the mission of internal auditing and the mandatory elements of the Internal Professional Practices Framework with Senior Management and the Board of Directors.

The internal audit Policy describes how the Company's Audit Function maintains the required independence.

The Audit function has the following characteristics:

- an organisational structure that guarantees its independence and autonomy so that its objective judgement is not compromised;
- free access to all company structures and to the documentation related to the audited business area, including information instrumental to the assessment of the adequacy of the controls on the outsourced company functions;
- organic links with all the centres in charge of internal control functions;
- quantitatively and qualitatively adequate human and technological resources to continuously carry out checks, analyses and other tasks necessary to fulfil its mandate;
- sufficient knowledge to assess the risks of fraud and the way in which these are managed by the organisation, however it is not necessary for the Department to have the knowledge of those whose primary responsibility is the invest identification and investigation of fraud.

The independent action of the Audit function is also ensured by the Head who:

- has specific expertise and professionalism and meets the eligibility requirements for the position to carry out the activity, as governed by the Rules adopted pursuant to article 25(1) of IVASS Regulation no. 38/2018;
- is appointed or revoked by the Board of Directors, having consulted the Board of Statutory Auditors, which sets the tasks, powers, responsibilities and reporting procedures to the Board;
- has no hierarchical and functional relations with the audited areas;
- reports its activity directly to the Board of Directors and to the Board of Statutory Auditors;
- confirms to the Board of Directors, at least on an annual basis, the organizational independence of the internal audit activity;
- informs the Board of Directors of any interference in determining the scope or objective of internal audits, in carrying out the work, in disclosing the results and discussing the implications;

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- if independence and objectivity has been compromised or appears to be compromised, it will inform the relevant parties of the circumstances of these influences;
 - If there are any breaches of the code of ethics or standards that may affect the scope or work done during the internal audit activity, it will disclose any non-conformities and their impact, to senior management and to the Board of Directors.

The Audit function is staffed by people with the necessary skills, abilities and knowledge to conduct their work competently and professionally.

According to current regulations (IVASS Regulation 38/2018 Article 25), Audit personnel have been identified based on the company's "Policy on fitness for office and requirements" in terms of meeting requirements of integrity, professionalism and independence. Therefore, each year, the Board of Directors will assess whether the Audit team meets these requirements.

B.6 ACTUARIAL FUNCTION

Intesa Sanpaolo Vita Insurance Group

The activities of the Actuarial function are carried out in accordance with the provisions of Article 272 of Delegated Regulation (EU) 2015/3 and Article 48 of the Solvency II Directive (2009/138/EC).

Apart from performing its duties for the Company, the Actuarial Function of the USCI has introduced a series of controls, in its capacity as the Actuarial function of the USCI parent company.

The Group Companies must send the Actuarial function of the Parent Company all the information needed for the relevant control activity.

The Group Actuarial Function carries out independent audits, and in performing its coordination and steering duties, supervises the contents of documents prepared by the Actuarial Function of individual companies, as well as the completeness of audit activities carried out, with reference to the following areas:

- Solvency II Technical Provisions;
- Underwriting policies and reinsurance agreements;
- contribution to the risk management system and to the internal risk and solvency assessment; in this context, the Actuarial Function contributes to identifying specific Group parameters (GSP), and parameters to determine them, as well as controls on the consistency of data used to calculate specific parameters and the parameters used to determine technical provisions.

Intesa Sanpaolo Vita S.p.A.

The Actuarial Function of Intesa Sanpaolo Vita reports directly to the Board of Directors to ensure its independence in control activities.

In particular, the Head of the Actuarial Function:

- is responsible for the fulfilment of the function's duties;
- must meet the requirements of competence, integrity and experience (in the same way as other members of Function identified as key resources);

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- with regard to Solvency II, the Head of the Actuarial function reports at least once a year to the Board of Directors, expressing an opinion on the adequacy of the technical provisions, the underwriting and reserving policy, and the reinsurance agreements. Specifically, the opinion on the technical provisions included in the Solvency Report will consist of an analysis of their adequacy and reliability both in terms of process and numerical results. This opinion can be accompanied, if necessary, by a series of recommendations and indications relating to potential improvement areas;
 - liaises with the other control functions, organisational units and committees by exchanging information with the respective heads and contact persons as provided for by the relevant internal regulations;
 - determination of the action plan, at least on an annual basis, to submit to the Board of Directors.

The Head of the Actuarial Function is provided free access to the information needed to carry out his/her responsibilities to the extent allowed by law.

The company's Actuarial function also performs a series of duties as part of the audits on the adequacy of the technical provisions, as provided for in IVASS Provision no. 53/2016. In particular, the Head of the Actuarial function prepares and signs the technical report on the provisions of the direct Italian portfolio which the Company intends to include in the financial statements. In the report, the Actuarial function describes in detail the procedures and assessments carried out with reference to the basic techniques used to calculate the technical provisions. It specifically highlights any implicit valuations and the reasons for them, confirms the accuracy of the procedures, reports on the audits of the procedures used to calculate the provisions and for the correct recording of the portfolio, and gives an opinion on the sufficiency of all the technical provisions.

The Head of the Actuarial Function and the company representative sign the report on the current and foreseeable performance, as required by section 32 of Annex 14 to ISVAP Regulation no. 22/2008.

Intesa Sanpaolo Assicura S.p.A.

The Actuarial Function of Intesa Sanpaolo Assicura reports directly to the Board of Directors to ensure its independence in control activities.

The activities of the Function are carried out by Intesa Sanpaolo Vita under a specific outsourcing agreement.

Refer to the information given in relation to roles and responsibilities in the section on Intesa Sanpaolo Vita.

With reference to the direct Italian portfolio reserves, which the company intends to recognise in the company's statutory accounts, the Head of the Actuarial Function also signs the report on technical provisions only for the following lines: Third-party Motor (Land-based) (Line 10) and Third-party marine, lake and river craft (Line 12). Together with the legal representative of Intesa Sanpaolo Assicura, they will also sign the annual CARD claims report as required by IVASS provision no. 43/2016.

As regards risk management, the Actuarial Function contributes to assessments that identify specific business parameters (USP), and parameters to determine them, as well as controls on the

consistency of data used to calculate specific parameters and the parameters used to determine technical provisions.

Fideuram Vita S.p.A.

The Actuarial function of Fideuram Vita reports directly to the Board of Directors to ensure its independence in control activities.

As part of the contribution to the risk management system and to the internal risk and solvency assessment, the Actuarial Function contributes to identifying specific Group parameters (GSP), and parameters to determine them, as well as controls on the consistency of data used to calculate specific parameters and the parameters used to determine technical provisions.

The activities of the Function are carried out by Intesa Sanpaolo Vita under a specific outsourcing agreement.

Refer to the information given in relation to roles and responsibilities in the section on Intesa Sanpaolo Vita.

Intesa Sanpaolo Life D.A.C.

The Head of the Actuarial Function reports directly to the Board of Directors in order to guarantee independence in control activities.

The roles and responsibilities are in line with the structure in force at the Parent Company and correspond to the specific requirements of the Local Regulator.

Intesa Sanpaolo RBM Salute S.p.A.

The Actuarial Function of Intesa Sanpaolo RBM Salute reports directly to the Board of Directors to ensure its independence in control activities.

As part of the contribution to the risk management system and to the internal risk and solvency assessment, the Actuarial Function contributes to identifying specific Group parameters (GSP), and parameters to determine them, as well as controls on the consistency of data used to calculate specific parameters and the parameters used to determine technical provisions.

The activities of the Function are carried out by Intesa Sanpaolo Vita under a specific outsourcing agreement.

Refer to the information given in relation to roles and responsibilities in the section on Intesa Sanpaolo Vita.

Cargeas Assicurazioni S.p.A.

The Actuarial Function of Cargeas Assicurazioni reports directly to the Board of Directors to ensure its independence in control activities.

As part of the contribution to the risk management system and to the internal risk and solvency assessment, the Actuarial Function contributes to identifying specific Group parameters (GSP),

and parameters to determine them, as well as controls on the consistency of data used to calculate specific parameters and the parameters used to determine technical provisions.

The activities of the Function are carried out by Intesa Sanpaolo Vita under a specific outsourcing agreement.

Refer to the information given in relation to roles and responsibilities in the section on Intesa Sanpaolo Vita.

With reference to the direct Italian portfolio reserves, which the company intends to recognise in the company's statutory accounts, the Head of the Actuarial Function also signs the report on technical provisions only for the following lines: Third-party Motor (Land-based) (Line 10) and Third-party marine, lake and river craft (Line 12) and the Reassurance acceptances. In addition to the work done for Intesa Sanpaolo Vita, in connection with civil liability insurance for motorised vehicles, the Head of the Actuarial Function will prepare a report whenever there is a change in the pricing or discount rates, describing the work done and the reasons underlying the company's decisions, as required by Article 11 of the Regulation. IVASS No 37 of 2018. Together with the legal representative of Cargeas Assicurazioni, they will also sign the annual CARD claims report as required by IVASS provision no. 43/2016.

B.7 OUTSOURCING

Intesa Sanpaolo Vita Insurance Group

Activities may be outsourced due to the need to achieve cost savings (for example services that would require investments and overheads if they were performed internally can be done by a specialised firm that can rely on economies of scale); specialised companies with best practices in a specific business such as financial management may also be used; the need to concentrate efforts on the core business, looking outside for non-characteristic activities (e.g. mail management services outsourcing); objectives to streamline the organisational model of the Insurance Group.

Intesa Sanpaolo Vita has adopted and updates the Policy on outsourcing and selecting suppliers of the Insurance Group, that defines the principles used to regulate the decision-making process, the responsibilities, duties and controls applicable to the outsourcing of activities and company functions within the Intesa Sanpaolo Vita Insurance Group, and to other third parties, thus strengthening the control of risks related to outsourcing decisions.

The Policy:

- establishes that the Insurance Group Companies may, if appropriate, outsource some of the activities and/or processes within their production cycle based on the need to achieve economies of scale and of purpose;
- regulates the criteria for identifying which services should be outsourced, based on the possibility of obtaining intragroup or external suppliers (in reference to the Intesa Sanpaolo Group) according to the guidelines of the Regulator and of the Parent Company;
 - regulates the criteria for choosing service providers based on ethical, documentary and technical criteria, and their financial status.

Intesa Sanpaolo Vita S.p.A.

Intesa Sanpaolo Vita mainly uses Intesa Sanpaolo Group companies for the outsourcing of essential services; this choice, which is prevalent but not exclusive (horizontal outsourcing of broad-ranging services) nor mandatory, guarantees, as business areas become more complex to manage, a greater focus on business continuity, service quality, the containment and integrated management of costs, as well as certified professional ability and financial status of the supplier.

All the outsourced services, and relations with outsourcers themselves are governed by service agreements, which define the object and terms of the services, the rights, obligations, responsibilities, penalties, duration of the agreements, renewal, termination conditions and any reciprocal commitments related to termination, the Service Level Agreement, the parameters used to monitor service levels, and the process used to determine payment.

The policy on outsourcing and selecting suppliers of Intesa Sanpaolo Vita regulates the audits and evaluations that the business units receiving the outsourced services must perform, and defines the reports that need to be produced for Senior Management, the Board of Directors and the Regulator, as well as any reports to the Supervisory Body.

In assessing whether the outsourced activity is essential or non-essential, the safeguards adopted by the company comply with the industry regulatory principles expressed by IVASS Regulation no. 38/2018 and Eiopa regulations. The monitoring of the correct execution of activities complies with the agreed standards and service levels, with a view to providing the best possible service to customers; as well as the ability to re-internalize the outsourced activity if necessary, the quantitative and temporal aspect of the activity with reference to its duration and related costs.

Intesa Sanpaolo Assicura S.p.A.

Intesa Sanpaolo Assicura has implemented the Policy on outsourcing of the Insurance Group and adopted its own Policy on outsourcing and selecting suppliers of Intesa Sanpaolo Assicura to outsource essential services in particular; this choice, which is prevalent but not exclusive (horizontal outsourcing of broad-ranging services) nor mandatory, guarantees, as business areas become more complex to manage, a greater focus on business continuity, service quality, the containment and integrated management of costs, as well as certified professional ability and financial status of the supplier.

In line with the organisational model of the Intesa Sanpaolo Vita insurance parent company, the company plans to outsource services relating to the following areas:

- IT systems;
- investments management
- claims management.

The suppliers used are specialised and qualified leading companies that undergo internal due diligence processes or companies that are part of the Intesa Sanpaolo Group. The Company's corporate governance system ensures controls of a similar standard to those that would be implemented if the activities were carried out directly by the Company.

In assessing whether the outsourced activity is essential or non-essential, the safeguards adopted by the company comply with the industry regulatory principles expressed by IVASS Regulation no. 38/2018 and Eiopa regulations. The monitoring of the correct execution of activities complies with

the agreed standards and service levels, with a view to providing the best possible service to customers; as well as the ability to re-internalize the outsourced activity if necessary, the quantitative and temporal aspect of the activity with reference to its duration and related costs.

Fideuram Vita S.p.A.

Fideuram Vita has implemented the "Policy on outsourcing and selecting suppliers of the Insurance Group" and adopted its own "Policy on outsourcing and selecting suppliers", mainly for Intesa Sanpaolo Group Companies and the Insurance Group, for outsourcing essential services in particular; this choice, which is prevalent but not exclusive (horizontal outsourcing of broad-ranging services) not mandatory, guarantees, as business areas become more complex to manage, a greater focus on business continuity, service quality, the containment and integrated management of costs, as well as certified professional ability and financial status of the supplier.

In line with the organisational model of the Intesa Sanpaolo Vita insurance parent company, the company plans to outsource services relating to the following areas:

- IT systems;
- investments management

The suppliers used are specialised and qualified leading companies that undergo internal due diligence processes or companies that are part of the Intesa Sanpaolo Group. The Company's corporate governance system ensures controls of a similar standard to those that would be implemented if the activities were carried out directly by the Company.

In assessing whether the outsourced activity is essential or non-essential, the safeguards adopted by the company comply with the industry regulatory principles expressed by IVASS Regulation no. 38/2018 and Eiopa regulations. The monitoring of the correct execution of activities complies with the agreed standards and service levels, with a view to providing the best possible service to customers; as well as the ability to re-internalize the outsourced activity if necessary, the quantitative and temporal aspect of the activity with reference to its duration and related costs.

Intesa Sanpaolo Life D.A.C.

Intesa Sanpaolo Life adopted the Outsourcing Risk Policy in 2012. It defines the governance, due diligence processes, approval and monitoring processes followed by the company in accordance with the requirements of the Central Bank of Ireland and European regulations (Solvency II).

Intesa Sanpaolo Life has also adopted the Group outsourcing guidelines.

The Corporate Governance Office function is responsible for maintaining and updating the policy at least once a year as defined in the policy itself.

The Policy sets out the roles and responsibilities within the Company, detailing the internal supplier selection process, the regulations to observe for preparing contracts and the activities for and frequency of monitoring supply performance, in accordance with contracts and internal regulations.

The Policy indicates the requirements that the company needs to assess before entering into a new outsourcing agreement:

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- Defining the process and obligations to report to the Central Bank of Ireland in the case of a critical outsourcer;
 - Defining the Fitness and Probity standards to be considered;
 - Listing the criteria to be included in the selection process.

Each quarter, the Corporate Governance function reports to the Board of Directors on the adequacy of control oversight and the actions considered necessary for more efficient and effective controls.

Intesa Sanpaolo RBM Salute S.p.A.

Intesa Sanpaolo RBM Salute has implemented the Policy on outsourcing of the Insurance Group and adopted its own Policy on outsourcing and selecting suppliers for outsourcing essential services in particular; this choice, which is prevalent but not exclusive (horizontal outsourcing of broad-ranging services) nor mandatory, guarantees, as business areas become more complex to manage, a greater focus on business continuity, service quality, the containment and integrated management of costs, as well as certified professional ability and financial status of the supplier.

In line with the organisational model of the Intesa Sanpaolo Vita insurance parent company, the company plans to outsource services relating to the following areas:

- IT systems;
- investments management
- claims management

The suppliers used are specialised and qualified leading companies that undergo internal due diligence processes or companies that are part of the Intesa Sanpaolo Group. The Company's corporate governance system ensures controls of a similar standard to those that would be implemented if the activities were carried out directly by the Company.

Cargeas Assicurazioni S.p.A.

Cargeas Assicurazioni S.p.A has implemented the Policy on outsourcing of the Insurance Group and adopted its own Policy on outsourcing and selecting suppliers for outsourcing essential services in particular; this choice, which is prevalent but not exclusive (horizontal outsourcing of broad-ranging services) nor mandatory, guarantees, as business areas become more complex to manage, a greater focus on business continuity, service quality, the containment and integrated management of costs, as well as certified professional ability and financial status of the supplier.

In line with the organisational model of the Intesa Sanpaolo Vita insurance parent company, the company plans to outsource services relating to the following areas:

- IT systems;
- investments management

The suppliers used are specialised and qualified leading companies that undergo internal due diligence processes or companies that are part of the Intesa Sanpaolo Group. The Company's corporate governance system ensures controls of a similar standard to those that would be implemented if the activities were carried out directly by the Company.

In assessing whether the outsourced activity is essential or non-essential, the safeguards adopted by the company comply with the industry regulatory principles expressed by IVASS Regulation no. 38/2018 and Eiopa regulations. The monitoring of the correct execution of activities complies with the agreed standards and service levels, with a view to providing the best possible service to customers; as well as the ability to re-internalize the outsourced activity if necessary, the quantitative and temporal aspect of the activity with reference to its duration and related costs.

B.8 ADEQUACY OF THE SYSTEM OF GOVERNANCE

The Board of Directors of the USCI for the Group and for for Intesa Sanpaolo Vita and those of the other Group Companies receive regular updates about the assessment of the internal control and risk management system, from the control functions, as part of their periodic reports. The report presented during 2021 by these functions did not highlight any areas of concern in the internal control or risk management system that would affect the proper functioning of the company or of the Insurance Group. In particular the corporate governance system was reviewed, as provided for by Regulation 38, Article 71 (2) (cc), as regards:

- the adequacy of the organisational model;
- the suitability of the system of powers;
- the adequacy and effectiveness of the risk management system;
- the effectiveness and efficiency of the internal control system;
- the effectiveness of the information transmission system;
- the requirements of professionalism, integrity and independence of those who carry out administrative, management and control functions, of the heads and of those who carry out core functions and of other staff able to affect the risk profile.

The outcome of the review process shows that the corporate governance system of the Group and of its insurance Companies is adequate for the nature, scope and complexity of risks concerning the Company's activities.

B.9 OTHER INFORMATION

Intesa Sanpaolo Vita Insurance Group

In July 2021, the Antitrust Authority imposed a sanction on Intesa Sanpaolo RBM Salute S.p.A. for unfair commercial practice. The Company has taken action by preparing a Compliance Plan, which was notified to the Authority within the required time limits, covering the 2021-2022 time horizon and which is currently being implemented and monitored.

As of early 2022, the USCI is managing a project to integrate Cargeas Assicurazioni S.p.A. with the aim of merging it into the subsidiary Intesa Sanpaolo assicura S.p.A..

Intesa Sanpaolo Vita S.p.A.

See above, in relation to the Insurance Group.

Intesa Sanpaolo Assicura S.p.A.

See above, in relation to the Insurance Group.

Fideuram Vita S.p.A.

See above, in relation to the Insurance Group.

Intesa Sanpaolo Life D.A.C.

See above, in relation to the Insurance Group.

Intesa Sanpaolo RBM Salute S.p.A.

See above, in relation to the Insurance Group.

Cargeas Assicurazioni S.p.A.

See above, in relation to the Insurance Group.



C. RISK PROFILE

Below is the composition of the Insurance Group's capital requirement divided by major risk type.

The presence of the "Add-On" item in the table above, for the Insurance Group, is due to the adoption by the company Intesa Sanpaolo RBM Salute S.p.A. of a temporary capital increase (so-called Conservative Margin), which was updated on 31 December 2021 following discussions with the Supervisory Authority. The value of the Conservative Margin, updated annually, is equal to 245 million euros, which replaces the previous value of the Conservative Margin of approximately 22 million euros. Following the provision IVASS Provision - prot. n. 57811/22 of March 16, 2022, the capital increase relating to governance issues was revoked, which amounted to 10.3 million euro imposed by IVASS Order no. 67739/18 of 27 February 2018.

(euro thousands)

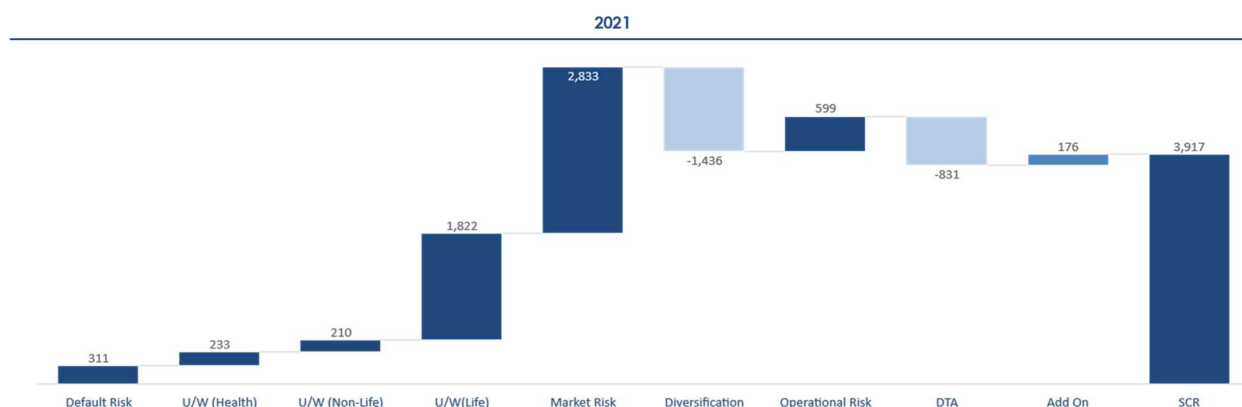
	2021	2020	Variation	
Solvency Capital Requirement	3,916,527.9	3,957,255.4	-40,727.5	-1.0%
Add On	176,175.2	30,692.4	145,482.8	>100%
Deferred Tax Adjustment	-831,232.8	-392,842.6	-438,390.2	>100%
Solvency Capital Requirement ante adj	4,571,585.5	4,319,405.6	252,179.9	5.8%
Operational Risk	598,600.1	508,600.7	89,999.4	17.7%
Basic Solvency Capital Requirement	3,972,985.4	3,810,804.9	162,180.5	4.3%
Diversification	-1,435,917.8	-1,449,274.0	13,356.2	-0.9%
Market Risk	2,832,758.2	2,328,384.7	504,373.4	21.7%
Interest Rate Risk	87,465.3	60,273.1	27,192.2	45.1%
Equity Risk	1,200,860.8	963,907.6	236,953.2	24.6%
Property Risk	99,606.0	61,266.0	38,340.1	62.6%
Spread Risk	1,365,551.4	1,091,374.2	274,177.2	25.1%
Concentration Risk	29,304.1	89,854.8	-60,550.7	-67.4%
Currency Risk	782,944.6	767,612.7	15,331.9	2.0%
Diversification	-732,974.1	-705,903.5	-27,070.5	3.8%
Underwriting Risk (Life)	1,821,778.3	2,183,581.7	-361,803.5	-16.6%
Mortality Risk	169,748.3	135,936.7	33,811.6	24.9%
Longevity Risk	211,677.8	270,598.9	-58,921.1	-21.8%
Disability Risk	-	-	-	na
Expenses Risk	380,155.2	271,815.3	108,339.9	39.9%
Revision Risk	-	-	-	na
Lapse Risk	1,492,136.2	1,920,496.9	-428,360.7	-22.3%
Cat Risk	85,461.7	76,883.5	8,578.1	11.2%
Diversification	-517,400.9	-492,149.6	-25,251.3	5.1%
Underwriting Risk (Non-Life)	210,317.7	174,360.7	35,957.0	20.6%
Premium & reserve Risk	189,999.9	159,452.8	30,547.1	19.2%
Lapse Risk	49,778.9	41,720.5	8,058.4	19.3%
Cat Risk	41,448.7	29,598.6	11,850.1	40.0%
Diversification	-70,909.9	-56,411.2	-14,498.7	25.7%
Underwriting Risk (Health)	233,241.6	254,599.2	-21,357.7	-8.4%
Cat Risk	26,920.9	17,251.2	9,669.7	56.1%
Mass Accident Risk	1,360.9	1,163.9	197.0	16.9%
Concentration Risk	2,398.3	415.3	1,983.1	>100%
Pandemic Risk	26,779.3	17,206.9	9,572.4	55.6%
Diversification	-3,617.7	-1,534.9	-2,082.8	>100%
Non- SLT Risk	225,050.3	249,737.9	-24,687.7	-9.9%
Reserve Risk	215,254.5	242,451.6	-27,197.1	-11.2%
Lapse Risk	65,674.4	59,885.5	5,789.0	9.7%
Diversification	-55,878.7	-52,599.1	-3,279.6	6.2%
Diversification	-18,729.6	-12,389.9	-6,339.7	51.2%
Default Risk	310,807.4	319,152.4	-8,345.0	-2.6%

The "Add-On" item in the table above, for the Insurance Group, is due to the adoption by the Company Intesa Sanpaolo RBM Salute S.p.A. of a temporary Conservative Margin, which was updated at YE 2021 following discussions with the Supervisory Authority. The Conservative Margin

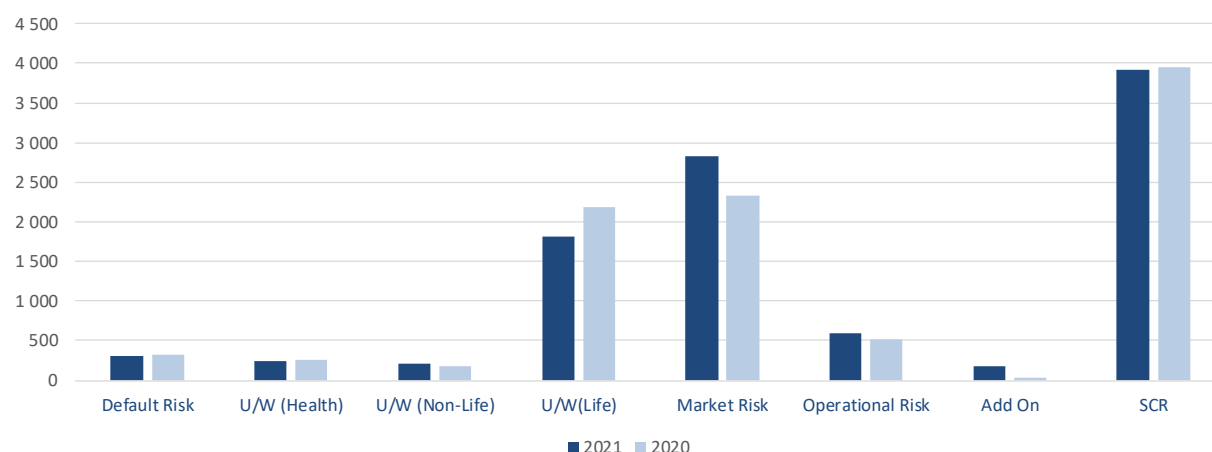
value, updated annually, is 245 million euro, replacing the previous Conservative Margin value of approximately 22 million euro.

Following IVASS Provision - Ref. no. 57811/22 of 16 March 2022, the Conservative Margin relating to Governance issues was removed; this amounted to 10.3 million euro imposed by IVASS Provision no. 67739/18 of 27 February 2018.

Composition of the solvency capital requirement (in millions of euro)



Comparison of the solvency capital requirement (in millions of euro)



The table and graph show a slight reduction in the Capital Solvency Requirement, compared to the valuation at 31 December 2020, of approximately 1%, i.e. 40 million euro. There was an increase in Market Risk and Underwriting Risk (Non-Life) and a decrease in Underwriting Risk (both Life and Health), Deferred Tax Adjustment and Credit Risk. The increase in Market Risk is mainly due to the merger of Assicurazioni Vita, Lombarda Vita, BancAssurance Popolari Vita and Previdenza into Intesa Sanpaolo Vita in the fourth quarter of 2021.

The increase in Non-Life Underwriting Risk is mainly due to the presence of this type of risk also for the RBMS Company due to the "Assistance" and "Pecuniary Losses" Non-Life business for which the RBMS Company has recently obtained an authorisation to conduct business.

The decrease in Underwriting Risk (Life) is mainly due to the increase in risk-free interest rates.

C.1 UNDERWRITING RISK

Intesa Sanpaolo Vita Insurance Group

C.1.1 Exposures and their measurement

The Insurance Group defines the underwriting risk as the risk of loss or adverse change to the value of the insurance liabilities due to inadequate price setting assumptions (price setting risk), or the assumptions used in establishing the technical provisions.

The companies belonging to the Intesa Sanpaolo Vita Insurance Group, under Article 1(r)-bis of the Private Insurance Code, adopt the standard formula for the calculation of the Solvency Capital Requirement (Article 45-quinquies to 45-undecies).

At 31 December 2021 the value of the technical risks of the Life business, according to the Standard Formula, was 1,821 million euro. The main risks of this type to which the Company is exposed are those related to policyholder behaviour (surrender risk), followed by the costs risk, and demographic risks.

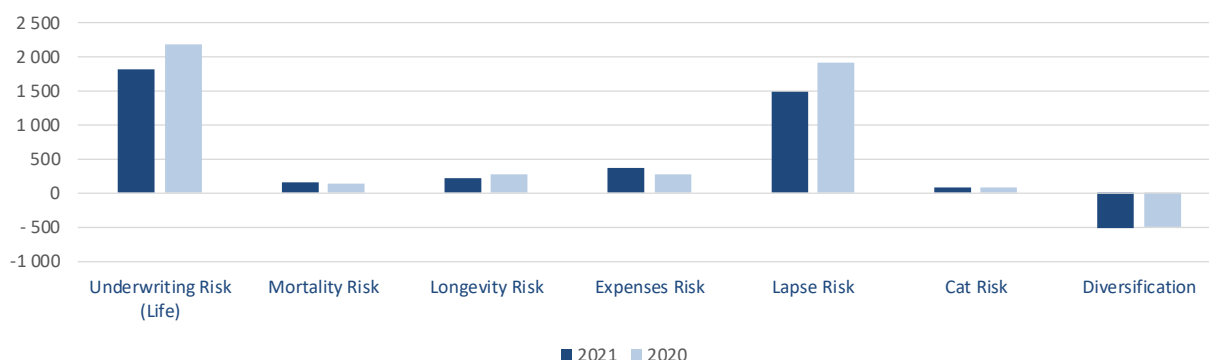
With regard to the absorption of capital by the technical risks of the Non-life business this amounts to 210 million euro while Health technical risks amounts to 233 million euro. The main risks of this type to which the Insurance Group is exposed are the pricing and reserve risks.

The tables below show a breakdown of the submodules of the Insurance Group's technical risks:

Module	2021	2020	Variation	
Underwriting Risk (Life)	1,821,778	2,183,582	-361,803	-16.6%
Mortality Risk	169,748	135,937	33,812	24.9%
Longevity Risk	211,678	270,599	-58,921	-21.8%
Disability Risk	-	-	-	na
Expenses Risk	380,155	271,815	108,340	39.9%
Revision Risk	-	-	-	na
Lapse Risk	1,492,136	1,920,497	-428,361	-22.3%
Cat Risk	85,462	76,884	8,578	11.2%
Diversification	-517,401	-492,150	-25,251	5.1%

Compared to the previous valuation of 31 December 2020, the underwriting risk (Life) declined by 16% for a total of approximately 361 million euro. Below is a bar chart summarising the changes between the two valuations.

Underwriting Risk - Life (in millions of euro)

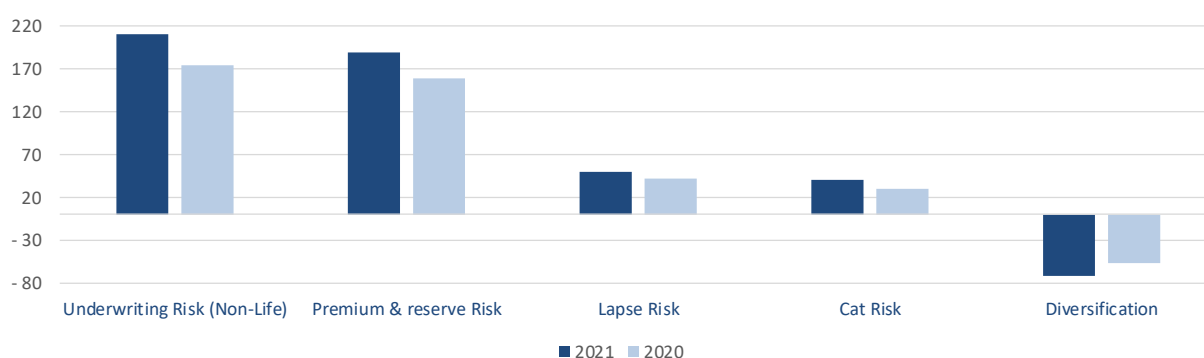


(euro thousands)

Module	2021	2020	Variation	
Underwriting Risk (Non-Life)	210,318	174,361	35,957	21%
Premium & reserve Risk	190,000	159,453	30,547	19%
Lapse Risk	49,779	41,721	8,058	19%
Cat Risk	41,449	29,599	11,850	40%
Diversification	-70,910	-56,411	-14,499	26%

Compared to the previous valuation of 31 December 2020, the underwriting risk (Non-life) rose by 21% for a total of approximately 35 million euro. The increase in the capital solvency requirement for Underwriting Risk (Non-Life) is mainly due to the increase in Pricing, Reserving and Catastrophe risks. Below is a bar chart summarising the changes between the two valuations.

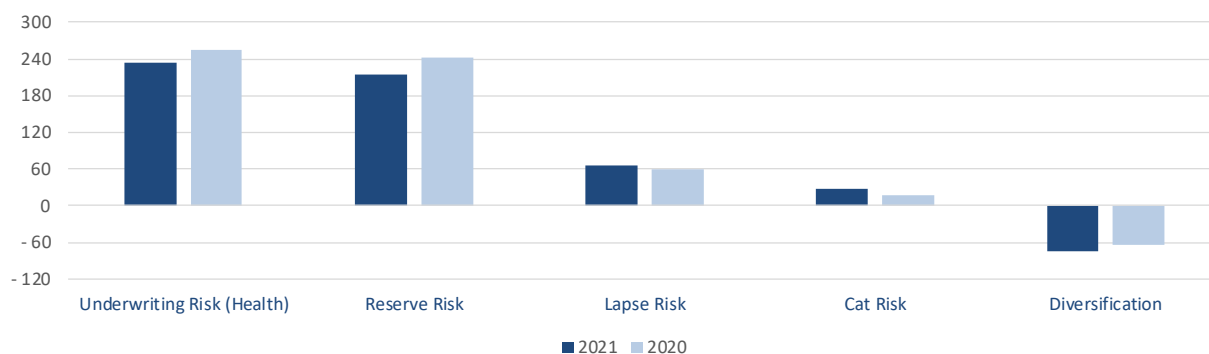
Underwriting Risk - Non-life (in millions of euro)



Module	2021	2020	Variation	
Underwriting Risk (Health)	233,242	254,599	-21,358	-8.4%
Cat Risk	26,921	17,251	9,670	56.1%
Mass Accident Risk	1,361	1,164	197	16.9%
Concentration Risk	2,398	415	1,983	>100%
Pandemic Risk	26,779	17,207	9,572	55.6%
Diversification	-3,618	-1,535	-2,083	>100%
Non- SLT Risk	225,050	249,738	-24,688	-9.9%
Reserve Risk	215,254	242,452	-27,197	-11.2%
Lapse Risk	65,674	59,885	5,789	9.7%
Diversification	-55,879	-52,599	-3,280	6.2%
Diversification	-18,730	-12,390	-6,340	51.2%

SLT refers to "Similar to Life Techniques" and therefore "Non-SLT" refers to all policies that are similar to non-life policies. Compared to the previous valuation of 31 December 2020, the underwriting risk (Health) declined by 8.4% for a total of approximately 21 million euro. The increase in the capital solvency requirement for Underwriting Risk is mainly due to the increase in non-SLT risk. Below is a bar chart summarising the changes between the two valuations.

Underwriting Risk - Health (in millions of euro)



The diversification effect between the various sub-lines is 22.1% for the underwriting risk (Life), for the Non-life underwriting risks it is 25.2%, while for the Health underwriting risk it is 24.2%.

With regard to measurement methods, specific monitoring processes are put in place within the Insurance Group's risk management framework, which incorporates a regular stress test activity for Underwriting risks.

The stress tests are represented by a set of techniques used by the Insurance Group to:

- measure their vulnerability to extraordinary yet plausible events;
- allow Senior Management to understand the relationship between the risk assumed and its risk appetite, as well as the adequacy of the available capital.

The stress testing activity involves hypothesising a joint shock of selected risks and the related calculation of loss. The Risk Management function of the Insurance Group Parent together with the Risk Management functions assess the impact on the capital availability of each insurance company of the Insurance Group and the Group as a whole, and the related impact in terms of the regulatory and economic capital requirement.

Should the results of the stress tests show that there is potential non-compliance with the minimum regulatory requirements and/or that the controls for each risk are inadequate, the Risk Committee will suggest improvements in order to consolidate the Insurance Group's capital stability to the Board of Directors of the company concerned.

Depending on the nature, scope and complexity of the risks of the company's business, the Insurance Group companies define investment policies for the entire portfolio, based on the principle of a reasonable person, as already described in section B.3 "System of risk management, including the internal assessment of risk and solvency".

The risk of underwriting is also managed through the definition and monitoring of Risk Appetite limits for some indicators representative of such a risk. As regards underwriting risk, the Group's Risk Appetite framework establishes limits on the ratio between the capital requirement for underwriting risk and eligible own funds of the Group. The Group monitors the guaranteed minimum levels.

Below are the figures for the Insurance Group companies' exposures to Technical risks, in terms of use of capital. The figures are also compared against those for 31 December 2020.

C.1.2 Concentration of risks

The Insurance Group has a risks concentration policy that defines the concentrations considered to be significant, together with the calculation methods in order to mitigate the risk that they could have negative effects on the solvency and financial situation of the Insurance Group.

The objective of the policy is to define a risk concentration policy that would be consistent with the risks management strategy and policy and with the investment policies.

Risk concentrations are identified by assessing the impact they may have on the company's capital and solvency, in the wake of adverse scenarios on the main risk factors whether they be financial or technical.

The criteria used to identify them are based, in accordance with IVASS Regulation no. 30/2016, on the percentage they have compared to the total group technical provisions, or compared to the group technical requirements depending on their nature.

For the life, non-life and health segments present at the year-end date, the capital requirement associated with the catastrophic risk (CAT) net of any reinsurance is calculated. That value is compared to the capital requirements of the ISV Group, calculated for the last annual report.

For the Underwriting risk, the Insurance Group has set the concentration threshold for the capital requirement associated with the Natural Disaster risk at 5%, Underwriting risk taking into account the standard operations and limits on operations as provided for in the Framework Decision on Investments. This has been calculated as the ratio between the capital requirements for the Company's catastrophe module, and the Group Solvency Capital Requirement.

There were no significant concentrations as of the reporting date of 31 December 2021.

C.1.3 Sensitivity analysis

Stress tests analyse the solvency and stability of the company, in adverse, extreme scenarios.

As part of the self-assessment, the Insurance Group carries out stress tests by combining the underwriting and market risks in a way that presents the solvency and stability impacts in a collective and reasonably realistic manner.

The results of these analyses are presented in the ORSA Report.

Intesa Sanpaolo Vita S.p.A.

C.1.1 Exposures and their measurement

At 31 December 2021 the value of the technical risks of the Life business, according to the Standard Formula, was 1,377 million euro. The main risks of this type to which the Company is exposed are those related to policyholder behaviour (surrender risk), followed by demographic risks and costs risk.

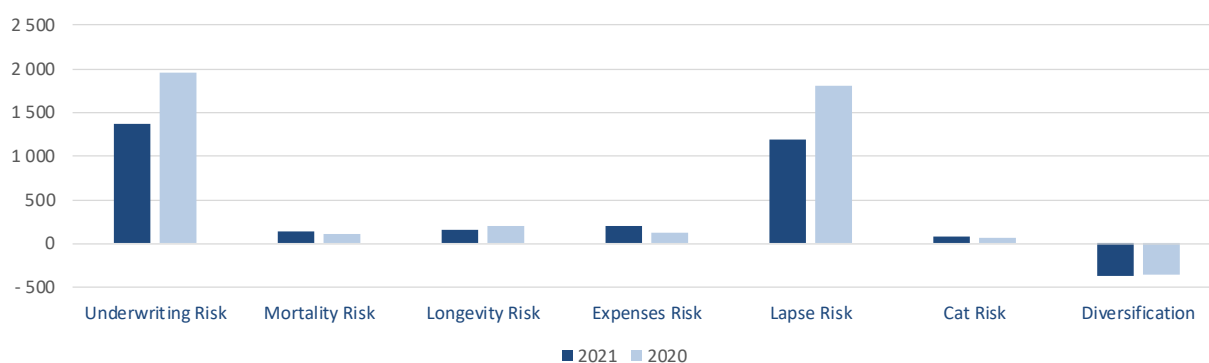
(euro thousands)

Module	2021	2020	Variazione	
Underwriting Risk	1,377,949	1,949,747	-571,798	-29.3%
Mortality Risk	134,418	103,674	30,744	29.7%
Longevity Risk	151,168	200,551	-49,382	-24.6%
Disability Risk	-	-	-	na
Expenses Risk	199,666	125,484	74,182	59.1%
Revision Risk	-	-	-	na
Lapse Risk	1,186,344	1,800,987	-614,643	-34.1%
Cat Risk	78,297	70,006	8,291	11.8%
Diversification	-371,944	-350,955	-20,990	6.0%

The effect of diversification among the various sub-lines was 21% of the underwriting risk, up on the figure at 31 December 2020.

Compared to the previous valuation of 31 December 2020, the Underwriting risk rose by 29% for a total of approximately 571 million euro. The main difference compared to the previous valuation is due to the decrease in the surrender risk (-614 million). Below is a bar chart summarising the changes between the two valuations.

Underwriting Risk (in millions of euro)



The risk of underwriting is also managed through the definition and monitoring of Risk Appetite limits for some indicators representative of such a risk. As regards underwriting risk, the Company's Risk Appetite framework establishes limits on the ratio between the capital requirement for underwriting risk and eligible own funds of the Company.

C.1.2 Risk mitigation techniques

On the valuation date, the company did not consider underwriting risk mitigation techniques in the calculation of the solvency requirements under the Solvency II regulations. Outward reinsurance is residual, and there are no collateral guarantees.

The risk containment strategies designed to reduce the volatility of income statement results and the resulting technical balance of the portfolio.

For the Life business lines, the aim is to protect the portfolio through reinsurance agreements, in order to mitigate any peak exposures and to protect against the risks of catastrophe that could affect multiple people in the same event.

At the time of its formation, Intesa Sanpaolo Vita received fully paid-up share capital that is sufficient to cover the normal risks of its underwriting without any need for substantial recourse to proportional reinsurance agreements.

The responsibility for reinsurance strategies lies with the Reinsurance area, while the annual reinsurance plan must be shared with Risk Management and the Actuarial Function.

Intesa Sanpaolo Assicura S.p.A.

C.1.1 Exposures and their measurement

At 31 December 2021, the valuation according to the standard formula, by adopting the USP parameters, of the technical risks for the Non-life business was approximately 161 million euro, while for the technical risks of the Health business it was approximately 127 million euro. The main risks of this type to which the Company is exposed are pricing and reserving risks.

(euro thousands)

Module	2021	2020	Variation	
Underwriting Risk (Non-Life)	160,567	174,361	-13,794	-7.9%
Premium & reserve Risk	143,573	159,453	-15,880	-10.0%
Lapse Risk	48,478	41,721	6,757	16.2%
Cat Risk	28,192	29,599	-1,406	-4.8%
Diversification	-59,675	-56,411	-3,264	5.8%

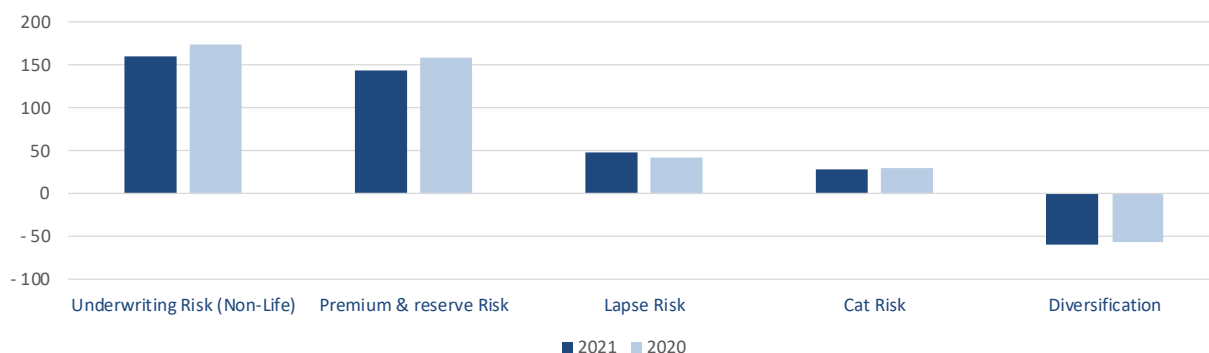
(euro thousands)

Module	2021	2020	Variation	
Underwriting Risk (Health)	126,938	184,563	-57,625	-31.2%
Cat Risk	2,932	1,863	1,069	57.4%
Mass Accident Risk	1,217	1,119	98	8.8%
Concentration Risk	2,398	415	1,983	>100%
Pandemic Risk	1,168	1,431	-263	-18.4%
Diversification	-1,851	-1,102	-749	68.0%
Non- SLT Risk	126,174	184,088	-57,915	-31.5%
Reserve Risk	113,770	177,871	-64,101	-36.0%
Lapse Risk	54,554	47,438	7,116	15.0%
Diversification	-42,150	-41,221	-929	2.3%
Diversification	-2,167	-1,388	-779	56.1%

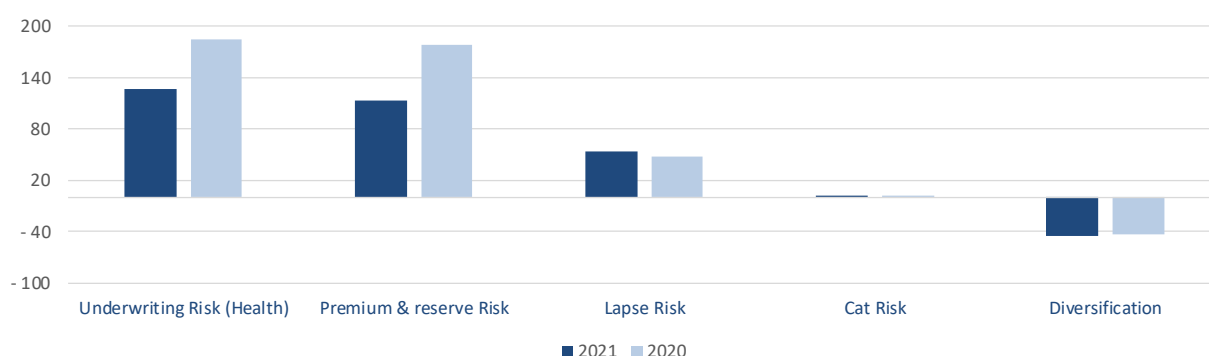
The diversification effect is equal to 27% for the Non-Life business and 26% for the Health business.

Compared to the solvency valuation of 31 December 2020, the underwriting risk of the Non-Life business went down by 8%, for a total of 13.8 million euro, while the underwriting risk of the Health business went down by 31%, for a total of 57.6 million euro. The reduction in underwriting risks is mainly due to the adoption of company-specific parameters, instead of market parameters, for the calculation of capital requirement for pricing and reserving risks. Below are charts summarising the changes between the two valuations.

Underwriting Risk - Non-life (in millions of euro)



Underwriting Risk - Health (in millions of euro)



C.1.2 Risk mitigation techniques

On the valuation date the company used outward reinsurance as a way to mitigate the underwriting risk.

At the time of its formation, Intesa Sanpaolo Assicura received fully paid-up share capital sufficient to cover the normal risks of its underwriting without any need for reinsurance arrangements available on the market.

The risk containment strategy aims to reduce the volatility of the income statement results and the ensuing technical balance of the portfolio based on the impact on the solvency margin of the various business lines provided for by regulations.

Under the Solvency II rules, Intesa Sanpaolo Assicura considers the effects of reinsurance with reference to the calculation of the pricing risk, the reserving risk, the surrender risk, the catastrophe risk and the Best Estimate Liability. Subject to considerations on materiality of the re-insured items, all these components are calculated both gross and net of reinsurance, in order to value the use of reinsurance as a strategic resource for the effective transfer of risk and thus to limit the capital requirement.

The responsibility for reinsurance strategies lies with the Reinsurance area of Intesa Sanpaolo Vita, while the annual reinsurance plan must be shared with Risk Management and the Actuarial Function.

The reinsurance system is calibrated to suit the specific features of the policies and is intended to reduce the potential exposures from the placement of policies. Intesa Sanpaolo Assicura places retail products for motor, home and health insurance, with a high content of service, Credit

Protection Insurance, Business Protection policies for SMEs and corporate products for collective accident insurance Standard/Tailor Made, Cyber Standard/Tailor Made e D&O Standard/Tailor Made. From this point of view, the company protects the portfolio with non-proportional arrangements in excess of claims, to mitigate peak exposures and catastrophe risks (earthquakes, atmospheric events, large claims), and only for specific types of cover or policies, by means of proportional arrangements. During the year, coinsurance policies were signed and were then assigned under optional reinsurance, with high percentages of risks not applicable to the current reinsurance arrangements.

Fideuram Vita S.p.A.

C.1.1 Exposures and their measurement

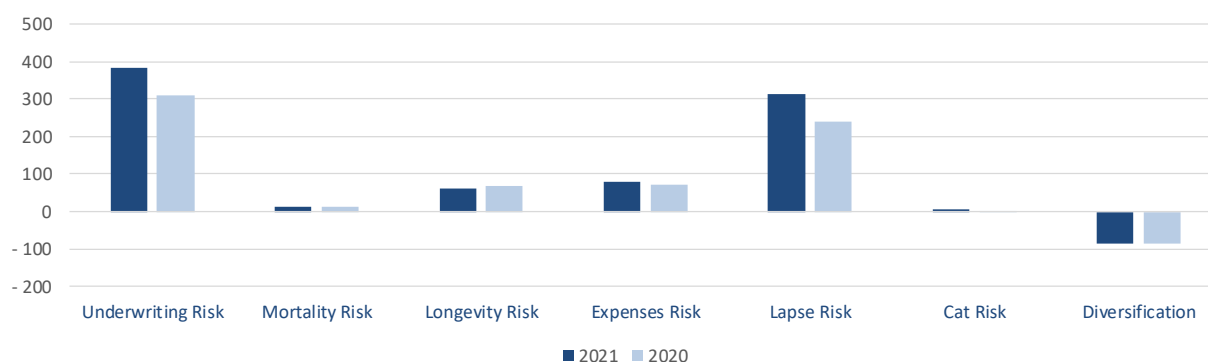
At 31 December 2021 the value of the technical risks of the Life business, according to the Standard Formula, was 382 million euro. The main risks of this type to which the Company is exposed are those related to policyholder behaviour (surrender risk), followed by the costs risk, and demographic risks.

(euro thousands)				
Module	2021	2020	Variation	
Underwriting Risk	382,082	309,282	72,799	23.5%
Mortality Risk	11,958	11,295	663	5.9%
Longevity Risk	60,509	67,430	-6,921	-10.3%
Disability Risk	-	-	-	na
Expenses Risk	78,480	70,796	7,684	10.9%
Revision Risk	-	-	-	na
Lapse Risk	314,038	240,626	73,412	30.5%
Cat Risk	3,759	3,125	634	20.3%
Diversification	-86,662	-83,990	-2,673	3.2%

The effect of diversification among the various sub-lines was 18% of the underwriting risk, down on the figure at 31 December 2020.

Compared to the previous valuation of 31 December 2020, the Underwriting risk rose by 23% for a total of approximately 73 million euro. The main difference compared to the previous valuation is due to the increase in the surrender risk (+73 million). Below is a bar chart summarising the changes between the two valuations.

Underwriting Risk (in millions of euro)



The risk of underwriting is also managed through the definition and monitoring of Risk Appetite limits for some indicators representative of such a risk. As regards underwriting risk, the Company's Risk Appetite framework establishes limits on the ratio between the capital requirement for underwriting risk and eligible own funds of the Company.

C.1.2 Risk mitigation techniques

On the valuation date, the company did not consider underwriting risk mitigation techniques in the calculation of the solvency requirements under the Solvency II regulations. Outward reinsurance is residual, and there are no collateral guarantees.

To limit exposures regarding specific portfolios, a proportional arrangement in excess to protect products with death and accident cover was used; moreover, an arrangement in excess of claims to protect Catastrophe risk for the part held in all portfolios was used.

Recourse to optional reinsurance was not necessary in the year, which was limited to cases in which the risk does not apply to the existing reinsurance arrangements.

All reinsurance was finalised with leading and specialist operators.

With particular attention to the mitigation of the Company's risks, insurance cover is arranged with leading reinsurers. Within the framework agreement the Company identifies the criteria used to select these reinsurers. In particular:

- the structure and composition of the shareholder body and their membership of a group or conglomerate;
- the financial stability and solidity of the reinsurers;
- the regulatory framework of the country in which the reinsurer is based;
- the level of concentration of the counterparty's risk, on an individual and group basis.

Intesa Sanpaolo Life D.A.C.

C.1.1 Exposures and their measurement

At 31 December 2021 the value of the technical risks, according to the Standard Formula, was 442 million euro. The main risks of this type to which the company is exposed are those related to policyholder behaviour (redemption risk), followed by the costs risk, and mortality risk.

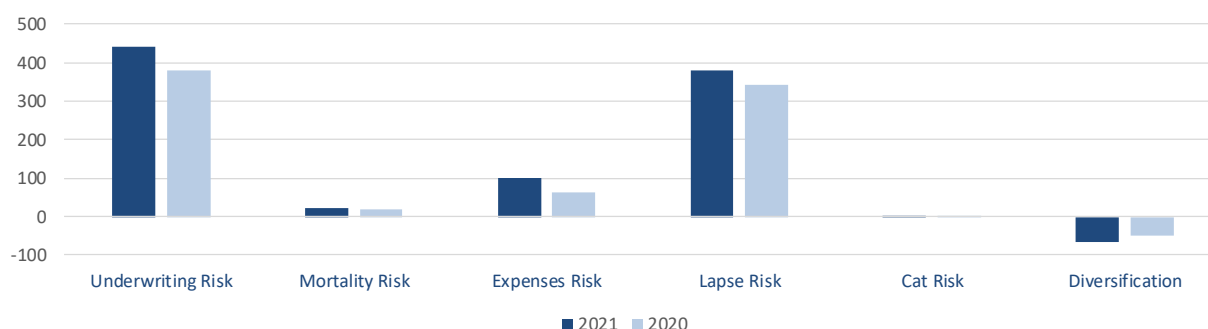
The table below shows the percentage of the sub-modules on the total underwriting risk diversification.

(euro thousands)				
Module	2021	2020	Variation	
Underwriting Risk	442,110	381,207	60,904	16.0%
Mortality Risk	23,372	20,148	3,224	16.0%
Longevity Risk	-	-	-	na
Disability Risk	-	-	-	na
Expenses Risk	102,010	64,066	37,944	59.2%
Revision Risk	-	-	-	na
Lapse Risk	379,167	342,794	36,373	10.6%
Cat Risk	3,406	3,201	205	6.4%
Diversification	-65,845	-49,002	-16,842	34.4%

The effect of diversification among the various sub-lines was 13% of the underwriting risk, essentially in line with the figure for 2020.

Compared to the previous valuation of 31 December 2020, the underwriting risk increased by 16%, i.e. 61 million euro. Below is a bar chart summarising the changes between the two valuations.

Underwriting Risk (in millions of euro)



C.1.2 Risk mitigation techniques

The Company uses "smart product design" as the main form of mitigation; this includes variations in the level of cover according to age band, and the inclusion of surrender penalties in the first few years of the policy term. The Company also carefully analyses surrender history and mortality rates in order to formulate the assumptions to maximise the mitigation of underwriting risk.

Intesa Sanpaolo RBM Salute S.p.A.

C.1.1 Exposures and their measurement

At 31 December 2021 the value of the technical risks of the Life business, according to the Standard Formula, was equal to 118 million euro. The main risks of this type to which the Company is exposed are pricing and reserving risks.

(euro thousands)

Module	2021	2020	Variation	
Underwriting Risk (Non-Life)	33	-	33	na
Premium & reserve Risk	20	-	20	na
Lapse Risk	-	-	0	na
Cat Risk	21	-	21	na
Diversification	-9	-	-9	na

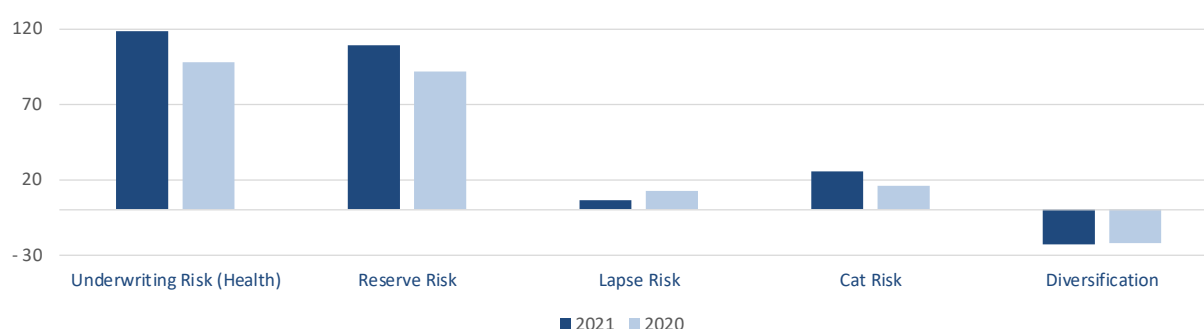
(euro thousands)

Module	2021	2020	Variation	
Underwriting Risk (Health)	117,987	97,930	20,056	20%
Cat Risk	25,575	15,772	9,802	62%
Mass Accident Risk	116	45	71	>100%
Concentration Risk	-	-	-	na
Pandemic Risk	25,574	15,772	9,802	62%
Diversification	-116	-45	-71	>100%
Non- SLT Risk	108,965	92,789	16,176	17%
Reserve Risk	108,768	91,950	16,818	18%
Lapse Risk	6,551	12,447	-5,896	-47%
Diversification	-6,354	-11,609	5,255	-45%
Diversification	-16,553	-10,631	-5,922	56%

The diversification effect is equal to 16% for the Health business and 21% for the Non-Life business.

Compared to the solvency valuation of 31 December 2020, there is an underwriting risk for the Non-Life "Assistance" and "Pecuniary Losses" business, for which the Company has recently obtained authorisation to conduct business, while the underwriting risk for the Health business has increased by 20% to a total of approximately 20.1 million euro. Below are charts summarising the changes between the two valuations in the Health business.

Underwriting Risk - Health (in millions of euro)



C.1.2 Risk mitigation techniques

On the valuation date the company used outward reinsurance as a way to mitigate the underwriting risk.

The risk containment strategy aims to reduce the volatility of the income statement results and the ensuing technical balance of the portfolio based on the impact on the solvency margin of the various business lines provided for by regulations.

Under the Solvency II rules, Intesa Sanpaolo RBM Salute S.p.A considers the effects of reinsurance with reference to the calculation of the underwriting risk and the Best Estimate Liability. Subject to considerations on materiality of the re-insured items, all these components are calculated both gross and net of reinsurance, in order to value the use of reinsurance as a strategic resource for the effective transfer of risk and thus to limit the capital requirement.

The reinsurance system is calibrated to suit the specific features of the policies and is intended to reduce the potential exposures from the placement of policies. Intesa Sanpaolo RBM Salute S.p.A. places collective and *retail* health products (accident and illness) with high protection content.

Cargeas Assicurazioni S.p.A.

C.1.1 Exposures and their measurement

At 31 December 2021, the valuation according to the standard formula, of the technical risks for the Non-life business was approximately 54 million euro, while for the technical risks of the Health business it was approximately 38 million euro. The main risks of this type to which the Company is exposed are pricing and reserving risks.

(euro thousands)

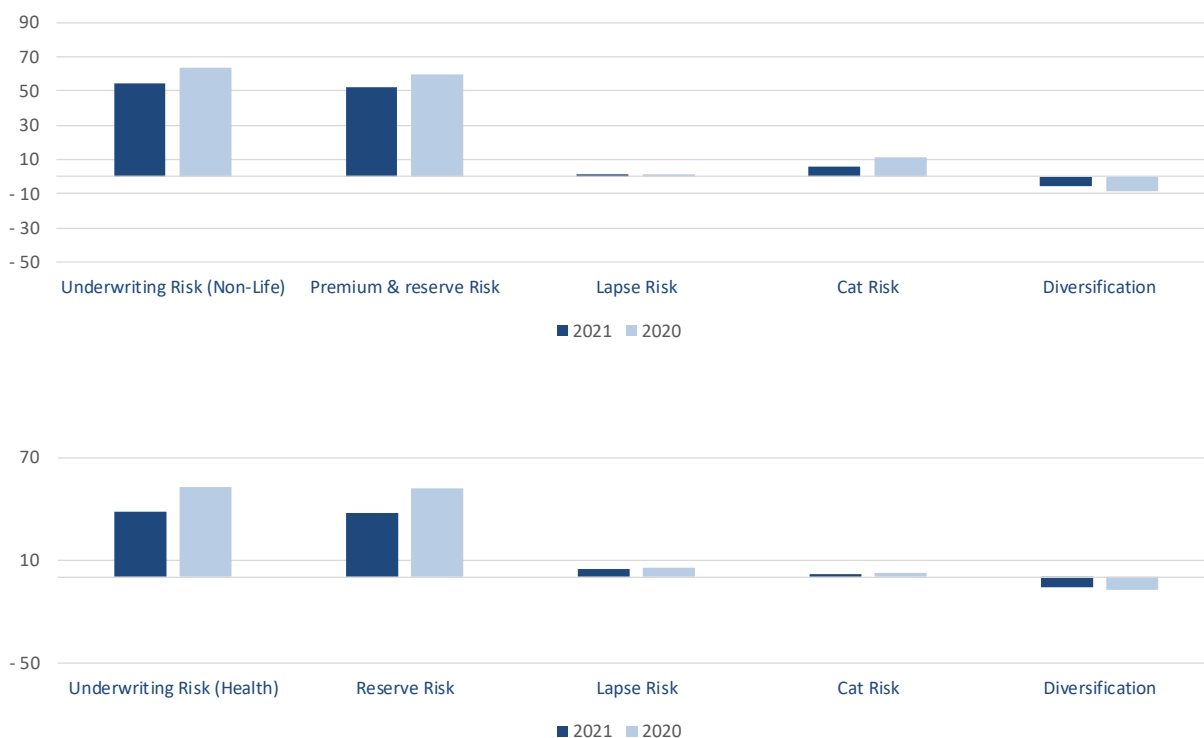
Module	2021	2020	Variation	
Underwriting Risk (Non-Life)	54,080	63,538	-9,458	-14.9%
Premium & reserve Risk	52,347	59,859	-7,512	-12.5%
Lapse Risk	1,301	1,189	112	9.4%
Cat Risk	5,728	11,044	-5,316	-48.1%
Diversification	-5,297	-8,555	3,258	-38.1%

(euro thousands)

Module	2021	2020	Variation	
Underwriting Risk (Health)	38,531	53,127	-14,596	-27.5%
Cat Risk	1,745	2,622	-877	-33.5%
Mass Accident Risk	1,000	802	198	24.7%
Concentration Risk	1,018	1,705	-687	-40.3%
Pandemic Risk	1,005	1,824	-819	-44.9%
Diversification	-1,277	-1,708	431	-25.2%
Non- SLT Risk	38,058	52,411	-14,353	-27.4%
Reserve Risk	37,783	52,067	-14,284	-27.4%
Lapse Risk	4,570	5,997	-1,427	-23.8%
Diversification	-4,294	-5,652	1,358	-24.0%
Diversification	-1,272	-1,906	634	-33.3%

The diversification effect is equal to 8.9% for the Non-Life business and 3.2% for the Health business.

Compared to the solvency valuation of 31 December 2020, the underwriting risk of the Non-Life business went down by 15%, for a total of 9.5 million euro, while the underwriting risk of the Health business went down by 27.5%, for a total of 14.6 million euro.



C.1.2 Risk mitigation techniques

On the valuation date the company used outward reinsurance as a way to mitigate the underwriting risk.

The risk containment strategy aims to reduce the volatility of the income statement results and the ensuing technical balance of the portfolio based on the impact on the solvency margin of the various business lines provided for by regulations.

Under the Solvency II rules, Cargeas considers the effects of reinsurance with reference to the calculation of the pricing risk, the reserving risk, the surrender risk, the catastrophe risk and the Best Estimate Liability. Subject to considerations on materiality of the re-insured items, all these components are calculated both gross and net of reinsurance, in order to value the use of reinsurance as a strategic resource for the effective transfer of risk and thus to limit the capital requirement.

The responsibility for reinsurance strategies lies with the Reinsurance area of Intesa Sanpaolo Vita, while the annual reinsurance plan must be shared with Risk Management and the Actuarial Function.

The reinsurance system is calibrated to suit the specific features of the policies and is intended to reduce the potential exposures from the placement of policies. Cargeas places retail products for motor, home and health insurance, with a high content of service, Credit Protection Insurance, Business Protection or tailor made policies for SMEs and corporate products for collective accident insurance. From this point of view, the company protects the portfolio with non-proportional arrangements in excess of claims, to mitigate peak exposures and catastrophe risks (earthquakes, atmospheric events, large claims), and only for specific types of cover or policies, by means of proportional arrangements.

C.2 MARKET RISK

Intesa Sanpaolo Vita Insurance Group

C.2.1 Exposures and their measurement

The Insurance Group defines market risk as the risk of a loss or adverse change in the financial situation deriving directly or indirectly from fluctuations in the level and volatility of the market prices of the assets, liabilities and financial instruments.

The companies belonging to the Insurance Group, under Article 1(r)-bis of the Private Insurance Group, adopt the standard formula for the calculation of the Solvency Capital Requirement (Articles 45-quinquies to 45-undecies).

At 31 December 2021, the value of the Market risks, according to the Standard Formula, was approximately 2,832 million euro. The main risks of this type, to which the Insurance Group is exposed, are the spread and share price risks.

The tables below show a breakdown of the submodules of the Group's Market risks:

(euro thousands)				
Module	2021	2020	Variation	
Market Risk	2,832,758	2,328,385	504,373	22%
Interest Rate Risk	87,465	60,273	27,192	45%
Equity Risk	1,200,861	963,908	236,953	25%
Property Risk	99,606	61,266	38,340	63%
Spread Risk	1,365,551	1,091,374	274,177	25%
Concentration Risk	29,304	89,855	-60,551	-67%
Currency Risk	782,945	767,613	15,332	2%
Diversification	-732,974	-705,904	-27,071	4%

The effect of diversification among the various sub-lines was 21% of the market risk, in line with the figure for 2020.

Compared to the previous valuation of 31 December 2020, the market risk fell for a total of 0.5 million euro.

Below is a bar chart summarising the changes between the two valuations.

Market Risk (in millions of euro)



With regard to measurement methods, specific monitoring processes are put in place within the Group's risk management framework. Further details in this regard can be found in section C.1.1 "Underwriting risk - Exposures and their measurement".

In reference to the assets portfolio, the Company defines its investment policies in line with the prudent person principle as already mentioned in section B.3 "Risk Management system".

The market risk is managed within the risk management framework already mentioned in section B.3 "Risk Management system".

The Company also controls this risk using the principles, processes and operational limits defined in the investment rules and in the rules regarding the management of assets and liabilities. All the assets are invested in accordance with the risk appetite limits and the limits contained in the Framework Agreement on Investments.

As regards market risk, the Group's Risk Appetite framework establishes limits on the ratio between the capital requirement for market risk and eligible own funds of the Company.

Below are the figures for the Insurance Group companies' exposures to Market risks, in terms of use of capital. The figures are also compared against those for 31 December 2020.

C.2.2 Concentration of risks

The Insurance Group as already described in section C.1.2 "Concentration of risks" has a risks concentration policy that defines the significant concentrations and the related calculation methods.

The Insurance Group has defined various concentration thresholds in relation to Market risk, taking into account the normal, standard operations and limitations imposed by the Framework Decision on Investments.

The following risk concentrations have been identified as potentially significant. For each of them, the metrics and methods of calculating the concentration have been indicated, for which the scope of application, where referring to financial instruments, is made up of the following portfolios:

- Class C and class D guaranteed of the company Intesa Sanpaolo Vita;
- Class C and class D guaranteed of the company Fideuram Vita;
- The entire financial portfolio of the company Intesa Sanpaolo Assicura, Intesa Sanpaolo RBM Salute, Cargeas;
- the Shareholder Fund of Intesa Sanpaolo Life.

Geographical concentration

For each country, the market value of all the direct and indirect bond and equity exposures is added together. That value is compared to the total technical provisions of the Insurance Group, calculated for the last annual report. The threshold is 1.5% of the value of the Insurance Group's technical provisions.

Sector concentration - financial sector

For each issuer group in the financial sector, the market value of all the direct and indirect bond and equity exposures is added together. That value is compared to the total technical provisions

of the ISV Group, calculated for the last annual report. The threshold is 0.1% of the value of the Group's technical provisions.

Sector concentration - corporate sector

For each issuer group in the corporate sector, the market value of all the direct and indirect bond and equity exposures is added together. That value is compared to the total technical provisions of the ISV Group, calculated for the last annual report. The threshold is 0.1% of the value of the Group's technical provisions.

Sector concentration – government sector

For each issuer group in the government sector, the market value of all the direct and indirect bond and equity exposures is added together. That value is compared to the total technical provisions of the ISV Group, calculated for the last annual report. The threshold is 0.1% of the value of the Group's technical provisions.

Concentration by currency

For each currency other than the euro, the capital requirement is calculated (asset side only) for that currency, associated with the Currency risk submodule. That value is compared to the capital requirements of the ISV Group, calculated for the last annual report. The concentration for the capital requirement associated to the currency risk has been identified at 5% which is calculated as a ratio between the capital requirement for the currency risk element of the company, and the group SCR.

C.2.3 Risk mitigation techniques

The risk containment strategy aims to reduce the volatility of the income statement results and the ensuing technical balance of the portfolio based on the impact on the solvency margin of the various lines of business provided for by the regulations.

In order to mitigate the financial risks to which it is exposed, the company uses financial derivatives that differ depending on the objective.

Below is a list of the main financial risks that can be mitigated by using derivatives:

- Rate risk;
- Spread risk;
- Equity risk;
- Currency risk.

When planning their activities, the Companies intend to pursue the path launched in previous years and use risk mitigation techniques (including derivatives) whenever the market conditions deviate significantly from the average long-term levels, or ahead of particular phases in which there is likely to be an increase in volatility, or simply when there are latent gains or losses to be safeguarded, or managed in a more flexible, efficient manner.

In such situations, apart from the potential increase in distortion effects, due to the presence of cover included in the policies and behavioural dynamics on the part of the policyholders, additional adverse economic impacts can occur due to forced losses, heightened by weak liquidity in the reference markets and/or lower ability to liquidate the portfolio assets.

C.2.4 Sensitivity analysis

Stress tests analyse the solvency and stability of the company, in adverse, extreme scenarios.

As part of the self-assessment, the Company carries out stress tests by combining the underwriting and market risks in a way that presents the solvency and stability impacts in a collective and reasonably realistic manner. The results of these stress tests are presented in the ORSA Report.

Intesa Sanpaolo Vita S.p.A.

C.2.1 Exposures and their measurement

The Company Intesa Sanpaolo Vita has significant exposure to market risk.

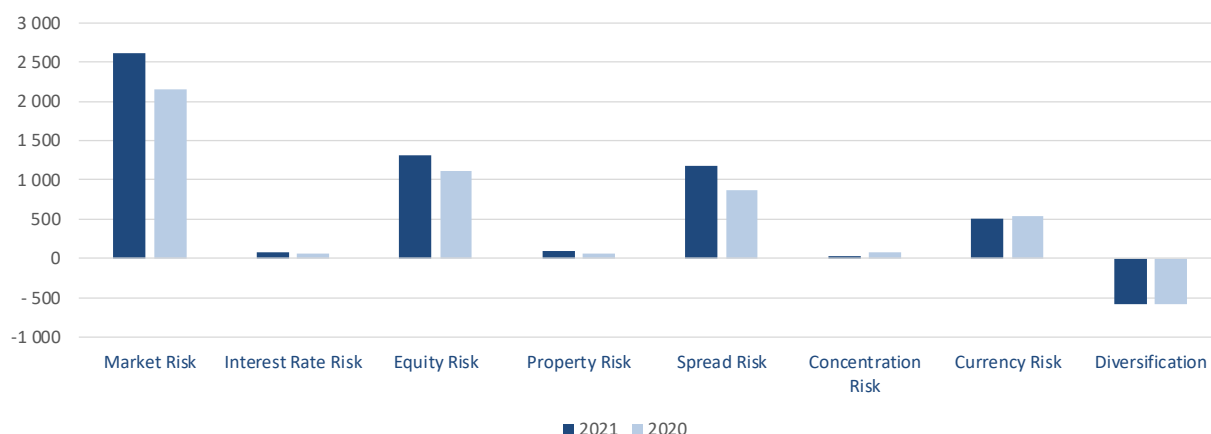
At 31 December 2021 the value of the market risks, according to the Standard Formula, was equal to approximately 2,617 million euro. The main risks of this type to which the Company is exposed, are the spread and share price risks.

(euro thousands)				
Module	2021	2020	Variation	
Market Risk	2,617,000	2,146,246	470,753	21.9%
Interest Rate Risk	84,951	56,369	28,582	50.7%
Equity Risk	1,310,068	1,122,209	187,859	16.7%
Property Risk	89,134	58,664	30,471	51.9%
Spread Risk	1,178,005	863,797	314,208	36.4%
Concentration Risk	25,769	84,676	-58,907	-69.6%
Currency Risk	499,721	544,442	-44,722	-8.2%
Diversification	-570,649	-583,911	13,262	-2.3%

The effect of diversification among the various sub-lines was 18% of the market risk, down compared to the figure for 2020.

Compared to the previous valuation on 31 December 2020, the Market risk rose by 22% for a total of approximately 470 million euro. This increase is mainly due to the rise in equity and spread risks, only partially offset by the reduction in other risk modules. Below is a bar chart summarising the changes between the two valuations.

Market Risk (in millions of euro)



As regards market risk, the Company's Risk Appetite framework establishes a limit on the ratio between the capital requirement for market risk and eligible own funds of the Company.

C.2.2 Disclosures to the public on the Policy of engagement and agreements with asset managers (in compliance with IVASS Regulation 46/2020)

European Directive 2017/828 (on the encouragement of long-term shareholder engagement-SHRD II), and implementing legislation in Italy (Legislative Decree 49/2019 amending Legislative Decree 58/98) establish that Insurance Undertakings, also in their capacity as entities establishing pension funds, notify the public of any adoption of a policy describing the procedures supplementing the engagement of shareholders in listed companies having their registered office in a member state in their investment strategy.

At present, with reference to equity investments, the Company opted for the following:

- **it did not adopt an engagement policy** based on the remaining shares held directly compared to volumes managed and equity assets in the portfolio, and therefore it did not carry out activities covered by the policy concerning **a)** the monitoring of investees as regards significant matters, such as strategy, financial and non-financial results, risks, capital structure, social and environmental impact and corporate governance, **b)** engagement with investees, through the exercise of voting rights and other rights related to shares, **c)** cooperation with other shareholders or in communication with the company's stakeholders, including the management of current and potential conflicts of interest;
- for the remainder of the portfolio, **it stipulated specific management mandates with the following delegated managers:**

Eurizon Capital Real Asset SGR. Joint Stock Company
Eurizon Capital SGR S.p.A.
Epsilon SGR S.p.A.

That, to adopt the engagement policy with reference to the exercise of voting rights for equity investments, it disclosed information on the vote, indicated in documents available at:

- Eurizon Capital SGR S.p.A. and Eurizon Capital Real Asset SGR S.p.A.

- Epsilon SGR S.p.A.
https://www.epsilonmgr.it/it/societa/Documents/EPSSGR_Politica%20di%20impegno.pdf

The management mandates govern, among others, the following aspects:

- the procedures adopted by the Company to provide incentives for the delegated manager to align the strategy and investment decisions with the profile and duration of liabilities of managed volumes; in particular, the same results are achieved through identifying different types of benchmark and portfolio diversification. The Company continually monitors the alignment of the portfolio duration with that of liabilities (the duration mismatch), by adopting suitable safeguards to monitor compliance with limits and the investment choices adopted by the delegated manager;
- the procedures adopted by the delegated manager, in performing the mandate, comply with the guidelines established by the Company with reference to the characteristics of each portfolio. To monitor financial results, time intervals are adopted, consistent with the medium/long term time horizon of the strategic asset allocation.
As regards assessments of non-financial variables, with particular reference to guidelines to include ESG factors in investment strategies, the Company monitors the engagement and voting activities of the delegated managers;
- the procedures adopted by the company to put in place specific organisational oversight suitable for guaranteeing the monitoring of the delegated manager's activities, also in the long term. In particular, if investment limits are exceeded, recovery procedures defined with the delegated manager according to efficient procedures and times, are put in place. In this context, the Company checks the progress of results of activities carried out by the delegated manager, based on portfolio choices made, and an analysis of performance and market views;
- the duration of management mandates stipulated by the Company in relation to each delegated manager.
The mandates with Eurizon Capital SGR S.p.A., Epsilon SGR S.p.A. and Eurizon Capital Real Asset SGR S.p.A. for assets underlying insurance investment products are indefinite (with the Company having the right to early withdrawal);
The mandates with Eurizon Capital SGR S.p.A. and Epsilon SGR S.p.A. for assets underlying pension funds have an annual duration with automatic renewal.

The mandates do not establish specific turnover limits, considering the main characteristics of the products and investment management policies. In any case, the manager's operations are monitored based on specific organisational safeguards.

Intesa Sanpaolo Assicura S.p.A.

C.2.1 Exposures and their measurement

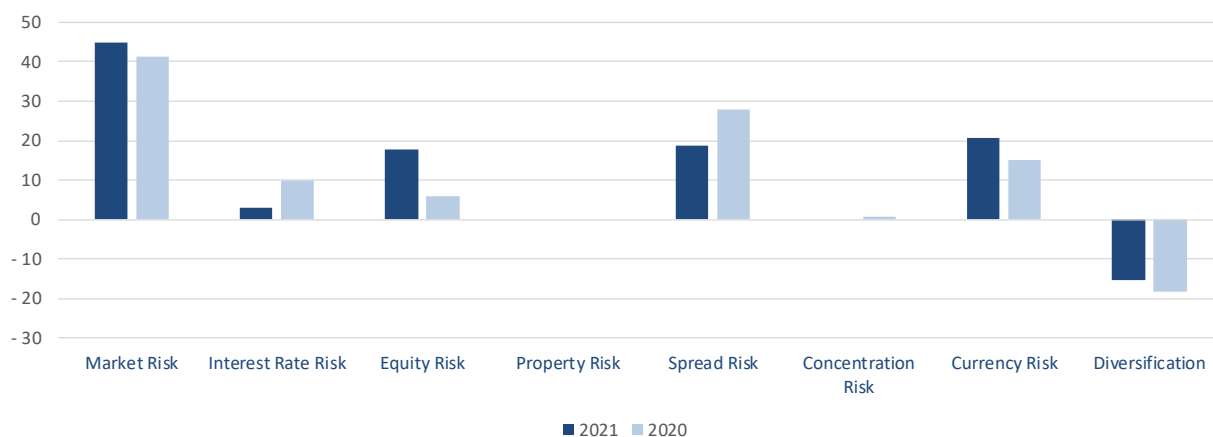
At 31 December 2021 the value of the Market risks, according to the Standard Formula, was 45 million euro. The main risks of this type to which the Company is exposed, are the currency, spread and equity risks.

(euro thousands)				
Module	2021	2020	Variation	
Market Risk	44,792	41,389	3,403	8.2%
Interest Rate Risk	2,899	9,989	-7,090	-71.0%
Equity Risk	17,810	6,039	11,771	>100%
Property Risk	-	-	-	na
Spread Risk	18,620	27,769	-9,149	-32.9%
Concentration Risk	-	804	-804	-100.0%
Currency Risk	20,718	15,000	5,718	38.1%
Diversification	-15,254	-18,212	2,958	-16.2%

The diversification effect relative to market risk is equal to 25%.

Compared to the solvency valuation at 31 December 2020, the market risk rose by 8% for a total of approximately 3 million euro. The increase in market risk is mainly attributable to the increase in equity and currency risk, partially offset by the reduction in spread risk. Below is a bar chart summarising the changes between the two valuations.

Market Risk (in millions of euro)



Fideuram Vita S.p.A.

C.2.1 Exposures and their measurement

At 31 December 2021 the value of the Market risks, according to the Standard Formula, was 359 million euro. The main risks of this type to which the Company is exposed, are the spread and share price risks.

The table below shows the percentage of the sub modules on the total market risk:

(euro thousands)				
Module	2021	2020	Variation	
Market Risk	359,260	303,295	55,965	18%
Interest Rate Risk	14,668	1,865	12,802	100%
Equity Risk	215,551	153,870	61,680	40%
Property Risk	3,391	473	2,918	100%
Spread Risk	109,396	123,686	-14,290	-12%
Concentration Risk	-	-	-	na
Currency Risk	116,553	99,356	17,198	17%
Diversification	-100,298	-75,956	-24,343	32%

The diversification effect is 22% of the Market risk prior to diversification, down compared to the figure for 2020.

Compared to the previous valuation on 31 December 2020, the Market risk rose by 18% for a total of approximately 55 million euro. This increase is mainly due to the rise in the equity and spread risk. Below is a bar chart summarising the changes between the two valuations.

Market Risk (in millions of euro)



As regards market risk, the Company's Risk Appetite framework establishes a limit on the ratio between the capital requirement for market risk and eligible own funds of the Company.

C.2.2 Disclosures to the public on the Policy of engagement and agreements with asset managers (in compliance with IVASS Regulation 46/2020)

European Directive 2017/828 (on the encouragement of long-term shareholder engagement-SHRD II), and implementing legislation in Italy (Legislative Decree 49/2019 amending Legislative Decree 58/98) establish that Insurance Undertakings, also in their capacity as entities establishing pension funds, notify the public of any adoption of a policy describing the procedures supplementing the engagement of shareholders in listed companies having their registered office in a member state in their investment strategy.

At present, with reference to equity investments, the Company opted for the following:

- **it did not adopt an engagement policy** based on the remaining shares held directly compared to volumes managed and equity assets in the portfolio, and therefore it did not carry out

activities covered by the policy concerning **a)** the monitoring of investees as regards significant matters, such as strategy, financial and non-financial results, risks, capital structure, social and environmental impact and corporate governance, **b)** engagement with investees, through the exercise of voting rights and other rights related to shares, **c)** cooperation with other shareholders or in communication with the company's stakeholders, including the management of current and potential conflicts of interest;

- for the remainder of the portfolio, **it stipulated specific management mandates with the following delegated managers:**

Fideuram Asset Management Ireland Dac.,
Fideuram Asset Management SGR S.p.A.,
Eurizon Capital Real Asset SGR S.p.A.,

that, to adopt the engagement policy with reference to the exercise of voting rights for equity investments, it disclosed information on the vote, indicated in documents available at:

- Fideuram Asset Management Ireland
<http://www.fideuramireland.ie/it/policy/>
http://www.fideuramireland.ie/upload/File/pdf/Policy_FAMI/Sustainable%20and%20Responsible%20Investment%20Policy.pdf
http://www.fideuramireland.ie/upload/File/pdf/Policy_FAMI/Engagement%20Policy.pdf
http://www.fideuramireland.ie/upload/File/pdf/Policy_FAMI/Voting%20Rights%20Policy.pdf
- Fideuram Asset Management SGR
http://www.fideuramireland.ie/upload/File/pdf/Policy_FidInvestimenti/8.%20CA_30.10.20_Allegato%20B%20Politica%20di%20impegno%20di%20Fideuram%20Investimenti%20SGR%20S.p.A_def.docx.pdf
- Eurizon Capital Real Asset SGR
https://www.eurizoncapital.com/Lists/AllegatiDocumento/Pagine/20200710164806_EC%20SGR_Politica%20di%20impegno_30062020.pdf

The management mandates govern, among others, the following aspects:

- the procedures adopted by the Company to provide incentives for the delegated manager to align the strategy and investment decisions with the profile and duration of liabilities of managed volumes; in particular, the same results are achieved through identifying different types of benchmark and portfolio diversification. The Company continually monitors the alignment of the portfolio duration with that of liabilities (the duration mismatch), in compliance with the limits in the Investment Policies, Regulations on Separate Management, by adopting suitable safeguards to monitor compliance with limits and the investment choices adopted by the delegated manager;
- the procedures adopted by the delegated manager, in performing the mandate, comply with the guidelines established by the Company with reference to the characteristics of each portfolio.
To monitor financial results, time intervals are adopted, consistent with the medium/long term time horizon of the strategic asset allocation.

As regards assessments of non-financial variables, with particular reference to guidelines to include ESG factors in investment strategies, the Company monitors the engagement and voting activities of the delegated managers;

- the procedures adopted by the company to put in place specific organisational oversight suitable for guaranteeing the monitoring of the delegated manager's activities, also in the long term. In particular, if investment limits are exceeded, recovery procedures defined with the delegated manager according to efficient procedures and times, are put in place. In this context, the Company checks the progress of results of activities carried out by the delegated manager, based on portfolio choices made, and an analysis of performance and market views;
- the duration of management mandates stipulated by the Company in relation to each delegated manager.
The mandates with Asset Management SGR S.p.A. and Eurizon Capital Real Asset SGR S.p.A. for assets underlying insurance investment products are indefinite (with the Company having the right to early withdrawal);
The mandate with Fideuram Asset Management Ireland Dac. for assets underlying the Pension Funds expires on 31 December 2024.

The mandates do not establish specific turnover limits, considering the main characteristics of the products and investment management policies. In any case, the manager's operations are monitored based on specific organisational safeguards

Intesa Sanpaolo Life D.A.C.

C.2.1 Exposures and their measurement

At 31 December 2021 the value of the Market risks, according to the Standard Formula, was 355 million euro. The main risks of this type to which the Company is exposed, are the share price risks followed by currency risks, in line with the previous year.

The following table shows the amount of each sub module of market risk, and the diversification effect:

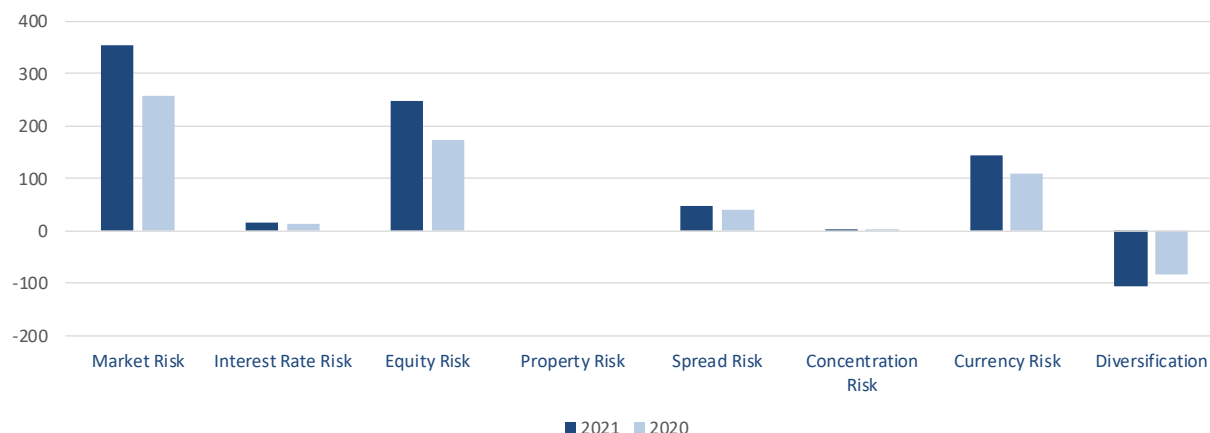
(euro thousands)				
Module	2021	2020	Variation	
Market Risk	354,740	258,765	95,975	37.1%
Interest Rate Risk	16,237	13,095	3,142	24.0%
Equity Risk	248,480	174,786	73,694	42.2%
Property Risk	-	-	-	na
Spread Risk	47,651	39,729	7,922	19.9%
Concentration Risk	3,535	4,375	-840	-19.2%
Currency Risk	145,269	108,815	36,454	33.5%
Diversification	-106,431	-82,035	-24,396	29.7%

The effect of diversification among the various sub-lines was 23% of the market risk, in line with the figure for the previous year.

The capital absorbed by the market risk has increased compared to the figures for 31 December 2020 by 37% overall. The main drivers of this increase are the increased exposure to equity

investments (as a result of policyholders' choices) and the more stringent stress parameters applied given persistently above-trend markets. The bar chart shows the changes compared to the previous year.

Market Risk (in millions of euro)



Intesa Sanpaolo RBM Salute S.p.A.

C.2.1 Exposures and their measurement

At 31 December 2021 the value of the Market risks, according to the Standard Formula, was 4 million euro. The main risks of this type to which the Company is exposed, is interest rate risk.

(euro thousands)				
Module	2021	2020	Variation	
Market Risk	4,149	685	3,464	>100%
Interest Rate Risk	4,089	-	4,089	na
Equity Risk	23	-	23	na
Property Risk	1	685	-684	-99.9%
Spread Risk	na	na	na	na
Concentration Risk	-	-	-	na
Currency Risk	-	-	-	na
Diversification	-648	-	-648	na

The diversification effect relative to market risk is equal to 14%.

Compared to the solvency valuation at 31 December 2020, the market risk rose by 506% for a total of approximately 3.5 million euro. The increase in market risk is attributable to interest risk as a result of the investment of approximately 230 million euro in Italian government bonds.

Below is a bar chart summarising the changes between the two valuations.

Market Risk (in millions of euro)



Cargeas Assicurazioni S.p.A.

C.2.1 Exposures and their measurement

At 31 December 2021 the value of the Market risks, according to the Standard Formula, was 20 million euro. The main risks of this type to which the Company is exposed, are the spread and the real estate risks.

The table below shows the percentage of the sub modules on the total market risk:

(euro thousands)				
Module	2021	2020	Variation	
Market Risk	19,784	31,679	-11,895	-37.5%
Interest Rate Risk	2,984	9,306	-6,322	-67.9%
Equity Risk	3,710	9,235	-5,525	-59.8%
Property Risk	6,395	6,183	212	3.4%
Spread Risk	11,880	17,697	-5,817	-32.9%
Concentration Risk	-	-	-	na
Currency Risk	684	1,743	-1,059	-60.7%
Diversification	-5,870	-12,486	6,616	-53.0%

The diversification effect relative to market risk is equal to 53%.

Compared to the solvency valuation of 31 December 2020, the market risk fell by 37.5% for a total of approximately 12 million euro. The decrease in market risk is attributable to a decrease in the total value of assets mainly due to the payment of dividends (80.5 million euro for the years 2019 and 2020).



C.3 CREDIT RISK

Intesa Sanpaolo Vita Insurance Group

C.3.1 Exposures and their management

The Insurance Group defines credit or counterparty risk as the risk of loss deriving from default by the counterparty on deposits, derivatives or credit exposures.

The companies belonging to the Insurance Group, under Article 1(r)-bis of the Private Insurance Group, adopt the standard formula for the calculation of the Solvency Capital Requirement (Articles 45-quinquies to 45-undecies).

At 31 December 2021 the Credit risks represented about 8% of the Company's Basic Capital Requirement, for a total of approximately 310 million euro.

Compared to the previous valuation of 31 December 2020, the credit risk fell by 2.6% for a total of 8 million euro.

As regards credit risk, the Insurance Group's Risk Appetite framework establishes a limit on the ratio between the capital requirement for credit risk and eligible own funds of the Company.

Below are the figures for the Group companies' exposures to Credit risks, in terms of use of capital. The figures are also compared against those for 31 December 2020.

C.3.2 Concentration of risks

The Intesa Sanpaolo Vita Group has not identified the concentration of credit risk as being potentially significant in the Rules on risk concentration. However, there are limits on operations contained in the Investments Framework Decision and types of contract that reduce the risk of concentration.

C.3.3 Risk mitigation techniques

The high credit quality is guaranteed through the selection of counterparties and management of related exposures in accordance with the risk preferences defined in the Risk Appetite Framework.

C.3.4 Sensitivity analysis

The Group companies consider the shocks defined in the Standard Formula to be sufficient for the purposes of evaluating the sensitivity to Credit risk.

The companies' risk profile highlights a limited exposure to credit risk and therefore the companies did not consider it necessary to use additional quantitative sensitivity analyses for this risk.

Intesa Sanpaolo Vita S.p.A.

C.3.1 Exposures and their management

At 31 December 2021, the value of the counterparty risks, according to the Standard Formula, was 186 million euro.

The Company's exposure in terms of counterparties shows a high level of credit quality.

As regards credit risk, the Company's Risk Appetite framework establishes limits on the ratio between the capital requirement for market risk and eligible own funds of the Company.

Compared to the previous valuation of 31 December 2020, the credit risk rose by 6% for a total of approximately 10 million euro.

C.3.3 Risk mitigation techniques

For the exposures to derivatives, it must be remembered that these operations are all regulated by ISDA contracts with annexed CSA that standardise the following clauses, among others:

- *Function transferability;*
- *Change of credit rating;*
- *Change of control;*
- *Resolution;*
- *Termination amount.*

The clauses in the ISDA contracts regulate events that could have an adverse impact on both parties, such as a downgrading of credit rating or change of control and therefore limit the unexpected risks of exposure to the Default risk, on existing derivatives contracts.

Intesa Sanpaolo Assicura S.p.A.

C.3.1 Exposures and their management

At 31 December 2021 the value of the counterparty risks, according to the Standard Formula, was 34 million euro.

During 2021, the Company did not carry out any derivatives transactions and therefore there are no open positions. The main exposures relate to accounts receivable from insureds.

Compared to the solvency valuation at 31 December 2020, the capital absorbed by counterparty rose by 5% overall for a total of approximately 2 million euro.

The Company's exposure in terms of counterparties shows a high level of credit quality.

C.3.3 Risk mitigation techniques

The high credit quality is guaranteed through the selection of counterparties and management of related exposures in accordance with the risk preferences defined in the Risk Appetite Framework.

As regards exposures with reinsurers, the Company uses reinsurance by selecting reinsurers that have a high credit standing.

Fideuram Vita S.p.A.

C.3.1 Exposures and their management

At 31 December 2021, the value of the counterparty risks, according to the Standard Formula, was 29 million euro.

The Company's exposure in terms of counterparties shows a high level of credit quality.

As regards credit risk, the Company's Risk Appetite framework establishes limits on the ratio between the capital requirement for market risk and eligible own funds of the Company.

Compared to the previous valuation of 31 December 2020, the credit risk rose by 9% for a total of approximately 2 million euro.

C.3.3 Risk mitigation techniques

Currently, the Company does not consider it necessary to use specific techniques to mitigate credit risks. The high credit quality is guaranteed through the selection of counterparties and management of related exposures in accordance with the risk preferences defined in the Risk Appetite Framework.

Intesa Sanpaolo Life D.A.C.

C.3.1 Exposures and their management

At 31 December 2021, the value of the counterparty risks, according to the Standard Formula, was 25 million euro.

The main components of the Company's credit risk relate to banking counterparties that hold its liquidity in the form of deposits and credits to third parties.

The capital absorbed by the credit risk fell by 22% compared to the figures at 31 December 2020.

C.3.3 Risk mitigation techniques

The Company sets limits on investment in its proprietary portfolio, based on the counterparties' ratings. There are also methods to diversify investments. The Company, through its Risk Committee, regularly evaluates the level of exposure to risk in accordance with the Company's risk appetite.

Intesa Sanpaolo RBM Salute S.p.A.

C.3.1 Exposures and their management

At 31 December 2021 the value of the counterparty risks, according to the Standard Formula, was 50 million euro.

During 2021, the Company did not carry out any derivatives transactions and therefore there are no open positions. The main exposures relate to banking counterparties holding the Company's liquidity in the form of deposits, and accounts receivable from insured.

Compared to the solvency valuation of 31 December 2020, credit risk fell by 25% for a total of approximately 16 million euro. The decrease in credit risk is due to a combined decrease in receivables from policyholders and cash on hand at the valuation date.

C.3.3 Risk mitigation techniques

The high credit quality is guaranteed through the selection of counterparties and management of related exposures in accordance with the risk preferences defined in the Risk Appetite Framework.

As regards exposures with reinsurers, the Company uses reinsurance by selecting reinsurers that have a high credit standing.

Cargeas Assicurazioni S.p.A.

C.3.1 Exposures and their management

At 31 December 2021 the value of the counterparty risks, according to the Standard Formula, was 6.1 million euro.

During 2021, the Company did not directly carry out any derivatives transactions and therefore there are no open positions.

The Company's exposure in terms of counterparties shows a high level of credit quality.

C.3.3 Risk mitigation techniques

The high credit quality is guaranteed through the selection of counterparties and management of related exposures in accordance with the risk preferences defined in the Risk Appetite Framework.

As regards exposures with reinsurers, the Company uses reinsurance by selecting reinsurers that have a high credit standing.

C.4 LIQUIDITY RISK

Intesa Sanpaolo Vita Insurance Group

C.4.1 Exposures and their management

The Insurance Group defines liquidity risk as the risk of not being able to meet its obligations to policyholders and other creditors due to problems in converting investments into liquidity without suffering losses.

The Companies are exposed to the financial and liquidity risks with the aim of ensuring that they reflect the characteristics of their insurance obligations, thus favouring the diversification of assets and prudent management.

The companies' objectives include achieving solidity of the liquidity position as stated in the Group Risk Appetite Statement.

During the activity planning period there are not expected to be any changes in the exposure to liquidity risk as the Company's investment strategy is aimed at maintaining highly liquid securities in order to deal with any adverse scenarios quickly, without incurring significant losses.

The liquidity risk is managed within the risk management framework already mentioned in section B.3 "Risk management system, including the internal risk and solvency assessment".

The Companies also control this risk using the principles, processes and operational limits defined in the Rules on managing liquidity risk.

If the analysis highlights any imbalances or need for financial resources, either in normal conditions or under stress conditions, specific monitoring is put in place.

The liquidity risk is measured at least once a quarter, by analysing the mismatches between the asset and liability flows generated from the technical operations only, checking that it is higher than zero for each portfolio and for the entire portfolio of each Company, with a time frame of up to twelve months in stress situations.

The liquidity risk is of principal importance within the fundamental risk dimensions of the Risk Appetite Framework and is monitored using the following metrics:

- amount of highly liquid securities;
- indicator level of cumulative Cash Flow Matching.

C.4.2 Concentration of risks

The Insurance Group, as already described in section C.1.2 “Concentration of risks - Underwriting Risks”, has a risks concentration policy that defines the significant concentrations and the related calculation methods.

For each financial instrument valued with a fair value of 3, the market value of all direct exposures are added together. That value is compared to the total technical provisions of the ISV Group, calculated for the last annual report. In case of alternative investment funds, the total commitment is considered instead of the market value of the exposures. The threshold is 0.2% of the value of the group's technical provisions.

C.4.3 Risk mitigation techniques

The companies operate with the aim of achieving cohesion between the Financial Reporting activities and the liability structure in order to reduce its exposure to liquidity risk.

Currently, the companies do not consider it necessary to use specific techniques to mitigate the liquidity risk, as there is a robust liquidity monitoring system.

C.4.4 Profits expected from future premiums

As required by the regulations, the companies have carried out a quantitative assessment on the appropriateness of the composition of the assets in terms of their type, duration and liquidity for the purposes of complying with the company's obligations as they arise. No specific critical issues have been detected.

The Group Companies have conducted an assessment to identify the cash flows and profits generated only from the future premiums component, relating to policies in existence on the valuation date, which each Company expects to receive according to the conditions of these policies; this assessment will measure the value of the profits expected in future premiums (EPIFP).

C.4.5 Sensitivity analysis

Stress tests analyse the solvency and stability of the company, in adverse, extreme scenarios.

The liquidity position of companies under stress is reflected by the shocks defined in the stress tests imposed for the other risks.

In addition to the impact of liquidity on stress tests conducted as part of the self-assessment, there is quarterly monitoring of the liquidity coverage as part of the monitoring of the Risk Appetite Framework.

Intesa Sanpaolo Vita S.p.A.

C.4.1 Exposures and their management

The Company manages liquidity risk in accordance with the provisions determined at Group level. Refer to the details of the section on the Insurance Group.

The liquidity risk is of principal importance within the Risk Appetite Framework. The Company monitors exposure to liquidity risk with the following metrics:

- highly liquid securities;
- Cumulative Cash Flow Matching.

C.4.4 Profits expected from future premiums

With regard to Intesa Sanpaolo Vita, for the valuation at 31 December 2021, the total EPIFP was 557 million.

C.4.5 Sensitivity analysis

The ALM function monitors the liquidity risk each quarter, by applying various levels of stress on the Assets side, and a shock on the surrender risk, on the Liabilities side.

On the Asset side, for the purposes of assessing the gains from the assets considered in the analysis, the realisable assets were subject to 3 levels of stress, with a hypothetical shock rate.

On the Liabilities side, an increase in surrenders is used.

Intesa Sanpaolo Assicura S.p.A.

C.4.1 Exposures and their management

The Company manages liquidity risk in accordance with the provisions determined at Group level. Refer to the details of the section on the Insurance Group.

C.4.4 Profits expected from future premiums

As regards Intesa Sanpaolo Assicura, for the valuation at 31 December 2021, the total EPIFP was 72.9 million euro.

C.4.5 Sensitivity analysis

The AML function monitors liquidity risk monthly. The purpose of monitoring is to identify any current and forward-looking cash imbalances of the Company in given stress scenarios.

Fideuram Vita S.p.A.

C.4.1 Exposures and their management

The Company manages liquidity risk in accordance with the provisions determined at Group level. Refer to the details of the section on the Insurance Group.

C.4.4 Profits expected from future premiums

With regard to Fideuram Vita, for the valuation at 31 December 2021, the total EPIFP was 190 million euro.

C.4.5 Sensitivity analysis

The liquidity position of the Company under stress is reflected by the shocks defined in the stress tests identified for the other risks which analyse company solvency and stability in adverse scenarios.

Intesa Sanpaolo Life D.A.C.

C.4.1 Exposures and their management

The Company has a limited exposure to liquidity risk due to the nature of the products distributed (unit-linked). Moreover, since a significant portion of available equity is reflected in the present value of expected future profits on the existing portfolio, a close monitoring of cash flows is in place in relation to this situation.

Having said that, the Company manages liquidity risk in accordance with the provisions determined at Group level. Refer to the details of the section on the Insurance Group.

C.4.4 Profits expected from future premiums

As regards Intesa Sanpaolo Life, for the valuation at 31 December 2021, the total EPIFP was equal to 50 million euro.

C.4.5 Sensitivity analysis

The Company evaluates the impact of certain stressors on liquidity, in the self-assessment process with particular reference to easily liquidated assets. The stressors are placed on technical variables and on market variables. A shock is also imposed, by raising the taxation rate for the mathematical reserves.

Intesa Sanpaolo RBM Salute S.p.A.

C.4.1 Exposures and their management

The Company Intesa Sanpaolo RBM Salute S.p.A defines liquidity risk as the risk of not being able to meet its obligations to policyholders and other creditors due to problems in converting investments into liquidity without suffering losses.

During the activity planning period there are not expected to be any changes in the exposure to liquidity risk as the Company's investment strategy is aimed at maintaining highly liquid securities in order to deal with any adverse scenarios quickly, without incurring significant losses.

Liquidity risk is managed within the risk management framework, in particular as defined in the Framework Agreement of Investments and related attachments.

If the analysis highlights any imbalances or need for financial resources, either in normal conditions or under stress conditions, specific monitoring is put in place.

C.4.4 Profits expected from future premiums

As regards Intesa Sanpaolo RBM Salute, for the valuation at 31 December 2021, the total EPIFP was 17 million euro.

C.4.5 Sensitivity analysis

Planning and management control monitors liquidity risk. The purpose of monitoring is to identify any current and forward-looking cash imbalances of the Company in given stress scenarios.

Cargeas Assicurazioni S.p.A.

C.4.1 Exposures and their management

The Company manages liquidity risk in accordance with the provisions determined at Group level. Refer to the details of the section on the Insurance Group.

C.4.4 Profits expected from future premiums

As regards Cargeas, for the valuation at 31 December 2021, the total EPIFP was 5.6 million euro (6.4 million euro before Reinsurance).

C.4.5 Sensitivity analysis

During 2021, in addition to the impact on liquidity of *stress tests* carried out as part of the self-assessment, quarterly monitoring was conducted by the Risk Management Department and the Cargeas Administration and Reporting Department. The purpose of monitoring is to identify any current and forward-looking cash imbalances of the Company in given stress scenarios.

C.5 OPERATIONAL RISK

Intesa Sanpaolo Vita Insurance Group

C.5.1 Exposures and their management

The Insurance Group has implemented the definition of operational risk as indicated in ISVAP Regulation no. 38/2018 and the one provided by the Intesa Sanpaolo Group as indicated below: "the risk of sustaining losses arising from the inadequacy or malfunction of internal procedures, human resources and internal systems, or from external events".

For the economic loss component, the following risks are included in operational risk: legal, conduct, compliance, financial crime, IT and cyber, physical security, operating continuity, financial disclosure, third parties and model risk. Strategic and reputational risks are excluded.

Strategic and reputational risks are not included.

On 31 December 2021 the value of the operational risks, according to the Standard Formula, was 598 million euro before the diversification effect. Compared to the previous valuation of 31 December 2020, the operational risk rose by 18%, i.e. 90 million euro.

There are not expected to be any significant changes in the operational risks during the planning period.

By adopting the framework of the Parent Company Intesa Sanpaolo for the management of operational risks, the Insurance Group contributes to the internal model of Intesa Sanpaolo which quantifies a risk indicator (capital absorption) that includes the insurance perimeter.

This framework consists of two main processes: Loss Data Collection and self-diagnosis (assessment of the operational context and scenario analysis).

This work is done with the assistance of the Operational, Technology and Information Risk Management unit of the Parent Company's Enterprise Risk Management Head Office Department.

The absorption of capital for the Company's operational risk which derives from the internal model of the Parent Company Intesa Sanpaolo, is used for the self-assessment of the risk itself for the Pillar II valuation.

C.5.2 Concentration of risks

The Insurance Group has not identified the operational risk concentration as being potentially significant, in the Rules on risk concentration.

C.5.3 Risk mitigation techniques

The operational risk in the Standard Formula is calculated using a linear formula. The operational risk increases as the size of the Insurance Group companies' business increases, except where the company has a very low Basic Capital Requirement. The Standard Formula does not provide for any diversification of that risk with the other risks to which the companies of the Insurance Group are exposed, nor any mitigation techniques that can reduce exposure.

In order to mitigate operational risks, a system of controls has been set up within the Risk Appetite Framework with the aim of keeping operational risks within certain limits.

The Insurance Group, together with the Parent Company Intesa Sanpaolo, has also implemented a Business Continuity Management System (BCMS) to minimise the potential financial, regulatory and reputational impact of interruptions to company operations.

This system may be defined as a holistic management process involving the advance identification of the threats to the Group and its individual Companies and their potential impacts on its critical business processes, aimed at the implementation of primarily organisational, infrastructural and technological countermeasures that guarantee its survival, even when it has lost all or part of the assets supporting its operational capability.

The Intesa Sanpaolo Group and, in particular, the Insurance Group are focussed on ensuring the continuity of services, processes and critical functions, in order to contribute to the stability of financial markets, maintain customers' trust, safeguard revenues and mitigate risks.

C.5.4 Sensitivity analysis

The shocks defined in the Standard Formula for the valuation of the operational risk sensitivity tend not to represent the company's risk profile as they refer to the quantity of business underwritten, or to the future commitments towards the policyholders and not to the operational context (which is all of the systems, procedures and actions by personnel) and its vulnerability to endogenous and exogenous variables.

In reference to the internal valuation framework the companies do not consider it necessary to use additional quantitative sensitivity tests.

Intesa Sanpaolo Vita S.p.A.

C.5.1 Exposures and their management

On 31 December 2021 the value of the operational risks, according to the Standard Formula, was 436 million euro. Compared to the previous valuation of 31 December 2020, the operational risk rose by 24%, i.e. 84 million euro.

The main sources of operational risk identified are related to the following circumstances:

- "Customers, products and operating practices" attributable to customer relations, in particular concerning legal proceedings brought by customers;
- "Performance, delivery and management of processes" attributable to unintentional errors in managing operations.

Intesa Sanpaolo Assicura S.p.A.

C.5.1 Exposures and their management

At 31 December 2021, the value of the operational risks of Intesa Sanpaolo Assicura according to the Standard Formula, was equal to approximately 22 million euro. Compared to the solvency valuation of 31 December 2020, the operational risk rose by 3%, i.e. by approximately 0.6 million euro.

The main sources of risk identified from the loss data collection process are related to the following circumstances:

- "external offences", attributable to fraudulent activities of persons qualified as external to the Company, usually carried out to obtain personal advantages to the detriment of the Company (frauds connected with the settlement of motor claims);
- "Execution, delivery and management of processes" attributable to errors in the management of the settlement process

Fideuram Vita S.p.A.

C.5.1 Exposures and their management

At 31 December 2021 the value of the operational risks, according to the Standard Formula, was 34 million euro. Compared to the previous valuation of 31 December 2020, operational risk fell by 5%, i.e. by approximately 2 million euro.

The main source of operational risk identified was related to the circumstance "Performance, delivery and management of processes" attributable to unintentional errors in managing the Company's operations.

Intesa Sanpaolo Life D.A.C.

C.5.1 Exposures and their management

At 31 December 2021, the value of the operational risks, according to the Standard Formula, was 88 million euro. Compared to the previous valuation of 31 December 2020, the operational risk rose by 3%, i.e. 3 million euro.

The main source of operational risk identified was related to the circumstance: "Performance, delivery and management of processes" attributable to unintentional errors in managing operations.

Intesa Sanpaolo RBM Salute S.p.A.

C.5.1 Exposures and their management

At 31 December 2021, the value of the operational risks of Intesa Sanpaolo RBM Salute, according to the Standard Formula, was equal to approximately 15 million euro. Compared to the solvency valuation of 31 December 2020, the operational risk fell by approximately 0.2 million euro.

The main source of risk identified from the loss data collection process concerns the "Customers, products and operating practices" and refers to the adoption of improper operating practices with clients, in particular related to a commercial practice in the offer of insurance services, which may violate the legislation on unfair commercial practices potentially prohibiting its distribution or continuation.

Cargeas Assicurazioni S.p.A.

C.5.1 Exposures and their management

At 31 December 2021, the valuation according to the standard formula of Cargeas operational risks was approximately 8 million euro; compared to the previous valuation of 31 December 2020, Operational risk fell by approximately 1 million euro.

The main sources of risk identified from the loss data collection process are related to the following circumstances: "Execution, delivery and process management", 'customers, products and operational practices', 'Technology systems and utilities'.

C.6 OTHER MATERIAL RISKS

The Group has no significant exposure to other measurable risks other than those provided for in Pillar I of the Standard Formula.

As mentioned in section B.3 “System of risk management internal assessment of risk and solvency”, the material risks that the company has identified, and which are not entirely included in the calculation of the solvency capital requirements, according to the Standard Formula, include:

- reputational risks, referring to those events that may tarnish the reputation or image of each Insurance Group company;
- strategic risks, which refer to the risk of losses due to wrong strategic choices and includes financial, management, logistics and product subcategories. This category also includes group risks (risks deriving from intragroup operations, the risk of contagion and the risk of conducting an insurance business in different companies and jurisdictions);
- environmental, Social and Governance risks, which refer to the risk that the activities related to the insurance business may undermine ESG principles or fail to contribute to their enhancement. This type of risk may have multiple effects and may also affect other risk categories.

The controls in place for these risks are on the whole adequate.

C.6.1 Exposures and their management

The Insurance Group defines the risks to which it is exposed using a risk exposure-risk mitigation logic and risk map. Exposure to risk is determined according to the combination between probability and impact, and is assessed on a scale of 1 to 6; the assessment of risk mitigation, or the efficiency of risk mitigation and monitoring systems, consists of five levels: absent, scarce, adequate, good and excellent.

With reference to Cyber Risk and the GDPR, the Insurance Group has paid increasing attention to consolidating its own Information System, concerning governance and through a specific technology transformation project.

Within the Risk Appetite Framework the Insurance Group has imposed early-warning thresholds on the main risk factors. The main limits are:

- Solvency: the levels of solvency ratio and the levels of individual risk types, in relation to Own Funds;
- Liquidity: the level of highly liquid securities, cash flow matching and the liquidity coverage ratio;
- Investments;
- Operational risks: the level of operational losses.

C.6.2 Concentration of risks

Not applicable.

C.6.3 Risk mitigation techniques

Not applicable.

C.6.4 Sensitivity analysis

Not applicable.

C.7 OTHER INFORMATION

Intesa Sanpaolo Vita Insurance Group

The Group, and each company, have input all the relevant information about their own risk profiles, in the above section

D. VALUATION FOR SOLVENCY PURPOSES

This section provides information about the values of the assets and liabilities used for the purposes of the solvency of the Insurance Group and of each company. The comparison between financial parameters in the Solvency Report and the Group consolidated financial statements prepared according to IAS/IFRS and those in the annual Financial Statements prepared according to national accounting standards by individual companies is also described.

The main regulatory references relating to the preparation of the Solvency Report are the following:

- Article 75 of European Directive No. 138/2009;
- Article 35 quater of Legislative Decree No. 74/2015 which enacts the above Directive;
- IVASS Regulation No. 18/2016 concerning rules for determining technical provisions;
- IVASS Regulation No. 34/2017, concerning the provisions on corporate governance relating to the valuation of assets and liabilities other than technical provisions, and the related valuation criteria;
- Delegated Regulation No. 35/2015 of the European Commission – Reference to Title I – Chapter II;
- "Guidelines" issued by EIOPA (European Insurance and Occupational Pensions Authority).

In particular, the Solvency Report has been prepared according to a market-consistent approach to value the assets and liabilities, in particular:

- assets are measured at the amount at which they could be exchanged between consenting parties in an operation carried out at normal market conditions;
- liabilities are valued at the amount of which they could be transferred or settled between informed, consenting parties, in an arm's-length transaction without any adjustment to take into account the credit rating of the insurance company.

Moreover, the assets and liabilities are also valued on a going concern basis, with express reference to IAS/IFRS, which are usually the reference standards utilised to value assets and liabilities for solvency purposes, unless stipulated otherwise, and if the valuation criteria provided for in IAS are in line with the above-mentioned market consistent valuation approach.

Therefore, the Insurance Group's Solvency Report involved the following phases:

- a valuation of individual assets and liabilities in application of the criteria provided for in Delegated Regulation No. 35/2015, in line, where applicable, with the valuations given for the purposes of the Group Consolidated Financial statements prepared in accordance with IAS/IFRS;
- re-presentation of the assets and liabilities of each company based on the classification criteria applied to the compilation of the QRT S.02.01 (Balance Sheet).

Annexed to this report are the QRT for the Solvency Report (S.02.01.02) for the Insurance Group and individual companies at 31 December 2021. Each QRT includes a list of the assets and liabilities of the Insurance Group and of each company.

The valuation criteria used for the assets and liabilities contained in the QRT, in line with the provisions of article 10 of the above-mentioned Delegated Regulation are the following:

- assets and liabilities are valued at market prices quoted on active markets according to the definition of the international accounting standards;
- when no such market prices are available, the prices recorded on active markets for similar assets and liabilities are used, and adjusted to reflect any differences considering the specific characteristics of the asset or liability (such as condition, location, the extent to which the valuation input relates to comparable elements, the volume or level of activity in the markets from which the input was taken);
- if it is impossible to apply the above mentioned valuation criteria, the Group and individual companies have used alternative valuation methods, minimising the use of specific input from the company and using market input as far as possible, including the elements indicated below:
 - prices quoted for identical or similar assets or liabilities, in non-active markets;
 - input other than the observable listed prices, including interest rates and performance curves observed at commonly-quoted intervals, implied volatility and credit spread;
 - input corroborated by the market, which may not be directly observable but is based on observable market data, or supported by it.

If no observable input is available, including situations of low activity on the market on the valuation date, non-observable input is used, which reflects the scenarios that the market traders would use in determining the price, including the risk hypotheses. In evaluating the risk hypotheses, companies take into account the risk of a particular valuation technique used to measure the fair value and the risk related to the input used in the valuation technique.

Section 3 of the Delegated Regulation provides for methods on the solvency valuation of the insurance company's technical provisions that are specific and separate from the measurement criteria used in the annual Financial Statements and IAS/IFRS.

D.1 ASSETS

Intesa Sanpaolo Vita Insurance Group

With reference to the QRT S.02.01.02 annexed to this Report, a list of the items in the Solvency Report is given.

GOODWILL

The goodwill in the Solvency Report are valued at zero in line with Delegated Regulation No. 35/2015.

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Goodwill	-	1,059,904	-1,059,904

Goodwill in the IAS/IFRS Consolidated Financial Statements, reported for a total of 1,059,904 thousand euro, consists of 634,580 thousand euro from Intesa Sanpaolo Vita, 279.392 thousand

euro from Intesa Sanpaolo RBM Salute and 145,932 thousand euro from Cargeas Assicurazioni, which was acquired in 2021.

Deferred Acquisition Costs

Deferred acquisition costs in the Solvency Accounts are valued at zero in line with Delegated Regulation No. 35/2015.

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Deferred acquisition cost	-	479,892	-479,892

Intangible assets

The intangible assets in the Solvency Report are valued at zero in line with Delegated Regulation No. 35/2015. The intangible assets recognised in the Consolidated Financial Statements and the Separate Financial Statements cannot be sold separately and it is not possible to demonstrate any fair value, on an active market, for an identical or similar asset.

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Intangible assets	-	177,353	-177,353

Deferred tax assets

The calculation of the deferred taxes given in the Solvency Report was made in application of IAS 12 and Articles 20-22 of IVASS Regulation No. 34/2017. Deferred taxes are calculated on the temporary differences between the book value of the assets and liabilities in the solvency report and their fiscal value.

For the individual companies, the differences compared to what was contained in the annual financial statements relate to the deferred fiscal effect on the temporary differences deriving from the adjustments of asset and liability valuations. In line with IAS 12, the Insurance Group records tax assets for deferred taxes to the extent that it is probable that the deductible temporary differences or fiscal losses could lead to a corresponding reduction in the future liabilities for current taxes.

The recoverability analysis is based on an examination of the presence, in future years, of a presumable reversal of the deductible temporary differences of corresponding taxable temporary differences (for the same tax, and towards the same tax authority) for which the corresponding liabilities for deferred taxes were recorded.

Any part not covered by the above point is determined by taking into account:

- The presence of temporal restrictions that limit the carrying forward of tax losses and/or temporary differences to future years;
- The expected profitability, which can be deduced from the results of the plans approved by the executive bodies corroborated by an analysis of the capacity to generate taxable income during previous years that would reabsorb any past fiscal losses. The presence of significant taxable amounts at the end of the period is a reasonable measure of the company's long-term profitability, on the basis of which it is possible to evaluate the

recoverability of any temporary deductible differences that would be expected to be cancelled out in years after those covered by the plan.

The Group's solvency report includes:

- deferred tax assets (DTA) totalling 2,689.8 million euro, compared to 586.3 million euro entered in the Consolidated Financial Statements; the solvency value represents 1.2% of the total assets in the financial statements;
- deferred tax liabilities (DTL) totalling 3,492.1 million euro, compared to 942.2 million euro entered in the Consolidated Financial Statements; the solvency value represents 1.7% of the total assets in the financial statements.

Below is a breakdown of assets and liabilities for deferred taxes recorded for the Insurance Group companies:

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Deferred tax assets	2,689,818	586,291	2,103,527
Deferred tax liabilities	3,492,112	942,194	2,549,918

Deferred taxes mainly relate to temporary differences that refer to the adjustments between the value of the consolidated financial statements and the Solvency II value of the investments and technical provisions.

These temporary differences will reverse with the approximation of the maturity or sale of the financial instruments or with the liquidation of the corresponding portfolio policies.

Property, plant and equipment held for own use

The item is shown for a total of 32,028 thousand euro compared to 31,799 thousand euro in the consolidated financial statements. The difference of 229 thousand euro is due to a different method in calculating the Solvency value, supported by an appraisal of Intesa Sanpaolo RBM property. The IAS/IFRS value reflects the depreciation recognised in the period.

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Property, plant & equipment held for own use	32,028	31,799	229

Investments

The Financial Investments portfolio shown in the Solvency II accounts amounts to 107,763.7 million euro of securities measured at fair value.

The following table shows the breakdown by investment types.

	2021	%
Holding in related undertakings, including participations	6,467.7	0.0%
Equities	2,264,901.3	2.1%
Bonds	90,585,592.8	84.1%
Collective investments undertakings	14,553,128.8	13.5%
Derivatives	353,622.9	0.3%
Investments (other than assets held for index-linked and unit-linked contracts)	107,763,713.5	100.0%

The Group's investment operations carried out in 2021 were consistent with the guidelines defined by the Finance Policy of the Group Companies and, in particular, in compliance with the general principles of prudence and of promoting the quality of assets in the medium and long term. The Group has continued to implement a policy aimed at limiting financial risk while maintaining a level of profitability appropriate to the commitments undertaken with policyholders.

Assets held for index-linked and unit-linked contracts

The asset item classified as "Assets held for index linked or unit-linked insurance contracts" includes all the financial assets defined as "Class D" in the balance sheet of the Consolidated Financial Statements.

These financial assets correspond to assets for which the investment risk is borne by the policyholder.

This item is made up of investments used to cover the commitments pertaining to LoB III policies, whose benefits are directly linked to the value of the assets in internal unit and index linked funds or to the value of units of UCITS, and to the financial investments linked to pension policies (open pension funds of Intesa Sanpaolo Vita and Fideuram Vita).

These investments are recognised, both in Consolidated Financial Statements prepared in accordance with the IAS, IFRS and Solvency II too principles, at the year current value

Compared to 2020 the component of unit-linked contracts has increased by 2.3%, going from 87,226 million euro to 100,925 million euro. The weighting of this item in the total assets is 46.2%.

With regard to the valuation methods for individual companies, see the notes given with regard to Group level.

Reinsurance recoverables

This item contains all the recoverables regarding the Outward Reinsurance used by the Insurance Group as a technique to mitigate the underwriting risks.

In the same way as occurs for the technical provisions of direct business, the shares paid by the reinsurers are reprocessed, compared to the Financial Statements using Solvency II criteria, which take into account the expected cash flows connected to recoveries relating to direct business obligations, discounted according to the risk-free rate curve.

The valuation of the reinsurance impact is described in the section below, on technical provisions.

The group data is given below:

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Non-Life excluding Health	45,514	64,402	-18,887
Health similar to Non-Life	87,660	99,953	-12,292
Life excluding Health and Index-linked and unit-linked	-	43,714	-43,714
Reinsurance recoverables	133,175	208,068	-74,894

With regard to the item "Life excluding health, Index-linked and Unit-linked", which in the IAS/IFRS financial statements amounts to 43,714 thousand euro, mainly consisting of transferred provisions of the merged former-Ubi companies, it should be noted that the amount was prudentially reduced to zero under Solvency, following an analysis of technical forms, tariffs and treaties also on a prospective basis.

Loans and Receivables

This item includes:

- "Mortgages and loans" relating to loans on Life policies for products that contain this clause in the insurance policy. No valuation differences emerged between the consolidated financial statements and the solvency reports;
- "Insurance receivables from intermediaries" relating to receivables from direct insurance transactions with intermediaries, particularly the retail network of Intesa Sanpaolo or the financial advisers of Banca Fideuram, for Fideuram Vita. These last receivables are valued at nominal value without considering adjustments due to losses for uncollectable amounts. By their nature these receivables are due and payable in the short term;
- "Reinsurance receivables" payable in the short term by the reinsurers. Also for these receivables, the market value is in line with the related value as stated in the Consolidated Financial Statements;
- "Receivables (commercial, non-insurance)" relating to non-insurance receivables such as interest, tax credits and other types of accounts receivable.

The data for the Insurance Group is given below:

	(euro thousands)
	Solvency II value
Loans and mortgages	764
Insurance and intermediaries receivables	321,746
Reinsurance receivables	7,916
Receivables (trade, not insurance)	3,694,889

The item Receivables (trade, not insurance) includes the reclassification of amounts relating to the offsetting of tax assets and liabilities (IRES advances etc.) mainly pertaining to Cargeas Assicurazioni.

Other assets

This item includes all the assets of residual importance compared to the above.

In detail they include "Cash and cash equivalents" and other assets not belonging to the items mentioned in the above sections.

The valuation of the other Financial Statement assets is based on the presumed realisation value. This approach is in line with the valuations made in the Solvency Report.

The data for the insurance group is as follows:

	(euro thousands)
	Solvency II value
Cash and cash equivalents	1,740,727
Any other assets, not elsewhere shown	1,164,833

Intesa Sanpaolo Vita S.p.A.

Deferred Acquisition Costs

Deferred acquisition costs in the Solvency Accounts are valued at zero in line with Delegated Regulation No. 35/2015.

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Deferred acquisition cost	-	639	-639

Intangible assets

The intangible assets recognised in Intesa Sanpaolo Vita's financial statements are brought down to nil balance as the conditions for the assets in question to be sold separately are not met and no value can be demonstrated for identical or similar assets.

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Intangible assets	-	26,229	-26,229

Deferred tax assets

The Company's Solvency Report includes:

- deferred tax assets (DTA) totalling 2,491 million euro, compared to 290 million euro DTA entered in the statutory financial statements (Italian accounting standards); the solvency value represents 1.9% of the total assets in the financial statements;
- deferred tax liabilities (DTL) totalling 3,114 million euro, compared to 4.8 million euro DTL entered in the annual financial statements according to Italian accounting standards; the solvency value represents 2.5% of the total liabilities in the financial statements.

Below is a breakdown of assets and liabilities for deferred taxes recorded for the company:

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Deferred tax assets	2,491,161	290,354	2,200,807
Deferred tax liabilities	3,113,771	4,839	3,108,932

Deferred taxes mainly relate to temporary differences that refer to the adjustments between the statutory value and the Solvency II value of the investments and the technical provisions.

These temporary differences are reversed with the approximation of the maturity or sale of the financial instruments or the liquidation of the corresponding portfolio policies.

On the reporting date there were no tax loss carry forwards or unused tax credits for which the corresponding deferred tax assets had not been recognised.

Property, plant and equipment held for own use

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Property, plant & equipment held for own use	10,598	5,479	5,120
Financial liabilities other than debts owed to credit institutions	4,991	-	4,991

The difference is due to a different methodology in calculating the value. In the Solvency Accounts, the international accounting standard IFRS 16 was applied, which has introduced significant changes to the recognition of leasing in the financial statements based on the *right-of-use* model. As required by IFRS16, this item includes contractual commitments related to property rentals and leased cars with right of use.

Holdings in related undertakings, including participations

For Intesa Sanpaolo Vita the shares held in subsidiaries, including participations, are the following:

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Holdings in related undertakings, including participations	2,928,092	1,310,005	1,618,088

The Solvency Report of the company includes in that item the value of "assets in excess of liabilities" on the solvency report of the subsidiaries, thus expressing the market consistent method as provided for in Delegated Regulation No. 35/2015.

The annual Financial Statements prepared in accordance with statutory provisions provide for equity investments to be measured at cost, adjusted to reflect impairment losses.

Investments (Equities, bonds, Collective Investment Undertaking derivatives)

Below is a summary of the main items in the asset investments for Intesa Sanpaolo Vita:

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Equity	2,160,638	1,483,613	677,024
Equity - Listed	2,069,873	1,403,455	666,418
Equity - Unlisted	90,764	80,158	10,607
Bonds	82,779,793	75,825,244	6,954,549
Government bonds	65,338,675	59,328,700	6,009,974
Corporate bonds	15,161,347	14,344,104	817,243
Structured note	2,243,545	2,117,859	125,686
Collateralised securities	36,227	34,581	1,646
Collective investments undertakings	13,168,963	12,169,138	999,825
Derivatives	352,513	51,848	300,665
Investments	98,461,905	89,529,843	8,932,062

Total investments in Equities, Bonds, UCITS and Derivatives account for 73.6% of total assets in the financial statements. The main part of the investments of this category is allocated to government bonds (66.4%) while 15.4% are invested in corporate bonds. The remaining 18.2% is divided between equities (approximately 2.2%), collective investment undertakings (13.4%), Structured Securities (2.3%) and derivatives (0.4%).

The difference between the amount of the asset and liability items relating to financial investments recognised in the annual Financial Statements prepared in accordance with Italian accounting standards, of 89,530 million euro, and the amount determined for solvency purposes, of 98,462 million euro, relates to the recognition of the unrealised gains resulting from the fair value

measurement of all financial instruments determined in accordance with IFRS 13, compared to the statutory measurement of the minimum between the cost and market for working capital and cost for long-term assets.

Assets held for index-linked and unit-linked contracts

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Assets held for index-linked and unit-linked contracts	25,855,026	25,855,026	-

Compared to 2020 the component of unit-linked contracts has increased by 7 million euro, from 18,836 million euro to 25,855 million euro. The weighting of this item in the total assets is 19.3%. In both the Financial Statements prepared in accordance with the national accounting standards and the Solvency II accounts, assets are measured at current value, equal to market value.

Reinsurance recoverables

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Health similar to Non-Life	-	9	-9
Life excluding Health and Index-linked and unit-linked	-	43,714	-43,714
Reinsurance recoverables	-	43,724	-43,724

With regard to the item "Life excluding health, Index-linked and Unit-linked", which in the IAS/IFRS financial statements amounts to 43,714 thousand euro, mainly consisting of transferred provisions of the merged former-Ubi companies, it should be noted that the amount was prudentially reduced to zero under Solvency, following an analysis of technical forms, tariffs and treaties also on a prospective basis.

Loans and Receivables

The following table summarises the nature of the Loans and Receivables item:

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Loans and mortgages	208	208	-
Insurance and intermediaries receivables	6,360	6,360	-
Reinsurance receivables	883	883	-
Receivables (trade, not insurance)	2,220,602	2,220,602	-

Specifically, the item Receivables of 2,220,602 thousand euro includes tax receivables of 1,945,417 thousand euro, of which 1,778,781 thousand euro for withholding taxes on mathematical reserves.

Other assets

The valuation does not take into account the differences between the value recognised on the annual financial statements and the value for solvency purposes.

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Cash and cash equivalents	1,095,365	1,095,365	-
Any other assets, not elsewhere shown	787,569	787,569	-

Any other assets not elsewhere shown is equal to 787,569 thousand euro and it include 656,005 thousand euro relating to insurance suspense accounts.

Intesa Sanpaolo Assicura S.p.A.

Intangible assets

The intangible assets recognised in Intesa Sanpaolo Assicura's statutory accounts are brought down to nil balance as the conditions for the assets in question to be sold separately are not met and no value can be demonstrated for identical or similar assets.

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Intangible assets	-	12,705	-12,705

(euro thousands)

Deferred tax assets

The Company's Solvency Report includes:

- deferred tax assets (DTA) totalling 29.6 million euro, compared to 30.3 million euro DTA entered in the annual Financial Statements according to Italian accounting standards; the solvency value represents 1.6% of the total assets in the financial statements;
- total deferred tax liabilities (DTL) of 121.0 million euro, compared to the annual Financial Statements prepared in accordance with Italian accounting standards, which does not show DTL; the solvency value represents 16% of the total liabilities in the financial statements.

Below is a breakdown of assets and liabilities for deferred taxes recorded for the company:

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Deferred tax assets	29,622	18,687	10,935
Deferred tax liabilities	120,997	-	120,997

(euro thousands)

Deferred taxes mainly relate to temporary differences that refer to the adjustments between the statutory value and the Solvency II value of the investments and the technical provisions. These temporary differences are reversed with the approximation of the maturity or sale of the financial instruments or the liquidation of the corresponding TP.

On the reporting date there were no tax loss carry forwards or unused tax credits for which the corresponding deferred tax assets had not been recognised.

Holdings in related undertakings, including equity investments

Intesa Sanpaolo Assicura does not hold any equity investments.

Property, plant and equipment held for own use

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Property, plant & equipment held for own use	2,182	267	1,915
Financial liabilities other than debts owed to credit institutions	1,993	-	1,993

The difference is due to a different valuation methodology, where IFRS 16 was applied in the Solvency Report.

Investments (Equity, bonds, Collective Investment Undertaking, derivatives)

Below is a summary of the main items in the various capital instruments for Intesa Sanpaolo Assicura:

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Equity	297	284	-
Equity - Listed	297	284	-
Equity - Unlisted	-	-	-
Bonds	1,046,677	1,044,403	2,274
Government bonds	1,046,677	1,044,403	2,274
Corporate bonds	-	-	-
Structured note	-	-	-
Collateralised securities	-	-	-
Collective investments undertakings	476,462	470,829	5,633
Derivatives	-	-	-
Investments	1,523,436	1,515,516	7,920

The total investments represent 80.3% of total assets in the financial statements. The main part of the investments in this category is allocated to government stocks, 55.2%. 25.1% refers to collective investments while the remaining part refers to equities and subordinated loans.

The difference between the amount of the asset and liability items relating to financial investments recognised in the annual Financial Statements prepared in accordance with Italian accounting standards, of 1,516 million euro, and the amount determined for solvency purposes, of 1,523 million euro, relates to the recognition of the unrealised gains resulting from the fair value measurement of all financial instruments determined in accordance with IFRS 13.

Reinsurance recoverables

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Health similar to Non-Life	28,079	38,505	-10,426
Non-Life excluding Health	16,415	26,026	-9,611
Reinsurance recoverables	44,494	64,531	-20,037

The Solvency Report includes the best estimate of cash flows connected to recoveries relating to direct business obligations, discounted on the basis of the risk free rate curve.

This different valuation compared to the national accounting standards results in a difference of -20,037 thousand euro between the Financial Statements and the Solvency Report.

Loans and Receivables

The valuation does not take into account the differences between the value recognised on the annual financial statements and the value for solvency purposes.

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Loans and mortgages	115	115	-
Insurance and intermediaries receivables	196,378	196,378	-
Reinsurance receivables	5,557	5,557	-
Receivables (trade, not insurance)	4,403	4,403	-

Other assets

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Cash and cash equivalents	16,897	16,897	-
Any other assets, not elsewhere shown	73,383	73,383	-

Fideuram Vita S.p.A.

Intangible assets

The intangible assets recognised in the financial statements are brought down to nil balance as the conditions for the assets in question to be sold separately are not met and no value can be demonstrated for identical or similar assets.

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Intangible assets	-	72,959	-72,959

Deferred tax assets

The Company's Solvency Report includes:

- deferred tax assets (DTA) totalling 60.6 million euro, compared to 17.5 million euro DTA entered in the annual Financial Statements according to Italian accounting standards; the solvency value represents 0.14% of the total assets on the financial statements;
- deferred tax assets (DTL) totalling 170.0 million euro, compared to 1.4 million euro DTL entered in the annual financial statements according to Italian accounting standards; the solvency value represents of the total assets in the financial statements.

Below is a breakdown of assets and liabilities for deferred taxes recorded for the company:

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Deferred tax assets	60,654	17,518	43,137
Deferred tax liabilities	170,078	1,432	168,646

Also for Fideuram Vita S.p.A., the deferred taxes mainly relate to temporary differences that refer to the adjustments between the *statutory value* and the Solvency II value of the investments and the technical provisions.

These temporary differences are reversed with the approximation of the maturity or sale of the financial instruments or the liquidation of the corresponding portfolio policies.

On the reporting date there were no tax loss carry forwards or unused tax credits for which the corresponding deferred tax assets had not been recognised.

Property, plant and equipment held for own use

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Property, plant & equipment held for own use	9,762	-	9,762

The Company, adopting IFRS 16 which came into force on 1 January 2019, has recognised the right of use of assets of rental, hire or free loan agreements in the financial statements.

Holdings in related undertakings, including equity investments

Fideuram Vita S.p.A. does not hold any equity investments.

Investments (Equity, bonds, Collective Investment Undertaking, derivatives)

Below is a summary of the main items in the various capital instruments for Fideuram Vita S.p.A.:

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Equity	103,689	72,144	31,546
Equity - Listed	103,559	72,144	31,415
Equity - Unlisted	130	-	130
Bonds	5,803,708	5,320,070	483,638
Government bonds	4,593,810	4,149,766	444,044
Corporate bonds	1,000,231	966,835	33,397
Structured note	209,131	202,937	6,194
Collateralised securities	536	533	3
Collective investments undertakings	780,781	758,830	21,951
Derivatives	1,110	1,090	20
Investments	6,689,288	6,152,134	537,154

The total investments in this category represent 16.0% of total assets. The main part of the investments of this type is allocated to government bonds (86.80%) while 15.0% are invested in corporate bonds. The remaining component (11.70%) refers to collective investments. Marginal contribution of equities.

Also for this company, the difference between the values in the balance sheet of the annual Financial Statements prepared in accordance with Italian accounting standards and those of the Solvency Report is due to the same reason as that indicated for Intesa Sanpaolo Vita.

Assets held for index-linked and unit-linked contracts

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Assets held for index-linked and unit-linked contracts	34,018,076	34,018,076	-

Compared to 2020 the component of unit-linked policy assets has increased by 13.33%, from 30,016 to 34,018 million euro, mainly due to the recovery of financial markets. The weighting of this item in the total assets is 81.39%.

Reinsurance recoverables

The run-off of the reinsurance agreements with Fideuram Vita S.p.A., do not generate recoverable amounts.

Loans and Receivables

The valuation does not take into account the differences between the value recognised on the annual financial statements and the value for solvency purposes.

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Loans and mortgages	441	441	-
Insurance and intermediaries receivables	1,164	1,164	-
Reinsurance receivables	76	76	-
Receivables (trade, not insurance)	588,674	588,778	-104

Other assets

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Cash and cash equivalents	210,814	210,814	-
Any other assets, not elsewhere shown	214,716	215,105	-389

Intesa Sanpaolo Life D.A.C.

Deferred Acquisition Costs

The difference of purchase fees to depreciate is indicated below.

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Deferred acquisition costs	-	349,219	-349,219

The value shown in the financial statements, equal to 349,219 thousand euro, is entirely composed of Deferred Acquisition Costs (DAC) which, by their nature, are written off in the Solvency Accounts.

Intangible assets

The intangible assets recorded in the local IAS/IFRS financial statements, amounting to 1,801 thousand euro, were written off in accordance with the Solvency Report rules.

Deferred tax assets

The company's Solvency Report shows deferred tax assets of 0 million euro, which coincides with the amount on the annual accounts prepared in accordance with the International accounting standards (IAS/IFRS). Deferred tax liabilities (DTL) totalled approximately 97.5 million euro, compared to 0.7 million euro of DTL entered in the Financial Statements prepared under IAS/IFRS; the solvency value represents 0.24% of the total liabilities on the financial statements. Below is a breakdown of assets and liabilities for deferred taxes recorded for the company:

	(euro thousands)		
	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Deferred tax assets	-	-	-
Deferred tax liabilities	97,517	739	96,779

The main difference in the adjustment of the DT relates to the portion of technical provisions for the liability items and the deferred costs of acquisition for the asset side. On this last item, the adjustment effect will be cancelled out over the years, in relation to the gradual unwinding of the deferred acquisition costs.

Property, plant and equipment held for own use

	(euro thousands)		
	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Property, plant & equipment held for own use	997	997	-

The item is mainly composed of:

- Right of use Land & Building for 579 thousand euro;
- Fixtures & Fittings for 41 thousand euro;
- Hardware for 340 thousand euro;
- Right of use car and printers for 28 thousand euro;
- Other item for 9 thousand euro.

Holdings in related undertakings, including participations

Intesa Sanpaolo Life does not hold any participations.

Investments (Equities, bonds, UCITS, derivatives)

Below is a summary of the main items in the various capital instruments for Intesa Sanpaolo Life:

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Equity	228	228	-
Equity - Listed	228	228	-
Equity - Unlisted	-	-	-
Bonds	284,787	284,787	-
Government bonds	232,726	232,726	-
Corporate bonds	52,061	52,061	-
Structured note	-	-	-
Collateralised securities	-	-	-
Collective investments undertakings	91,088	91,088	-
Derivatives	-	-	-
Investments	376,103	376,103	-

These assets are valued at fair value by using the prices obtained from the financial markets, for instruments listed on active markets, or using internal valuation techniques for other instruments. If the market prices are not available, the prices available from brokers or dealers can also be used. When there is no listing on an active market or the market does not operate regularly, the fair value of financial instruments is mainly determined through valuation techniques whose purpose is to determine the price of a hypothetical market transaction. The total investments in this category represent just 0.9% of total assets. Investments in government stocks represent 62% while 24% is invested in collective investments. The remaining 14% relates to corporate bonds.

In this case there are no differences between the Solvency and the Statutory Accounts as the valuation principles applied according to Irish law for the drafting of the Statutory Accounts, are IAS/IFRS standards and therefore they are aligned with the fair value principles used for Solvency II.

Assets held for index-linked and unit-linked contracts

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Assets held for index-linked and unit-linked contracts	41,051,446	41,051,446	-

Compared to 2020 the component of unit-linked contracts has increased by 8%, going from 38,104 million euro to 41,051 million euro. The weighting of this item in the total assets is 97%.

Reinsurance recoverables

The reinsurance agreements stipulate by Intesa Sanpaolo Life, in the run-off phase, do not generate recoverable amounts.

Loans and Receivables

The valuation does not take into account the differences between the value recognised on the annual financial statements and the value for solvency purposes.

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Loans and mortgages	-	-	-
Insurance and intermediaries receivables	-	-	-
Reinsurance receivables	-	-	-
Receivables (trade, not insurance)	805,183	805,183	-

The item Receivables (trade, not insurance) is mainly composed of:

- Tax receivables. - Advanced claims tax L. 209/02 for 700 million euro;
- Receivable income from fees for 80 million euro;
- U/L Receivable Income from distributor (sales incentive) for 24 million euro.

Other assets

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Cash and cash equivalents	76,807	76,807	-
Any other assets, not elsewhere shown	58,686	58,686	-

Intesa Sanpaolo RBM Salute S.p.A.

Deferred Acquisition Costs

Deferred acquisition costs in the Solvency Accounts are valued at zero in line with Delegated Regulation No. 35/2015.

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Deferred acquisition costs	-	-	-

Intangible assets

The intangible assets recorded in the statutory accounts of Intesa Sanpaolo RBM Salute are zeroed.

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Intangible assets	-	1,230	-1,230

Deferred tax assets

The Company's Solvency Report includes:

- deferred tax assets (DTA) totalling 108.4 million euro, higher than the DTA entered in the annual Financial Statements prepared according to Italian accounting standards; the solvency value represents 11% of the total assets in the financial statements;
- deferred tax liabilities (DTL) are zero.

Below is a breakdown of assets and liabilities for deferred taxes recorded for the company:

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Deferred tax assets	108,380	106,579	1,801
Deferred tax liabilities	-	-	-

Deferred taxes mainly relate to temporary differences that refer to the adjustments between the statutory value and the Solvency II value of the investments and the technical provisions. These temporary differences are reversed with the approximation of the maturity or sale of the financial instruments or the liquidation of the corresponding TP.

Real estate, plant and equipment held for own use

The property held by the Company measured at fair value according to the survey of an independent expert generated the difference between the solvency value and value represented according to Italian accounting standards.

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Property, plant & equipment held for own use	6,782	3,393	3,389

(euro thousands)

Holdings in related undertakings, including equity investments

Intesa Sanpaolo RBM Salute does not hold any equity investments.

Investments (Capital instruments, bonds, UCITS, derivatives)

Below is a summary of the main items in the various capital instruments for Intesa Sanpaolo RBM Salute:

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Equity	50	50	-
Equity - Listed	50	50	-
Equity - Unlisted	-	-	-
Bonds	290,047	289,973	74
Government bonds	290,047	289,973	74
Corporate bonds	0	0	-
Structured note	-	-	-
Collateralised securities	-	-	-
Collective investments undertakings	-	-	-
Derivatives	-	-	-
Investments	290,097	290,023	74

(euro thousands)

Total investments account for 29% of total assets on the balance sheet, allocated almost entirely to government bonds and for a residual part to equity securities.

Also for this company, the difference between the values in the balance sheet of the annual Financial Statements prepared in accordance with Italian accounting standards and those of the Solvency Report is due to the same reason as that indicated for Intesa Sanpaolo Vita.

Amounts recoverable from reinsurance

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Health similar to Non-Life	69,755	70,705	-950
Reinsurance recoverables	69,755	70,705	-950

In the Solvency Report, the technical provisions pertaining to the reinsurers are estimated on the basis of the cash flows connected to recoveries relating to direct business obligations, discounted on the basis of the risk free rate curve.

This different valuation compared to the annual Financial Statements prepared in accordance with national accounting standards results in a difference of -950 thousand euro.

Loans and Receivables

The valuation does not take into account the differences between the value recognised on the annual financial statements and the value for solvency purposes.

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Loans and mortgages	-	-	-
Insurance and intermediaries receivables	97,172	97,172	-
Reinsurance receivables	-	-	-
Receivables (trade, not insurance)	60,045	60,045	-

Other items

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Cash and cash equivalents	327,184	327,184	-
Any other assets, not elsewhere shown	28,552	28,552	-

Cargeas Assicurazioni S.p.A.

Intangible assets

The intangible assets recognised in Cargeas Assicurazioni's statutory accounts are brought down to nil balance as the conditions for the assets in question to be sold separately are not met and no value can be demonstrated for identical or similar assets.

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Intangible assets	-	2,021	-2,021

Deferred tax assets

The Company's Solvency Report includes:

- deferred tax assets (DTA) from the separate financial statements prepared in accordance with Italian GAAP amounting to 8.7 million euro; at solvency level the amount is offset against the value of DTL;

- total deferred tax liabilities (DTL) of 9.5 million euro, compared to the annual Financial Statements prepared in accordance with Italian accounting standards, which does not show DTL; the solvency value represents 2.6% of the total liabilities in the financial statements.

Below is a breakdown of assets and liabilities for deferred taxes recorded for the company:

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Deferred tax assets	-	8,073	-8,073
Deferred tax liabilities	9,470	-	9,470

Deferred taxes mainly relate to temporary differences that refer to the adjustments between the statutory value and the Solvency II value of the investments and the technical provisions. These temporary differences are reversed with the approximation of the maturity or sale of the financial instruments or the liquidation of the corresponding TP.

On the reporting date there were no tax loss carry forwards or unused tax credits for which the corresponding deferred tax assets had not been recognised.

Holdings in related undertakings, including partecipations

There are no equity investments for Cargeas Assicurazioni.

Real estate, plant and equipment held for own use

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Property, plant & equipment held for own use	1,706	712	993
Financial liabilities other than debts owed to credit institutions	1,181	-	1,181

The difference is due to the valuation in the Solvency Report where the IFRS 16 was applied.

Investments (Equity, bonds, Collective Investment Undertaking, derivatives)

Below is a summary of the main items in the various capital instruments for Cargeas Assicurazioni:

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Equity	-	-	-
Equity - Listed	-	-	-
Equity - Unlisted	-	-	-
Bonds	380,581	363,959	16,622
Government bonds	234,004	220,213	13,791
Corporate bonds	135,494	132,933	2,560
Structured note	11,084	10,813	271
Collateralised securities	-	-	-
Collective investments undertakings	35,834	33,961	1,874
Derivatives	-	-	-
Investments	416,416	397,920	18,496

The total investments represent 80.3% of total assets in the financial statements. The main part of the investments in this category is allocated to government stocks, 45.1%. 6.9% refers to collective investments while the remaining part refers to structured and corporate bonds.

The difference between the amount of the asset and liability items relating to financial investments recognised in the annual Financial Statements prepared in accordance with Italian accounting standards, of 398 million euro, and the amount determined for solvency purposes, of 416 million euro, relates to the recognition of the unrealised gains resulting from the fair value measurement of all financial instruments determined in accordance with IFRS 13.

Reinsurance recoverables

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Health similar to Non-Life	1,491	3,213	-1,722
Non-Life excluding Health	17,435	25,897	-8,462
Reinsurance recoverables	18,926	29,110	-10,183

The Solvency Report values the percentages payable by the reinsurers on the basis of the quantification and subsequent discounting of cash flows connected to recoveries relating to direct business obligations discounted on the basis of the risk free rate curve.

This different valuation compared to the annual Financial Statements prepared in accordance with Italian accounting standards results in a difference of -10,183 thousand euro between the Financial Statements and the Solvency Report.

Loans and Receivables

The valuation does not take into account the differences between the value recognised on the annual financial statements and the value for solvency purposes.

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Loans and mortgages	-	-	-
Insurance and intermediaries receivables	20,672	20,672	-
Reinsurance receivables	1,399	1,399	-
Receivables (trade, not insurance)	44,062	44,062	-

Other assets

	Valore Bilancio di Solvibilità	Valore Bilancio d'esercizio	(in migliaia di euro) Impatto su riserva di riconciliazione
Contante ed equivalenti a contante	13.659	13.659	-
Tutte le altre attività non indicate altrove	1.928	1.928	-

D.2 TECHNICAL PROVISIONS

D.2.1 Valuation of technical provisions by Solvency II Business Line

Intesa Sanpaolo Vita Insurance Group

The technical provisions as of 31 December 2021 were calculated in accordance with the Solvency II framework and the national enacting laws.

In particular, the value of the technical provisions of the individual companies of the Insurance Group corresponds to the amount that the company would pay to transfer its insurance and reinsurance obligations to another insurer or reinsurer. The value of the Group's technical provisions is calculated using the arithmetical sum of the technical provisions of individual companies.

In terms of methodology, the value of the technical provisions is equal to the sum of the following components:

- the discounted sum of the cash flows that the Company expects to pay net of those it expects to receive during the next years (usually, the next 30 years). This amount is called "Best Estimate";
- the risk margin, which is an additional component calculated to cover potential inaccuracy in the estimate of the component referred to above.

For the Insurance Group, the following table shows the amount of the technical provisions at 31 December 2021 for the substantial areas of activity, divided between the Best Estimate and Risk Margin. The value of amounts recoverable from the reinsurer after counterparty default adjustment is also indicated.

(euro millions)					
Solvency Line of Business	BEL Net of Reinsurance	Reinsurance Recoverable	BEL Gross of Reinsurance	Risk Margin	Technical Provisions Gross of Reinsurance
Non Life	1,211.5	133.2	1,344.7	80.6	1,425.2
Non- Life (excluding Health)	580.4	45.5	625.9	40.9	666.8
Health (similar to Non-Life)	631.1	87.7	718.8	39.7	758.4
Life (excluding Health, Index- linked and unit-linked)	99,094.0	-	99,094.0	855.1	99,949.1
Health (similar to Life)	-	-	-	-	-
Life (excluding Health, Index- linked and unit- linked)	99,094.0	-	99,094.0	855.1	99,949.1
Index linked and unit linked	97,888.8	-	97,888.8	485.3	98,374.1
Total amount	198,194.3	133.2	198,327.5	1,421.0	199,748.5

The amount of the technical provisions, of 199,748.5 million euro, is mainly composed of the provisions for the Life business which represent 99% of the total. They can be broken down among technical provisions relating to conventional policies, at 99,949.1 million euro, and technical provisions for Linked policies, of 98,374.1 million euro. The Linked policies category also includes Pension Funds and the Linked components of multi-line products.

Below is the value of the technical provisions with a distinction between the Best Estimate and risk margin (amounts in million euro) of the Group divided by area of business.

Intesa Sanpaolo Vita S.p.A.

(euro millions)

Solvency Line of Business	BEL Net of Reinsurance	Reinsurance Recoverable	BEL Gross of Reinsurance	Risk Margin	Technical Provisions Gross of Reinsurance
Non- Life (excluding Health)	-	-	-	-	-
Health (similar to Non-Life)	1.4	-	1.4	-	1.4
Health (similar to Life)	-	-	-	-	-
Life (excluding Health, Index-linked and unit-linked)	92,816.1	-	92,816.1	792.9	93,609.0
Index linked and unit linked	24,589.1	-	24,589.1	181.5	24,770.5
Total amount	117,406.6	-	117,406.6	974.4	118,381.0

The above values also include the provisions of the former UBI companies' portfolios that were merged at the end of 2021, amounting to 25,345 million euro.

With regard to the valuation methods, see the notes given with regard to Group level.

Intesa Sanpaolo Assicura S.p.A.

(euro millions)

Solvency Line of Business	BEL Net of Reinsurance	Reinsurance Recoverable	BEL Gross of Reinsurance	Risk Margin	Technical Provisions Gross of Reinsurance
Non- Life (excluding Health)	408.8	28.1	436.9	28.7	465.5
Health (similar to Non-Life)	269.6	16.4	286.1	22.3	308.3
Total amount	678.4	44.5	722.9	50.9	773.8

With regard to the valuation methods, see the notes given with regard to Group level.

Fideuram Vita S.p.A.

(euro millions)

Solvency Line of Business	BEL Net of Reinsurance	Reinsurance Recoverable	BEL Gross of Reinsurance	Risk Margin	Technical Provisions Gross of Reinsurance
Life (excluding Health, Index-linked and unit-linked)	6,277.9	-	6,277.9	62.2	6,340.1
Index linked and unit linked	33,273.5	-	33,273.5	110.9	33,384.4
Total amount	39,551.3	-	39,551.3	173.1	39,724.5

With regard to the valuation methods, see the notes given with regard to Group level.

Intesa Sanpaolo Life D.A.C.

(euro millions)

Solvency Line of Business	BEL Net of Reinsurance	Reinsurance Recoverable	BEL Gross of Reinsurance	Risk Margin	Technical Provisions Gross of Reinsurance
Index linked and unit linked	40,026.3	-	40,026.3	192.9	40,219.2

With regard to the valuation methods, see the notes given with regard to Group level.

Intesa Sanpaolo RBM Salute S.p.A.

(euro millions)

Solvency Line of Business	BEL Net of Reinsurance	Reinsurance Recoverable	BEL Gross of Reinsurance	Risk Margin	Technical Provisions Gross of Reinsurance
Health (similar to Non-Life)	273.6	69.8	343.4	11.2	354.6
Total amount	273.6	69.8	343.4	11.2	354.6

With regard to the valuation methods, see the notes given with regard to Group level.

Cargeas S.p.A.

(euro millions)

Solvency Line of Business	BEL Net of Reinsurance	Reinsurance Recoverable	BEL Gross of Reinsurance	Risk Margin	Technical Provisions Gross of Reinsurance
Non- Life (excluding Health)	171.6	17.4	189.0	12.2	201.3
Health (similar to Non-Life)	86.4	1.5	87.9	6.2	94.1
Total amount	258.0	18.9	277.0	18.4	295.3

With regard to the valuation methods, see the notes given with regard to Group level.

D.2.2 Calculation methods and assumptions

Intesa Sanpaolo Vita Insurance Group

Best Estimate

The methods used to calculate the Best Estimate as applied by the Insurance Group are described in the sections below, relating to the individual companies.

Risk Margin

The risk margin is one of two components, together with the Best Estimate, of the technical provisions. It corresponds to the amount that guarantees that the value of the technical provisions is equivalent to the amount that the insurance and reinsurance companies would need in order to accept and honour their obligations.

The risk margin was calculated using the "cost of capital" approach, which consists of determining the current value of the cost paid by the company as a result of the capitalisation of own funds to cover the "non-hedgeable" risks throughout the duration of the contracts. The cost-of-capital rate is 6% as specified in Article 39 of the Delegated Act.

The risk margin was valued in accordance with the Solvency II Directive, without using the volatility adjustment for the purposes of the calculation.

At 31 December 2021 the risk margin of the Insurance Group was 1,421 million euro.

Operating assumptions

One of the inputs needed for the calculation of technical provisions is the operational assumptions which include the non-economic factors that influence the calculation of the Best Estimate.

The operational hypotheses were valued in accordance with the contractual limits, where present, in the various portfolios; they mainly have an impact on:

- the insured's exercise of contractual options that modify the policy terms and the resulting cash flows (for example the option to convert into an annuity);
- the frequency and amount of the insured events (for example the operational factor relating to surrenders and mortality);
- technical scenarios relating to the non-life business (such as the definition of the loss ratio).

The Life companies have also expressly defined an inflation scenario for the calculation of the Best Estimate, in reference to key market data.

Financial assumptions

For the valuation at 31 December 2021, the Group companies used the risk-free rate curve published by EIOPA. Intesa Sanpaolo Vita and Fideuram Vita used a volatility adjustment of 3 bps, coinciding with the EIOPA adjustment at 31 December 2021. This adjustment was not used in the case of non-life companies. For more information see section "D.2.5 Transitional measures and long-term guarantee measures".

Main methodological changes in the calculation of technical provisions since the last report

For Intesa Sanpaolo Vita, there were no significant changes compared to the previous valuation.

As regards Fideuram Vita, for the valuation at 31 December 2021, certain operational and cost assumptions were modified based on the updating of the historic events considered relevant for the purposes of calculating the BEL and due to some methodological refinements. More specifically, considering that the Company, in determining redemption, takes into account both total and partial redemptions, the actuarial projection model has been adjusted to correctly attribute the management costs and thus avoid its application for partial redemptions.

The grouping criteria included in the model points for group policies were also refined to improve the representativeness of the relevant model points.

For Intesa Sanpaolo Assicura, the following is noted:

- Premiums Provision Best Estimate: use of future earned premiums (rather than written premiums) to estimate cash flows related to expected claims and expenses;
- Actuarial statistical methodologies to define the Claims BEL: besides the LoB 4 (Motor vehicle liability insurance) and the LoB 2 (Income Protection insurance), actuarial statistical methodologies (Chain Ladder Paid, Chain Ladder Incurred, Bornhuetter-Ferguson Paid, Bornhuetter-Ferguson Incurred e Initial Expected Loss Ratio) were also used for LoB 7 (Fire and other damage to property insurance) and LoB 8 (General Liability insurance), in order to estimate the cash flows of the Undiscounted Best Estimate Liability for Claims.

For Cargeas, no significant changes were reported compared to last year's calculation.

For Intesa Sanpaolo RBM Salute, the main methodological changes applied for the valuation of technical provisions as at 31.12.2021, compared to the previous valuation, are as follows:

- Premiums Provision Best Estimate:

- the Company has increased the level of detail in the granularity of the calculation of the *Best Estimate* of the Premium Reserve. In particular, for year end 31.12.2020, the valuation was made by splitting the portfolio into two *Clusters*; for the valuation at 31.12.2021, the Company increased the level of detail by splitting the portfolio into 13 *HRGs*;
- the Company has also introduced a methodological refinement in the determination of future premiums, compared to the approach adopted until the valuation at 31.12.2020, under which the amount of payable instalments was calculated through an approximation based on a monthly straight-line distribution of instalments; the methodological refinement makes it possible to accurately place this amount in temporal terms;
- finally, the Company introduced an improvement to the OGI calculation method. In particular, flows in the first year of the projection were also taken into account, unlike previous valuations in which such flows were not considered.
- Claims Provision Best Estimate:
- the Company has not made any methodological changes in the calculation of the Best Estimate of the Claims Reserve compared to the valuation for the previous year, except for the change in the OGI calculation also made in the calculation of the Best Estimate of the Premium Reserve.

For Intesa Sanpaolo Life D.A.C., the following is noted:

- the change in the calculation of the recurrent premium rate applied in the BEL projection model. The change significantly reduces the amount of projected future premiums and has an impact on the calculation of future profits for products: Doppio Centro (product code UR301) and Sustainable Perspective (product code EP104);
- the inclusion of recurrent premiums in the estimate of future profits (PVFP) of the Sustainable Perspective product (product code EP104), in line with contract conditions for this product.

Comparison between IAS/IFRS Consolidated Financial Statement provisions and Solvency II provisions

Comparison between the technical provisions in the IAS/IFRS consolidated financial statements and Solvency II provisions referred to the Intesa Sanpaolo Vita Group.

(euro millions)

Solvency Line of Business	Solvency II value	Statutory accounts value	Difference	Risk Margin
Non- Life	1,425.2	1,738.1	-312.9	80.6
Non- Life (excluding Health)	666.8	872.1	-205.3	40.9
Health (similar to Non-Life)	758.4	866.0	-107.6	39.7
Life (excluding Index- linked and unit- linked)	99,949.1	100,065.9	-116.8	855.1
Health (similar to Life)	-	-	-	-
Life (excluding Health, Index- linked and unit- linked)	99,949.1	100,065.9	-116.8	855.1
Index linked and unit linked	98,374.1	100,923.3	-2,549.2	485.3
Other Provisions	-	-	-	-
Total amount	199,748.4	202,727.3	-2,978.9	1,421.0

Expected profits included in future premiums

The value of the EPIFP was estimated as the difference between the Best Estimate calculated by zeroing the recurring premiums and additional future premium payments, where applicable, and the stochastic Best Estimate, calculated in the Best Estimate scenarios. As provided for in Article 260 section 3 of the Delegated Acts, the valuation is carried out for each homogeneous risk group, according to the following formula:

$$\text{EPIFP} = \sum_i \max\{0; \Delta\text{BEL}_i\}$$

For the Life business, the following table shows the value of the EPIFP for Intesa Sanpaolo Vita Group companies. For Intesa Sanpaolo Life, the business is mainly characterised by single premium policies: the residual part relating to recurring premiums is not considered for the purposes of calculating the EPIFP as it goes beyond the scope of the contractual limits and is not modelled in the best estimate calculation.

For the non-life business, the expected profits for future premiums have been valued, in the context of the valuation of the premiums best estimate, by considering the future premiums and instalments due, which the Company will collect from the policies in force on the valuation date. These profits have been estimated by considering the 1's complement of the Combined Ratio estimated for future years and considering the discounting effect.

(euro millions)	
Company	EPIFP
Intesa Sanpaolo Vita	556.9
Fideuram Vita	190.1
Intesa Sanpaolo Assicura	73.0
Intesa Sanpaolo LIFE	50.0
Intesa Sanpaolo RBM Salute	16.6
Cargeas	5.6
Total	892.2

Future management actions

The calculation of best estimate and, more generally, of expected future cash flows requires specific assumptions regarding Future Management Actions.

These are any action by the insurer which is currently planned or could reasonably be implemented in the future deriving from a contract, statutory, commercial or other option.

Scenarios pertaining to future management actions are formalised by the company taking these actions, in a document approved annually by the management board (FMA Plan) and form the basis of the calculation of the best estimate.

The main measures relate to the management of with-profits portfolios and relate to:

- realisation strategies that are the result of a predefined sequence of checks in terms of cash flow mismatches, asset allocation, potential yield objectives and sale priorities for assets in the portfolio;
- reinvestment policies;
- potential management of the level of over-coverage of assets compared to related liabilities.

Dynamic policyholder behaviour

Below are details of the methods used by the Parent Company Intesa Sanpaolo Vita to govern the estimate of the possible dynamic behaviours of policyholders in relation to the exercise of the option to surrender on the with-profits portfolios of the Company.

At each time step in the projection the Parent Company includes a change in the percentage of surrenders if the difference between the measurement of the payout revaluation and the appropriate rate of return, accepted as the market benchmark, is significant. If this happens, the change translates into an increase or reduction in the basic surrender frequency (best estimate) depending on whether the above-mentioned difference is negative or positive.

Following this analysis, the company Fideuram Vita found that the correlation between the trends in the surrenders of its portfolio compared to the market trends, was not at a level that would affect the basic scenario (Best Estimate).

For the other Group companies the dynamic behaviour of insured is not significant.

Intesa Sanpaolo Vita S.p.A.

Best Estimate

The calculation of the best estimate as defined in section "D.2.1 Valuation of technical provisions by Solvency II business line" may be done using a deterministic or stochastic approach depending on the characteristics of the liabilities portfolio.

The stochastic approach refers to the fact that the cash flows are defined as the average flow is calculated according to an adequate number of different market scenarios, which give the most probable representation of future commitments in a risk-neutral market scenario, while incorporating the expected volatility. This approach is particularly used where there are financial guarantees and contractual options that depend on the financial situation in question.

The deterministic approach is based on valuations made according to the risk-neutral market scenario considered to be most probable.

More specifically, it should be noted that: - for policies or business lines where the cash flows do not directly depend on market volatility, the best estimate is calculated according to the deterministic approach; Some examples may concern the Protection LoB, Saving products without profit participation and without guarantees, and unit-linked products without guarantees

for products or LoB where the cash flows contain financial guarantees and contractual options (which do not move symmetrically with market movements), the best estimate should be calculated using a stochastic approach; - examples include conventional policies with guarantees or profit sharing mechanisms.

The projections include all the potential inflows and outflows necessary to value the company's commitments for their entire duration, in line with the contractual limits pertaining to the contracts to which those amounts refer.

A non-exhaustive list of cashflows considered in the calculation of the Best Estimate includes:

- payments of life benefits and, in case of death, payments in case of surrender, payments of annuities;
- The costs of administration, management of investments and claims payouts;

-
- Future premiums and other cash flows deriving from those premiums;
 - commission paid to the retail networks;
 - the costs paid to investment firms in relation to asset management or the protection schemes underlying certain types of contract.

This methodological framework was also applied to measure the portfolios of the former UBI companies that were merged at the end of 2021, although the original procedures and instruments of those companies continued to be adopted.

Operating assumptions

The main operating assumptions considered by Intesa Sanpaolo Vita in calculating the Best Estimate relates to the propensity to surrender (which also includes cases of partial surrenders), additional payments, cases of premium payments being interrupted for annual premium policies and single recurring premiums, the case of mortality, cost, automatic deferment of maturity, conversion into annuity and subrogation on "Personal Protection Insurance", or "PPI").

Difference between provisions of the Financial Statements and Solvency II provisions

The company's Actuarial function has conducted an analysis to reconcile these two amounts. The starting point is the Solvency II technical provisions at 31 December 2021 and the endpoint is the statutory technical provisions at 31 December 2021.

This approach gives a reconciliation aimed at identifying and isolating the main factors that caused the difference. Overall there were no critical issues with the portfolio analysis, and the technical provisions on the financial statements and the best estimate in the Solvency II report were consistent. The residual variation from the reconciliation was limited.

Intesa Sanpaolo Assicura S.p.A.

Best Estimate

The Best Estimate calculation methodology includes:

- the Premium Provision Best Estimate calculation;
- the Claims Provision Best Estimate calculation.

The Premium Provision Best Estimate before the reinsurance calculation is obtained by adding the present value of the difference between future incoming and outgoing cash-flows with respect to future years.

Future cash outflows consist of:

- expected claims, with reference to both the unearned premium reserve and future premiums;
- expected operating costs, with reference to both the unearned premium reserve and future premiums;
- expected premium refunds, with reference to the unearned premium reserve.

Incoming future cash flows consist of future premiums and instalments due, adjusted for any anticipated terminations.

The Claims Provision Best Estimate gross of reinsurance is made on the basis of an analysis of historical data for settled and reserved claims (gross of any recovery by reinsurers, net of indirect costs and of any recoveries from policyholders and third parties), aggregated by LoB. This data is needed to estimate the ultimate cost of claims through the method that best fits each homogeneous risk group.

The Claim Provision Best Estimate before reinsurance is calculated as the sum, over future years, of the discounted cash flows described above.

The Premium Reserve Best Estimate net of reinsurance is the difference between the Premium Reserve Best Estimate before reinsurance and the Best Estimate of recoveries from reinsurers, inclusive of the adjustment for counterparty default risk.

Operating assumptions

The main operational scenarios considered for the purposes of calculating the Best Estimate by the Company Intesa Sanpaolo Assicura, include the "Loss Ratio" prospect, the "Expense Ratio", of the early surrender rates (either with the reimbursement of the unused premium or without) and the rates of unwinding claims.

Difference between provisions of the Financial Statements and Solvency II provisions

Premiums provision

The differences between the local premiums provision and the best estimate of the premiums provision at 31 December 2021, essentially relate to the different methodological approach followed to determine the liabilities, for which the Solvency II valuation also takes into consideration the current value of future profits.

Claims provision

Moving from the annual Financial statements prepared for Local purposes to the Solvency II accounts, the main differences relate to the discounting, the effect of estimated recoveries and the decisions taken with regard to the application of the statistical actuarial methodologies.

Fideuram S.p.A.

Best Estimate

For Fideuram Vita, see above, in relation to Intesa Sanpaolo Vita.

Operating assumptions

The main operational scenarios considered in the calculation of the best estimate by the company Fideuram Vita relate to the propensity to surrender (also including partial surrenders),

additional payments, cases of mortality/longevity, cost, conversion into annuities, penalties in the event of surrender at the end of deferment and the pensionable age for the open pension fund.

Difference between provisions of the Financial Statements and Solvency II provisions

For Fideuram Vita, see above, in relation to the company Intesa Sanpaolo Vita.

Intesa Sanpaolo Life D.A.C.

Best Estimate

For Intesa Sanpaolo Life, see above, in relation to Intesa Sanpaolo Vita.

Operating assumptions

The main operational scenarios considered in the calculation of the best estimate by the company Intesa Sanpaolo Life relate to the propensity to surrender (total or partial), and the cases of mortality and cost.

Difference between provisions of the annual Financial Statements and Solvency II provisions

With regard to the cohesion between the provisions on the annual Financial Statements and the best estimate net of the risk margin, the difference between these two items can be fully explained by the current value of the future profits. The portfolio of Intesa Sanpaolo Life mainly consists of unit-linked policies whose technical provisions are calculated on the annual accounts as the countervalue of the units on the valuation date. The Solvency II valuation however is based on the projected flows and therefore takes into consideration future profits as well.

Intesa Sanpaolo RBM Salute S.p.A.

Best Estimate

The Best Estimate calculation methodology includes:

- the Premium Provision Best Estimate calculation;
- the Claims Provision Best Estimate calculation.

The Premium Provision Best Estimate before the reinsurance calculation is obtained by adding the present value of the difference between future incoming and outgoing cash-flows with respect to future years.

Future cash outflows consist of:

- expected claims, with reference to both the unearned premium reserve and future premiums;
- expected operating costs, with reference to both the unearned premium reserve and future premiums;

Incoming future cash flows consist of future premiums and instalments due, adjusted for any anticipated terminations.

The Claims Provision Best Estimate gross of reinsurance is made on the basis of an analysis of historical data for settled and reserved claims (gross of any recovery by reinsurers, net of indirect costs and of any recoveries from policyholders and third parties), aggregated by LoB. This data is needed to estimate the ultimate cost of claims through the method that best fits each homogeneous risk group.

The Claim Provision Best Estimate before reinsurance is calculated as the sum, over future years, of the discounted cash flows described above.

For the purpose of calculating the Best Estimate ceded for reinsurance, the value obtained as the difference between the Best Estimate gross of reinsurance and the Best Estimate net of reinsurance is lowered to take account of reinsurers' default.

Operating assumptions

The differences between the local GAAP premiums provision and the best estimate at 31 December 2021, essentially relate to the different methodological approach followed to determine the liabilities, and, therefore, to the different assumptions used to estimate future cash flows, and to a lesser extent, to the effect of discounting the expected cash flows.

Difference between provisions of the annual Financial Statements and Solvency II provisions

Premiums provision

The differences between the local GAAP premiums provision and the best estimate at 31 December 2021, essentially relate to the different methodological approach followed to determine the liabilities, and, therefore, to the different assumptions used to estimate future cash flows, and to a lesser extent, to the effect of discounting the expected cash flows.

Claims provision

The differences between the Local GAAP Claims Reserve and the Best Estimate, as at 31 December 2021, are mainly due to the following factors:

- discounted cash flow effect obtained by applying the EIOPA rate curve;
- use of a pattern that considers the speed of claims settlement;
- consideration of investment management costs.

Cargeas Assicurazioni S.p.A.

Best Estimate

The Best Estimate calculation methodology includes:

- the Premium Provision Best Estimate calculation;

-
- the Claims Provision Best Estimate calculation.

The Premium Provision Best Estimate before the reinsurance calculation is obtained by adding the present value of the difference between future incoming and outgoing cash-flows with respect to future years.

Future cash outflows consist of:

- expected claims, with reference to both the unearned premium reserve and future premiums;
- expected operating costs, with reference to both the unearned premium reserve and future premiums;
- expected premium refunds, with reference to the unearned premium reserve.

Incoming future cash flows consist of future premiums and instalments due, adjusted for any anticipated terminations.

The Claims Provision Best Estimate gross of reinsurance is made on the basis of an analysis of historical data for settled and reserved claims (gross of any recovery by reinsurers and net of indirect costs). This data is needed to estimate the ultimate cost of claims through the method that best fits each homogeneous risk group.

The Claim Provision Best Estimate before reinsurance is calculated as the sum, over future years, of the discounted cash flows described above.

The Best Estimate of amounts that can be recovered from reinsurance is the difference between the Best Estimate before reinsurance and the Best Estimate net of amounts recoverable from reinsurers, with no adjustment for counterparty risk. The resulting difference is then adjusted for the counterparty's default risk.

Operating assumptions

The main operational scenarios considered for the purposes of calculating the Best Estimate by the Company Cargeas Assicurazioni, include the "Loss Ratio" prospect, the "Expense Ratio", of the early surrender rates and the rates of unwinding claims.

Difference between provisions of the Financial Statements and Solvency II provisions

Premiums provision

The differences between the local premiums provision and the best estimate of the premiums provision at 31 December 2021, essentially relate to the different methodological approach followed to determine the liabilities, for which the Solvency II valuation also takes into consideration the current value of future profits.

Claims provision

Moving from the annual Financial statements prepared for Local purposes to the Solvency II accounts, the main differences relate to the discounting, the effect of estimated recoveries and the decisions taken with regard to the application of the statistical actuarial methodologies.

D.2.3 Simplifications used in calculating technical provisions

Intesa Sanpaolo Vita Insurance Group

As regards the company Intesa Sanpaolo Vita:

- partial surrenders are considered together with total surrenders and not modelled separately. In order to correctly allocate management expenses, the actuarial projection model for the Intesa Sanpaolo Vita portfolio was adjusted to take into account policies that were no longer included due solely to total surrenders, claims and expiries.
- given the non-materiality of the Non-Life portfolio, Technical Provisions were valued as a whole and considered as equal to statutory reserves net of the reserve component for reinsurers, without therefore considering the risk margin component;
- with reference to the coinsurance portfolio with the company Poste Vita, in a capacity as principal insurer, the BEL were obtained by reportioning the revaluable portfolio BEL, based on the ratio of values of the Local GAAP mathematical provision;
- the reinsurance was not considered for the purposes of calculating the Technical Provisions, as it was immaterial; therefore, the BEL and consequently the Technical Provisions net of reinsurance were equal to the BEL and Technical Provisions valued gross of reinsurance.

As regards the company Fideuram Vita:

- The undertaking reinsures only a portion of its portfolio with proportional treaties for excess risk premium. As at 31 December 2021, the portfolio potentially exposed to reinsurance amounted to approximately 1.15% of the contracts in the portfolio, of which only a portion was actually ceded to reinsurers. For this reason, in complying with the principle of materiality and proportionality a simplified methodology was defined to evaluate the amounts recoverable from reinsurance arrangements (RR);
- Based on this approach, the amount of the RR measured at 31.12.2021 was not material and equal to -829 thousand euro;
- As regards the Fideuram Pension Fund, the business was modelled entirely according to a deterministic approach, also including the guaranteed component, considering that the related amount is of limited materiality;

(euro thousands)	
Pension fund	Mathematical reserve 2021
FIDEURAM MILLENIALS	77,247
FIDEURAM SICUREZZA	98,019
FIDEURAM EQUILIBRIO	687,450
FIDEURAM VALORE	588,206
FIDEURAM CRESCITA	968,980
FIDEURAM GARANZIA	77,816
Total	2,497,718

- Unit-linked products with a capital guarantee on maturity were processed according to a deterministic approach, as the difference of the BEL between a stochastic approach and deterministic approach was found to be negligible, and consequently, there was no asymmetry in market movements.

-
- The policies with a reversible and certain return were considered in the projections as annuities, despite considering the correct benefits. Since the unmodelled calculation takes into account the difference between the balance sheet reserve and the reserve recalculated by the model at the initial point in time (the projection model calculates a lower reserve than the balance sheet reserve) and thus the BELs are increased due to this deviation, it is considered proportionate to the implementation effort to treat these contracts as life annuities;
 - Partial surrenders are considered together with total surrenders and not modelled separately. In order to correctly allocate management expenses, the actuarial projection model was adjusted to take into account policies that were no longer included due solely to total surrenders, claims and expiries;
 - Future recurring premiums are not projected for weekly NAV non-guaranteed unit-linked policies classified as "insurance" under IFRS 4, as the guarantee of the annuity conversion factor is deemed immaterial in light of the low propensity for annuity conversion found on this portfolio;
 - Multi-line Products: due to the characteristics of multi-line products, it is possible to process them fully unbundled. This simplification is substantial only for the Fideuram Progetto Pensione, a product that provides for a life cycle mechanism towards the Line I component as of eight years before the contract's maturity; in 2018, an analysis was carried out which demonstrated the sustainability of this simplification.

For the purpose of calculating the Risk Margin, given the potential complexity inherent in this calculation, the Directive allows companies to use simplified methods. As stated in Article 60 of Regulation no. 18, the valuation may be made by using simplifications and approximations of the individual risks or certain risks used to calculate the future SCR, within the various modules or submodules.

For the valuation at 31 December 2021, all the Group companies (apart from Intesa Sanpaolo Life and Intesa Sanpaolo RBM Salute) calculated the risk margin according to the method 2 simplification as indicated in Annex 4 of Regulation no. 18 and the EIOPA guidelines on the calculation of technical provisions, based on the assumption that the Solvency Capital Requirement for each future year would be proportionate to the Best Estimate. Intesa Sanpaolo Life and Intesa Sanpaolo RBM Salute have relied on the method 1 simplification which estimates the individual risks or subrisks within all or some of the modules and submodules to be used in calculating the future solvency capital requirements.

D.2.4 Level of uncertainty associated with the value of technical provisions

Intesa Sanpaolo Vita Insurance Group

The technical provisions are calculated on the basis of the projection of the current portfolio volumes on the valuation date, which is done on the basis of appropriate financial-economic and technical-operational scenarios that may be accurate but may differ from the real situation in the future and therefore generate a degree of uncertainty in the calculation.

It is standard practice to carry out sensitivity tests to verify the uncertainty associated to the calculation of provisions by measuring the impact of these changes whenever there are changes in the individual scenarios, on the final results in order to understand how sensitive the valuation is,

to any deviations that could occur in each scenario. With reference to the assumptions formulated within Solvency II, the BEL may be affected by changes in external factors such as volatility of rates, or macroeconomic factors, and internal factors such as surrenders, mortality and costs.

At methodological level, a minimum sensitivity set has been identified to explain the main factors of uncertainty at Group level, found in the BEL calculation. Each Company is able to carry out additional sensitivity tests depending on the specific nature of individual portfolios and, if considered appropriate, they also analyse the results of the stress tests used in the Standard Formula to calculate the solvency capital requirement.

Below is the set of sensitivity tests for the Group. For the company Intesa Sanpaolo Assicura, at Group level only the sensitivity tests relating to the increase or decrease in the interest rate curve are valid. The operational sensitivity tests indicated below are relevant to the Life segment as this business line is the most important one at Group level.

For the valuations relating to Intesa Sanpaolo Vita, this analysis was not done on the non-life component of the portfolio as it is not material.

Economic sensitivities:

- an increase in the interest rate curve of 100 bps;
- a decrease of 100 bps in the interest rate curve (with no floor on the negative rates);
- a decrease in the value of the shares of 10%;
- zeroing of the volatility adjustment.

Operational sensitivities:

- a 10% increase in the surrender rates;
- a 10% decrease in the surrender rates;
- a 10% increase in the amount of costs and an increase of 1% in the rate of inflation (as per the Standard Formula);
- an increase of 15% in the mortality rates (as per the Standard Formula);
- annulment of the additional payments scenario.

The sensitivities indicated that the group's best estimate was more sensitive to a change in the interest rates than to the other market factors; with regard to the operational sensitivities the impacts were less significant: in general, the operational factors have no significant impact, because at sensitivity level, compensatory effects are also permitted.

Finally, where appropriate each company also carried out additional sensitivity tests, to reflect the specific nature of their own portfolios.

D.2.5 Transitional measures and long-term guarantee measures

Intesa Sanpaolo Vita Insurance Group

For the valuation at 31 December 2021, Intesa Sanpaolo Vita and Fideuram Vita used a volatility adjustment of 3 bps, coinciding with the EIOPA adjustment at 31 December 2021.

(euro millions)

	BEL	Risk Margin	Technical Provisions	Eligible Own Funds*	Solvency Capital Requirement	Minimum Capital Requirement	Solvency Ratio
No Volatility Adjustment	170,803.3	1,421.0	172,224.3	10,086.0	3,980.3	2,144.2	253.4%

* Eligible to meet the Solvency Capital Requirement

In the event of the zeroing of volatility adjustment, the Solvency Ratio would decrease by about 6 percentage points to 253.4%, however well above the 100% threshold.

Intesa Sanpaolo Vita S.p.A.

The volatility adjustment is applied to the maturity structure of the interest rates with reference to the pure-risk portfolios and the separate management portfolios including the Line III component relating to multi-line pension products (PIP).

The table below shows the impact in terms of BEL, Risk Margin, Technical Provisions, Eligible Own Funds, SCR, MCR and Solvency Ratio, calculated without taking account of the volatility adjustment:

(euro millions)

	BEL	Risk Margin	Technical Provisions	Eligible Own Funds*	Solvency Capital Requirement	Minimum Capital Requirement	Solvency Ratio
No Volatility Adjustment	117,504.6	974.4	118,479.0	8,600.7	3,122.3	1,405.0	275.5%

* Eligible to meet the Solvency Capital Requirement

If the volatility adjustment is zeroed, the Solvency Ratio would fall by 11 percentage points to 275.5%, which is still far above the 100% threshold.

The numbers in the table refer to the company's entire portfolio however impact is mainly attributable to the segregated funds, as the adjustment for volatility is not applied to the pension fund portfolio or to the unit-linked policies portfolios.

Intesa Sanpaolo Assicura S.p.A.

The company does not apply long-term guarantee measures.

Fideuram Vita S.p.A.

The volatility adjustment is applied to the interest rates maturity structure but only for the valuation of with-profits policies.

The table below shows the impact in terms of Best Estimate, Risk Margin, Technical Provisions, Eligible Own Funds, Minimum Capital Requirement and Solvency Ratio, calculated without taking account of the volatility adjustment:

(euro millions)

	BEL	Risk Margin	Technical Provisions	Eligible Own Funds*	Solvency Capital Requirement	Minimum Capital Requirement	Solvency Ratio
No Volatility Adjustment	39,384.5	173.1	39,557.6	1,356.8	498.7	224.4	272.1%

* Eligible to meet the Solvency Capital Requirement

If the volatility adjustment is zeroed, the Solvency Ratio would fall by 3 percentage points to 272.1%, which is still far above the 100% threshold.

Intesa Sanpaolo Life D.A.C.

The company does not apply long-term guarantee measures.

Intesa Sanpaolo RBM Salute S.p.A.

The company does not apply long-term guarantee measures.

Cargeas S.p.A.

The company does not apply long-term guarantee measures.

D.2.6 Reinsurance recoverables and SPV contracts

Intesa Sanpaolo Vita Insurance Group

The provisions assigned to reinsurance are commented on in the sections below, about the individual companies.

Intesa Sanpaolo Vita S.p.A.

For Intesa Sanpaolo Vita, the provision transferred to reinsurance has been left out of the calculation of the technical provisions as it is not material; therefore the Best Estimate net of reinsurance has been included, and it is equal to the Best Estimate inclusive of reinsurance.

Intesa Sanpaolo Assicura S.p.A.

In calculating the Best Estimate, the recoverable amounts from reinsurance are determined as follows:

- in calculating the Best Estimate of the premiums provision, the amounts recoverable from the reinsurer are the difference between:
 - the claims generated from the provision for portions of premiums, future premiums and the reimbursements transferred to reinsurance;
 - the premiums transferred to the reinsurer;
 - o in addition to:
 - fees received from the reinsurer;
- in measuring the Best Estimate of claims, the amounts recoverable from the reinsurer are the difference between:
 - claims transferred for non-proportional arrangements;

-
- claims transferred for the share quota arrangement;
 - claims ceded on an optional basis.

Fideuram Vita S.p.A.

Fideuram Vita, in complying with the principle of materiality and proportionality evaluated amounts recoverable from reinsurance arrangements (RR), defining a simplified methodology; based on this approach, the amount of the RR was not material.

Intesa Sanpaolo Life D.A.C.

For Intesa Sanpaolo Life, see above, in relation to Intesa Sanpaolo Vita.

Intesa Sanpaolo RBM Salute S.p.A.

In the Best Estimate valuation, the calculation net of reinsurance is carried out, for each homogeneous risk group, by taking into account the volume figures (and the relative ratios for Best Estimate Premiums) net of reinsurance. For the purpose of calculating the Best Estimate ceded for reinsurance, the value obtained as the difference between the Best Estimate gross of reinsurance and the Best Estimate net of reinsurance is lowered to take account of reinsurers' default. The reinsurer's cash flow is determined based on the total cash flow of the ceded Best Estimate and by applying an estimated rate as the weight of the statutory reserve ceded to the reinsurer relative to the total ceded reserve.

Cargeas S.p.A.

The rate of recovery from reinsurance contracts is estimated through the Best Estimates of the amounts ceded to reinsurers. These are calculated separately for the Claims Reserve and the Premium Reserve.

The undiscounted Best Estimate of amounts ceded for reinsurance relating to the Claims Reserve (hereafter referred to as UBEL Ceded Claims) has been estimated using the statutory figure and considering a reinsurance ratio (hereafter referred to as RR), using a gross to net approach.

The following formula was used for the claims reserve for proportional treaties:

$$\left\{ \begin{array}{l} \text{UBEL Ceduto Sinistri} = (\text{Ceduto Civilistico Riserva Sinistri} * \text{RR}) \\ \text{RR} = \frac{\text{UBEL Riserva Sinistri Lordo Riassicurazione}}{\text{Riserva Sinistri Civilistica Lordo Riassicurazione}} \end{array} \right.$$

For the claims reserve relating to non-proportional treaties, the UBEL Ceded Claims have been determined on a case-by-case basis, as explained below.

The UBEL for each ceded claim is determined using the same company procedures that calculate the individual statutory reserve ceded, but using a different cost:

- in the statutory approach, the case reserve is used;
- in the Best Estimate approach, the UBEL reserve of the individual claim is used.

The UBEL cost per claim is determined by applying the following formula:

$$\left\{ \begin{array}{l} \text{UBEL Costo Sinistro} = \text{Pagato} + (\text{Riserva Civilistica} * \text{RR}) \\ \text{RR} = \frac{\text{UBEL Riserva Sinistri Lordo Riassicurazione}}{\text{Riserva Sinistri Civilistica Lordo Riassicurazione}} \end{array} \right.$$

The following elements were considered for the premium reserve: premium fractions (UPR), future premiums (FP) and lapses (Lapse).

For each of the three metrics, a reinsurance ratio has been determined, which is equal to the ratio of the undiscounted Best Estimate figure before reinsurance to the statutory figure before reinsurance. The following ratios were calculated in this way: RR UPR, RR FP and RR Lapse.

By applying these ratios to the statutory data of the amount ceded for reinsurance we obtain the value of the UBEL Ceded for the premium reserve.

The Best Estimate of amounts ceded for reinsurance (claims reserve and premium reserve) is determined net of the adjustment for counterparty default.

The Cash Flow of the Best Estimate of amounts ceded for reinsurance follows the logic explained above for the Best Estimate of the claims reserve and the premium reserve.

D.3 OTHER LIABILITIES

The purpose of this section is to specify additional liabilities on the solvency report which together with the best estimate of technical provisions, contribute to the total liabilities item.

Intesa Sanpaolo Vita Insurance Group

Provisions other than technical provisions

This item refers to the provisions for risks and charges, and the provision for taxes.

There are no differences between the valuations referring to the consolidated IFRS accounts and the Solvency II value, as the valuation models are fully aligned. Any differences should be recognised exclusively where:

- a company has a current obligation deriving from past events;
- it is probable that funds will need to be used to liquidate the obligation;
- it is possible to make a reliable estimate of the amount of the obligation.

The data for the Insurance Group is given below:

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Provisions other than technical provisions	126,179	208,371	-82,192

The amount of 208,371 thousand euro relating to the IAS / IFRS financial statements includes a provision for risks and charges relating to probable risks inherent in a non-life insurance contract which, in the Solvency context, was considered in the prospective assessment of the BEL and therefore not included in the item "Provisions other than technical provisions".

Pension benefit obligations

This item includes the liabilities for post-employment benefits, length of service bonuses and medical care benefits paid to directors and their families after the termination of a contract of employment.

In the context of Solvency II, considering the complexity deriving from the use of valuation rules based on actuarial scenarios in order to estimate the discounted value of the benefits accruing to the employee for services rendered, IAS 19 is applied but without the corridor approach, to prevent companies from obtaining results that differ depending on the rules chosen for the recognition of actuarial gains and losses. The International accounting standard was applied to the post-employment benefits, length of service bonuses and medical care for directors.

The data for the Insurance Group is given below:

	(euro thousands) Solvency II value
Pension benefit obligations	18,772

Deferred tax liabilities

In relation to the numerical and methodological findings concerning deferred tax liabilities, refer to the contents of section D.1 (Deferred tax assets) for each company.

Deposits from reinsurers

The valuation, which recognises the nominal value, does not result in any differences between the value recognised in the annual financial statements and the value for solvency purposes. It relates only to the company Intesa Sanpaolo Assicura.

	(euro thousands) Solvency II value
Deposits from reinsurers	11,703

Financial liabilities

This category consists of:

- Derivatives
- Debts owed to credit institutions.

Financial derivatives are only used in order to reduce the investment risk and to achieve an efficient management of the securities portfolio, with the exclusion of purely speculative aims. Hedging derivatives contracts are valued in line with the hedged assets and liabilities.

According to the Solvency II regulations, derivatives have to be valued at market value according to the valuation methods contained in section D.1 of this Report. With regard to the item "Payables to credit institutions", the Solvency II framework prescribes that they are valued in line with IFRS/IAS, on condition that these standards include valuation methods that are consistent with the valuation approach contained in Article 75 of European Directive 138/2009. The valuation takes place without any adjustment to take account of the change in the company's credit rating after the initial recognition.

As can be seen from the table below, for these items the application of the Solvency Report valuation methods does not create any differences compared to the valuation done according to the IFRS.

The data for the Insurance Group is given below:

	(euro thousands)
	Solvency II value
Derivatives	125,604
Debts owed to credit institutions	385

Other liabilities

This category consists of the following items:

- insurance and intermediaries payables;
- Reinsurance payables;
- Payables (trade, non-insurance);
- Any other liabilities not elsewhere shown.

The valuation criteria used for the items in question on the consolidated accounts prepared according to IAS are consistent with the Solvency II framework for the group and for the individual companies.

The item "Insurance and intermediaries payables" consists of payables to in policyholders, insurance brokers, from relations with the sales network represented by the banks that retail the insurance policies, and to insurance companies, referring to the amounts due on the coinsurance accounts. The difference relating to this item, of 301 million euro is due to the cancellation of the "Deferred Income Liabilities" of Intesa Sanpaolo Life, which is valued at zero in the Solvency Report as its measurement is included in the estimate of the technical provisions of the related contracts.

The "Reinsurance payables" are composed of the balance of technical accounts of transfers to the reinsurers.

The item "Payables, trade non-insurance" includes amounts payable to employees, suppliers, public bodies and other counterparties which do not relate to the insurance business.

Finally, the item "Other liabilities not reported elsewhere" includes all the liabilities not included in the other items of the balance sheet detailed below. It should be noted that, with respect to the consolidated financial statements, the liability for deferred profits (DIR) relating to investment contracts for 320 million euros was reversed in the solvency balance sheet.

	(euro thousands)
	Solvency II value
Insurance & intermediaries payables	1,430,162
Reinsurance payables	56,992
Payables (trade, not insurance)	1,047,817
Any other liabilities, not elsewhere shown	1,190,379

Subordinated liabilities

This category consists of the subordinated liabilities issued by Intesa Sanpaolo Vita and by Fideuram Vita, the amount of which is partially recognised under own funds.

When valuing the subordinated liabilities the individual and group companies use methods of determining the value of which those liabilities can be transferred or settled between informed, consenting parties in an operation carried out at normal market conditions without considering any adjustments that will take into account changes in the credit rating of the company after initial recognition.

With regard to the valuation for the purposes of the consolidated financial accounts, the subordinated liabilities are entered at the amortised cost.

Due to the different valuation approach in the two systems, the Insurance Group has recorded a difference of 21,930 thousand euro.

	(euro thousands)		
	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Subordinated liabilities	2,242,006	2,220,077	21,930

Intesa Sanpaolo Vita S.p.A.

Provisions other than technical provisions

In the statutory context, provisions for risks and charges are intended to cover year-end losses or liabilities whose nature is known, certain or probable, and whose amount or date is indeterminate. Provisions for risks and charges may not be used to correct the values of the asset items. When valuing these items, the company takes into consideration the general principles of financial reporting with particular regard to the principles of matching and conservatism.

	(euro thousands)		
	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Provisions other than technical provisions	14,740	14,740	-

Pension benefit obligations

According to the statutory rules on financial reporting, the length of service bonuses contained in the item "Severance pay" are determined in accordance with Article 2120 of the Civil Code and the current national and supplementary contracts in force on the reporting date applicable to each case, and considering all forms of ongoing remuneration.

The Solvency valuation from the application of IAS 19, has generated a revaluation of liabilities of 5,147 thousand euro.

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Pension benefit obligations	8,173	3,026	5,147

Deposits from reinsurers

The valuation, which recognises the nominal value, does not result in any differences between the value recognised in the annual financial statements and the value for solvency purposes.

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Deposits from reinsurers	11,021	11,021	-

Financial liabilities

Regarding the derivatives, the revaluation according to fair value results in a difference of approximately 38,662 thousand euro compared to the statutory figure.

No differences in the valuation of payables to banks were recorded.

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Derivatives	125,604	164,265	-38,662
Debts owed to credit institutions	385	385	-

Other liabilities

Other liabilities recognised in the solvency accounts are set out below by nature:

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Insurance & intermediaries payables	960,070	960,070	-
Reinsurance payables	1,328	1,328	-
Payables (trade, not insurance)	898,414	898,592	-178
Any other liabilities, not elsewhere shown	658,098	658,098	-

In particular, the item All other liabilities not reported elsewhere, amounting to 658,098 thousand euro, consists mainly of the balance of insurance suspense accounts.

Subordinated liabilities

The subordinated liabilities equal to 2,091 million euro according to the solvency valuation refer to a series of subordinated loans issued by the Company in various batches from 1999 onwards, through to the final batch which was issued in December 2020, with a nominal value of 600 million and a duration of 10 years. In the classification of own funds this loan is classified as Tier 2.

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Subordinated liabilities	2,091,190	2,083,336	7,854

Below is a summary of the company's main subordinated loans:

- Non-convertible subordinated bond with indeterminate maturity, to be called in on expiry of the 10th year, issued on 17/12/2014 with a nominal value of 750 million euro (ISIN: XS1156024116);
- Non-convertible subordinated bond of a 10-year duration issued on 21/7/2017 for 600 million euro, agreed with Intesa Sanpaolo and transferred to Mediobanca.
- A non-convertible subordinated bond of 10-year duration issued on 17/12/2020 for 600 million euro (SIN: XS2262806933).

Intesa Sanpaolo Assicura S.p.A.

Provisions other than technical provisions

This item amounted to 2,459 thousand euro and refers to a provision for extraordinary personnel expenses.

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Provisions other than technical provisions	2,459	2,459	-

Pension benefit obligations

The Solvency valuation from the application of IAS 19, has generated a revaluation of liabilities of 1,089 thousand euro.

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Pension benefit obligations	1,613	524	1,089

(euro thousands)

Financial liabilities

The company has not recorded any liability in relation to this item in its Financial Statements.

Subordinated liabilities

The company has not issued subordinated liabilities.

Other liabilities

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Insurance & intermediaries payables	30.290	30.290	-
Reinsurance payables	34.485	34.485	-
Payables (trade, not insurance)	111.500	111.526	-26
Any other liabilities, not elsewhere shown	62.691	62.691	-

(euro thousands)

Fideuram Vita S.p.A.

Provisions other than technical provisions

The changes are due to the reversal of the residual value of a provision for risks entered in the financial statements prepared according to the National accounting standards, as the conditions of IAS 37 did not exist.

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Provisions other than technical provisions	5,675	6,172	-497

(euro thousands)

Pension benefit obligations

The Solvency Report valuation from the application of IAS 19, has generated a revaluation of liabilities of 2,277 thousand euro.

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Pension benefit obligations	3,920	1,643	2,277

(euro thousands)

Financial liabilities

The company has not recorded any liability in relation to this item in its Financial Statements.

Other liabilities

For Fideuram Vita S.p.A. the only difference relates to the fair value adjustment of a debt pertaining to a bonus scheme for risk-takers, with a marginal value.

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Insurance & intermediaries payables	250,008	250,008	-
Reinsurance payables	-	-	-
Payables (trade, not insurance)	22,080	22,080	-
Any other liabilities, not elsewhere shown	246,016	246,011	5

(euro thousands)

Subordinated liabilities

The subordinated liabilities of 150.8 million relate to a subordinated loan granted on 18 December 2017 by Intesa Sanpaolo, expiring on 18 December 2027, with a fixed annual nominal rate of 2.8%. The loan provides for the company, after authorisation from the supervisory body, to make an early repayment of all or part of it, starting from the end of the fifth year, or after each interest payment date. Based on the subordination conditions alone, the loan refers to the provisions of Article 44 and 45 of Legislative Decree 209/2005. Therefore, if the Company is liquidated, that loan would have a lower ranking compared to the claims of all the other creditors and would only be reimbursed after all the other debts in existence on the liquidation date have been paid, but with a preference ahead of the Company's shareholders. The subordinated loan was considered appropriate for the purposes of inclusion in the own funds to cover the solvency requirement (Article 45A of the Code, and the minimum capital requirement, Article 47A of the Code).

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Subordinated liabilities	150,816	145,133	5,683

(euro thousands)

Intesa Sanpaolo Life D.A.C.

Provisions other than technical provisions

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Provisions other than technical provisions	1,877	1,877	-

(euro thousands)

The items is compose of legal cases provision.

Pension benefit obligations

The company has not recorded any liability in relation to this item in its Financial Statements.

Financial liabilities

The company has not recorded any liability in relation to this item in its Financial Statements.

Other liabilities

The difference relating to the item "Insurance and intermediaries payables", of approximately 299 million euro is due to the cancellation of the "Deferred Income Liabilities", which is valued at zero in the Solvency Report as its measurement is included in the estimate of the technical provisions of the related contracts.

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Insurance & intermediaries payables	169,070	468,424	-299,354
Reinsurance payables	12	12	-
Payables (trade, not insurance)	10,479	10,479	-
Any other liabilities, not elsewhere shown	203,530	188,893	14,637

(euro thousands)

Subordinated liabilities

There are no subordinated liabilities for Intesa Sanpaolo Life.

Intesa Sanpaolo RBM Salute S.p.A.

Provisions other than technical provisions

The company has not recorded any liability in relation to this item in its Financial Statements.

Pension obligations

This item includes the liabilities for post-employment benefits.

(euro thousands)			
	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Pension benefit obligations	888	294	594

Financial liabilities

The company has not recorded any liability in relation to this item in its Financial Statements.

Other liabilities

(euro thousands)			
	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Insurance & intermediaries payables	10,746	10,746	-
Reinsurance payables	20,460	20,460	-
Payables (trade, not insurance)	15,753	13,096	2,657
Any other liabilities, not elsewhere shown	2,281	2,281	-

Subordinate liabilities

The company has not issued subordinated liabilities.

Cargeas Assicurazioni S.p.A.

Provisions other than technical provisions

(euro thousands)			
	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Provisions other than technical provisions	7,032	7,032	-

Pension benefit obligations

The Solvency valuation from the application of IAS 19, has generated a revaluation of liabilities of 3,311 thousand euro.

(euro thousands)			
	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Pension benefit obligations	4,178	867	3,311

Financial liabilities

The company has not recorded any liability in relation to this item in its Financial Statements, except for the liability arising from the right of use under IFRS 16.

Subordinated liabilities

The company has not issued subordinated liabilities.

Other liabilities

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Insurance & intermediaries payables	9,979	9,979	-
Reinsurance payables	707	707	-
Payables (trade, not insurance)	17,671	17,671	-
Any other liabilities, not elsewhere shown	17,763	17,763	-

D.4 ALTERNATIVE VALUATION METHODS

Intesa Sanpaolo Vita Insurance Group

The Intesa Sanpaolo Group regulates and formalises the measurement of the fair value of the financial instruments through the "Group Fair Value Policy" which is prepared by the Financial and Market Risks Division and which applies to the parent company and all the subsidiaries in the consolidation perimeter.

The Insurance Group companies have outsourced the pricing of the bonds to the parent company Intesa Sanpaolo, which carries out its valuations in accordance with the Fair Value Policy.

The existence of official prices on an active market is the best evidence of their value. these quotes therefore represent the prices to use on a priority basis to measure the financial assets and liabilities in the trading portfolio. If there is no active market, fair value is calculated by using measurement techniques that establish, as a final analyses, what price the product would have at the measurement date, in open trading driven by normal commercial considerations. These techniques include:

- the reference to market values indirectly linked to the instrument to be valued, deduced from products with a similar risk profile;
- valuations made by using, entirely or partially, input not taken from market-observable parameters, for which recourse is made to estimates and assumptions made by the valuer.

The choice between the above-mentioned methods is not optional since they have to be applied on a hierarchical basis: if a price expressed on an active market is available, no other measurement approaches can be used.

The use of a valuation technique is intended to estimate the price at which an asset would be sold or a liability would be transferred between market operators on the valuation date under current market conditions. Three widely-used valuation techniques are the market valuation method, the cost method and the income method. Valuation techniques that reflect one or more of these methods are used to obtain the fair value. Although multiple valuation techniques are used to value the fair value, the results have to be assessed by considering the reasonableness of the range of values. A fair value valuation is the most representative value in the range, in those specific circumstances.

If the price of the operation is the fair value at the time of initial recognition, and if a valuation technique based on non-observable input is used to value the fair value subsequently, the input must be calibrated so that at the time of initial recognition, the result of the valuation technique equates to the price of the operation. Calibration ensures that the valuation technique reflects the current market conditions and helps the entity to determine whether the valuation technique needs to be rectified (for example, there may be a characteristic of the asset or liability that is not considered in the valuation technique). After initial recognition, when the fair value is valued using one or more techniques based on non-observable input, the entity needs to ensure that the valuation techniques reflect observable market data (for example the price of a similar asset or liability) on the valuation date.

Without a price from an active market, or if the market is not functioning regularly, i.e. if the market does not have a sufficient number of continuous transactions, bid-ask spread and volatility that is not low enough, the determination of the fair value of the financial instruments is mainly achieved by using valuation techniques designed to establish the price at which, in an ordinary transaction, the asset would be sold or the liability would be transferred among market operators, on the valuation date, under current market conditions. These techniques include:

- The use of market values indirectly linked to the valued instrument, derived from policies with a similar risk profile (Level 2);
- Valuations based even partially on input not derived from market-observable parameters for which estimates and assumptions from the valuer are used (Level 3).

For Level 2 input, the valuation is not based on prices of the valued instrument, but on prices or spreads taken from the official prices of instruments that are essentially similar in terms of risk factors, using a given calculation method (pricing model). The use of this approach requires a search for transactions on active markets, relating to instruments which in terms of risk factors are comparable with the valued instrument. The Level 2 calculation methods reproduce the prices of financial instruments listed on active markets (calibration of the model) without including discretionary parameters - i.e. parameters whose value cannot be deduced from the prices of financial instruments on active markets or cannot be set at levels that replicate prices on active markets - which have a decisive influence on the final valuation.

They are valued using models based on Level 2 input:

- Bonds with no official prices on an active market whose fair value is determined by using an appropriate credit spread, identified on the basis of liquid financial instruments with a similar profile;
- Derivatives, if they are valued using appropriate pricing models derived from market-observable input parameters such as rate, currency and volatility curves;
- ABS for which there are no significant prices and whose fair value is determined by using valuation techniques that take into account parameters that can be deduced from the market;
- Equities valued by recourse to direct transactions, or significant transactions on the stock during a period of time considered sufficiently brief compared to the time of valuation, and under constant market conditions, for which "relative" multiplier-based valuation models are used.

To determine the fair value of certain types of financial instrument, valuation models that require the use of parameters not observable on the market need to be used, thus requiring estimates

and assumptions by the valuer (Level 3). The financial instrument is valued by using a calculation methodology based on specific assumptions regarding:

- The trend in future cash flows which may be influenced by future events, to which probability can be attributed on the basis of past experience or behavioural assumptions;
- the level of certain parameters in input not available from active markets, for which the information acquired from market-observed prices and spreads is generally preferred. If this information is not available, historic data for the underlying risk factor will be used, or alternatively specialised research such as reports by rating agencies or leading market players).

The following items are valued with a mark-to-model approach:

- debt securities and complex derivatives within the perimeter of structured credit instruments and tranche-linked derivatives;
- hedge funds not considered in Level 1;
- ownership interests and other capital securities valued using models based on discounted cash flows.

In relation to bonds, the pricing of non-contributed securities (those with no official prices on an active market which are classified at fair value level 2 or 3) whose fair value is determined by using an appropriate credit spread, identified on the basis of liquid financial instruments with a similar profile. This measurement is drawn from the following sources:

- contributed liquid securities from the same issuer;
- credit default swaps on the same reference entity;
- contributed liquid securities from an issuer with the same rating belonging to the same sector.

In any case, attention is paid to the different seniority of the security to be priced in relation to the issuer's debt structure.

For Italian public issuers, a rating/duration grid is drawn up, based on the spread levels of the government issues. Differentials are then applied, between the various rating/duration classes compared to public issues (regional, provincial and municipal authorities, and government bodies).

Similarly, for financial liabilities valued at fair value, in order to determine and measure the credit spread of the Intesa Sanpaolo Group, reference is made to bonds issued by the Parent Company with regular coupons, maturity beyond 1 year and listed on an active market in accordance with IAS/IFRS. The market prices are used to obtain the implied credit rating which is then perfected using interpolation models. These generate credit spread curves that are differentiated according to the type of coupon, maturity and subordination level.

In the case of bonds not listed on active markets, in order to take into account the higher premium required from the market in respect of a similar bond, an additional component is added to the fair credit spread, estimated on the basis of the market bid/ask spread.

If there is an embedded option, there is a further adjustment to the spread by adding a component intended to include the structure's hedging costs and the illiquidity of the underlying assets. This component is determined on the basis of the type of option and the maturity.

Intesa Sanpaolo Vita S.p.A.

See above, in relation to the Insurance Group.

Intesa Sanpaolo Assicura S.p.A.

See above, in relation to the Insurance Group.

Fideuram Vita S.p.A.

See above, in relation to the Insurance Group.

Intesa Sanpaolo Life D.A.C.

See above, in relation to the Insurance Group.

Intesa Sanpaolo RBM Salute S.p.A.

See above, in relation to the Insurance Group.

Cargeas Assicurazioni S.p.A.

See above, in relation to the Insurance Group.

D.5 OTHER INFORMATION

Intesa Sanpaolo Vita Insurance Group

The Group considers that it has covered all the information relevant for the purposes of this document, in sections D.1 to D.4.

E. CAPITAL MANAGEMENT

With reference to the QRT S.23.01 annexed to this Report, a list is given of the items in the own funds, and the solvency value and minimum solvency value required by regulations, with an emphasis on the main characteristics of each item.

E.1 OWN FUNDS

This section focuses on a representation of the insurance group's solvency position, and that of individual Companies. The solvency position is represented by the ratio between the own funds and SCR of the Group or companies.

Specifically, in relation to own funds, issues relating to the various components of the solvency position are explored and analysed. In particular:

- Items within the capital availability and related tiering;
- The reconciliation between own funds and shareholders' equity in the financial statements;
- An analysis of the changes in own funds.

The issue of Solvency Capital Requirement and Minimum Capital Requirement is also dealt with, investigating issues relating to the various types of risk that make up this amount, and the main features of the standard formula used by the group companies.

Intesa Sanpaolo Vita Insurance Group

E.1.1 Structure, amount and quality of own funds

The own funds, in the context of the Solvency II framework, are important asset items that can be used to absorb the losses resulting from the occurrence of risks facing the Insurance Group. They are equal to the sum of the basic own funds and the ancillary own funds as defined in Articles 88 and 89 of the Directive.

The capital requirement is valued by taking into consideration the risk tolerance threshold identified with a forward-looking valuation of risks and solvency (RAF- Risk appetite framework) and by following the ORSA (Own Risk and Solvency Assessment) principles, as well as a strategic planning of the Insurance Group defined for each Company.

The capital management policy, in compliance with the regulatory restraints and compatibly with maintaining the solvency of the Insurance Group, aims at supporting the growth of the Group and the companies and meeting the shareholders' yield expectations, while maintaining a balanced composition of the own funds.

Through the capital management process, it is possible:

- to monitor the capital position, periodically ensuring compliance with the RAF limits and consistency with the business strategy suggesting changes to the own risk profile;

-
- to provide the bases for the activities relating to strategic planning through the assessment of capital adequacy;
 - to determine the amount of dividends to shareholders;
 - to guide the capital-raising activities and select the most adequate instrument;
 - to ensure the availability of capital in qualitative terms, the relevant tier and ability to cover losses;
 - to optimise the risk/yield balance of the business, maintaining the regulatory capital levels in compliance with regulatory provisions and the Risk Appetite of the Company, and the target capital levels in line with management limits;
 - to contribute to determining the commercial strategies considering a new capital absorption and value creation strategy;
 - to assess the impacts of new products in terms of current and forward-looking capital.

At individual Company and Insurance Group level, the Eligible Own Funds are determined following the regulatory provisions of Solvency II through a process consisting of several phases:

- determining the Excess of Assets Over Liabilities in a consistent market context;
- including any subordinated loans;
- tiering and quantitative limits for the eligibility of Funds.

As regards the potential limitations in the Own Funds' use, the appropriate assessments are carried out on the basis of the nature of the fund, the capital components and the legal and regulatory operational context.

At 31 December 2021 the total basic "eligible" own funds amounted to 10,160 million euro, up by 1,311 million euro compared to the previous year.

The main components of the own funds are:

- share capital of 678 million euro;
- share premium reserve of 1,328 million euro;
- reconciliation reserve of 5,946 million euro;
- subordinated loans of 2,242 million euro;
- minority interest of -34 million euro.

Certain securities known as "Encumbrances" that are subject to restrictions are excluded from the calculation of own funds, amounting to 107,314 thousand euro, in accordance with the provisions of Article 71 (1)(o) of the Delegated Regulation.

The solvency indicators relating to the value of the group SCR and the group MSR for 2021 were 259% and 435%, respectively.

With regard to the quality of the own funds, indicated by the tiering of each item, 78% of the eligible own funds are classified in the highest most reliable level (Tiering 1 unrestricted) while 8% is classified in the medium level (Tiering 1 restricted), which relates to a particular category of subordinated loans with no maturity. The remaining 14% is classified in Tier 2 as the result of another portion of subordinated loans with maturity. The share capital, share premium reserve and the reconciliation reserves are fully available to absorb potential losses (Tiering 1 unrestricted).

In relation to the subordinated loans we can conclude that the following items were recognised in the Solvency Reports of the individual Companies at 31 December 2021:

- 10 loans with indeterminate maturity granted by the Parent Company Intesa Sanpaolo and Cassa di Risparmio di Firenze to the value of 18,814 thousand euro;
- 1 subordinated bond on the Luxembourg market, the nominal value of which is 750,000 thousand euro, while the Solvency II value is 772,141 thousand euro;
- 2 loans with fixed maturity, the first granted by the Parent Company Intesa Sanpaolo to the value of 634,510 thousand euro and transferred to Mediobanca; the second issued in December 2021 for a nominal amount of 600 million, and whose value is equal to 573,258 thousand euro;
- 1 bond relating to the Company Fideuram Vita granted by Intesa Sanpaolo on 18 December 2017 maturing in 2027 for a nominal value of 145 million euro with an option for full or partial reimbursement from 18 December 2022 after authorisation by the regulator, while the solvency value is equal to 158,816 thousand euro.
- 6 loans with indefinite maturity and 2 loans with fixed maturity, arising from the acquisition of Compagnia Assicurazioni Vita to the value of 90,306 thousand euro;

Basic own funds

Below there are the components of the basic own funds that make up the own funds of the Insurance Group:

- The ordinary share capital and share premium reserves;
- Surplus of assets over liabilities;
- The subordinated liabilities valued in accordance with the Solvency II framework to the extent that they meet all the requirements for eligibility.
- The minority interest referred to the company RBM Salute.

(euro thousands)

Basic Own Funds	2021	Tiering 2021				2020	Tiering 2020			
		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	677,869	677,869	-	-	-	738,950	738,950	-	-	-
Share premium related to ordinary share capital	1,328,097	1,328,097	-	-	-	1,328,097	1,328,097	-	-	-
Reconciliation reserve	5,945,821	5,945,821	-	-	-	4,700,145	4,700,145	-	-	-
Subordinated liabilities	2,242,006	-	792,845	1,449,162	-	2,216,862	-	807,609	1,409,254	-
Non-available minority interests at group level	-34,218	-34,218	-	-	-	-135,320	-135,320	-	-	-
Total amount	10,159,576	7,917,570	792,845	1,449,162	-	8,848,734	6,631,872	807,609	1,409,254	-

At year end 2021, there was an increase in Own Funds of 1,311 thousand euro, up 15% from the previous year; of these, 1,246 million euro are attributable to the increase in the reconciliation reserve, -61 million euro are related to the decrease in share capital and the remaining portion to the increase in subordinated liabilities for 25 million euro and to the decrease in the unavailable minority portion pertaining to RBM Salute at group level, for 101 million euro.

78.0% of the own funds are classified as Tier 1 unrestricted.

Below is the amount of own funds eligible to cover the SCR and MCR, classified by levels.

(euro thousands)

Eligible Own Funds	Tiering 2021					Tiering 2020				
	2021	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3	2020	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	677,869	677,869	-	-	-	738,950	738,950	-	-	-
Share premium related to ordinary share capital	1,328,097	1,328,097	-	-	-	1,328,097	1,328,097	-	-	-
Reconciliation reserve	5,945,821	5,945,821	-	-	-	4,700,145	4,700,145	-	-	-
Subordinated liabilities	1,212,325	-	792,845	419,480	-	1,240,323	-	807,609	432,715	-
Non-available minority interests at group level	-34,218	-34,218	-	-	-	-135,320	-135,320	-	-	-
Total amount	9,129,895	7,917,570	792,845	419,480	-	7,872,196	6,631,873	807,609	432,715	-

There is a reduction of 16.6% in the total eligible own funds compared to 2020, while 86.5% of the funds are classified as Tier 1 unrestricted.

The item of subordinated liabilities eligible for the Minimum Capital Requirement is lower than the item included in available subordinated liabilities because in the calculation the amounts classified as *Tier 2* are included for up to 20% of the Minimum Capital Requirement as required by Solvency regulations. The amount increases from 432 million euro in 2020 to 419 million euro in 2021.

E.1.2 Differences between the own capital stated in the company's financial statements and the excess assets compared to liabilities calculated for solvency purposes

Please refer to chapter D for the details of the most significant items that contribute to the reconciliation reserve of group equity, such as differences between the amounts recognized in the consolidated financial statements and those included in the Group Balance Sheet. Vice versa, please refer to the following paragraphs, relating to the individual Group companies, where a reconciliation is reported between the Shareholders' Equity of each drawn up in accordance with the provisions of ISVAP Regulation no. 22/2008 (and subsequent amendments and additions) and the excess of assets over liabilities calculated on the basis of the provisions of art. 75 and section 2 of Chapter IV of the Directive, as well as with total own funds, as defined in section 3 of Chapter IV of the Directive

E.1.3 Transitional provisions

Within the Group, Intesa Sanpaolo Vita and Fideuram Vita, adopting the "grandfathering" principle (as indicated in the Delegated Regulation of 2015, no. 35), divided subordinated loans between Tier 1-restricted (the loans described above in a. and b.), and Tier 2.

E.1.4 Ancillary own funds

No Group Company has requested authorisation for the use of ancillary own funds.

Intesa Sanpaolo Vita S.p.A.

E.1.1 Structure, amount and quality of own funds

Basic own funds

The Company Intesa Sanpaolo Vita holds 82.2% of the share capital of the items in the own funds of the Insurance Group, 100% of the share premium reserve. The Company also holds 93% of subordinated liabilities in relation to the Insurance Group.

Below is an illustration of the Company's own funds:

Basic Own Funds	2021	Tiering 2021				2020	Tiering 2020			
		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	320,423	320,423	-	-	-	320,423	320,423	-	-	-
Share premium related to ordinary share capital	1,328,097	1,328,097	-	-	-	1,328,097	1,328,097	-	-	-
Reconciliation reserve	4,929,745	4,929,745	-	-	-	3,700,586	3,700,586	-	-	-
Subordinated liabilities	2,091,190	-	792,845	1,298,345	-	2,060,636	-	807,609	1,253,027	-
Total amount	8,669,455	6,578,265	792,845	1,298,345	-	7,409,741	5,349,106	807,609	1,253,027	-

(euro thousands)

According to Own Funds Regulations, the ordinary shares of the Company have the following characteristics:

- They are issued directly by the company with a resolution of its shareholders or by the management board (as permitted by national regulations);
- They give the bearer the right to draw on the residual assets after the company has been liquidated, in proportion to the securities held, without fixed amounts or caps.

Based on these considerations, they are considered to be Tier 1 Unrestricted together with the issue premium.

The reconciliation reserve was also fully considered in Tier 1 Unrestricted in accordance with the provisions of Delegated Regulation No. 35/2015.

The subordinated loans were classified in accordance with the contents of section E.1.3.

The Company has not included in its own funds any element that requires prior approval by the national regulator.

The reconciliation reserve consists of the net equity reserves not included in the items relating to share capital and share premium reserves and includes also the sum of the valuation differences emerging from the valuation principles adopted for the statutory financial statements and those applied for the purposes of the solvency report. The result corresponds to the total surplus assets compared to liabilities net of the asset items already contained in the financial statements valued using the national accounting standards, less the value of shares, dividends in distribution and the basic own funds with the exclusion of the subordinated liabilities.

In essence the reconciliation reserve represents the difference between the NAV (net asset value = value of assets – value of liabilities) of the Solvency Report, based on the market value of assets and liabilities (market values for assets and best estimate for liabilities) and the NAV of the statutory accounts, which is characterised by the “at cost” valuation of the various items (more specifically, the lower of the “cost” and “market” with regard to the assets).

The reconciliation reserve is the most volatile component of the available own funds, as its value depends directly on the dynamics on the financial markets and the impact that those dynamics have on the Company's assets portfolio which are not offset by similar effects on the liabilities side

both because of the different discount curve used and also because of the guarantees and options available to policyholders, which lead to an imbalance in behaviour, with regard to the former.

The Company's Asset Allocation strategy is therefore important. This is the degree of diversification of portfolios among the various classes of the investable universe, and the market risks to which each portfolio is subject, based on the various guarantees of return on capital offered to the policyholders and their behaviour in terms of exercising their options (early surrender and/or additional payments).

The reconciliation reserve calculated according to the Solvency II principles amounts to 4,929,745 thousand euro and comprises:

- Annual profits net of dividends distributed in March 2021 of 904,117 thousand euro, and profits carried forward of 134,449 thousand euro;
- Legal reserves: 64,085 thousand euro;
- Other Statutory reserves: 929,270 thousand euro;
- Other reserves: 491,275 thousand euro;
- Differences in valuation between the principles of the statutory accounts and those of Solvency II: 3,539,064 thousand euro.

With regard to the subordinated loans, below are details of the main loans in the solvency report of Intesa Sanpaolo Vita:

- a non-convertible subordinated bond with indeterminate maturity, to be called in on expiry of the 10th year, issued on 17/12/2014 with a nominal value of 750 million euro: a solvency value at 31/12/2020 equal to 787 million euro;
- a non-convertible subordinated bond of 10-year duration issued on 21/7/2017 for 600 million euro: a solvency value at 31/12/2020 equal to 655 million euro;
- A subordinated loan issued in December 2020 for a nominal amount of 600 million euro, and whose value is equal to 597 million euro.

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Below is the amount of own funds eligible to cover the SCR and MCR, classified by levels.

Eligible Own Funds	2021	Tiering 2021				2020	Tiering 2020			
		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	320,423	320,423	-	-	-	320,423	320,423	-	-	-
Share premium related to ordinary share capital	1,328,097	1,328,097	-	-	-	1,328,097	1,328,097	-	-	-
Reconciliation reserve	4,929,745	4,929,745	-	-	-	3,700,586	3,700,586	-	-	-
Subordinated liabilities	1,064,828	-	792,845	271,983	-	1,117,696	-	807,609	310,087	-
Total amount	7,643,093	6,578,265	792,845	271,983	-	6,466,802	5,349,106	807,609	310,087	-

The item of subordinated liabilities eligible for the Minimum Capital Requirement is lower than the item included in available subordinated liabilities because in the calculation the amounts classified as Tier 2 are included for up to 20% of the Minimum Capital Requirement as required by Solvency regulations. The amount increases from 1,118 million euro in 2020 to 1,064 million euro in 2021.

E.1.2 Differences between the own capital stated in the company's financial statements and the excess assets compared to liabilities calculated for solvency purposes

From a comparison with 2020 it can be seen there is an increase of 17% on the total own funds. Encumbrances decreased by -23 million euro, and the dividend coupon for the parent company was 904 thousand euro. The assets are further consolidated by the 39% increase in the reconciliation reserve.

	2021	2020	Change	(euro thousands) %
Equity- Statutory	3,999,297	3,143,463	855,834	27.2%
Adjustment on assets	12,729,848	13,906,342	-1,176,494	-8.5%
Goodwill and other intangible assets	-26,229	-20,026	-6,203	31.0%
Properties and plants	5,120	5909	790	-
Holdings in financial and credit institutions	-	-	-	-
Holdings in other entities	1,618,088	1,939,240	-321,152	-16.6%
Financial instruments	8,932,062	9,208,750	-276,688	-3.0%
Deferred tax assets	2,200,807	2,772,916	-572,109	-20.6%
Reinsurance receivables	-	-447	447	>100%
Adjustment on technical provisions	-6,007,687	-8,162,328	2,154,641	-26.4%
Life technical provisions	-7,056,227	-8,918,006	1,861,779	-20.9%
Life technical provisions - Index linked and unit- linked	1,048,531	755,666	292,865	38.8%
Other technical provisions	9	13	-2	-19.6%
Adjustment on other liabilities	-3,132,447	-3,165,910	33,463	-1.1%
Deferred tax liabilities	-3,108,932	-3,098,757	-10,175	0.3%
Financial liabilities	38,662	8,352	30,310	>100%
Pension benefit obligations	-5,147	-4,017	-1,130	28.1%
Other adjustments	-57,030	-71,488	14,458	-20.2%
Reconciliation reserve	3,589,714	2,578,104	1,011,610	39.2%
Subordinated liabilities includes in Basic Own Funds	2,091,190	2,060,636	30,554	1.5%
Dividend	-904,117	-242,408	-661,709	>100%
Encumbrances	-106,628	-130,053	23,424	-18.0%
Total Own Funds	8,669,455	7,409,741	1,259,714	17.0%

E.1.3 Transitional provisions

Subordinate liabilities

According to Delegated Regulation no. 35/2015 the subordinated loans entered in the Financial Statements of Intesa Sanpaolo Vita at 31 December 2021 considered for Solvency II purposes are as follows:

- **10 loans with indeterminate maturity** granted by the Parent Company Intesa Sanpaolo and Cassa di Risparmio di Firenze to the value of 33,747 thousand euro (Individual accounts prepared according to Italian accounting standards and Solvency II);
- **1 subordinated bond** on the Luxembourg market, the nominal value of which is 750,000 thousand euro, while the Solvency II value is 772,141 thousand euro.
- **1 loan with fixed maturity** granted by the Parent Company Intesa Sanpaolo and transferred to Mediobanca to the value of 600,000 thousand euro for a total of 634,510 thousand euro (Separate Financial Statements prepared according to Italian accounting standards and Solvency II).

- **1 non-convertible subordinated loan issued** in December 2020 for a nominal amount of 600 million euro, and whose value is equal to 573,529 thousand euro;
- **6 loan contracts with indefinite maturity** granted by the former Ubi Banca for 38,494 thousand euro to the companies of the former Ubi Group merged on 31 December 2021.
- **two loan contracts** for a total of 50,000 thousand euro, of which one for 10,000 thousand euro granted by the former Ubi Banca and the remaining 40,000 thousand euro granted by Aviva Italia Holding S.p.A. to Assicurazioni Vita S.p.A., now fully merged as of 31 December 2021.

Intesa Sanpaolo Vita and Fideuram Vita, adopting the "grandfathering" principle (as indicated in the Delegated Regulation of 2015, no. 35), divided subordinated loans between Tier 1–restricted (the loans described above in a. and b.), and Tier 2.

Intesa Sanpaolo Assicura S.p.A.

E.1.1 Structure, amount and quality of own funds

Basic own funds

The basic own funds of Intesa Sanpaolo Assicura include:

- the paid-up ordinary shares;
- the reconciliation reserve.

The essential conditions of the main elements of the company's own funds can be summarised as follows:

- Share capital: at 31 December 2021 the value was equal to 27,912 thousand euro, divided into 27,912,258 ordinary shares each with a nominal value of 1 euro;
- reconciliation reserve: this item is calculated by taking into account the surplus assets over liabilities (of 727,705 thousand euro) net of the share capital.

All the components of own funds are considered in Tier 1.

The Company has not included in its own funds any element that requires prior approval by the national regulator.

Basic Own Funds	Tiering 2021					Tiering 2020				
	2021	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3	2020	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	27,912	27,912	-	-	-	27,912	27,912	-	-	-
Share premium related to ordinary share capital	-	-	-	-	-	-	-	-	-	-
Reconciliation reserve	727,705	727,705	-	-	-	705,923	705,923	-	-	-
Subordinated liabilities	-	-	-	-	-	-	-	-	-	-
Total amount	755,617	755,617	-	-	-	733,835	733,835	-	-	-

The reconciliation reserve amounts to 727,705 thousand euro and comprises:

- Annual profits equal to 182,201 thousand euro, and profits carried forward of 63,478 thousand euro;
- Legal reserves: 6,849 thousand euro;
- Other Statutory reserves: 201,909 thousand euro;
- Other reserves: 26,839 thousand euro;

- Differences in valuation between the principles of the statutory accounts and those of Solvency II: 246,715 thousand euro.

(euro thousands)

Eligible Own Funds	2021	Tiering 2021				2020	Tiering 2020			
		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	27,912	27,912	-	-	-	27,912	27,912	-	-	-
Share premium related to ordinary share capital	-	-	-	-	-	-	-	-	-	-
Reconciliation reserve	727,705	727,705	-	-	-	705,923	705,923	-	-	-
Subordinated liabilities	-	-	-	-	-	-	-	-	-	-
Total amount	755,617	755,617	-	-	-	733,835	733,835	-	-	-

There is an increase of 3.0% of the total eligible own funds compared to 2020.

E.1.2 Differences between the own capital stated in the company's financial statements and the excess assets compared to liabilities calculated for solvency purposes

From a comparison with 2020 it can be seen there is an increase of 3.0% in total own funds and a considerable decrease in Encumbrances of 28.0%. The assets are further strengthened by the increase of 18.8% in the reconciliation reserve.

(euro thousands)

	2021	2020	Change	%
Equity- Statutory	509,199	526,527	-17,328	-3.3%
Adjustment on assets	-11,971	436	-12,407	<100%
Goodwill and other intangible assets	-10,789	-8,674	-2,116	24%
Financial instruments	7,920	16,282	-8,362	>100%
Deferred tax assets	10,935	9,693	1,242	13%
Other adjustments	-20,037	-16,866	-3,171	19%
Adjustment on technical provisions	382,739	313,769	68,971	22.0%
Non- Life technical provisions	201,861	156,408	45,453	29.1%
Riserve tecnica riassicurazione	170,880	147,378	23,501	15.9%
Other technical provisions	9,999	9,983	16	0.2%
Adjustment on other liabilities	-124,053	-106,484	-17,569	16.5%
Deferred tax liabilities	-120,997	-102,690	-18,307	17.8%
Pension benefit obligations	-1,089	-768	-321	41.8%
Other adjustments	-1,967	-3,026	1,059	<100%
Reconciliation reserve	246,715	207,721	38,994	18.8%
Encumbrances	-297	-412	116	-28.0%
Total Own Funds	755,617	733,835	21,782	3.0%

Fideuram Vita S.p.A.

E.1.1 Structure, amount and quality of own funds

Basic own funds

Also for Fideuram Vita, the components of the basic own funds are made up of the surplus of assets over liabilities, the subordinated liabilities and the own shares.

The basic own funds of Fideuram Vita include:

- the paid-up ordinary shares;
- the reconciliation reserves;
- the subordinated liabilities paid and valued according to the Solvency II framework.

As part of a capital reinforcement plan the Company may resort to a subordinated loan of 151 million euro expiring in 2027, in compliance with IVASS Regulation no. 25/2016 which implements

the provisions of Delegated Regulation 35/2015 and the Private Insurance Code (CAP), in order to control risks in line with the risk-based approach of European Directive 138 of 2009.

The Company has tiered the various levels of own funds in accordance with Article 44-i CAP.

The Company has not included in its own funds any element that requires prior approval by the national regulator.

The essential conditions of the main elements of the company's own funds can be summarised as follows:

- Share capital: at 31 December 2021 the value was 357,447 thousand euro, attributable entirely to the Life business;
- reconciliation reserve: this item is equal to 852,878 thousand euro and was calculated by taking into account the excess of assets over liabilities (equal to 1,210,713 thousand euro) net of share capital (equal to 357,447 thousand euro) and encumbrances (equal to 388 thousand euro);
- subordinated loans: the total is 150,816 thousand euro, classified entirely in Tier 2.

Below is the amount of own funds eligible to cover the SCR and MCR, classified by levels.

Basic Own Funds	2021	Tier 1 unrestricted	Tiering Tier 1 restricted	2021 Tier 2	Tier 3	2020	Tier 1 unrestricted	Tiering Tier 1 restricted	2020 Tier 2	Tier 3
Ordinary share capital (gross of own shares)	357,447	357,447	-	-	-	357,447	357,447	-	-	-
Reconciliation reserve	852,878	852,878	-	-	-	701,071	701,071	-	-	-
Subordinated liabilities	150,816	-	-	150,816	-	156,227	-	-	156,227	-
Total amount	1,361,141	1,210,324	-	150,816	-	1,214,744	1,058,518	-	156,227	-

The reconciliation reserve at 31 December 2021 totalled 852,878 thousand euro and is formed of the following elements:

- Profits reserve of 75,176 thousand euro;
- Statutory reserves of 33,376 thousand euro;
- Other reserves of 464,893 thousand euro;
- Differences in valuation between the principles used for the statutory accounts and those for the Solvency Report, equal to 279,821 thousand euro;
- Encumbrance, equal to 388 thousand euro.

Below is the amount of own funds eligible to cover the SCR and MCR, classified by levels.

Eligible Own Funds	2021	Tier 1 unrestricted	Tiering Tier 1 restricted	2021 Tier 2	Tier 3	2020	Tier 1 unrestricted	Tiering Tier 1 restricted	2020 Tier 2	Tier 3
Ordinary share capital (gross of own shares)	357,447	357,447	-	-	-	357,447	357,447	-	-	-
Reconciliation reserve	852,878	852,878	-	-	-	701,071	701,071	-	-	-
Subordinated liabilities	44,537	-	-	44,537	-	39,641	-	-	39,641	-
Total amount	1,254,862	1,210,324	-	44,537	-	1,098,159	1,058,518	-	39,641	-

The item of subordinated liabilities eligible for the Minimum Capital Requirement is lower than the item included in available subordinated liabilities because in the calculation the amounts classified as Tier 2 are included for up to 20% of the Minimum Capital Requirement as required by Solvency regulations. The amount increases from 156.2 in 2020 to 150.8 million euro in 2021.

E.1.2 Differences between the own capital stated in the company's financial statements and the excess assets compared to liabilities calculated for solvency purposes

From a comparison with 2020 it can be seen there is an increase of 12.1% on the total own eligible funds.

	2021	2020	Change	(euro thousands) %
Equity- Statutory	930,891	855,104	75,787	8.9%
Adjustment on assets	516,601	837,269	-320,668	-38.3%
Goodwill and other intangible assets	-72,959	-85,692	12,733	-14.9%
Properties and plants	9,762	10,196	-434	-4.3%
Holdings in financial and credit institutions	-	-	-	-
Financial instruments	537,154	765,806	-228,652	-29.9%
Deferred tax assets	43,137	147,211	-104,075	-70.7%
Other assets	-493	-253	-240	94.9%
Adjustment on technical provisions	-50,758	-370,471	319,714	-86.3%
Life technical provisions	-701,112	-983,236	282,124	-28.7%
Life technical provisions - Index linked and unit- linked	650,355	612,765	37,589	6.1%
Adjustment on other liabilities	-186,021	-262,355	76,334	-29.1%
Deferred tax liabilities	-168,646	-239,253	70,607	-29.5%
Financial liabilities	-5,683	-11,093	5,410	-48.8%
Pension benefit obligations	-2,277	-2,209	-68	3.1%
Other adjustments	-9,415	-9,800	384	-3.9%
Reconciliation reserve	279,822	204,442	75,380	36.9%
Subordinated liabilities includes in Basic Own Funds	150,816	156,227	-5,410	-3.5%
Total Basic Own Funds	1,361,529	1,215,773	145,756	12.0%
Encumbrances	-389	-1,028	639	-62.2%
Total Own Funds	1,361,140	1,214,745	146,395	12.1%

Intesa Sanpaolo Life D.A.C.

E.1.1 Structure, amount and quality of own funds

Basic own funds

The components of the basic own funds of Intesa Sanpaolo Life are made up of the surplus of assets over liabilities and by equity reserves. The Company has not issued subordinated liabilities.

The basic own funds of Intesa Sanpaolo Life are all classified as Tier 1, are all eligible for the required solvency capital ratio and include:

- the paid-up ordinary shares;
- the reconciliation reserves;
- the capital contribution.

	2021	Tier 1 unrestricted	Tiering 2021 Tier 1 restricted	Tier 2	Tier 3	2020	Tier 1 unrestricted	Tiering 2020 Tier 1 restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	625	625	-	-	-	625	625	-	-	-
Share premium related to ordinary share capital	10	10	-	-	-	10	10	-	-	-
Reconciliation reserve	1,561,728	1,561,728	-	-	-	1,448,515	1,448,515	-	-	-
Capital contribution	104,444	104,444	-	-	-	104,444	104,444	-	-	-
Total amount	1,666,807	1,666,807	-	-	-	1,553,594	1,553,594	-	-	-

The essential conditions of the main elements of the company's own funds can be summarised as follows:

- Share capital: at 31 December 2021 the value was 625 thousand euro;
- the share premium reserve, with a value of approximately 10 thousand euro;
- the capital reserve of 104,444 thousand euro;
- reconciliation reserve: this item is calculated by taking into account the Excess of Assets over Liabilities (equal to 1,561,728 thousand euro) net of share capital (equal to 625 thousand euro), net of the capital contribution (of 104,444 thousand euro).

The reconciliation reserve is made up as follows:

(euro thousands)		
Reconciliation reserve	2021	2020
Reconciliation at the beginning of the year	1,448,515	1,239,418
IFRS Net Income	193,078	150,090
Adjustment AFS Reserve	-2,416	2,019
Depreciation due tax assets relation to the claims	-	1,428
Adjustment on balance sheet	-8,485	-8,137
Adjustment on the risk margin	31,578	63,881
Dividend	-100,000	-
Other	-542	-184
Reconciliation year to date	1,561,728	1,448,515

Below is the amount of own funds eligible to cover the SCR and MCR, classified by levels. The funds eligible to cover the minimum requirement are all classified as Tier 1 Unrestricted and correspond to the amounts available to cover the solvency requirement.

(euro thousands)										
Eligible Own Funds	2021	Tier 1 unrestricted	Tiering Tier 1 restricted	2021 Tier 2	Tier 3	2020	Tier 1 unrestricted	Tiering Tier 1 restricted	2020 Tier 2	Tier 3
Ordinary share capital (gross of own shares)	625	625	-	-	-	625	625	-	-	-
Share premium related to ordinary share capital	10	10	-	-	-	10	10	-	-	-
Reconciliation reserve	1,561,728	1,561,728	-	-	-	1,448,515	1,448,515	-	-	-
Capital contribution	104,444	104,444	-	-	-	104,444	104,444	-	-	-
Total amount	1,666,807	1,666,807	-	-	-	1,553,594	1,553,594	-	-	-

There is an increase of 15.1% of the total eligible own funds compared to 2020. The Company Intesa Sanpaolo Life has all of its funds classified as Tier 1 unrestricted.

E.1.2 Differences between the own capital stated in the company's financial statements and the excess assets compared to liabilities calculated for solvency purposes

From a comparison with 2020 it can be seen there is an increase of 15.1% on the total own funds. The assets are further strengthened by the increase of 7.8% in the reconciliation reserve.

	2021	2020	Change	%
Equity- Statutory	989,358	899,237	90,120	10.0%
Adjustment on assets	-351,020	-340,582	-10,438	3.1%
Goodwill and other intangible assets	-351,020	-340,582	-10,438	3.1%
Properties and plants	-	-	-	-
Holdings in financial and credit institutions	-	-	-	-
Financial instruments	-	-	-	-
Deferred tax assets	-	-	-	-
Other assets	-	-	-	-
Adjustment on technical provisions	840,531	788,002	52,529	6.7%
Life technical provisions	-	-	-	-
Life technical provisions - Index linked and unit- linked	831,200	781,058	50,142	6.4%
Other technical provisions	9,331	6,944	2,387	34.4%
Adjustment on other liabilities	187,939	206,937	-18,998	-9.2%
Deferred tax liabilities	-96,779	-93,480	-3,299	3.5%
Financial liabilities	-	-	-	-
Pension benefit obligations	-	-	-	-
Insurance and intermediaries payables	299,354	301,001	-1,647	-0.5%
Other adjustments	-14,637	-585	-14,052	2403.0%
Reconciliation reserve	677,450	654,357	23,093	3.5%
Subordinated liabilities includes in Basic Own Funds	-	-	-	-
Total Own Funds	1,666,807	1,553,594	113,214	7.3%

Intesa Sanpaolo RBM Salute S.p.A.

E.1.1 Structure, amount and quality of own funds

Basic own funds

The criteria that the Company has observed to identify aspects of own basic funds, with reference to ordinary level 1 shares and the reconciliation reserve are defined below.

In particular, the Company, in compliance with regulations, considered share capital as own level 1 funds which may be referred to, to absorb losses with a view to the business being a going concern.

In the asset management plan, the Company has not used subordinated loans, at present.

The Company has not included in its own funds any element that requires prior approval by the national regulator.

The essential conditions of the main elements of the company's own funds can be summarised as follows:

- Share capital: at 31 December 2021 the value was equal to 269 million euro, divided into 269,000,000 ordinary shares each with a nominal value of 1 euro;
- reconciliation reserve: this item is calculated by taking into account the surplus assets over liabilities (of 227 million euro) net of the share capital.

(euro thousands)

Basic Own Funds	2021	Tiering 2021				2020	Tiering 2020			
		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	269,000	269,000	-	-	-	160,000	160,000	-	-	-
Share premium related to ordinary share capital	-	-	-	-	-	-	-	-	-	-
Reconciliation reserve	218,217	109,837	-	-	108,380	227,031	227,301	-	-	-
Subordinated liabilities	-	-	-	-	-	-	-	-	-	-
Total amount	487,217	378,837	-	-	108,380	387,031	387,301	-	-	-

Compared to the year 2020, own funds increase by 100.2 million euro including the capital increase in December 2021 of 450 million euro. There was a decrease in the reconciliation reserve equal to 8.8 million euro (-4%), including the statutory loss for the year of 325.7 million euro, due mainly to:

- the increase in the value of assets equal to 388.7 million euro;
- the increase in cash and cash equivalents for 69.5 million euro;
- the increase in DTA for 103.4 million euro;
- the decrease in the net value between receivables and payables to insured and intermediaries for 65.9 million euro;
- the increase in liabilities related to Technical Provisions for 252.7 million euro;
- a decrease in DTL for an amount equal to 8.4 million euro.
- the increase in the net value of assets and liabilities equal to 23.5 million euro;

Below is the amount of own funds eligible to cover the SCR and MCR, classified by levels.

Eligible Own Funds	2021					2020				
		Tier 1 unrestricted	Tiering Tier 1 restricted	Tier 2	Tier 3		Tier 1 unrestricted	Tiering Tier 1 restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	269,000	269,000	-	-	-	160,000	160,000	-	-	-
Share premium related to ordinary share capital	-	-	-	-	-	-	-	-	-	-
Reconciliation reserve	218,217	109,837	-	-	108,380	227,031	227,301	-	-	-
Subordinated liabilities	-	-	-	-	-	-	-	-	-	-
Total amount	487,217	378,837	-	-	108,380	387,031	387,301	-	-	-

(euro thousands)

E.1.2 Differences between the own capital stated in the company's financial statements and the excess assets compared to liabilities calculated for solvency purposes

From a comparison with 2020 it can be seen there is an increase of 25.9% on the total own funds.

	2021	2020	Change	%
Equity- Statutory	492,562	367,892	124,670	33.9%
Adjustment on assets	4,033	1,021	3,012	>100%
Goodwill and other intangible assets	-1,230	-72	-1,158	>100%
Financial instruments	74	339	-265	-78%
Deferred tax assets	1,801	-	1,801	100%
Other adjustments	3,388	754	2,634	>100%
Adjustment on technical provisions	-4,527	26,537	-31,064	<-100%
Non- Life technical provisions	-	-	-	n.a
Health non-STL technical provisions	-4,527	26,537	-31,064	<-100%
Other technical provisions	-	-	-	n.a
Adjustment on other liabilities	-3,251	-8,419	5,168	-61.4%
Deferred tax liabilities	-	-8,419	8,419	-100.0%
Pension benefit obligations	-594	-	-594	100.0%
Other adjustments	-2,657	-	-2,657	100.0%
Reconciliation reserve	-3,745	19,139	-22,884	<-100%
Total Own Funds	488,817	387,031	101,786	26.3%

(euro thousands)

The difference of 1.6 million euro between the basic own funds and the own funds shown in the table refers to the amount the Company has set aside for the expenses it will have to incur to adapt its processes and information systems following the authorisation received in 2021 to operate in new business lines.

Cargeas Assicurazioni S.p.A.

E.1.1 Structure, amount and quality of own funds

Basic own funds

The basic own funds of Cargeas Assicurazioni include:

- the paid-up ordinary shares;
- the reconciliation reserve.

The essential conditions of the main elements of the company's own funds can be summarised as follows:

- Share capital: at 31 December 2021 the value was equal to 32,812 thousand euro, divided into 63,100,000 ordinary shares each with a nominal value of 0.52 euro;
- reconciliation reserve: this item is calculated by taking into account the surplus assets over liabilities (of 122,647 thousand euro) net of the share capital.

All the components of own funds are considered in Tier 1.

The Company has not included in its own funds any element that requires prior approval by the national regulator.

(euro thousands)

Basic Own Funds	2021	Tiering 2021				2020	Tiering 2020			
		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	32,812	32,812	-	-	-	32,812	32,812	-	-	-
Share premium related to ordinary share capital	-	-	-	-	-	-	-	-	-	-
Reconciliation reserve	122,647	122,647	-	-	0	163,887	163,887	-	-	-
Subordinated liabilities	-	-	-	-	-	-	-	-	-	-
Total amount	155,459	155,459	-	-	-	196,699	196,699	-	-	-

The reconciliation reserve calculated according to the Solvency II principles amounts to 122,627 thousand euro and comprises:

- Profit for the year of 30,501 thousand euro;
- Legal reserves: 6,563 thousand euro;
- Other Statutory reserves: 15,838 thousand euro;
- Other reserves: 29,929 thousand euro;
- Differences in valuation between the principles of the statutory accounts and those of Solvency II: 39,377 thousand euro.

(euro thousands)

Eligible Own Funds	2021	Tiering 2021				2020	Tiering 2020			
		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	32,812	32,812	-	-	-	32,812	32,812	-	-	-
Share premium related to ordinary share capital	-	-	-	-	-	-	-	-	-	-
Reconciliation reserve	122,647	122,647	-	-	-	163,887	163,887	-	-	-
Subordinated liabilities	-	-	-	-	-	-	-	-	-	-
Total amount	155,459	155,459	-	-	-	196,699	196,699	-	-	-

There is a decrease of 21% of the total eligible own funds compared to 2020.

E.1.2 Differences between the own capital stated in the company's financial statements and the excess assets compared to liabilities calculated for solvency purposes

From a comparison with 2020 it can be seen there is a decrease of 21.0% in total own funds.

	2021	2020	Change	%
(euro thousands)				
Equity- Statutory	116,082	125,997	-9,915	-8%
Adjustment on assets	5,040	14,410	-9,370	-65%
Goodwill and other intangible assets	-1,398	-3,232	1,834	-57%
Properties and plants	687	3,301	-2,613	-79%
Financial instruments	12,796	23,101	-10,306	-45%
Reinsurance recoverables	-7,045	-8,760	1,715	-20%
Other assets	-	-	-	-
Adjustment on technical provisions	37,444	60,806	-23,362	-38%
Non Life technical provisions	21,944	30,903	-8,959	-29%
Health non-STL technical provisions	15,500	29,903	-14,403	-48%
Other technical provisions	-	-	-	-
Adjustment on other liabilities	-3,107	-4,514	1,406	-31%
Pension benefit obligations	-2,290	-1,032	-1,258	>100%
Other adjustments	-817	-3,482	2,665	-77%
Reconciliation reserve	39,377	70,702	-31,325	-44%
Total Own Funds	155,459	196,699	-41,240	-21%

E.2 SOLVENCY CAPITAL REQUIREMENT AND MINIMUM CAPITAL REQUIREMENT

With reference to the contents of the QRT S.25.01 annexed to this report, the SCR should be mentioned, highlighting the individual risks it comprises.

Intesa Sanpaolo Vita Insurance Group

The companies belonging to the Intesa Sanpaolo Vita Insurance Group, under Article 1(r)-bis of the Private Insurance Code, adopt the standard formula for the calculation of the Solvency Capital Requirement (Article 45-quinquies to 45-undecies).

The solvency capital requirement of the Insurance Group at 31 December 2021 was 3,916 million euro.

The table below gives the SCR distributed according to the modules and submodules of risk, calculated with the Standard Formula.

(euro thousands)

	2021	2020	Variation	
Solvency Capital Requirement	3,916,527.9	3,957,255.4	-40,727.5	-1.0%
Add On	176,175.2	30,692.4	145,482.8	>100%
Deferred Tax Adjustment	-831,232.8	-392,842.6	-438,390.2	>100%
Solvency Capital Requirement ante adj	4,571,585.5	4,319,405.6	252,179.9	5.8%
Operational Risk	598,600.1	508,600.7	89,999.4	17.7%
Basic Solvency Capital Requirement	3,972,985.4	3,810,804.9	162,180.5	4.3%
Diversification	-1,435,917.8	-1,449,274.0	13,356.2	-0.9%
Market Risk	2,832,758.2	2,328,384.7	504,373.4	21.7%
Interest Rate Risk	87,465.3	60,273.1	27,192.2	45.1%
Equity Risk	1,200,860.8	963,907.6	236,953.2	24.6%
Property Risk	99,606.0	61,266.0	38,340.1	62.6%
Spread Risk	1,365,551.4	1,091,374.2	274,177.2	25.1%
Concentration Risk	29,304.1	89,854.8	-60,550.7	-67.4%
Currency Risk	782,944.6	767,612.7	15,331.9	2.0%
Diversification	-732,974.1	-705,903.5	-27,070.5	3.8%
Underwriting Risk (Life)	1,821,778.3	2,183,581.7	-361,803.5	-16.6%
Mortality Risk	169,748.3	135,936.7	33,811.6	24.9%
Longevity Risk	211,677.8	270,598.9	-58,921.1	-21.8%
Disability Risk	0.0	0.0	0.0	na
Expenses Risk	380,155.2	271,815.3	108,339.9	39.9%
Revision Risk	0.0	0.0	0.0	na
Lapse Risk	1,492,136.2	1,920,496.9	-428,360.7	-22.3%
Cat Risk	85,461.7	76,883.5	8,578.1	11.2%
Diversification	-517,400.9	-492,149.6	-25,251.3	5.1%
Underwriting Risk (Non-Life)	210,317.7	174,360.7	35,957.0	20.6%
Premium & reserve Risk	189,999.9	159,452.8	30,547.1	19.2%
Lapse Risk	49,778.9	41,720.5	8,058.4	19.3%
Cat Risk	41,448.7	29,598.6	11,850.1	40.0%
Diversification	-70,909.9	-56,411.2	-14,498.7	25.7%
Underwriting Risk (Health)	233,241.6	254,599.2	-21,357.7	-8.4%
Cat Risk	26,920.9	17,251.2	9,669.7	56.1%
Mass Accident Risk	1,360.9	1,163.9	197.0	16.9%
Concentration Risk	2,398.3	415.3	1,983.1	>100%
Pandemic Risk	26,779.3	17,206.9	9,572.4	55.6%
Diversification	-3,617.7	-1,534.9	-2,082.8	>100%
Non- SLT Risk	225,050.3	249,737.9	-24,687.7	-9.9%
Reserve Risk	215,254.5	242,451.6	-27,197.1	-11.2%
Lapse Risk	65,674.4	59,885.5	5,789.0	9.7%
Diversification	-55,878.7	-52,599.1	-3,279.6	6.2%
Diversification	-18,729.6	-12,389.9	-6,339.7	51.2%
Default Risk	310,807.4	319,152.4	-8,345.0	-2.6%

The MCR is calculated on the basis of the provisions of Chapter VII of the Delegated Acts, and amounts to 2,097 million euro.

On the valuation date, no simplifications had been used to calculate the SCR.

The value of the own funds eligible to cover the SCR at Group level is equal to 10,160 million euro. With reference to Article 230, the Group solvency value has been stated. It is calculated as the difference between the eligible own funds and the SCR at Group level, amounting to 6,294 million euro.

Intesa Sanpaolo Vita S.p.A.

The SCR of the Company on 31 December 2021 was 3,022 million euro. In calculating the SCR, the Company uses the Volatility Adjustment.

(euro thousands)

	2021	2020	Variation	
Solvency Capital Requirement	3,022,034	3,445,416	-423,382	-12.3%
Deferred Tax Adjustment	-724,699	-207,442	-517,257	>100%
Solvency Capital Requirement ante adj	3,746,733	3,652,858	93,875	2.6%
Operational Risk	436,649	352,697	83,953	23.8%
Basic Solvency Capital Requirement	3,310,084	3,300,161	9,923	0.3%
Diversification	-870,887	-971,597	100,710	-10.4%
Market Risk	2,617,000	2,146,246	470,753	21.9%
Interest Rate Risk	84,951	56,369	28,582	50.7%
Equity Risk	1,310,068	1,122,209	187,859	16.7%
Property Risk	89,134	58,664	30,471	51.9%
Spread Risk	1,178,005	863,797	314,208	36.4%
Concentration Risk	25,769	84,676	-58,907	-69.6%
Currency Risk	499,721	544,442	-44,722	-8.2%
Diversification	-570,649	-583,911	13,262	-2.3%
Underwriting Risk	1,377,949	1,949,747	-571,798	-29.3%
Mortality Risk	134,418	103,674	30,744	29.7%
Longevity Risk	151,168	200,551	-49,382	-24.6%
Disability Risk	-	-	-	na
Expenses Risk	199,666	125,484	74,182	59.1%
Revision Risk	-	-	-	na
Lapse Risk	1,186,344	1,800,987	-614,643	-34.1%
Cat Risk	78,297	70,006	8,291	11.8%
Diversification	-371,944	-350,955	-20,990	6.0%
Default Risk	186,023	175,766	10,257	5.8%

The MCR is calculated on the basis of the provisions of Chapter VII of the Delegated Acts, and amounts to 1,359 million euro.

On the valuation date, no simplifications had been used to calculate the SCR.

Intesa Sanpaolo Assicura S.p.A.

The SCR of the company at 31 December 2021 was 202.9 million euro. In calculating the SCR the company does not use the volatility adjustment.

The table below gives the SCR distributed according to the modules and sub-modules of risk, calculated with the Standard Formula, by applying company-specific parameters (USP) to calculate the capital requirement for pricing and reserving risk of the Non-Life and Health business.

(euro thousands)

	2021	2020	Variation	
Solvency Capital Requirement	202,873	236,678	-33,805	-14.3%
Deferred Tax Adjustment	-64,065	-74,740	10,675	-14.3%
Solvency Capital Requirement ante adj	266,938	311,419	-44,480	-14.3%
Operational Risk	22,248	21,636	612	2.8%
Basic Solvency Capital Requirement	244,691	289,783	-45,093	-15.6%
Diversification	-121,602	-142,955	21,353	-14.9%
Market Risk	44,792	41,389	3,403	8.2%
Interest Rate Risk	2,899	9,989	-7,090	-71.0%
Equity Risk	17,810	6,039	11,771	>100%
Property Risk	-	-	-	na
Spread Risk	18,620	27,769	-9,149	-32.9%
Concentration Risk	-	804	-804	-100.0%
Currency Risk	20,718	15,000	5,718	38.1%
Diversification	-15,254	-18,212	2,958	-16.2%
Underwriting Risk (Non-Life)	160,567	174,361	-13,794	-7.9%
Premium & reserve Risk	143,573	159,453	-15,880	-10.0%
Lapse Risk	48,478	41,721	6,757	16.2%
Cat Risk	28,192	29,599	-1,406	-4.8%
Diversification	-59,675	-56,411	-3,264	5.8%
Underwriting Risk (Health)	126,938	184,563	-57,625	-31.2%
Cat Risk	2,932	1,863	1,069	57.4%
Mass Accident Risk	1,217	1,119	98	8.8%
Concentration Risk	2,398	415	1,983	>100%
Pandemic Risk	1,168	1,431	-263	-18.4%
Diversification	-1,851	-1,102	-749	68.0%
Non- SLT Risk	126,174	184,088	-57,915	-31.5%
Reserve Risk	113,770	177,871	-64,101	-36.0%
Lapse Risk	54,554	47,438	7,116	15.0%
Diversification	-42,150	-41,221	-929	2.3%
Diversification	-2,167	-1,388	-779	56.1%
Default Risk	33,994	32,425	1,569	4.8%

The MCR is calculated on the basis of the provisions of Chapter VII of the Delegated Acts, and amounts to 91.3 million euro.

On the valuation date, no simplifications had been used to calculate the SCR.

Fideuram Vita S.p.A.

At 31 December 2021, the SCR of Fideuram Vita amounted to 495 million euro. The requirement is calculated using the Standard Formula, on the basis of the provisions of Chapters V and VI of the Delegated Acts. In calculating the SCR the company uses the Volatility Adjustment.

The table below gives the SCR distributed according to the modules and submodules of risk, calculated with the Standard Formula.

	2021	2020	(euro thousands)	
			Variazione	
Solvency Capital Requirement	494,859	440,455	54,404	12.4%
Deferred Tax Adjustment	-135,516	-88,936	-46,579	52.4%
Solvency Capital Requirement ante adj	630,374	529,391	100,983	19.1%
Operational Risk	34,094	35,816	-1,722	-4.8%
Basic Solvency Capital Requirement	596,281	493,576	102,705	20.8%
Diversification	-174,696	-146,204	-28,492	19.5%
Market Risk	359,260	303,295	55,965	18.5%
Interest Rate Risk	14,668	1,865	12,802	>100%
Equity Risk	215,551	153,870	61,680	40.1%
Property Risk	3,391	473	2,918	>100%
Spread Risk	109,396	123,686	-14,290	-11.6%
Concentration Risk	-	-	-	na
Currency Risk	116,553	99,356	17,198	17.3%
Diversification	-100,298	-75,956	-24,343	32.0%
Underwriting Risk	382,082	309,282	72,799	23.5%
Mortality Risk	11,958	11,295	663	5.9%
Longevity Risk	60,509	67,430	-6,921	-10.3%
Disability Risk	-	-	-	na
Expenses Risk	78,480	70,796	7,684	10.9%
Revision Risk	-	-	-	na
Lapse Risk	314,038	240,626	73,412	30.5%
Cat Risk	3,759	3,125	634	20.3%
Diversification	-86,662	-83,990	-2,673	3.2%
Default Risk	29,635	27,203	2,433	8.9%

No simplifications have been used to calculate the SCR.

At 31 December 2021, the MCR amounted to 223 million euro.

Intesa Sanpaolo Life D.A.C.

At 31 December 2021, the SCR of Intesa Sanpaolo Life amounted to 637 million euro. The requirement is calculated using the Standard Formula, on the basis of the provisions of Chapters V and VI of the Delegated Acts.

The table below gives the SCR distributed according to the modules and submodules of risk, calculated with the Standard Formula.

(euro thousands)

	2021	2020	Variazione	
Solvency Capital Requirement	637,067	531,201	105,866	19.9%
Deferred Tax Adjustment	-91,010	-75,886	-15,124	19.9%
Solvency Capital Requirement ante adj	728,077	607,087	120,990	19.9%
Operational Risk	87,560	84,813	2,747	3.2%
Basic Solvency Capital Requirement	640,517	522,274	118,243	22.6%
Diversification	-181,237	-149,455	-31,782	21.3%
Market Risk	354,740	258,765	95,975	37.1%
Interest Rate Risk	16,237	13,095	3,142	24.0%
Equity Risk	248,480	174,786	73,694	42.2%
Property Risk	-	-	-	na
Spread Risk	47,651	39,729	7,922	19.9%
Concentration Risk	3,535	4,375	-840	-19.2%
Currency Risk	145,269	108,815	36,454	33.5%
Diversification	-106,431	-82,035	-24,396	29.7%
Underwriting Risk	442,110	381,207	60,904	16.0%
Mortality Risk	23,372	20,148	3,224	16.0%
Longevity Risk	-	-	-	na
Disability Risk	-	-	-	na
Expenses Risk	102,010	64,066	37,944	59.2%
Revision Risk	-	-	-	na
Lapse Risk	379,167	342,794	36,373	10.6%
Cat Risk	3,406	3,201	205	6.4%
Diversification	-65,845	-49,002	-16,842	34.4%
Default Risk	24,903	31,757	-6,854	-21.6%

No simplifications have been used to calculate the SCR.

At 31 December 2021, the MCR amounted to 287 million euro.

Intesa Sanpaolo RBM Salute S.p.A.

The SCR of the company at 31 December 2021 was 400 million euro, including a conservative margin of 245 million euro (add-on). In calculating the SCR the company does not use the volatility adjustment.

The table below gives the SCR distributed according to the modules and submodules of risk, calculated with the Standard Formula.

(euro thousands)

	2021	2020	Variazione	
Solvency Capital Requirement	400,017	143,283	256,734	>100%
Add On	244,967	32,059	212,908	>100%
Deferred Tax Adjustment	-	-35,123	35,123	-100.0%
Solvency Capital Requirement ante adj	155,050	146,348	8,702	5.9%
Operational Risk	14,637	14,819	-182	-1.2%
Basic Solvency Capital Requirement	140,413	131,529	8,884	6.8%
Diversification	-31,585	-33,445	1,860	-5.6%
Market Risk	4,149	685	3,464	>100%
Interest Rate Risk	4,089	-	4,089	na
Equity Risk	23	-	23	na
Property Risk	1	685	-684	-99.9%
Spread Risk	na	na	na	na
Concentration Risk	-	-	-	na
Currency Risk	-	-	-	na
Diversification	-648	-	-648	na
Underwriting Risk (Non-Life)	33	-	33	na
Premium & reserve Risk	20	-	20	na
Lapse Risk	-	-	-	na
Cat Risk	20.8	-	21	na
Diversification	-9	-	-9	na
Underwriting Risk (Health)	117,987	97,930	20,056	20.5%
Cat Risk	25,575	15,772	9,802	62.1%
Mass Accident Risk	116	45	71	>100%
Concentration Risk	-	-	-	na
Pandemic Risk	25,574	15,772	9,802	62.1%
Diversification	-116	-45	-71	>100%
Non- SLT Risk	108,965	92,789	16,176	17.4%
Reserve Risk	108,768	91,950	16,818	18.3%
Lapse Risk	6,551	12,447	-5,896	-47.4%
Diversification	-6,354	-11,609	5,255	-45.3%
Diversification	-16,553	-10,631	-5,922	55.7%
Default Risk	49,864	66,359	-16,495	-24.9%

The MCR is calculated on the basis of the provisions of Chapter VII of the Delegated Acts, and amounts to 100 million euro.

On the valuation date, no simplifications had been used to calculate the SCR.

Cargeas Assicurazioni S.p.A.

The SCR of the Company at 31 December 2021 was 81.8 million euro. In calculating the SCR the company does not use the volatility adjustment.

The table below gives the SCR distributed according to the modules and submodules of risk, calculated with the Standard Formula.

(euro thousands)

	2021	2020	Variazione	
Solvency Capital Requirement	81,829	94,259	-12,430	-13%
Deferred Tax Adjustment	-5,588	-18,843	13,255	-70%
Solvency Capital Requirement ante adj	87,417	113,101	-25,685	-23%
Operational Risk	8,309	9,406	-1,097	-12%
Basic Solvency Capital Requirement	79,108	103,695	-24,587	-24%
Diversification	-39,348	-53,707	14,359	-27%
Market Risk	19,784	31,679	-11,895	-38%
Interest Rate Risk	2,984	9,306	-6,322	-68%
Equity Risk	3,710	9,235	-5,525	-60%
Property Risk	6,395	6,183	212	3%
Spread Risk	11,880	17,697	-5,817	-33%
Concentration Risk	-	-	-	na
Currency Risk	684	1,743	-1,059	-61%
Diversification	-5,870	-12,486	6,616	-53%
Underwriting Risk (Non-Life)	54,080	63,538	-9,458	-14.9%
Premium & reserve Risk	52,347	59,859	-7,512	-12.5%
Lapse Risk	1,301	1,189	112	9.4%
Cat Risk	5,728	11,044	-5,316	-48.1%
Diversification	-5,297	-8,555	3,258	-38.1%
Underwriting Risk (Health)	38,531	53,127	-14,596	-27.5%
Cat Risk	1,745	2,622	-877	-33.5%
Mass Accident Risk	1,000	802	198	24.7%
Concentration Risk	1,018	1,705	-687	-40.3%
Pandemic Risk	1,005	1,824	-819	-44.9%
Diversification	-1,277	-1,708	431	-25.2%
Non- SLT Risk	38,058	52,411	-14,353	-27.4%
Reserve Risk	37,783	52,067	-14,284	-27.4%
Lapse Risk	4,570	5,997	-1,427	-23.8%
Diversification	-4,294	-5,652	1,358	-24.0%
Diversification	-1,272	-1,906	634	-33.3%
Default Risk	6,061	9,058	-2,997	-33.1%

The MCR is calculated on the basis of the provisions of Chapter VII of the Delegated Acts, and amounts to 36.8 million euro.

Information of LAC DT

The Intesa Sanpaolo Vita Group companies, except for Intesa Sanpaolo Life D.A.C, prepare a recoverability plan that allows, in the presence of sufficient future profits, to calculate the adjustment to the SCR ("LAC DT") according to the deferred notional tax assets generated by a loss equal to the SCR.

The Companies have calculated the potential LAC DT adjustment ("nDTA") referred to in Article 207 of the Delegated Acts, allocating to each MVBS item, the loss deriving from each risk sub-module of the BSCR and from the Operational Risk, taking into account proportional to the diversification effect. The potential LAC DT adjustment was calculated by assessing only the temporary differences that give rise to prepaid IRES taxes in that, any IRAP tax losses would not be reportable in future years as governed by national tax legislation.

The nominal reference tax rate used in the calculation is therefore 24%, considering permanent valuation differences on specific income components that are partially or totally non-deductible (for example, the PEX regime).

To identify the admissibility of the nDTAs, the Companies determine future taxable annual incomes post-stress related to new production in order to recover tax receivables, generated by a loss determined pursuant to Article 207 of the delegated acts. In order to ensure the double counting prohibition in compliance with Article 16 of IVASS Regulation No 35 of 7 February 2017 concerning LAC DT, future income relating to new production is determined using a marginal approach, i.e., as the difference between portfolio profits including new production and those of the existing portfolio. In addition, in accordance with paragraph 2 quarter included into Article 207 by the amendments introduced by Commission Delegated Regulation (EU) 2019/981, future income relating to new business has been determined by assuming that the rates of return on the Company's investments are equal to the implied forward rate returns derived from the relevant risk-free interest rate term structure.

The Companies determine the potential impact of financial and technical stresses on the profit from new business in proportion to the change in Excess of Assets over Liabilities generated by the allocation of the loss arising from each sub-module of Market and Life Underwriting risk on the MVBS. The stress factor thus applied is gradually reduced in the projection years following the first, to take into account the exit of contracts and securities that generated the loss and the inclusion of new contracts and securities acquired in future periods in which a gradual recovery of losses and market normalisation are expected.

Further considerations are made with regard to the future recoverability of financial markets. The occurrence of market stress led to the occurrence of losses directly impacting on future profits generated by the companies' business. Future market developments make it possible to foresee a recovery, albeit gradual and limited, of the value of the Company's investments with consequent recovery of the financial losses incurred (e.g. recovery over time of the value of equity investments or reduction of bond spreads). Since these profits are not already taken into account in the MVBS, they are directly attributable to new production.

For the definition of new production volumes, the Companies agreed to use the hypotheses of premium volume as a reference, consistent with the ORSA projections but with a longer projection period, replicating for each missing year to the completion of the recovery plan (which is assumed to be 7 years), the same assumptions as in the last year available of the ORSA plan. In accordance with paragraph 2 quarter (d) inserted in Article 207 through the amendments introduced by the Commission Delegated Regulation (EU) 2019/981, the Companies shall apply appropriate and

time-increasing haircuts to the profits arising from the new business outside the ORSA plan, set equal to those provided for in Article 13 paragraph 4 of IVASS Regulation 35/2017:

- 20 per cent for likely future taxable income in the 4th projection year;
- 40 per cent for likely future taxable income in the 5th projection year;
- 60 per cent for likely future taxable income in the 6th projection year;
- 80 per cent for likely future taxable income in the 7th projection year;

E.3 USE OF THE SHARE PRICE RISK SUBMODULE BASED ON THE DURATION IN THE SCR CALCULATION

All the Group companies don't use this method.

E.4 DIFFERENCES BETWEEN THE STANDARD FORMULA AND THE INTERNAL MODEL

All the Insurance Group companies use standard formula.

E.5 FAILURE TO MEET THE MCR AND SCR

None of the Group companies consider that there is a reasonably predictable risk of not meeting the MCR or SCR.

E.6 OTHER INFORMATION

The Insurance Group has not valued any part of its portfolio as Ring Fenced Funds, pending the publication of the level II regulations.

We consider that we have provided all the information relevant for the purposes of this document.

GLOSSARY AND ACRONYMS

Certain sections of this document contain acronyms. In some cases, English terminology has been used to minimise any doubts as to interpretation, in the use of international definitions or methods. To facilitate the understanding of certain concepts, the Italian translations have been given below.

English term	Acronym	Italian term
As a whole		Elemento unico
Best Estimate	BE/BEL	Best Estimate
Cash Flow		Flussi di cassa
Certainty equivalent	CE	Certo equivalente
Combined Ratio		Indicator relating the cost of claims, commission and general expenses to net premiums collected Contractual limits
Contract boundaries		
Cost of Capital	CoC	Costo del Capitale
Credit protection insurance	CPI	Credit insurance cover
Deferred Tax Assets	DTA	Deferred Tax Assets
Deferred Tax Liabilities	DTL	Deferred Tax Liabilities
Dread disease		Insurance cover for serious illnesses
Excess of loss	XL	Type of reinsurance arrangement for excess of loss Certainty equivalent approach
Certainty Equivalent		
Dynamic Policyholder Behaviour		Dynamic policyholder behaviour
Standard formula		Formula used to calculate the Group SCR
Excess of Assets Over Liabilities		Eccesso delle attività sulle passività
Expected Profits Included in Future Premiums	EPIFP	Method to calculate Expected Profits Included in Future Premiums
Expert Judgement		Giudizio esperto
Expense Ratio		Indicator that refers general expenses to net premiums collected
Future Discretionary Benefits	FDB	Future discretionary benefits
Homogeneous Risk Groups	HRG	Gruppi di rischio omogenei
Lines of Business	LoB	Linee di Business
Long Term Guarantees Measures	LGT	Misure di garanzie a lungo termine
Loss Ratio		Indicator that refers the cost relative to claims to net collected premiums
Management Actions	FMG	Future Management Actions
Market Consistent		Market valuation
Market Value Balance Sheet	MVBS	Financial Statements prepared according to Solvency II
Minimum Capital Requirement	MCR	Minimum capital requirement

Non-Similar To Life Technique	Non-SLT	Health products with characteristics similar to the Non-Life business
Reference Curve		Curva di riferimento
Ring Fenced Funds	RFF	Separate funds
Risk Appetite Framework	RAF	Risk Appetite
Risk Free Curve		Curva priva di rischio
Risk Margin	RM	Risk Margin
Risk Neutral		Neutrali rispetto al rischio
Run Off		Existing portfolio
Non Hedgeable Risks		Rischi non immunizzabili
Similar To Life Technique	SLT	Health products with characteristics similar to the Life business
Solvency Capital Requirement	SCR	Requisito Patrimoniale di Solvibilità
Solvency Ratio	SR	Margine di Solvibilità
Statutory Reserve		Riserva civilistica
Technical Provisions	TP	Riserve tecniche
Unbundling		Scomposizione del contratto
Underwriting Risks		Rischi di sottoscrizione
Volatility Adjustment	VA	Aggiustamento di volatilità

In order to guarantee consistency in the representation of data, the Solvency regulations have defined the insurance business lines as follows:

Solvency II Lines of Business		
A. Non-Life insurance obligations		
1	Medical expense insurance	Medical expense insurance obligations where the underlying business is not pursued on a similar technical basis to that of life insurance, other than obligations included in the line of business 3.
2	Income protection insurance	Income protection insurance obligations where the underlying business is not pursued on a similar technical basis to that of life insurance, other than obligations included in the line of business 3.
3	Workers' compensation insurance	Health insurance obligations which relate to accidents at work, industrial injury and occupational diseases and where the underlying business is not pursued on a similar technical basis to that of life insurance.
4	Motor vehicle liability insurance	Insurance obligations which cover all liabilities arising out of the use of motor vehicles operating on land (including carrier's liability).
5	Other motor insurance	Insurance obligations which cover all damage to or loss of land vehicles (including railway rolling stock).

6	Marine, aviation and transport insurance Marine, aviation and transport insurance	Insurance obligations which cover all damage or loss to sea, lake, river and canal vessels, aircraft, and damage to or loss of goods in transit or baggage irrespective of the form of transport. Insurance obligations which cover liabilities arising out of the use of aircraft, ships, vessels or boats on the sea, lakes, rivers or canals (including carrier's liability).
7	Fire and other damage to property insurance	Insurance obligations which cover all damage to or loss of property other than those included in the lines of business 5 and 6 due to fire, explosion, natural forces including storm, hail or frost, nuclear energy, land subsidence and any event such as theft.
8	General liability insurance	Insurance obligations which cover all liabilities other than those in the lines of business 4 and 6.
9	Credit and suretyship insurance	Insurance obligations which cover insolvency, export credit, instalment credit, mortgages, agricultural credit and direct and indirect suretyship.
10	Legal expenses insurance	Insurance obligations which cover legal expenses and cost of litigation.
11	Assistance	Insurance obligations which cover assistance for persons who get into difficulties while travelling, while away from home or while away from their habitual residence.
12	Miscellaneous financial loss	Insurance obligations which cover employment risk, insufficiency of income, bad weather, loss of benefit, continuing general expenses, unforeseen trading expenses, loss of market value, loss of rent or revenue, indirect trading losses other than those mentioned above, other financial loss (non-trading) as well as any other risk of Non-Life insurance not covered by the lines of business 1 to 11.
B. Proportional non-life reinsurance obligations		
13-24	Proportional reinsurance obligations that relate to policies in the areas of activity from 1 to 12 respectively.	
C. Non-proportional non-life reinsurance obligations		
25	Non-proportional Health reinsurance	Non-proportional reinsurance obligations relating to insurance obligations included in lines of business 1 to 3.
26	Non-proportional casualty reinsurance	Non-proportional reinsurance obligations relating to insurance obligations included in lines of business 4 and 8.
27	Non-proportional marine, aviation and transport reinsurance	Non-proportional reinsurance obligations relating to insurance obligations included in line of business 6.
28	Non-proportional property reinsurance	Non-proportional reinsurance obligations relating to insurance obligations included in lines of business 5, 7 and 9 to 12.

D. Life insurance obligations		
29	Health insurance	Health insurance obligations where the underlying business is pursued on a similar technical basis to that of life insurance, other than those included in line of business 33.
30	Insurance with profit participation	Insurance obligations with profit participation other than obligations included in line of business 33 and 34.
31	Index-linked and unit-linked insurance	Insurance obligations with Index-linked and unit-linked benefits other than those included in lines of business 33 and 34.
32	Other life insurance	Other life insurance obligations other than obligations included in lines of business 29 to 31, 33 and 34.
33	Annuities stemming from Non-Life insurance contracts and relating to Health insurance obligations	
34	Annuities stemming from Non-Life insurance contracts and relating to insurance obligations other than Health insurance obligations Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	
E. Life reinsurance obligations		
35	Health reinsurance	Reinsurance obligations which relate to the obligations included in lines of business 29 and 33.
36	Life reinsurance	Reinsurance obligations which relate to the obligations included in lines of business 30 to 32 and 34

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Annex I

S.02.01.02

Balance sheet

(in migliaia di euro)

Assets		Solvency II value
		C0010
Goodwill	R0010	
Deferred acquisition costs	R0020	
Intangible assets	R0030	-
Deferred tax assets	R0040	2.689.818
Pension benefit surplus	R0050	-
Property, plant & equipment held for own use	R0060	32.028
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	107.763.713
Property (other than for own use)	R0080	-
Holdings in related undertakings, including participations	R0090	6.468
Equities	R0100	2.264.901
Equities - listed	R0110	2.174.007
Equities - unlisted	R0120	90.895
Bonds	R0130	90.585.593
Government Bonds	R0140	71.735.939
Corporate Bonds	R0150	16.349.132
Structured notes	R0160	2.463.759
Collateralised securities	R0170	36.763
Collective Investments Undertakings	R0180	14.553.129
Derivatives	R0190	353.623
Deposits other than cash equivalents	R0200	-
Other investments	R0210	-
Assets held for index-linked and unit-linked contracts	R0220	100.924.549
Loans and mortgages	R0230	764
Loans on policies	R0240	649
Loans and mortgages to individuals	R0250	-
Other loans and mortgages	R0260	115
Reinsurance recoverables from:	R0270	133.175
Non-life and health similar to non-life	R0280	133.175
Non-life excluding health	R0290	45.514
Health similar to non-life	R0300	87.660
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	0
Health similar to life	R0320	-
Life excluding health and index-linked and unit-linked	R0330	0
Life index-linked and unit-linked	R0340	-
Deposits to cedants	R0350	-
Insurance and intermediaries receivables	R0360	321.746
Reinsurance receivables	R0370	7.916
Receivables (trade, not insurance)	R0380	3.694.889
Own shares (held directly)	R0390	-
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	-
Cash and cash equivalents	R0410	1.740.727
Any other assets, not elsewhere shown	R0420	1.164.833
Total assets	R0500	218.474.156

(in migliaia di euro)

Liabilities		Solvency II value
		C0010
Technical provisions – non-life	R0510	1.425.219
Technical provisions – non-life (excluding health)	R0520	666.785
Technical provisions calculated as a whole	R0530	-
Best Estimate	R0540	625.901
Risk margin	R0550	40.883
Technical provisions - health (similar to non-life)	R0560	758.435
Technical provisions calculated as a whole	R0570	1.423
Best Estimate	R0580	717.338
Risk margin	R0590	39.673
Technical provisions - life (excluding index-linked and unit-linked)	R0600	99.949.146
Technical provisions - health (similar to life)	R0610	-
Technical provisions calculated as a whole	R0620	-
Best Estimate	R0630	-
Risk margin	R0640	-
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	99.949.146
Technical provisions calculated as a whole	R0660	-
Best Estimate	R0670	99.094.034
Risk margin	R0680	855.112
Technical provisions – index-linked and unit-linked	R0690	98.374.088
Technical provisions calculated as a whole	R0700	-
Best Estimate	R0710	97.888.804
Risk margin	R0720	485.285
Other technical provisions	R0730	-
Contingent liabilities	R0740	-
Provisions other than technical provisions	R0750	126.179
Pension benefit obligations	R0760	18.772
Deposits from reinsurers	R0770	11.703
Deferred tax liabilities	R0780	3.492.112
Derivatives	R0790	125.604
Debts owed to credit institutions	R0800	385
Financial liabilities other than debts owed to credit institutions	R0810	18.773,22
Insurance & intermediaries payables	R0820	1.430.162
Reinsurance payables	R0830	56.992
Payables (trade, not insurance)	R0840	1.047.817
Subordinated liabilities	R0850	2.242.006
Subordinated liabilities not in Basic Own Funds	R0860	-
Subordinated liabilities in Basic Own Funds	R0870	2.242.006
Any other liabilities, not elsewhere shown	R0880	1.190.379
Total liabilities	R0900	209.509.337
Excess of assets over liabilities	R1000	8.964.819

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QRT Intesa Sanpaolo Vita Group: S.22.01.22

Annex I

S.22.01.22

Impact of long term guarantees and transitional measures

(in migliaia di euro)

		Amount with Long Term Guarantee measures and transitionals	Impact of transitional on technical provisions	Impact of transitional on interest rate	Impact of volatility adjustment set to zero	Impact of matching adjustment set to zero
		C0010	C0030	C0050	C0070	C0090
Technical provisions	R0010	199.748.453	-	-	105.615	-
Basic own funds	R0020	10.159.576	-	-	-73.557	-
Eligible own funds to meet Solvency Capital Requirement	R0050	10.159.576	-	-	-73.557	-
Solvency Capital Requirement	R0090	3.916.528	-	-	63.799	-

QRT Intesa Sanpaolo Vita Group: S.23.01.22

Annex I
S.23.01.22
Own funds

(in migliaia di euro)

		Total C0010	Tier 1 - unrestricted C0020	Tier 1 - restricted C0030	Tier 2 C0040	Tier 3 C0050
Basic own funds before deduction for participations in other financial sector						
Ordinary share capital (gross of own shares)	R0010	677.869	677.869			
Non-available called but not paid in ordinary share capital at group level	R0020					
Share premium account related to ordinary share capital	R0030	1.328.097	1.328.097			
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Non-available subordinated mutual member accounts at group level	R0060					
Surplus funds	R0070					
Non-available surplus funds at group level	R0080					
Preference shares	R0090					
Non-available preference shares at group level	R0100					
Share premium account related to preference shares	R0110					
Non-available share premium account related to preference shares at group level	R0120					
Reconciliation reserve	R0130	5.945.821	5.945.821			
Subordinated liabilities	R0140	2.242.006		792.845	1.449.162	
Non-available subordinated liabilities at group level	R0150					
An amount equal to the value of net deferred tax assets	R0160					
The amount equal to the value of net deferred tax assets not available at the group level	R0170					
Other items approved by supervisory authority as basic own funds not specified above	R0180					
Non available own funds related to other own funds items approved by supervisory authority	R0190					
Minority interests (if not reported as part of a specific own fund item)	R0200					
Non-available minority interests at group level	R0210	- 34.218	- 34.218			
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	R0220					
Deductions						
Deductions for participations in other financial undertakings, including non-regulated undertakings carrying out financial activities	R0230					
whereof deducted according to art 228 of the Directive 2009/138/EC	R0240					
Deductions for participations where there is non-availability of information (Article 229)	R0250					
Deduction for participations included by using D&A when a combination of methods is used	R0260					
Total of non-available own fund items	R0270					
Total deductions	R0280					
Total basic own funds after deductions	R0290	10.159.576	7.917.570	792.845	1.449.162	-
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Non available ancillary own funds at group level	R0380					
Other ancillary own funds	R0390	-				
Total ancillary own funds	R0400	-			-	-
Own funds of other financial sectors						
Reconciliation reserve	R0410					
Institutions for occupational retirement provision	R0420					
Non regulated entities carrying out financial activities	R0430					
Total own funds of other financial sectors	R0440					
Own funds when using the D&A, exclusively or in combination of method 1						
Own funds aggregated when using the D&A and combination of method	R0450					
Own funds aggregated when using the D&A and a combination of method net of IGT	R0460					
Total available own funds to meet the consolidated group SCR (excluding own funds from other financial sector and from the undertakings included via D&A)	R0520	10.159.576	7.917.570	792.845	1.449.162	-
Total available own funds to meet the minimum consolidated group SCR	R0530	10.159.576	7.917.570	792.845	1.449.162	-
Total eligible own funds to meet the consolidated group SCR (excluding own funds from other financial sector and from the undertakings included via D&A)	R0560	10.159.576	7.917.570	792.845	1.449.162	-
Total-eligible own funds to meet the minimum consolidated group SCR	R0570	9.129.895	7.917.570	792.845	419.480	
Minimum consolidated Group SCR	R0610	2.097.402				
Ratio of Eligible own funds to Minimum Consolidated Group SCR	R0650	435%				
Total eligible own funds to meet the group SCR (including own funds from other financial sector and from the undertakings included via D&A)	R0660	10.159.576	7.917.570	792.845	1.449.162	
Group SCR	R0680	3.916.528				
Ratio of Eligible own funds to group SCR including other financial sectors and the undertakings included via D&A	R0690	259%				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	8.964.819
Own shares (included as assets on the balance sheet)	R0710	107.314
Forseeable dividends, distributions and charges	R0720	905.717
Other basic own fund items	R0730	2.005.967
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	-
Other non available own funds	R0750	-
Reconciliation reserve before deduction for participations in other financial sector	R0760	5.945.821
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	796.627
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	95.156
Total EPIFP	R0790	891.783

QRT Intesa Sanpaolo Vita Group: S.25.01.22

Annex I

S.25.01.22

Solvency Capital Requirement - for groups on Standard Formula

(in migliaia di euro)

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0080	C0090
Market risk	R0010	2.832.758		
Counterparty default risk	R0020	310.807		
Life underwriting risk	R0030	1.821.778		
Health underwriting risk	R0040	233.242		
Non-life underwriting risk	R0050	210.318		
Diversification	R0060	-1.435.918		
Intangible asset risk	R0070	-		
Basic Solvency Capital Requirement	R0100	3.972.985		

Calculation of Solvency Capital Requirement

		C0100
Operational risk	R0130	598.600
Loss-absorbing capacity of technical provisions	R0140	-2.455.434
Loss-absorbing capacity of deferred taxes	R0150	-831.233
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
Solvency capital requirement excluding capital add-on	R0200	3.740.353
Capital add-on already set	R0210	176.175
Solvency capital requirement	R0220	3.916.528
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	
Minimum consolidated group solvency capital requirement	R0470	2.097.402
Information on other entities		
Capital requirement for other financial sectors (Non-insurance capital requirements)	R0500	
Capital requirement for other financial sectors (Non-insurance capital requirements) - Credit institutions, investment firms and financial institutions, alternative investment funds managers, UCITS management companies	R0510	
Capital requirement for other financial sectors (Non-insurance capital requirements) - Institutions for occupational retirement provisions	R0520	
Capital requirement for other financial sectors (Non-insurance capital requirements) - Capital requirement for non - regulated entities carrying out financial activities	R0530	
Capital requirement for non-controlled participation requirements	R0540	
Capital requirement for residual undertakings	R0550	

Overall SCR

SCR for undertakings included via D and A	R0560	
Solvency capital requirement	R0570	3.916.528

QRT Intesa Sanpaolo Vita Group: S.32.01.22

Annex I

S.32.01.22

Undertakings in the scope of the group

Country	Identification code of the undertaking	Type of code of the ID of the undertaking	Legal Name of the undertaking	Type of undertaking	Legal form	Category (mutual/non mutual)	Supervisory Authority
C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080
IT	LEI/5493000YZPPFRVZ7PF37	LEI	Fideuram Vita	1	Societa Per Azioni	2	IVASS
IT	LEI/81560058D9F02B0FCD27	LEI	Intesa Sanpaolo Assicura	2	Societa Per Azioni	2	IVASS
IE	LEI/635400H9NIJ5SQ65LG47	LEI	Intesa Sanpaolo Life	1	Societa Per Azioni	2	CBI
IT	LEI/5493000UM31PJ24TTSR94	LEI	Intesa Sanpaolo Vita	4	Societa Per Azioni	2	IVASS
IT	LEI/815600F2CB73D0455054	LEI	Intesa Sanpaolo RBM	2	Societa Per Azioni	2	IVASS
IT	LEI/815600F7E2571DC1DC59	LEI	Cargeas Assicurazioni	2	Societa Per Azioni	2	IVASS

Ranking criteria (in the group currency)								
Total Balance Sheet (for (re)insurance undertakings)	Total Balance Sheet (for other regulated undertakings)	Total Balance Sheet (non-regulated undertakings)	Written premiums net of reinsurance ceded under IFRS or local GAAP for (re)insurance undertakings	Turn over defined as the gross revenue under IFRS or local GAAP for other types of undertakings or insurance holding companies	Underwriting performance	Investment performance	Total performance	Accounting standard
C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170
41.793.667.164	-	-	4.470.768.506	-	75.176.424	704.790.654	75.175.594	2
1.896.468.194	-	-	694.035.512	-	334.271.044	13.603.288	182.210.901	2
42.369.222.075	-	-	5.512.945.132	-	251.284.468	1.697.519.778	192.535.912	1
133.857.770.172	-	-	8.905.678.348	-	5.015.322	1.638.301.306	744.130.854	2
987.965.439	-	-	369.467.131	-	237.534.280	1.143.000	325.717.854	2
518.768.140	-	-	133.687.954	-	94.252.561	30.501.934	30.501.934	2



QRT INTESA SANPAOLO VITA S.P.A.

QRT Intesa Sanpaolo Vita: S.02.01.02

Annex I S.02.01.02 Balance sheet

(in migliaia di euro)

Assets		Solvency II value
		C0010
Goodwill	R0010	-
Deferred acquisition costs	R0020	-
Intangible assets	R0030	-
Deferred tax assets	R0040	2.491.161
Pension benefit surplus	R0050	-
Property, plant & equipment held for own use	R0060	10.598
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	101.389.998
Property (other than for own use)	R0080	-
Holdings in related undertakings, including participations	R0090	2.928.092
Equities	R0100	2.160.638
Equities - listed	R0110	2.069.873
Equities - unlisted	R0120	90.764
Bonds	R0130	82.779.793
Government Bonds	R0140	65.338.675
Corporate Bonds	R0150	15.161.347
Structured notes	R0160	2.243.545
Collateralised securities	R0170	36.227
Collective Investments Undertakings	R0180	13.168.963
Derivatives	R0190	352.513
Deposits other than cash equivalents	R0200	-
Other investments	R0210	-
Assets held for index-linked and unit-linked contracts	R0220	25.855.026
Loans and mortgages	R0230	208
Loans on policies	R0240	208
Loans and mortgages to individuals	R0250	-
Other loans and mortgages	R0260	-
Reinsurance recoverables from:	R0270	-
Non-life and health similar to non-life	R0280	-
Non-life excluding health	R0290	-
Health similar to non-life	R0300	-
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	-
Health similar to life	R0320	-
Life excluding health and index-linked and unit-linked	R0330	-
Life index-linked and unit-linked	R0340	-
Deposits to cedants	R0350	-
Insurance and intermediaries receivables	R0360	6.360
Reinsurance receivables	R0370	883
Receivables (trade, not insurance)	R0380	2.220.602
Own shares (held directly)	R0390	-
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	-
Cash and cash equivalents	R0410	1.095.365
Any other assets, not elsewhere shown	R0420	787.569
Total assets	R0500	133.857.771

(in migliaia di euro)

Liabilities		Solvency II value
		C0010
Technical provisions – non-life	R0510	1.423
Technical provisions – non-life (excluding health)	R0520	-
Technical provisions calculated as a whole	R0530	-
Best Estimate	R0540	-
Risk margin	R0550	-
Technical provisions - health (similar to non-life)	R0560	1.423
Technical provisions calculated as a whole	R0570	1.423
Best Estimate	R0580	-
Risk margin	R0590	-
Technical provisions - life (excluding index-linked and unit-linked)	R0600	93.609.045
Technical provisions - health (similar to life)	R0610	-
Technical provisions calculated as a whole	R0620	-
Best Estimate	R0630	-
Risk margin	R0640	-
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	93.609.045
Technical provisions calculated as a whole	R0660	-
Best Estimate	R0670	92.816.147
Risk margin	R0680	792.898
Technical provisions – index-linked and unit-linked	R0690	24.770.508
Technical provisions calculated as a whole	R0700	-
Best Estimate	R0710	24.589.053
Risk margin	R0720	181.455
Other technical provisions	R0730	-
Contingent liabilities	R0740	-
Provisions other than technical provisions	R0750	14.740
Pension benefit obligations	R0760	8.173
Deposits from reinsurers	R0770	11.021
Deferred tax liabilities	R0780	3.113.771
Derivatives	R0790	125.604
Debts owed to credit institutions	R0800	385
Financial liabilities other than debts owed to credit institutions	R0810	4.991
debts owed to non-credit institutions resident domestically	ER0812	4.991
Insurance & intermediaries payables	R0820	960.070
Reinsurance payables	R0830	1.328
Payables (trade, not insurance)	R0840	898.414
Subordinated liabilities	R0850	2.091.190
Subordinated liabilities not in Basic Own Funds	R0860	-
Subordinated liabilities in Basic Own Funds	R0870	2.091.190
Any other liabilities, not elsewhere shown	R0880	658.098
Total liabilities	R0900	126.268.760
Excess of assets over liabilities	R1000	7.589.011

(in migliaia di euro)

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)											Total	
		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	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	C0200
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0200
Premiums written														
Gross - Direct Business	R0110	3	499	-	-	-	-	-	-	-	-	-	-	503
Gross - Proportional reinsurance accepted	R0120		-											-
Gross - Non-proportional reinsurance accepted	R0130													
Reinsurers' share	R0140	-	24	-	-	-	-	-	-	-	-	-	-	24
Net	R0200	4	475	-	-	-	-	-	-	-	-	-	-	479
Premiums earned														
Gross - Direct Business	R0210	3	520											524
Gross - Proportional reinsurance accepted	R0220													
Gross - Non-proportional reinsurance accepted	R0230													
Reinsurers' share	R0240	-	28	-	-	-	-	-	-	-	-	-	-	28
Net	R0300	3	493	-	-	-	-	-	-	-	-	-	-	496
Claims incurred														
Gross - Direct Business	R0310	-	103	-	-	-	-	-	-	-	-	-	-	103
Gross - Proportional reinsurance accepted	R0320	-	-	-	-	-	-	-	-	-	-	-	-	-
Gross - Non-proportional reinsurance accepted	R0330													-
Reinsurers' share	R0340	-	0	-	-	-	-	-	-	-	-	-	-	-
Net	R0400	-	103	-	-	-	-	-	-	-	-	-	-	103
Changes in other technical provisions														
Gross - Direct Business	R0410	-	2											2
Gross - Proportional reinsurance accepted	R0420													-
Gross - Non-proportional reinsurance accepted	R0430													-
Reinsurers' share	R0440	-	-	-	-	-	-	-	-	-	-	-	-	-
Net	R0500	-	2	-	-	-	-	-	-	-	-	-	-	2
Expenses incurred	R0550	-	212	-	-	-	-	-	-	-	-	-	-	212
Other expenses	R1200													
Total expenses	R1300													212

(in migliaia di euro)

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QRT Intesa Sanpaolo Vita: S.12.01.02

(in migliaia di euro)

	Insurance with profit participation	Index-linked and unit-linked insurance		Other life insurance		Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Accepted reinsurance	Total (Life other than health insurance, incl. Unit-Linked)
		Contracts without options and guarantees	Contracts with options or guarantees	Contracts without options and guarantees	Contracts with options or guarantees			
	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0150
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 as a whole	R0020	-						-
Technical provisions calculated as a sum of BE and RM								
Best Estimate								
Gross Best Estimate								
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0030		23.286.181	1.302.872		-	458.484	117.405.200
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	R0090							
Risk Margin	R0100	181.455	23.286.181	1.302.872	53.661	-	458.484	117.405.200
Amount of the transitional on Technical Provisions	R0110							974.353
Technical Provisions calculated as a whole	R0120	-						-
Best estimate	R0130	-						-
Risk margin	R0140	-						-
Technical provisions - total	R0200	24.770.508			512.145			118.379.553

Annex I
S.17.01.02
Non-life Technical Provisions

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QRT Intesa Sanpaolo Vita: S.19.01.21

Annex I

S.19.01.21

Non-life Insurance Claims Information

Total Non-Life Business

Accident year /
Underwriting year

Z0020 1

Gross Claims Paid (non-cumulative)
(absolute amount)

(absolute amount)		(in migliaia di euro)															
Year		Development year															
		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15 & +
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160
Prior	R0100	-	-	-	-	-	-	-	-	-	-	0	-	-	-	-	-
N-14	R0110	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-13	R0120	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-12	R0130	-	-	-	103	-	-	-	-	-	-	-	-	-	-	-	-
N-11	R0140	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-10	R0150	-	55	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-9	R0160	55	251	55	79	-	-	-	55	-	-	-	-	-	-	-	-
N-8	R0170	55	110	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-7	R0180	103	55	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-6	R0190	203	-	-	-	-	-	103	-	-	-	-	-	-	-	-	-
N-5	R0200	-	258	55	-	-	-	-	-	-	-	-	-	-	-	-	-
N-4	R0210	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-3	R0220	103	158	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-2	R0230	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-1	R0240	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N	R0250	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

(in migliaia di euro)

(in migliaia di euro)

(in migliaia di euro)

In Current year	
C0170	
R0100	-
R0110	-
R0120	-
R0130	-
R0140	-
R0150	-
R0160	-
R0170	-
R0180	-
R0190	103
R0200	-
R0210	-
R0220	-
R0230	-
R0240	-
R0250	-
Total	R0260 103

Sum of years (cumulative)	
C0180	
R0100	-
R0110	-
R0120	-
R0130	103
R0140	-
R0150	55
R0160	495
R0170	165
R0180	158
R0190	307
R0200	313
R0210	-
R0220	-
R0230	262
R0240	-
R0250	-
Total	R0260 1.858

Gross undiscounted Best Estimate Claims Provisions
(absolute amount)

(absolute amount)		(in migliaia di euro)																
Year		Development year																
		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15 & +	
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0310	C0320	C0330	C0340	C0350	C0360	
Prior	R0100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
N-14	R0110	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
N-13	R0120	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
N-12	R0130	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
N-11	R0140	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
N-10	R0150	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
N-9	R0160	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
N-8	R0170	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
N-7	R0180	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
N-6	R0190	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
N-5	R0200	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
N-4	R0210	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
N-3	R0220	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
N-2	R0230	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
N-1	R0240	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
N	R0250	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

(in migliaia di euro)

(in migliaia di euro)

Year end (discounted data)	
C0360	
R0100	-
R0110	-
R0120	-
R0130	-
R0140	-
R0150	-
R0160	-
R0170	-
R0180	-
R0190	-
R0200	-
R0210	-
R0220	-
R0230	-
R0240	-
R0250	1.321
Total	R0260 1.321

QRT Intesa Sanpaolo Vita: S.22.01.21

Annex I

S.22.01.21

Impact of long term guarantees and transitional measures

(in migliaia di euro)

		Amount with Long Term Guarantee measures and transitionals	Impact of transitional on technical provisions	Impact of transitional on interest rate	Impact of volatility adjustment set to zero	Impact of matching adjustment set to zero
		C0010	C0030	C0050	C0070	C0090
Technical provisions	R0010	118.380.976	-	-	99.377	-
Basic own funds	R0020	8.669.455	-	-	-68.749	-
Eligible own funds to meet Solvency Capital Requirement	R0050	8.669.455	-	-	-68.749	-
Solvency Capital Requirement	R0090	3.022.034	-	-	100.219	-
Eligible own funds to meet Minimum Capital Requirement	R0100	7.643.093	-	-	-59.730	-
Minimum Capital Requirement	R0110	1.359.915	-	-	45.098	-

QRT Intesa Sanpaolo Vita: S.23.01.01

Annex I
S.23.01.01
Own funds

(in migliaia di euro)

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	320.423	320.423			
Share premium account related to ordinary share capital	R0030	1.328.097	1.328.097			
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	4.929.745	4.929.745			
Subordinated liabilities	R0140	2.091.190		792.845	1.298.345	
An amount equal to the value of net deferred tax assets	R0160					
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180					
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	R0220					
Deductions						
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	R0290	8.669.455	6.578.265	792.845	1.298.345	-
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390					

(in migliaia di euro)

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Total ancillary own funds	R0400					-
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	8.669.455	6.578.265	792.845	1.298.345	-
Total available own funds to meet the MCR	R0510	8.669.455	6.578.265	792.845	1.298.345	-
Total eligible own funds to meet the SCR	R0540	8.669.455	6.578.265	792.845	1.298.345	-
Total eligible own funds to meet the MCR	R0550	7.643.093	6.578.265	792.845	271.983	
SCR	R0580	3.022.034				
MCR	R0600	1.359.915				
Ratio of Eligible own funds to SCR	R0620	287%				
Ratio of Eligible own funds to MCR	R0640	562%				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	7.589.011
Own shares (held directly and indirectly)	R0710	106.628
Foreseeable dividends, distributions and charges	R0720	904.117
Other basic own fund items	R0730	1.648.520
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
Reconciliation reserve	R0760	4.929.745
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	556.881
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	
Total Expected profits included in future premiums (EPIFP)	R0790	556.881

QRT Intesa Sanpaolo Vita: S.25.01.21

Annex I

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

(in migliaia di euro)

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
Market risk	R0010	2.617.000		
Counterparty default risk	R0020	186.023		
Life underwriting risk	R0030	1.377.949		
Health underwriting risk	R0040			
Non-life underwriting risk	R0050			
Diversification	R0060	-870.887		
Intangible asset risk	R0070			
Basic Solvency Capital Requirement	R0100	3.310.084		

Calculation of Solvency Capital Requirement

		C0100
Operational risk	R0130	436.649
Loss-absorbing capacity of technical provisions	R0140	-2.490.843
Loss-absorbing capacity of deferred taxes	R0150	-724.699
Capital requirement for business operated in accordance with Art. 4 of	R0160	
Solvency capital requirement excluding capital add-on	R0200	3.022.034
Capital add-on already set	R0210	
Solvency capital requirement	R0220	3.022.034

Other information on SCR

Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirement for remaining	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced	R0420	
Total amount of Notional Solvency Capital Requirement for matching	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

QRT Intesa Sanpaolo Vita: S.28.02.01

Annex I

S.28.02.01

Minimum Capital Requirement - Both life and non-life insurance activity

(in migliaia di euro)

	Non-life activities		Life activities	
	MCR _(NL,NL)		MCR _(NL,L)	
	Result		Result	
	C0010		C0020	
Linear formula component for non-life insurance and reinsurance obligations	R0010	227	-	

(in migliaia di euro)

Medical expense insurance and proportional reinsurance
Income protection insurance and proportional reinsurance
Workers' compensation insurance and proportional reinsurance
Motor vehicle liability insurance and proportional reinsurance
Other motor insurance and proportional reinsurance
Marine, aviation and transport insurance and proportional reinsurance
Fire and other damage to property insurance and proportional reinsurance
General liability insurance and proportional reinsurance
Credit and suretyship insurance and proportional reinsurance
Legal expenses insurance and proportional reinsurance
Assistance and proportional reinsurance
Miscellaneous financial loss insurance and proportional reinsurance
Non-proportional health reinsurance
Non-proportional casualty reinsurance
Non-proportional marine, aviation and transport reinsurance
Non-proportional property reinsurance

	Non-life activities		Life activities	
	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
	C0030	C0040	C0050	C0060
R0020	1	3	-	-
R0030	1.422	475	-	-
R0040				
R0050				
R0060				
R0070				
R0080				
R0090				
R0100				
R0110				
R0120				
R0130				
R0140				
R0150				
R0160				
R0170				

(in migliaia di euro)

	Non-life activities		Life activities	
	MCR _(L,NL)		MCR _(L,L)	
	Result		Result	
	C0070		C0080	
Linear formula component for life insurance and reinsurance obligations	R0200	-	3.235.708	

(in migliaia di euro)

Obligations with profit participation - guaranteed benefits
Obligations with profit participation - future discretionary benefits
Index-linked and unit-linked insurance obligations
Other life (re)insurance and health (re)insurance obligations
Total capital at risk for all life (re)insurance obligations

	Non-life activities		Life activities	
	Net (of reinsurance/SPV) best estimate and TP	Net (of reinsurance/SPV) total capital at risk	Net (of reinsurance/SPV) best estimate and TP	Net (of reinsurance/SPV) total capital at risk
	C0090	C0100	C0110	C0120
R0210			87.856.106	
R0220			4.501.557	
R0230			24.589.053	
R0240			458.484	
R0250				53.374.260

Overall MCR calculation

		C0130
Linear MCR	R0300	3.235.935
SCR	R0310	3.022.034
MCR cap	R0320	1.359.915
MCR floor	R0330	755.508
Combined MCR	R0340	1.359.915
Absolute floor of the MCR	R0350	3.700
		C0130
Minimum Capital Requirement	R0400	1.359.915

Notional non-life and life MCR calculation

	Non-life activities	Life activities
	C0140	C0150
Notional linear MCR	R0500	227
Notional SCR excluding add-on (annual or latest calculation)	R0510	212
Notional MCR cap	R0520	95
Notional MCR floor	R0530	53
Notional Combined MCR	R0540	95
Absolute floor of the notional MCR	R0550	2.500
Notional MCR	R0560	2.500

QRT INTESA SANPAOLO ASSICURA S.P.A.

QRT Intesa Sanpaolo Assicura: S.02.01.02

Annex I S.02.01.02 Balance sheet

(in migliaia di euro)

Assets		Solvency II value
		C0010
Goodwill	R0010	-
Deferred acquisition costs	R0020	-
Intangible assets	R0030	-
Deferred tax assets	R0040	29.622
Pension benefit surplus	R0050	-
Property, plant & equipment held for own use	R0060	2.182
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	1.523.436
Property (other than for own use)	R0080	-
Holdings in related undertakings, including participations	R0090	-
Equities	R0100	297
Equities - listed	R0110	297
Equities - unlisted	R0120	-
Bonds	R0130	1.046.677
Government Bonds	R0140	1.046.677
Corporate Bonds	R0150	-
Structured notes	R0160	-
Collateralised securities	R0170	-
Collective Investments Undertakings	R0180	476.462
Derivatives	R0190	-
Deposits other than cash equivalents	R0200	-
Other investments	R0210	-
Assets held for index-linked and unit-linked contracts	R0220	-
Loans and mortgages	R0230	115
Loans on policies	R0240	-
Loans and mortgages to individuals	R0250	-
Other loans and mortgages	R0260	115
Reinsurance recoverables from:	R0270	44.494
Non-life and health similar to non-life	R0280	44.494
Non-life excluding health	R0290	28.079
Health similar to non-life	R0300	16.415
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	-
Health similar to life	R0320	-
Life excluding health and index-linked and unit-linked	R0330	-
Life index-linked and unit-linked	R0340	-
Deposits to cedants	R0350	-
Insurance and intermediaries receivables	R0360	196.378
Reinsurance receivables	R0370	5.557
Receivables (trade, not insurance)	R0380	4.403
Own shares (held directly)	R0390	-
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	-
Cash and cash equivalents	R0410	16.897
Any other assets, not elsewhere shown	R0420	73.383
Total assets	R0500	1.896.468

(in migliaia di euro)

Liabilities		Solvency II value
		C0010
Technical provisions – non-life	R0510	773.845
Technical provisions – non-life (excluding health)	R0520	465.519
Technical provisions calculated as a whole	R0530	-
Best Estimate	R0540	436.852
Risk margin	R0550	28.666
Technical provisions - health (similar to non-life)	R0560	308.326
Technical provisions calculated as a whole	R0570	-
Best Estimate	R0580	286.055
Risk margin	R0590	22.271
Technical provisions - life (excluding index-linked and unit-linked)	R0600	-
Technical provisions - health (similar to life)	R0610	-
Technical provisions calculated as a whole	R0620	-
Best Estimate	R0630	-
Risk margin	R0640	-
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	-
Technical provisions calculated as a whole	R0660	-
Best Estimate	R0670	-
Risk margin	R0680	-
Technical provisions – index-linked and unit-linked	R0690	-
Technical provisions calculated as a whole	R0700	-
Best Estimate	R0710	-
Risk margin	R0720	-
Other technical provisions	R0730	-
Contingent liabilities	R0740	-
Provisions other than technical provisions	R0750	2.459
Pension benefit obligations	R0760	1.613
Deposits from reinsurers	R0770	682
Deferred tax liabilities	R0780	120.997
Derivatives	R0790	-
Debts owed to credit institutions	R0800	-
Financial liabilities other than debts owed to credit institutions	R0810	1.993,00
debts owed to non-credit institutions resident domestically	ER0812	1.993,00
Insurance & intermediaries payables	R0820	30.290
Reinsurance payables	R0830	34.485
Payables (trade, not insurance)	R0840	111.500
Subordinated liabilities	R0850	-
Subordinated liabilities not in Basic Own Funds	R0860	-
Subordinated liabilities in Basic Own Funds	R0870	-
Any other liabilities, not elsewhere shown	R0880	62.691
Total liabilities	R0900	1.140.555
Excess of assets over liabilities	R1000	755.914

[illegible]

QRT Intesa Sanpaolo Assicura: S.17.01.02

Annex I
S.17.01.02
Non-life Technical Provisions

		Direct business and accepted proportional reinsurance														Accepted non-proportional reinsurance				Total Non-Life obligation
		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	Credit and suretyship insurance	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 insurance			
		RO020	RO030	RO040	RO050	RO060	RO070	RO080	RO090	RO100	RO110	RO120	RO130	RO140	RO150	RO160	RO170	RO180		
Technical provisions calculated as a whole		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
Total Recoverables from reinsurers/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
Net Best Estimate of Premium Provisions		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
Technical provisions calculated as a sum of BE and RM		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
Best estimate		-21,215	162,312	-	20,008	4,847	25	154,032	12,887	377	-20	925	74,485	-	-	-	-	418,324		
Total recoverable from reinsurers/SPV and Finite Re after the adjustment for expected losses due to counterparty default		311	-161	-	1,242	0	0	548	7,018	195	-80	649	315	-	-	-	-	10,035		
Net Best Estimate of Premium Provisions		-21,526	163,073	-	21,767	4,847	25	153,544	5,869	192	60	276	74,710	-	-	-	-	408,288		
Claims provisions		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
Gross		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
Total recoverable from reinsurers/SPV and Finite Re after the adjustment for expected losses due to counterparty default		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
Net Best Estimate of Claims Provisions		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
Total Best estimate - gross		-15,536	301,593	-	112,607	7,182	106	191,246	38,336	2,384	2,733	1,434	60,744	-	-	-	-	344,096		
Technical provisions - gross		-15,536	301,593	-	112,607	7,182	106	191,246	38,336	2,384	2,733	1,434	60,744	-	-	-	-	270,250		
Total Best estimate - net		-3,735	18,526	-	104,873	6,326	105	184,653	30,934	1,153	423	387	60,200	-	-	-	-	678,413		
Risk margin		-	-	-	3,633	3,295	10	8,698	2,215	77	62	114	13,534	-	-	-	-	50,038		
Amount of the transitional on Technical Provisions		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
Technical Provisions calculated as a whole		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
Best estimate		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
Best estimate - total		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
Technical provisions - total		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
Recoverables from reinsurers/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total		-11,803	320,129	-	116,289	7,507	115	199,943	40,571	2,471	2,797	1,548	94,278	-	-	-	-	773,845		
Net Best Estimate of Premium Provisions		1,392	-15,023	-	7,784	896	0	6,583	7,722	1,240	2,312	1,048	535	-	-	-	-	44,494		
Technical provisions minus recoverables from reinsurers/SPV and Finite Re - total		-13,194	305,106	-	108,505	6,651	115	193,361	32,849	1,230	485	500	93,743	-	-	-	-	723,351		

QRT Intesa Sanpaolo Assicura: S.19.01.21

Annex I
S.19.01.21
Non-life Insurance Claims Information

Total Non-Life Business

Accident year / Underwriting year	Z0020	1

Gross Claims Paid (non-cumulative)
(absolute amount)

		(in migliaia di euro)															(in migliaia di euro)		(in migliaia di euro)	
		Development year															In Current year	Sum of years (cumulative)		
Year		0	1	2	3	4	5	6	7	8	9	10 & +	11	12	13	14	15 & +			
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170		
Prior	R0100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4	C0180	4
N-14	R0110	-	-	-	1.141	358	153	431	283	0	73	123	4	(3)	(2)	(2)	-	-	R0100	4
N-13	R0120	-	-	3.099	747	430	202	125	157	35	52	-	(7)	6	22	-	-	-	R0110	(2)
N-12	R0130	-	15.752	3.016	1.191	465	388	151	45	29	33	63	12	3	-	-	-	-	R0120	22
N-11	R0140	18.390	15.979	5.499	1.438	1.236	286	239	190	79	367	50	193	-	-	-	-	-	R0130	3
N-10	R0150	16.802	24.968	6.357	4.008	2.072	1.585	565	533	313	158	87	-	-	-	-	-	-	R0140	193
N-9	R0160	20.463	26.137	11.891	4.286	2.318	938	662	650	366	259	-	-	-	-	-	-	-	R0150	87
N-8	R0170	27.159	32.396	15.768	2.987	1.561	939	2.108	341	542	-	-	-	-	-	-	-	-	R0160	259
N-7	R0180	31.676	33.156	6.431	1.966	997	527	687	302	-	-	-	-	-	-	-	-	-	R0170	542
N-6	R0190	34.461	29.851	9.063	1.760	1.269	465	276	-	-	-	-	-	-	-	-	-	-	R0180	302
N-5	R0200	36.579	29.091	11.805	4.541	1.008	748	-	-	-	-	-	-	-	-	-	-	-	R0190	276
N-4	R0210	37.156	29.170	10.426	2.996	1.595	-	-	-	-	-	-	-	-	-	-	-	-	R0200	748
N-3	R0220	41.668	42.113	13.635	3.042	-	-	-	-	-	-	-	-	-	-	-	-	-	R0210	1.595
N-2	R0230	54.997	60.904	16.044	-	-	-	-	-	-	-	-	-	-	-	-	-	-	R0220	3.042
N-1	R0240	56.078	59.410	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	R0230	16.044
N	R0250	63.533	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	R0240	59.410
Total																	R0250	63.533		

Gross undiscounted Best Estimate Claims Provisions
(absolute amount)

		(in migliaia di euro)															(in migliaia di euro)			
		Development year															Year end (discounted data)	Sum of years (cumulative)		
Year		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15 & +			
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0310	C0320	C0330	C0340	C0350	C0360		
Prior	R0100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	R0100	-
N-14	R0110	-	-	-	-	-	-	-	-	-	107	46	30	9	6	1	-	-	R0110	-
N-13	R0120	-	-	-	-	-	-	-	-	2.167	1.484	1.261	543	411	509	-	-	-	R0120	-
N-12	R0130	-	-	-	-	-	-	-	654	512	308	129	92	148	-	-	-	-	R0130	-
N-11	R0140	-	-	-	-	-	-	1.778	1.370	988	433	274	221	-	-	-	-	-	R0140	-
N-10	R0150	-	-	-	-	-	6.602	4.434	2.186	999	801	558	-	-	-	-	-	-	R0150	-
N-9	R0160	-	-	-	-	11.675	7.687	4.145	2.451	1.856	816	-	-	-	-	-	-	-	R0160	-
N-8	R0170	-	-	-	14.260	11.165	6.659	3.109	2.390	1.565	-	-	-	-	-	-	-	-	R0170	-
N-7	R0180	-	-	15.692	11.289	7.851	3.833	2.931	2.375	-	-	-	-	-	-	-	-	-	R0180	-
N-6	R0190	-	22.487	10.711	7.475	4.029	3.325	2.531	-	-	-	-	-	-	-	-	-	-	R0190	-
N-5	R0200	75.490	31.083	14.839	9.359	6.062	4.269	-	-	-	-	-	-	-	-	-	-	-	R0200	-
N-4	R0210	77.298	29.508	17.241	11.870	8.173	-	-	-	-	-	-	-	-	-	-	-	-	R0210	-
N-3	R0220	85.460	40.543	22.388	15.670	-	-	-	-	-	-	-	-	-	-	-	-	-	R0220	-
N-2	R0230	141.687	49.366	26.094	-	-	-	-	-	-	-	-	-	-	-	-	-	-	R0230	-
N-1	R0240	148.175	48.005	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	R0240	-
N	R0250	166.299	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	R0250	-
Total																	R0260	-		

QRT Intesa Sanpaolo Assicura: S.23.01.01

Annex I
S.23.01.01
Own funds

(in migliaia di euro)

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	27.912	27.912			
Share premium account related to ordinary share capital	R0030	-	-			
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	-	-			
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	727.705	727.705			
Subordinated liabilities	R0140					
An amount equal to the value of net deferred tax assets	R0160					
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180					
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	R0220					
Deductions						
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	R0290	755.617	755.617	-	-	-
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390					

(in migliaia di euro)

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Total ancillary own funds	R0400					
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	755.617	755.617	-	-	-
Total available own funds to meet the MCR	R0510	755.617	755.617	-	-	-
Total eligible own funds to meet the SCR	R0540	755.617	755.617	-	-	-
Total eligible own funds to meet the MCR	R0550	755.617	755.617	-	-	-
SCR	R0580	202.873				
MCR	R0600	91.293				
Ratio of Eligible own funds to SCR	R0620	372%				
Ratio of Eligible own funds to MCR	R0640	828%				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	755.914
Own shares (held directly and indirectly)	R0710	297
Foreseeable dividends, distributions and charges	R0720	-
Other basic own fund items	R0730	27.912
Adjustment for restricted own fund items in respect of matching adjustment	R0740	-
Reconciliation reserve	R0760	727.705
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	-
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	72.948
Total Expected profits included in future premiums (EPIFP)	R0790	72.948

QRT Intesa Sanpaolo Assicura: S.25.01.21

Annex I

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

(in migliaia di euro)

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
Market risk	R0010	44.792		
Counterparty default risk	R0020	33.994		
Life underwriting risk	R0030			
Health underwriting risk	R0040	126.938		
Non-life underwriting risk	R0050	160.567		
Diversification	R0060	-121.602		
Intangible asset risk	R0070			
Basic Solvency Capital Requirement	R0100	244.691		

Calculation of Solvency Capital Requirement		C0100
Operational risk	R0130	22.248
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	-64.065
Capital requirement for business operated in accordance with Art. 4 of	R0160	
Solvency capital requirement excluding capital add-on	R0200	202.873
Capital add-on already set	R0210	
Solvency capital requirement	R0220	202.873
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirement for remaining	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced	R0420	
Total amount of Notional Solvency Capital Requirement for matching	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

QRT Intesa Sanpaolo Assicura: S.28.01.01

Annex I

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

(in migliaia di euro)

		C0010
MCRNL Result	R0010	144.895

(in migliaia di euro)

		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	18.454
Income protection insurance and proportional reinsurance	R0030	286.570	281.716
Workers' compensation insurance and proportional reinsurance	R0040	-	-
Motor vehicle liability insurance and proportional reinsurance	R0050	104.873	66.340
Other motor insurance and proportional reinsurance	R0060	6.326	13.255
Marine, aviation and transport insurance and proportional reinsurance	R0070	105	99
Fire and other damage to property insurance and proportional reinsurance	R0080	184.663	178.186
General liability insurance and proportional reinsurance	R0090	30.634	77.925
Credit and suretyship insurance and proportional reinsurance	R0100	1.153	28
Legal expenses insurance and proportional reinsurance	R0110	423	1.526
Assistance and proportional reinsurance	R0120	387	11.574
Miscellaneous financial loss insurance and proportional reinsurance	R0130	80.209	44.933
Non-proportional health reinsurance	R0140	-	-
Non-proportional casualty reinsurance	R0150	-	-
Non-proportional marine, aviation and transport reinsurance	R0160	-	-
Non-proportional property reinsurance	R0170	-	-

Linear formula component for life insurance and reinsurance obligations

C0040

MCRl Result	R0200

(in migliaia di euro)

		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		
Obligations with profit participation - future discretionary benefits	R0220		
Index-linked and unit-linked insurance obligations	R0230		
Other life (re)insurance and health (re)insurance obligations	R0240		
Total capital at risk for all life (re)insurance obligations	R0250		

Overall MCR calculation

(in migliaia di euro)

		C0070
Linear MCR	R0300	144.895
SCR	R0310	202.873
MCR cap	R0320	91.293
MCR floor	R0330	50.718
Combined MCR	R0340	91.293
Absolute floor of the MCR	R0350	2.500
		C0070
Minimum Capital Requirement	R0400	91.293

QRT FIDEURAM VITA S.P.A.

QRT Fideuram Vita: S.02.01.02

Annex I S.02.01.02 Balance sheet

(in migliaia di euro)

Assets		Solvency II value
		C0010
Goodwill	R0010	
Deferred acquisition costs	R0020	
Intangible assets	R0030	-
Deferred tax assets	R0040	60.654
Pension benefit surplus	R0050	-
Property, plant & equipment held for own use	R0060	9.762
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	6.689.288
Property (other than for own use)	R0080	-
Holdings in related undertakings, including participations	R0090	-
Equities	R0100	103.689
Equities - listed	R0110	103.559
Equities - unlisted	R0120	130
Bonds	R0130	5.803.708
Government Bonds	R0140	4.593.810
Corporate Bonds	R0150	1.000.231
Structured notes	R0160	209.131
Collateralised securities	R0170	536
Collective Investments Undertakings	R0180	780.781
Derivatives	R0190	1.110
Deposits other than cash equivalents	R0200	-
Other investments	R0210	-
Assets held for index-linked and unit-linked contracts	R0220	34.018.076
Loans and mortgages	R0230	441
Loans on policies	R0240	441
Loans and mortgages to individuals	R0250	-
Other loans and mortgages	R0260	-
Reinsurance recoverables from:	R0270	-
Non-life and health similar to non-life	R0280	-
Non-life excluding health	R0290	-
Health similar to non-life	R0300	-
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	-
Health similar to life	R0320	-
Life excluding health and index-linked and unit-linked	R0330	-
Life index-linked and unit-linked	R0340	-
Deposits to cedants	R0350	-
Insurance and intermediaries receivables	R0360	1.164
Reinsurance receivables	R0370	76
Receivables (trade, not insurance)	R0380	588.674
Own shares (held directly)	R0390	-
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	-
Cash and cash equivalents	R0410	210.814
Any other assets, not elsewhere shown	R0420	214.716
Total assets	R0500	41.793.667

(in migliaia di euro)

Liabilities		Solvency II value
		C0010
Technical provisions – non-life	R0510	-
Technical provisions – non-life (excluding health)	R0520	-
Technical provisions calculated as a whole	R0530	-
Best Estimate	R0540	-
Risk margin	R0550	-
Technical provisions - health (similar to non-life)	R0560	-
Technical provisions calculated as a whole	R0570	-
Best Estimate	R0580	-
Risk margin	R0590	-
Technical provisions - life (excluding index-linked and unit-linked)	R0600	6.340.101
Technical provisions - health (similar to life)	R0610	-
Technical provisions calculated as a whole	R0620	-
Best Estimate	R0630	-
Risk margin	R0640	-
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	6.340.101
Technical provisions calculated as a whole	R0660	-
Best Estimate	R0670	6.277.887
Risk margin	R0680	62.214
Technical provisions – index-linked and unit-linked	R0690	33.384.352
Technical provisions calculated as a whole	R0700	-
Best Estimate	R0710	33.273.454
Risk margin	R0720	110.898
Other technical provisions	R0730	-
Contingent liabilities	R0740	-
Provisions other than technical provisions	R0750	5.675
Pension benefit obligations	R0760	3.920
Deposits from reinsurers	R0770	-
Deferred tax liabilities	R0780	170.078
Derivatives	R0790	-
Debts owed to credit institutions	R0800	-
Financial liabilities other than debts owed to credit institutions	R0810	9.908
debts owed to non-credit institutions resident domestically	ER0812	9.908
Insurance & intermediaries payables	R0820	250.008
Reinsurance payables	R0830	-
Payables (trade, not insurance)	R0840	22.080
Subordinated liabilities	R0850	150.816
Subordinated liabilities not in Basic Own Funds	R0860	-
Subordinated liabilities in Basic Own Funds	R0870	150.816
Any other liabilities, not elsewhere shown	R0880	246.016
Total liabilities	R0900	40.582.954
Excess of assets over liabilities	R1000	1.210.713

QRT Fideuram Vita: S.05.01.02

(in migliaia di euro)

		Line of Business for: life insurance obligations						Life reinsurance obligations		Total
		Health insurance C0210	Insurance with profit participation C0220	Index-linked and unit-linked insurance C0230	Other life insurance C0240	Annuities stemming from non-life insurance contracts and relating to health insurance obligations C0250	Annuities stemming from non-life insurance contracts and relating to health insurance obligations C0260	Health reinsurance C0270	Life-reinsurance C0280	
Premiums written										C0300
Gross	R1410	-	221.068	4.245.529	5.302	-	-	-	-	4.471.899
Reinsurers' share	R1420	-	288	-	843	-	-	-	-	1.130
Net	R1500	-	220.780	4.245.529	4.459	-	-	-	-	4.470.769
Premiums earned										
Gross	R1510	-	221.068	4.245.529	5.302	-	-	-	-	4.471.899
Reinsurers' share	R1520	-	288	-	843	-	-	-	-	1.130
Net	R1600	-	220.780	4.245.529	4.459	-	-	-	-	4.470.769
Claims incurred										
Gross	R1610	-	492.199	2.366.402	2.074	-	-	-	-	2.860.675
Reinsurers' share	R1620	-	65	-	190	-	-	-	-	255
Net	R1700	-	492.134	2.366.402	1.883	-	-	-	-	2.860.420
Changes in other technical provisions										
Gross	R1710	-	197.623	(3.934.801)	(70)	-	-	-	-	(3.737.248)
Reinsurers' share	R1720	-	-	-	-	-	-	-	-	-
Net	R1800	-	197.623	(3.934.801)	(70)	-	-	-	-	(3.737.248)
Expenses incurred	R1900	-	8.133	28.811	271	-	-	-	-	37.215
Other expenses	R2500									3.036
Total expenses	R2600									40.252

QRT Fideuram Vita: S.12.01.02

(in migliaia di euro)											
		Index-linked and unit-linked insurance			Other life insurance			Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Accepted reinsurance	Total Life other than health insurance, incl. Unit-Linked	
		Insurance with profit participation	Contracts without options or guarantees	Contracts with options or guarantees	C0060	C0070	C0080	C0090	C0100	C0150	
		C0020	C0030	C0040	C0050						
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 as a whole		R0020	-								
Technical provisions calculated as a sum of BE and RM											
Best Estimate											
Gross Best Estimate		R0030	6.281.997	32.859.077	414.377	-	-4.109	-	-	39.551.341	
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default		R0090	-	-	-	-	-	-	-	-	
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total		R0100	6.281.997	32.859.077	414.377	-	-	-4.109	-	-	
Risk Margin		R0110	110.886								
Amount of the transitional on Technical Provisions		R0120	-								
Technical Provisions calculated as a whole		R0130	-								
Best estimate		R0140	-								
Best estimate		R0150	-								
Risk margin		R0200	6.343.210	33.384.352	-	-3.108	-	-	-	-	
Technical provisions - Total											
		</									

QRT Fideuram Vita: S.22.01.21

Annex I

S.22.01.21

Impact of long term guarantees and transitional measures

(in migliaia di euro)

		Amount with Long Term Guarantee measures and transitionals	Impact of transitional on technical provisions	Impact of transitional on interest rate	Impact of volatility adjustment set to zero	Impact of matching adjustment set to zero
		C0010	C0030	C0050	C0070	C0090
Technical provisions	R0010	39.724.453	-	-	6.238	-
Basic own funds	R0020	1.361.141	-	-	-4.315	-
Eligible own funds to meet Solvency Capital Requirement	R0050	1.361.141	-	-	-4.315	-
Solvency Capital Requirement	R0090	494.859	-	-	3.863	-
Eligible own funds to meet Minimum Capital Requirement	R0100	1.254.862	-	-	-3.968	-
Minimum Capital Requirement	R0110	222.686	-	-	1.738	-

QRT Fideuram Vita: S.23.01.01

Annex I
S.23.01.01
Own funds

(in migliaia di euro)

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	357.447	357.447			
Share premium account related to ordinary share capital	R0030					
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	852.878	852.878			
Subordinated liabilities	R0140	150.816			150.816	
An amount equal to the value of net deferred tax assets	R0160					
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180					
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	R0220					
Deductions						
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	R0290	1.361.141	1.210.324		150.816	-
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390					

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Total ancillary own funds	R0400					
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	1.361.141	1.210.324		150.816	-
Total available own funds to meet the MCR	R0510	1.361.141	1.210.324		150.816	-
Total eligible own funds to meet the SCR	R0540	1.361.141	1.210.324		150.816	-
Total eligible own funds to meet the MCR	R0550	1.254.862	1.210.324		44.537	
SCR	R0580	494.859				
MCR	R0600	222.686				
Ratio of Eligible own funds to SCR	R0620	276%				
Ratio of Eligible own funds to MCR	R0640	554%				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	1.210.713
Own shares (held directly and indirectly)	R0710	389
Foreseeable dividends, distributions and charges	R0720	
Other basic own fund items	R0730	357.447
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
Reconciliation reserve	R0760	852.878
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	190.066
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	-
Total Expected profits included in future premiums (EPIFP)	R0790	190.066

QRT Fideuram Vita: S.25.01.21

Annex I

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

(in migliaia di euro)

		Net solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
Market risk	R0010	359.260		
Counterparty default risk	R0020	29.635		
Life underwriting risk	R0030	382.082		
Health underwriting risk	R0040			
Non-life underwriting risk	R0050			
Diversification	R0060	-174.696		
Intangible asset risk	R0070			
Basic Solvency Capital Requirement	R0100	596.281		

Calculation of Solvency Capital Requirement		C0100
Operational risk	R0130	34.094
Loss-absorbing capacity of technical provisions	R0140	-67.424
Loss-absorbing capacity of deferred taxes	R0150	-135.516
Capital requirement for business operated in accordance with Art. 4	R0160	
Solvency capital requirement excluding capital add-on	R0200	494.859
Capital add-on already set	R0210	-
Solvency capital requirement	R0220	494.859

QRT Fideuram Vita: S.28.01.01

Annex I

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

		(in migliaia di euro)
		C0040
MCR: Result	R0200	456.337

		(in migliaia di euro)	
		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	6.281.997	
Obligations with profit participation - future discretionary benefits	R0220	177.328	
Index-linked and unit-linked insurance obligations	R0230	33.273.454	
Other life (re)insurance and health (re)insurance obligations	R0240	-	
Total capital at risk for all life (re)insurance obligations	R0250		300.666

Overall MCR calculation

		(in migliaia di euro)
		C0070
Linear MCR	R0300	456.337
SCR	R0310	494.859
MCR cap	R0320	222.686
MCR floor	R0330	123.715
Combined MCR	R0340	222.686
Absolute floor of the MCR	R0350	3.700
		C0070
Minimum Capital Requirement	R0400	222.686

QRT INTESA SANPAOLO LIFE D.A.C.

QRT Intesa Sanpaolo Life: S.02.01.02

Annex I S.02.01.02 Balance sheet

(in migliaia di euro)

Assets		Solvency II value C0010
Goodwill	R0010	-
Deferred acquisition costs	R0020	-
Intangible assets	R0030	-
Deferred tax assets	R0040	-
Pension benefit surplus	R0050	-
Property, plant & equipment held for own use	R0060	997
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	376.103
Property (other than for own use)	R0080	-
Holdings in related undertakings, including participations	R0090	-
Equities	R0100	228
Equities - listed	R0110	228
Equities - unlisted	R0120	-
Bonds	R0130	284.787
Government Bonds	R0140	232.726
Corporate Bonds	R0150	52.061
Structured notes	R0160	-
Collateralised securities	R0170	-
Collective Investments Undertakings	R0180	91.088
Derivatives	R0190	-
Deposits other than cash equivalents	R0200	-
Other investments	R0210	-
Assets held for index-linked and unit-linked contracts	R0220	41.051.446
Loans and mortgages	R0230	-
Loans on policies	R0240	-
Loans and mortgages to individuals	R0250	-
Other loans and mortgages	R0260	-
Reinsurance recoverables from:	R0270	-
Non-life and health similar to non-life	R0280	-
Non-life excluding health	R0290	-
Health similar to non-life	R0300	-
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	-
Health similar to life	R0320	-
Life excluding health and index-linked and unit-linked	R0330	-
Life index-linked and unit-linked	R0340	-
Deposits to cedants	R0350	-
Insurance and intermediaries receivables	R0360	-
Reinsurance receivables	R0370	-
Receivables (trade, not insurance)	R0380	805.183
Own shares (held directly)	R0390	-
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	-
Cash and cash equivalents	R0410	76.807
Any other assets, not elsewhere shown	R0420	58.686
Total assets	R0500	42.369.222

(in migliaia di euro)

Liabilities		Solvency II value
		C0010
Technical provisions – non-life	R0510	-
Technical provisions – non-life (excluding health)	R0520	-
Technical provisions calculated as a whole	R0530	-
Best Estimate	R0540	-
Risk margin	R0550	-
Technical provisions - health (similar to non-life)	R0560	-
Technical provisions calculated as a whole	R0570	-
Best Estimate	R0580	-
Risk margin	R0590	-
Technical provisions - life (excluding index-linked and unit-linked)	R0600	-
Technical provisions - health (similar to life)	R0610	-
Technical provisions calculated as a whole	R0620	-
Best Estimate	R0630	-
Risk margin	R0640	-
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	-
Technical provisions calculated as a whole	R0660	-
Best Estimate	R0670	-
Risk margin	R0680	-
Technical provisions – index-linked and unit-linked	R0690	40.219.228
Technical provisions calculated as a whole	R0700	-
Best Estimate	R0710	40.026.297
Risk margin	R0720	192.931
Other technical provisions	R0730	-
Contingent liabilities	R0740	-
Provisions other than technical provisions	R0750	1.877
Pension benefit obligations	R0760	-
Deposits from reinsurers	R0770	-
Deferred tax liabilities	R0780	97.517
Derivatives	R0790	-
Debts owed to credit institutions	R0800	-
Financial liabilities other than debts owed to credit institutions	R0810	701
debts owed to non-credit institutions resident domestically	ER0812	8
debts owed to non-credit institutions resident in the euro area other than	ER0813	694
Insurance & intermediaries payables	R0820	169.070
Reinsurance payables	R0830	12
Payables (trade, not insurance)	R0840	10.479
Subordinated liabilities	R0850	-
Subordinated liabilities not in Basic Own Funds	R0860	-
Subordinated liabilities in Basic Own Funds	R0870	-
Any other liabilities, not elsewhere shown	R0880	203.530
Total liabilities	R0900	40.702.415
Excess of assets over liabilities	R1000	1.666.807

QRT Intesa Sanpaolo Life: S.05.01.02

(in migliaia di euro)

	Line of Business for: life insurance obligations						Life reinsurance obligations		Total
	Health insurance C0210	Insurance with profit participation C0220	Index-linked and unit-linked insurance C0230	Other life insurance C0240	Annuities stemming from non-life insurance contracts relating to health insurance obligations C0250	Annuities stemming from non-life insurance contracts relating to other than health insurance obligations C0260	Health reinsurance C0270	Life reinsurance C0280	
Premiums written									C0300
Gross	R1410	-	-	-	-	-	-	-	5.513.002
Reinsurers' share	R1420	-	-	-	-	-	-	-	57
Net	R1500	-	-	-	-	-	-	-	5.512.945
Premiums earned									
Gross	R1510	-	-	-	-	-	-	-	5.513.002
Reinsurers' share	R1520	-	-	-	-	-	-	-	57
Net	R1600	-	-	-	-	-	-	-	5.512.945
Claims incurred									
Gross	R1610	-	-	-	-	-	-	-	4.309.132
Reinsurers' share	R1620	-	-	-	-	-	-	-	23
Net	R1700	-	-	-	-	-	-	-	4.309.109
Changes in other technical provisions									
Gross	R1710	-	-	-	-	-	-	-	-2.948.602
Reinsurers' share	R1720	-	-	-	-	-	-	-	-
Net	R1800	-	-	-	-	-	-	-	-2.948.602
Expenses incurred									
Other expenses	R1900	-	-	-	-	-	-	-	510.107
Total expenses	R2500								
	R2600								510.107

QRT Intesa Sanpaolo Life: S.05.02.01

Annex I

S.05.02.01

Premiums, claims and expenses by country

(in migliaia di euro)

		Home country	Top 5 countries (by amount of gross premiums written) - life obligations		Total Top 5 and home country
					C0210
	R1400		IT	ES	
					C0280
Premiums written					
Gross	R1410		5.479.942	33.060	5.513.002
Reinsurers' share	R1420		57	-	57
Net	R1500		5.479.885	33.060	5.512.945
Premiums earned					
Gross	R1510		5.479.942	33.060	5.513.002
Reinsurers' share	R1520		57	-	57
Net	R1600		5.479.885	33.060	5.512.945
Claims incurred					
Gross	R1610		4.302.157	6.974	4.309.132
Reinsurers' share	R1620		23	-	23
Net	R1700		4.302.135	6.974	4.309.109
Changes in other technical provisions					
Gross	R1710		(2.918.150)	(30.452)	(2.948.602)
Reinsurers' share	R1720		-	-	-
Net	R1800		(2.918.150)	(30.452)	(2.948.602)
Expenses incurred	R1900		507.627	2.480	510.107
Other expenses	R2500				
Total expenses	R2600		-	-	510.107

QRT Intesa Sanpaolo Life: S.23.01.01

Annex I
S.23.01.01
Own funds

(in migliaia di euro)

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	625	625			
Share premium account related to ordinary share capital	R0030	10	10			
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	1.561.728	1.561.728			
Subordinated liabilities	R0140	-		-	-	
An amount equal to the value of net deferred tax assets	R0160	-				
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	104.444	104.444			
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	R0220					
Deductions						
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	R0290	1.666.807	1.666.807	-	-	-
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390					

(in migliaia di euro)

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Total ancillary own funds	R0400					
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	1.666.807	1.666.807	-	-	-
Total available own funds to meet the MCR	R0510	1.666.807	1.666.807	-	-	-
Total eligible own funds to meet the SCR	R0540	1.666.807	1.666.807	-	-	-
Total eligible own funds to meet the MCR	R0550	1.666.807	1.666.807	-	-	-
SCR	R0580	637.067				
MCR	R0600	281.076				
Ratio of Eligible own funds to SCR	R0620	262%				
Ratio of Eligible own funds to MCR	R0640	593%				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	1.666.807
Own shares (held directly and indirectly)	R0710	-
Foreseeable dividends, distributions and charges	R0720	-
Other basic own fund items	R0730	105.079
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring	R0740	-
Reconciliation reserve	R0760	1.561.728
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	49.680
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	-
Total Expected profits included in future premiums (EPIFP)	R0790	49.680

QRT Intesa Sanpaolo Life: S.25.01.21

Annex I

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

(in migliaia di euro)

		Gross solvency capital	USP	Simplifications
		C0110	C0090	C0120
Market risk	R0010	354.740		
Counterparty default risk	R0020	24.903		
Life underwriting risk	R0030	442.110		
Health underwriting risk	R0040			
Non-life underwriting risk	R0050			
Diversification	R0060	-181.237		
Intangible asset risk	R0070			
Basic Solvency Capital Requirement	R0100	640.517		

Calculation of Solvency Capital Requirement

		C0100
Operational risk	R0130	87.560
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	-91.010
Capital requirement for business operated in accordance with Art. 4 of	R0160	
Solvency capital requirement excluding capital add-on	R0200	637.067
Capital add-on already set	R0210	
Solvency capital requirement	R0220	637.067

Other information on SCR

Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirement for remaining	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced	R0420	
Total amount of Notional Solvency Capital Requirement for matching	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

QRT Intesa Sanpaolo Life: S.28.01.01

Annex I

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

(in migliaia di euro)

MCR _L Result	R0200	C0040
		281.076

(in migliaia di euro)

		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	-	
Obligations with profit participation - future discretionary benefits	R0220	-	
Index-linked and unit-linked insurance obligations	R0230	40.026.297	
Other life (re)insurance and health (re)insurance obligations	R0240	-	
Total capital at risk for all life (re)insurance obligations	R0250		1.273.592

Overall MCR calculation

(in migliaia di euro)

		C0070
Linear MCR	R0300	281.076
SCR	R0310	637.067
MCR cap	R0320	286.680
MCR floor	R0330	159.267
Combined MCR	R0340	281.076
Absolute floor of the MCR	R0350	3.700
		C0070
Minimum Capital Requirement	R0400	281.076



INTESA SANPAOLO RBM SALUTE S.P.A.

QRT Intesa Sanpaolo RBM SALUTE: S.02.01.02

Annex I

S.02.01.02

Balance sheet

(in migliaia di euro)

Assets		Solvency II value
		C0010
Goodwill	R0010	-
Deferred acquisition costs	R0020	-
Intangible assets	R0030	-
Deferred tax assets	R0040	108.380
Pension benefit surplus	R0050	-
Property, plant & equipment held for own use	R0060	6.782
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	290.097
Property (other than for own use)	R0080	-
Holdings in related undertakings, including participations	R0090	-
Equities	R0100	50
Equities - listed	R0110	50
Equities - unlisted	R0120	-
Bonds	R0130	290.047
Government Bonds	R0140	290.047
Corporate Bonds	R0150	-
Structured notes	R0160	-
Collateralised securities	R0170	-
Collective Investments Undertakings	R0180	-
Derivatives	R0190	-
Deposits other than cash equivalents	R0200	-
Other investments	R0210	-
Assets held for index-linked and unit-linked contracts	R0220	-
Loans and mortgages	R0230	-
Loans on policies	R0240	-
Loans and mortgages to individuals	R0250	-
Other loans and mortgages	R0260	-
Reinsurance recoverables from:	R0270	69.755
Non-life and health similar to non-life	R0280	69.755
Non-life excluding health	R0290	-
Health similar to non-life	R0300	69.755
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	-
Health similar to life	R0320	-
Life excluding health and index-linked and unit-linked	R0330	-
Life index-linked and unit-linked	R0340	-
Deposits to cedants	R0350	-
Insurance and intermediaries receivables	R0360	97.172
Reinsurance receivables	R0370	-
Receivables (trade, not insurance)	R0380	60.045
Own shares (held directly)	R0390	-
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	-
Cash and cash equivalents	R0410	327.184
Any other assets, not elsewhere shown	R0420	28.552
Total assets	R0500	987.965

(in migliaia di euro)

Liabilities		Solvency II value
		C0010
Technical provisions – non-life	R0510	354.623
Technical provisions – non-life (excluding health)	R0520	-
Technical provisions calculated as a whole	R0530	-
Best Estimate	R0540	-
Risk margin	R0550	-
Technical provisions - health (similar to non-life)	R0560	354.623
Technical provisions calculated as a whole	R0570	-
Best Estimate	R0580	343.373
Risk margin	R0590	11.250
Technical provisions - life (excluding index-linked and unit-linked)	R0600	-
Technical provisions - health (similar to life)	R0610	-
Technical provisions calculated as a whole	R0620	-
Best Estimate	R0630	-
Risk margin	R0640	-
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	-
Technical provisions calculated as a whole	R0660	-
Best Estimate	R0670	-
Risk margin	R0680	-
Technical provisions – index-linked and unit-linked	R0690	-
Technical provisions calculated as a whole	R0700	-
Best Estimate	R0710	-
Risk margin	R0720	-
Other technical provisions	R0730	-
Contingent liabilities	R0740	-
Provisions other than technical provisions	R0750	94.397
Pension benefit obligations	R0760	888
Deposits from reinsurers	R0770	-
Deferred tax liabilities	R0780	-
Derivatives	R0790	-
Debts owed to credit institutions	R0800	-
Financial liabilities other than debts owed to credit institutions	R0810	-
Insurance & intermediaries payables	R0820	10.746
Reinsurance payables	R0830	20.460
Payables (trade, not insurance)	R0840	15.753
Subordinated liabilities	R0850	-
Subordinated liabilities not in Basic Own Funds	R0860	-
Subordinated liabilities in Basic Own Funds	R0870	-
Any other liabilities, not elsewhere shown	R0880	2.281
Total liabilities	R0900	499.148
Excess of assets over liabilities	R1000	488.817

Annex 1
S.17.01.02
Non-life Technical Provisions

In compliance with																	
	Direct business and accepted proportional reinsurance							Accepted non-proportional reinsurance							Total Non-Life obligation		
	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	Credit and suretyship insurance	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	
	R0120	C0130	C0040	C0150	C0080	C0170	C0090	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180

(in millions of euro)

QRT Intesa Sanpaolo RBM SALUTE: S.19.01.21

Annex I
S.19.01.21
Non-life Insurance Claims Information

Total Non-Life Business

Accident year / Underwriting year	20020	1

Gross Claims Paid (non-cumulative)
(absolute amount)

Year	Development year															In Current year	Sum of years (cumulative)
	0	1	2	3	4	5	6	7	8	9	10 & +	11	12	13	14		
	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150		
Prior	R0100															R0170	C0180
N-14	R0110	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-13	R0120	7.006	4.444	179	18	4	106	-	-	-	-	-	-	-	-	-	11.758
N-12	R0130	12.687	10.621	271	58	5	10	0	2	0	-	-	-	-	-	-	23.655
N-11	R0140	18.917	14.661	758	99	50	5	1	0	-	-	-	-	-	-	-	34.490
N-10	R0150	28.073	27.122	1.885	283	59	18	8	0	50	-	-	-	-	-	-	57.499
N-9	R0160	88.536	12.962	2.111	302	131	46	1	33	7	1	-	-	-	-	1	104.131
N-8	R0170	126.341	29.284	1.997	830	(214)	(2)	74	42	1	-	-	-	-	-	1	158.353
N-7	R0180	173.017	36.309	4.067	884	223	63	68	13	-	-	-	-	-	-	13	214.643
N-6	R0190	210.851	47.099	7.231	639	48	104	24	-	-	-	-	-	-	-	24	265.996
N-5	R0200	189.147	94.823	5.112	309	279	157	-	-	-	-	-	-	-	-	157	289.827
N-4	R0210	189.814	129.873	4.199	589	445	-	-	-	-	-	-	-	-	-	445	324.920
N-3	R0220	269.084	123.609	4.190	1.044	-	-	-	-	-	-	-	-	-	-	1.044	397.926
N-2	R0230	371.574	80.153	6.377	-	-	-	-	-	-	-	-	-	-	-	6.377	458.105
N-1	R0240	235.504	116.213	-	-	-	-	-	-	-	-	-	-	-	-	116.213	351.717
N	R0250	463.144	-	-	-	-	-	-	-	-	-	-	-	-	-	463.144	463.144
Total																	587.419

Gross undiscounted Best Estimate Claims Provisions
(absolute amount)

Year	Development year															Year end (discounted data)
	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	
	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0310	C0320	C0330	C0340	C0350
Prior	R0100															
N-14	R0110	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-13	R0120	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-12	R0130	10.154	1.409	30	3	7	2	-	-	-	-	-	-	-	-	-
N-11	R0140	18.653	1.672	26	8	7	-	-	0	0	-	-	-	-	-	-
N-10	R0150	26.215	233	114	32	0	79	32	81	35	-	-	-	-	-	-
N-9	R0160	11.588	1.225	107	2	43	10	104	82	36	-	-	-	-	-	-
N-8	R0170	22.912	1.231	8	76	1	2	20	4	1	-	-	-	-	-	-
N-7	R0180	36.974	505	71	35	9	77	14	11	-	-	-	-	-	-	-
N-6	R0190	42.165	829	175	134	69	48	15	-	-	-	-	-	-	-	-
N-5	R0200	83.961	1.931	234	374	268	76	-	-	-	-	-	-	-	-	-
N-4	R0210	142.800	4.965	647	359	181	-	-	-	-	-	-	-	-	-	-
N-3	R0220	143.699	6.090	980	350	-	-	-	-	-	-	-	-	-	-	-
N-2	R0230	92.194	5.604	1.166	-	-	-	-	-	-	-	-	-	-	-	-
N-1	R0240	124.505	5.734	-	-	-	-	-	-	-	-	-	-	-	-	-
N	R0250	230.660	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total																

QRT Intesa Sanpaolo RBM SALUTE: S.23.01.01

S.23.01.01
Own funds

(in migliaia di euro)

		Total C0010	Tier 1 - unrestricted C0020	Tier 1 - restricted C0030	Tier 2 C0040	Tier 3 C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	269.000	269.000			
Share premium account related to ordinary share capital	R0030	-	-			
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	-	-			
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	109.837	109.837			
Subordinated liabilities	R0140					
An amount equal to the value of net deferred tax assets	R0160	108.380				
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180					
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	R0220					
Deductions						
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	R0290	487.217	378.837	-	-	-
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390					

(in migliaia di euro)

		Total C0010	Tier 1 - unrestricted C0020	Tier 1 - restricted C0030	Tier 2 C0040	Tier 3 C0050
Total ancillary own funds	R0400					
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	487.217	378.837	-	-	-
Total available own funds to meet the MCR	R0510	378.837	378.837	-	-	-
Total eligible own funds to meet the SCR	R0540	438.840	378.837	-	-	-
Total eligible own funds to meet the MCR	R0550	378.837	378.837	-	-	-
SCR	R0580	400.017				
MCR	R0600	100.004				
Ratio of Eligible own funds to SCR	R0620	110%				
Ratio of Eligible own funds to MCR	R0640	379%				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	488.817
Own shares (held directly and indirectly)	R0710	-
Foreseeable dividends, distributions and charges	R0720	1.600
Other basic own fund items	R0730	377.380
Adjustment for restricted own fund items in respect of matching adjustment	R0740	-
Reconciliation reserve	R0760	109.837
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	-
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	16.565
Total Expected profits included in future premiums (EPIFP)	R0790	16.565

QRT Intesa Sanpaolo RBM SALUTE: S.25.01.21

Annex I

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

(in migliaia di euro)

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
Market risk	R0010	4.149		
Counterparty default risk	R0020	49.864		
Life underwriting risk	R0030	-		
Health underwriting risk	R0040	117.987		
Non-life underwriting risk	R0050	-		
Diversification	R0060	-31.618		
Intangible asset risk	R0070	-		
Basic Solvency Capital Requirement	R0100	140.413		

Calculation of Solvency Capital Requirement		C0100
Operational risk	R0130	14.637
Loss-absorbing capacity of technical provisions	R0140	-
Loss-absorbing capacity of deferred taxes	R0150	-
Capital requirement for business operated in accordance with Art. 4 of	R0160	-
Solvency capital requirement excluding capital add-on	R0200	155.050
Capital add-on already set	R0210	244.967
Solvency capital requirement	R0220	400.017
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirement for remaining	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced	R0420	
Total amount of Notional Solvency Capital Requirement for matching	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

QRT Intesa Sanpaolo RBM SALUTE: S.28.01.01

Annex I

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

(in migliaia di euro)

MCRNL Result	R0010	C0010
		30.225

(in migliaia di euro)

		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	273.619	369.467
Income protection insurance and proportional reinsurance	R0030	-	-
Workers' compensation insurance and proportional reinsurance	R0040	-	-
Motor vehicle liability insurance and proportional reinsurance	R0050	-	-
Other motor insurance and proportional reinsurance	R0060	-	-
Marine, aviation and transport insurance and proportional reinsurance	R0070	-	-
Fire and other damage to property insurance and proportional reinsurance	R0080	-	-
General liability insurance and proportional reinsurance	R0090	-	-
Credit and suretyship insurance and proportional reinsurance	R0100	-	-
Legal expenses insurance and proportional reinsurance	R0110	-	-
Assistance and proportional reinsurance	R0120	-	-
Miscellaneous financial loss insurance and proportional reinsurance	R0130	-	-
Non-proportional health reinsurance	R0140	-	-
Non-proportional casualty reinsurance	R0150	-	-
Non-proportional marine, aviation and transport reinsurance	R0160	-	-
Non-proportional property reinsurance	R0170	-	-

Linear formula component for life insurance and reinsurance obligations

C0040

MCR _L Result	R0200	

(in migliaia di euro)

		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		
Obligations with profit participation - future discretionary benefits	R0220		
Index-linked and unit-linked insurance obligations	R0230		
Other life (re)insurance and health (re)insurance obligations	R0240		
Total capital at risk for all life (re)insurance obligations	R0250		

Overall MCR calculation

(in migliaia di euro)

		C0070
Linear MCR	R0300	30.225
SCR	R0310	400.017
MCR cap	R0320	180.008
MCR floor	R0330	100.004
Combined MCR	R0340	100.004
Absolute floor of the MCR	R0350	2.500
		C0070
Minimum Capital Requirement	R0400	100.004

QRT CARGEAS ASSICURAZIONI S.P.A

QRT CARGEAS INSURANCE: S.02.01.02

Annex I

S.02.01.02

Balance sheet

(in migliaia di euro)

Assets		Solvency II value C0010
Goodwill	R0010	-
Deferred acquisition costs	R0020	-
Intangible assets	R0030	-
Deferred tax assets	R0040	0
Pension benefit surplus	R0050	-
Property, plant & equipment held for own use	R0060	1.706
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	416.416
Property (other than for own use)	R0080	-
Holdings in related undertakings, including participations	R0090	-
Equities	R0100	0
Equities - listed	R0110	0
Equities - unlisted	R0120	-
Bonds	R0130	380.581
Government Bonds	R0140	234.004
Corporate Bonds	R0150	135.494
Structured notes	R0160	11.084
Collateralised securities	R0170	-
Collective Investments Undertakings	R0180	35.834
Derivatives	R0190	-
Deposits other than cash equivalents	R0200	-
Other investments	R0210	-
Assets held for index-linked and unit-linked contracts	R0220	-
Loans and mortgages	R0230	0
Loans on policies	R0240	-
Loans and mortgages to individuals	R0250	-
Other loans and mortgages	R0260	0
Reinsurance recoverables from:	R0270	18.926
Non-life and health similar to non-life	R0280	18.926
Non-life excluding health	R0290	17.435
Health similar to non-life	R0300	1.491
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	-
Health similar to life	R0320	-
Life excluding health and index-linked and unit-linked	R0330	-
Life index-linked and unit-linked	R0340	-
Deposits to cedants	R0350	-
Insurance and intermediaries receivables	R0360	20.672
Reinsurance receivables	R0370	1.399
Receivables (trade, not insurance)	R0380	44.062
Own shares (held directly)	R0390	-
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	-
Cash and cash equivalents	R0410	13.659
Any other assets, not elsewhere shown	R0420	1.928
Total assets	R0500	518.768

(in migliaia di euro)

Liabilities		Solvency II value
		C0010
Technical provisions – non-life	R0510	295.328
Technical provisions – non-life (excluding health)	R0520	201.266
Technical provisions calculated as a whole	R0530	-
Best Estimate	R0540	189.049
Risk margin	R0550	12.217
Technical provisions - health (similar to non-life)	R0560	94.062
Technical provisions calculated as a whole	R0570	-
Best Estimate	R0580	87.910
Risk margin	R0590	6.152
Technical provisions - life (excluding index-linked and unit-linked)	R0600	-
Technical provisions - health (similar to life)	R0610	-
Technical provisions calculated as a whole	R0620	-
Best Estimate	R0630	-
Risk margin	R0640	-
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	-
Technical provisions calculated as a whole	R0660	-
Best Estimate	R0670	-
Risk margin	R0680	-
Technical provisions – index-linked and unit-linked	R0690	-
Technical provisions calculated as a whole	R0700	-
Best Estimate	R0710	-
Risk margin	R0720	-
Other technical provisions	R0730	-
Contingent liabilities	R0740	-
Provisions other than technical provisions	R0750	7.032
Pension benefit obligations	R0760	4.178
Deposits from reinsurers	R0770	0
Deferred tax liabilities	R0780	9.470
Derivatives	R0790	0
Debts owed to credit institutions	R0800	0
Financial liabilities other than debts owed to credit institutions	R0810	1.181
Debts owed to non-credit institutions resident domestically	R0812	1.181
Insurance & intermediaries payables	R0820	9.979
Reinsurance payables	R0830	707
Payables (trade, not insurance)	R0840	17.671
Subordinated liabilities	R0850	-
Subordinated liabilities not in Basic Own Funds	R0860	-
Subordinated liabilities in Basic Own Funds	R0870	-
Any other liabilities, not elsewhere shown	R0880	17.763
Total liabilities	R0900	363.309
Excess of assets over liabilities	R1000	155.459

QRT CARGEAS INSURANCE: S.05.01.02

Annex I
S.05.01.02
Premiums, claims and expense by line of business

in millions of euro

	Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)										Line of Business for: accepted non-proportional insurance						
	Medical expense insurance C0010	Income protection insurance C0020	Workers' compensation insurance C0030	Motor vehicle liability insurance C0040	Other motor insurance C0050	Marine, aviation and transport insurance C0060	Fire and other damage to property insurance C0070	General liability insurance C0080	Credit and suretyship insurance C0090	Legal expenses insurance C0100	Assistance C0110	Miscellaneous financial loss C0120	Health C0130	Casualty C0140	Marine, aviation, transport C0150	Property C0160	Total C0200
Premiums written																	
Gross - Direct Business	R0110	8,192	31,957	-	28,996	9,335	60	34,749	13,994	615	5,909	5,907	777	-	-	-	140,201
Gross - Proportional reinsurance accepted	R0120	-	-	-	-	-	-	-	8	-	-	-	-	-	-	-	11
Gross - Non-proportional reinsurance accepted	R0130	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Reinsurers share	R0140	446	457	-	524	222	42	1,904	424	172	-	2,739	-406	-	-	-	6,523
Net	R0200	7,736	31,501	-	28,473	9,113	38	32,845	13,279	442	5,909	3,169	1,183	-	-	-	133,668
Premiums earned																	
Gross - Direct Business	R0210	17,251	43,266	-	40,152	11,948	119	37,890	14,798	777	6,696	6,876	7,323	-	-	-	187,060
Gross - Proportional reinsurance accepted	R0220	-	-	-	-	-	-	-	10	-	-	-	-	-	-	-	12
Gross - Non-proportional reinsurance accepted	R0230	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Reinsurers share	R0240	512	990	-	524	222	58	2,124	446	312	0	3,145	1,202	-	-	-	9,554
Net	R0300	16,740	42,277	-	39,629	11,727	61	35,767	14,322	466	6,696	3,731	6,121	-	-	-	177,557
Claims incurred																	
Gross - Direct Business	R0310	7,128	9,735	-	18,968	7,563	-156	11,698	164	-198	555	821	698	-	-	-	56,985
Gross - Proportional reinsurance accepted	R0320	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2
Gross - Non-proportional reinsurance accepted	R0330	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Reinsurers share	R0340	-8	692	-	1,744	400	-94	-412	-353	-172	-	692	166	-	-	-	2,636
Net	R0400	7,136	9,053	-	17,252	7,163	-42	12,101	519	-26	555	138	922	-	-	-	54,351
Changes in other technical provisions																	
Gross - Direct Business	R0410	-	-	-	-	-28	-	-104	-	-	-	-	-	-	-	-	-132
Gross - Proportional reinsurance accepted	R0420	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gross - Non-proportional reinsurance accepted	R0430	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Reinsurers share	R0440	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Net	R0500	-	-	-	-	-28	-	-104	-	-	-	-	-	-	-	-	-132
Expenses incurred																	
Gross - Direct Business	R0510	3,535	18,796	-	11,460	3,908	-12	19,941	7,751	314	2,880	2,132	615	-	-	-	71,338
Other expenses	R1200	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	11,960
Total expenses	R1300	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	82,899

Annex I
S.17.01.02
Non-life T

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QRT CARGEAS INSURANCE: S.19.01.21

Annex I
S.19.01.21
Non-life Insurance Claims Information

Total Non-Life Business

Accident year / Underwriting year	2020	1

Gross Claims Paid (non-cumulative)
(absolute amount)

Development year																(in migliaia di euro)		(in migliaia di euro)	(in migliaia di euro)	(in migliaia di euro)
Year	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15 & +				
	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160		In Current year		Sum of years (cumulative)
Prior	R0100																	R0100	C0160	C0160
N-14	R0110	58.888	57.356	20.842	9.171	5.687	2.631	2.523	1.574	1.041	1.088	1.140	221	1.013	235	7	589	R0110		589
N-13	R0120	54.319	47.980	19.508	7.855	4.697	1.884	2.518	1.459	2.948	1.508	2.260	1.338	290	29			R0120		163.415
N-12	R0130	44.128	36.269	14.419	6.911	3.062	1.578	2.208	1.778	1.631	895	948	578	68				R0130		148.594
N-11	R0140	34.577	28.672	16.933	4.470	1.573	1.830	1.111	1.136	437	511	301	274					R0140		114.472
N-10	R0150	32.710	30.093	14.302	5.279	4.122	3.295	1.247	1.060	773	241	292						R0150		91.825
N-9	R0160	31.504	31.722	11.321	5.399	2.402	2.447	1.265	393	196	469							R0160		93.415
N-8	R0170	33.999	32.519	13.946	3.922	1.450	844	678	398	191								R0170		87.118
N-7	R0180	33.489	30.109	14.808	3.682	873	1.311	1.887	443									R0180		87.948
N-6	R0190	34.677	28.324	12.839	3.835	2.233	2.719	485										R0190		86.601
N-5	R0200	37.827	29.387	10.758	3.986	1.038	880											R0200		85.113
N-4	R0210	44.186	38.624	18.980	4.868	2.042												R0210		83.876
N-3	R0220	36.113	31.908	14.718	4.784													R0220		108.701
N-2	R0230	42.382	29.309	12.185														R0230		4.784
N-1	R0240	34.487	25.587															R0240		12.185
N	R0250	33.086																R0250		83.876
																	Total	R0260	81.411	60.075

Gross undiscounted Best Estimate Claims Provisions
(absolute amount)

Development year																(in migliaia di euro)		(in migliaia di euro)	(in migliaia di euro)
Year	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15 & +		Year end (discounted data)	
	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0310	C0320	C0330	C0340	C0350		C0360	
Prior	R0100																	R0100	
N-14	R0110	-	-	-	-	-	-	-	-	-	9.874	7.499	6.612	5.237	3.718	2.840		R0110	11.822
N-13	R0120	-	-	-	-	-	-	-	-	14.295	11.225	6.613	3.759	2.211	1.978			R0120	2.838
N-12	R0130	-	-	-	-	-	-	13.392	9.905	8.832	5.827	3.698	3.434					R0130	1.974
N-11	R0140	-	-	-	-	-	-	13.571	9.769	8.030	5.910	3.504	1.958					R0140	3.435
N-10	R0150	-	-	-	-	-	18.423	13.789	10.603	7.327	4.957	3.151						R0150	1.958
N-9	R0160	-	-	-	-	21.174	15.577	12.635	9.194	6.012	4.277							R0160	3.152
N-8	R0170	-	-	-	22.238	18.019	13.182	8.804	4.869	2.835								R0170	4.274
N-7	R0180	-	-	28.436	20.380	16.564	11.927	6.752	4.063									R0180	2.833
N-6	R0190	-	37.476	23.546	16.501	10.432	6.612	4.480										R0190	4.062
N-5	R0200	69.221	39.037	24.110	15.572	10.418	7.377											R0200	4.477
N-4	R0210	80.063	43.034	21.113	14.447	10.785												R0210	7.374
N-3	R0220	66.595	34.268	20.964	16.151													R0220	10.785
N-2	R0230	63.485	32.237	22.654														R0230	16.157
N-1	R0240	55.429	31.789															R0240	22.683
N	R0250	56.941																R0250	31.847
																	Total	R0260	186.729

QRT CARGEAS INSURANCE: S.23.01.01

Annex I
S.23.01.01
Own funds

(in migliaia di euro)

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	32,812	32,812			
Share premium account related to ordinary share capital	R0030	439	439			
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	-	-			
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	122,208	122,208			
Subordinated liabilities	R0140					
An amount equal to the value of net deferred tax assets	R0160					
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180					
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	R0220					
Deductions						
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	R0290	155,459	155,459	-	-	-
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390					

(in migliaia di euro)

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Total ancillary own funds	R0400					
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	155,459	155,459	-	-	-
Total available own funds to meet the MCR	R0510	155,459	155,459	-	-	-
Total eligible own funds to meet the SCR	R0540	155,459	155,459	-	-	-
Total eligible own funds to meet the MCR	R0550	155,459	155,459	-	-	-
SCR	R0580	81,829				
MCR	R0600	36,823				
Ratio of Eligible own funds to SCR	R0620	190%				
Ratio of Eligible own funds to MCR	R0640	422%				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	155,459
Own shares (held directly and indirectly)	R0710	0
Foreseeable dividends, distributions and charges	R0720	-
Other basic own fund items	R0730	33,251
Adjustment for restricted own fund items in respect of matching adjustment	R0740	-
Reconciliation reserve	R0760	122,208
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	-
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	5,643
Total Expected profits included in future premiums (EPIFP)	R0790	5,643

QRT CARGEAS INSURANCE: S.25.01.21

Annex I

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

(in migliaia di euro)

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
Market risk	R0010	19.784		
Counterparty default risk	R0020	6.061		
Life underwriting risk	R0030			
Health underwriting risk	R0040	38.531		
Non-life underwriting risk	R0050	54.080		
Diversification	R0060	-39.348		
Intangible asset risk	R0070			
Basic Solvency Capital Requirement	R0100	79.108		

Calculation of Solvency Capital Requirement

		C0100
Operational risk	R0130	8.309
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	-5.588
Capital requirement for business operated in accordance with Art. 4 of	R0160	0
Solvency capital requirement excluding capital add-on	R0200	81.829
Capital add-on already set	R0210	
Solvency capital requirement	R0220	
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirement for remaining	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced	R0420	
Total amount of Notional Solvency Capital Requirement for matching	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

QRT CARGEAS INSURANCE: S.28.01.01

Annex I

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

(in migliaia di euro)

		C0010
MCRNL Result	R0010	39.833

(in migliaia di euro)

		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	1.453	8.036
Income protection insurance and proportional reinsurance	R0030	84.967	31.200
Workers' compensation insurance and proportional reinsurance	R0040	-	-
Motor vehicle liability insurance and proportional reinsurance	R0050	90.052	28.472
Other motor insurance and proportional reinsurance	R0060	5.606	9.113
Marine, aviation and transport insurance and proportional reinsurance	R0070	20	38
Fire and other damage to property insurance and proportional reinsurance	R0080	23.309	32.845
General liability insurance and proportional reinsurance	R0090	32.068	13.270
Credit and suretyship insurance and proportional reinsurance	R0100	419	442
Legal expenses insurance and proportional reinsurance	R0110	2.839	5.909
Assistance and proportional reinsurance	R0120	699	3.169
Miscellaneous financial loss insurance and proportional reinsurance	R0130	16.602	1.183
Non-proportional health reinsurance	R0140	-	-
Non-proportional casualty reinsurance	R0150	-	-
Non-proportional marine, aviation and transport reinsurance	R0160	-	-
Non-proportional property reinsurance	R0170	-	-

Linear formula component for life insurance and reinsurance obligations

C0040

MCR _L Result	R0200	

(in migliaia di euro)

		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		
Obligations with profit participation - future discretionary benefits	R0220		
Index-linked and unit-linked insurance obligations	R0230		
Other life (re)insurance and health (re)insurance obligations	R0240		
Total capital at risk for all life (re)insurance obligations	R0250		

Overall MCR calculation

(in migliaia di euro)

		C0070
Linear MCR	R0300	39.833
SCR	R0310	81.829
MCR cap	R0320	36.823
MCR floor	R0330	20.457
Combined MCR	R0340	36.823
Absolute floor of the MCR	R0350	3.700
		C0070
Minimum Capital Requirement	R0400	36.823

INDEPENDENT AUDITORS REPORT

The following pages contain the Reports of the auditing firm KPMG S.p.A., which was engaged by Intesa Sanpaolo Vita S.p.A.. The reports include the findings of the audits of the Intesa Sanpaolo Vita Insurance Group and the Italian Group companies for Section D "Information on valuation for solvency purposes" and sub-section E.1 "Own Funds" and E.2 "Solvency capital requirement and minimum capital requirement", according to the provisions of Article 47-septies(7) of the Italian Private Insurance Code, and in accordance with IVASS Regulation no. 42/2018.

The Insurance Parent Company INTESA SANPAOLO VITA S.p.A.

Registered office: Corso Inghilterra, 3 – 10138 Turin

Administration offices: Viale Stelvio, 55/57 – 20159 Milan

Turin Companies Register No. 02505650370 – Share capital 320,422,508.00 euro fully paid up

Listed on the Register of Insurance and Reinsurance Companies at no. 1.00066

Parent Company of the Intesa Sanpaolo Vita Insurance Group, listed on the Register of Insurance Groups at no. 28

Company subject to management and coordination by Intesa Sanpaolo S.p.A.

Intesa Sanpaolo Vita Insurance Group

Solvency and Financial Condition Report
as at December 31, 2021

Independent auditor's report pursuant to article 47-septies,
paragraph 7 of Legislative Decree n. 209, dated 7 September 2005, and
article 5, paragraph 1, letters a) and b) of IVASS Regulation n. 42,
dated 2 August 2018

Independent auditor's report pursuant to article 47-septies,
paragraph 7 of Legislative Decree n. 209, dated 7 September 2005,
and article 5, paragraph 1, letters a) and b) of IVASS Regulation n. 42,
dated 2 August 2018

(Translation from the original Italian text)

To the Board of Directors of
Intesa Sanpaolo Vita S.p.A.

Opinion

We have audited the following elements of the Single Solvency and Financial Condition Report (the "SFCR") of Intesa Sanpaolo Vita Insurance Group (the "Group") as at December 31, 2021, prepared pursuant to article 47-septies of Legislative Decree n. 209, dated 7 September 2005:

- reporting templates "S.02.01.02 Balance sheet" and "S.23.01.22 Own funds" (the "reporting templates") of the Group;
- sections "D. Valuation for solvency purposes" and "E.1 Own funds" (the "disclosures") of the Group.

Our procedures do not extend to:

- the components of technical provisions related to Risk Margin (items R0550, R0590, R0680 and R0720) of the reporting template "S.02.01.02 Balance sheet";
- the Solvency Capital Requirement (item R0680) and to the Minimum consolidated Capital Requirement (item R0610) of the reporting template "S.23.01.22 Own funds";

consequently, they are excluded from our opinion.

The reporting templates and the disclosures, with the exclusions above mentioned, constitute "the MVBS and OF reporting templates and related disclosures" as a whole.

In our opinion, the MVBS and OF reporting templates and related disclosures of the Group, included in the SFCR of the Intesa Sanpaolo Vita Insurance Group as at December 31, 2021 have been prepared, in all material respects, in accordance with the applicable European Union regulations and the national sectoral regulation.

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the MVBS and OF reporting templates and related disclosures* section of our report.

We are independent of Intesa Sanpaolo Vita S.p.A. (the "Parent Company" or the "Company") in accordance with the regulations and standards on ethics and independence of the Code of Ethics for Professional Accountants (IESBA Code) issued by the International Ethics Standards Board for Accountants applicable to the audit of the MVBS and OF reporting templates and related disclosures. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Emphasis of matter – Basis of preparation, purpose and restriction on use

We draw attention to section “D. Valuation for solvency purposes” which describes the basis of preparation. The MVBS and OF reporting templates and related disclosures have been prepared for solvency supervision purposes in accordance with the applicable European Union regulations and the national sectoral regulation, which results in a special purpose framework. As a result, they may not be suitable for other purposes. Our opinion is not modified in respect of this matter.

Other matters

The Company has prepared the consolidated financial statements as at December 31, 2021 in accordance with International Financial Reporting Standards as adopted by the European Union and the Regulation issued to implement article 90 of Legislative Decree n. 209, dated 7 September 2005, governing the criteria for their preparation, on which we issued our independent auditor’s report dated March 2, 2022.

The Company has prepared the reporting templates “S.25.01.22 Solvency Capital Requirement – for groups on Standard Formula” and the related disclosure presented in section “E.2 Solvency capital requirement and minimum capital requirement” included in the SFCR in accordance with the applicable European Union regulations, the national sectoral regulation and the undertaking specific parameters, as described in the disclosures included in the SFCR and as approved by IVASS which were subject to our limited review pursuant to article 4, paragraph 1, letter c) of IVASS Regulation n. 42, dated 2 August 2018, following which we have issued today a limited review report attached to the SFCR.

Other Information included in the SFCR

The Directors are responsible for the preparation of the other information included in the SFCR in accordance with the applicable laws and regulations governing the basis of preparation.

The other information included in the SFCR are:

- reporting templates “S.05.01.02 Premiums, claims and expenses by line of business”, “S.22.01.22 Impact of long term guarantees and transitional measures”, “S.25.02.22 Solvency Capital Requirement – for groups on Standard Formula” and “S.32.01.22 Undertakings in the scope of the group”;
- sections “A. Activities and Results”, “B. Governance system”, “C. Risk profile”, “E.2 Solvency capital requirement and minimum capital requirement”, “E.3 Use of the share price risk submodule based on the duration in the SCR calculation”, “E.4 Differences between the Standard Formula and the internal model”, “E.5 Failure to meet the MCR and SCR” and “E.6 Other information”.

Our opinion on the MVBS and OF reporting templates and related disclosures does not cover the other information.

In connection with our audit of the MVBS and OF reporting templates and related disclosures, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the MVBS and OF reporting templates and related disclosures or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify possible inconsistencies or material misstatement, we are required to determine if there is a material misstatement in the MVBS and OF reporting templates and related disclosures or in the other information. If, based on the work performed, we conclude that there is a material misstatement, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of Directors and Those Charged with Governance for the MVBS and OF reporting templates and related disclosures

The Directors are responsible for the preparation of the MVBS and OF reporting templates and related disclosures in accordance with the applicable laws and regulations governing the basis of preparation, and, within the terms provided by the law, for such internal control as they determine is necessary to enable the preparation of MVBS and OF reporting templates and related disclosures that are free from material misstatement, whether due to fraud or error.

The Directors are responsible for assessing the Group's ability to continue as a going concern and, in preparing the MVBS and OF reporting templates and related disclosures, for the appropriateness of the use of the going concern and for disclosing related matters.

The Directors use the going concern basis of accounting in the preparation of MVBS and OF reporting templates and related disclosures unless they either intend to liquidate the Parent Company or to cease operations or have no realistic alternative but to do so.

The statutory audit committee ("Collegio Sindacale") is responsible, within the terms provided by the law, for overseeing the Group's financial reporting process.

Auditor's Responsibilities for the Audit of the MVBS and OF reporting templates and related disclosures

Our objectives are to obtain reasonable assurance about whether the MVBS and OF reporting templates and related disclosures as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with International Standards on Auditing (ISAs) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the MVBS and OF reporting templates and related disclosures.

As part of an audit in accordance with International Standards on Auditing (ISAs), we have exercised professional judgment and maintained professional skepticism throughout the audit. In addition:

- we have identified and assessed the risks of material misstatement of the MVBS and OF reporting templates and related disclosures, whether due to fraud or error; have designed and performed audit procedures responsive to those risks and obtained audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;
- we have obtained an understanding of internal control relevant to the audit of the MVBS and OF reporting templates and related disclosures in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control;
- we have evaluated the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Directors;
- we have concluded on the appropriateness of Directors' use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures or, if such disclosures are inadequate, to consider this matter in forming our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Parent Company to cease to continue as a going concern.

We have communicated with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identified during our audit.

Milan, 20th May 2022

EY S.p.A.

Signed by: Paolo Ancona, Auditor

This independent auditor's report has been translated into the English language solely for the convenience of international readers. Accordingly, only the original text in Italian language is authoritative.

Intesa Sanpaolo Vita Insurance Group

Solvency and Financial Condition Report
as at December 31, 2021

Independent auditor's review report pursuant to article 47-septies,
paragraph 7 of Legislative Decree n. 209, dated 7 September 2005, and
article 5, paragraph 1, letter c) of IVASS Regulation n. 42,
dated 2 August 2018

Independent auditor's review report pursuant to article 47-septies, paragraph 7 of Legislative Decree n. 209, dated 7 September 2005, and article 5, paragraph 1, letter c) of IVASS Regulation n. 42, dated 2 August 2018

(Translation from the original Italian text)

To the Board of Directors of
Intesa Sanpaolo Vita S.p.A.

Introduction

We have reviewed the accompanying reporting templates "S.25.01.22 Solvency Capital Requirement – for undertakings on Standard Formula" (the "SCR and MCR reporting template") and the related disclosures presented in the section "E.2 Solvency capital requirement and minimum capital requirement" (the "disclosures" or the "related disclosures") of Intesa Sanpaolo Vita Insurance Group (the "Group") included in the Single Solvency and Financial Condition Report of the Group (the "SFCR") as at December 31, 2021, pursuant to article 47-septies of Legislative Decree n. 209, dated 7 September 2005.

The SCR and MCR reporting templates and related disclosures have been prepared by the Management in accordance with the applicable European Union regulations, the national sectoral regulation and the undertaking specific parameters, as described in the disclosures included in the SFCR and as approved by IVASS.

Management's Responsibility

Management is responsible for the preparation of the SCR and MCR reporting templates and related disclosures in accordance with the applicable European Union regulations, the national sectoral regulation and the undertaking specific parameters, as described in the disclosures included in the SFCR and as approved by IVASS, and, within the terms provided by the law, for such internal control as they determine is necessary to enable the preparation of SCR and MCR reporting templates and related disclosures that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express a conclusion on SCR and MCR reporting templates and related disclosures. We conducted our review in accordance with International Standard on Review Engagements (*ISRE*) n. 2400 (*Revised*), *Engagements to review Historical Financial Statements*. *ISRE 2400 (Revised)* requires us to conclude whether anything has come to our attention that causes us to believe that the SCR and MCR reporting templates and related disclosures are not prepared, in all material respects, in accordance with the applicable European Union regulations, the national sectoral regulation and the undertaking specific parameters, as described in the disclosures included in the SFCR and as approved by IVASS. This Standard also requires us to comply with relevant ethical requirements.

The review of SCR and MCR reporting templates and related disclosures in accordance with *ISRE 2400 (Revised)* is a limited assurance engagement. The auditor performs procedures, primarily consisting of making inquiries of management and others within the entity, as appropriate, and applying analytical procedures, and evaluates the evidence obtained.

The procedures performed in a review are substantially less than those performed in an audit conducted in accordance with International Standards on Auditing (ISA). Accordingly, we do not express an audit opinion on SCR and MCR reporting templates and related disclosures.

Conclusion

Based on our review, nothing has come to our attention that causes us to believe that SCR and MCR reporting templates of Intesa Sanpaolo Vita Insurance Group and related disclosures included in the SFCR of the Intesa Sanpaolo Vita Insurance Group as at December 31, 2021 are not prepared, in all material respects, in accordance with the applicable European Union regulations, the national sectoral regulation and the undertaking specific parameters, as described in the disclosures included in the SFCR and as approved by IVASS.

Basis of preparation, purpose and restriction on use

Without modifying our conclusion, we draw attention to section “E.2 Solvency capital requirement and minimum capital requirement” included in the SFCR, which describes the basis of preparation of SCR and MCR reporting templates.

The SCR and MCR reporting templates and the related disclosures are prepared, for solvency supervision purposes, in accordance with the applicable European Union regulations, the national sectoral regulation and the undertaking specific parameters, as described in the disclosures included in the SFCR and as approved by IVASS, which collectively results in a special purpose framework. Consequently, they may not be suitable for other purposes. In particular, in accordance with article 45-sexies, paragraph 7 of Legislative Decree n. 209, dated 7 September 2005, the use of undertaking specific parameters briefly described within the disclosures of the SFCR were approved by IVASS within the scope of its supervisory functions. As provided for by the article 13 of IVASS Regulation n. 42 dated 2 August 2018, our conclusions are not expressed with regard to the decisions made by IVASS within the scope of its supervisory functions and therefore, in particular, to the suitability of the undertaking specific parameters for the purposes of the applicable European Union regulations and the national sectoral regulation.

Milan, 20th May 2022

EY S.p.A.

Signed by: Paolo Ancona, Auditor

This independent auditor's report has been translated into the English language solely for the convenience of international readers. Accordingly, only the original text in Italian language is authoritative.

Intesa Sanpaolo Vita S.p.A.

Solvency and Financial Condition Report
as at December 31, 2021

Independent auditor's report pursuant to article 47-septies,
paragraph 7 of Legislative Decree n. 209, dated 7 September 2005, and
article 4, paragraph 1, letters a) and b) of IVASS Regulation n. 42,
dated 2 August 2018

Independent auditor's report pursuant to article 47-septies,
paragraph 7 of Legislative Decree n. 209, dated 7 September 2005,
and article 4, paragraph 1, letters a) and b) of IVASS Regulation n. 42,
dated 2 August 2018

(Translation from the original Italian text)

To the Board of Directors of
Intesa Sanpaolo Vita S.p.A.

Opinion

We have audited the following elements of the Single Solvency and Financial Condition Report of the Intesa Sanpaolo Vita Insurance Group (the "SFCR") as at December 31, 2021, prepared pursuant to article 47-septies of Legislative Decree n. 209, dated 7 September 2005:

- reporting templates "S.02.01.02 Balance sheet" and "S.23.01.01 Own funds" (the "reporting templates") of Intesa Sanpaolo Vita S.p.A. (the "Company");
- sections "D. Valuation for solvency purposes" and "E.1 Own funds" (the "disclosures") of Intesa Sanpaolo Vita S.p.A..

Our procedures do not extend to:

- the components of technical provisions related to Risk Margin (items R0680 and R0720) of the reporting template "S.02.01.02 Balance sheet";
- the Solvency Capital Requirement (item R0580) and to the Minimum Capital Requirement (item R0600) of the reporting template "S.23.01.01 Own funds";

consequently, they are excluded from our opinion.

The reporting templates and the disclosures, with the exclusions above mentioned, constitute "the MVBS and OF reporting templates and related disclosures" as a whole.

In our opinion, the MVBS and OF reporting templates and related disclosures of Intesa Sanpaolo Vita S.p.A. included in the SFCR of the Intesa Sanpaolo Vita Insurance Group as at December 31, 2021 have been prepared, in all material respects, in accordance with the applicable European Union regulations and the national sectoral regulation.

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the MVBS and OF reporting templates and related disclosures* section of our report.

We are independent of the Company in accordance with the regulations and standards on ethics and independence of the Code of Ethics for Professional Accountants (IESBA Code) issued by the International Ethics Standards Board for Accountants applicable to the audit of the MVBS and OF reporting templates and related disclosures.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Emphasis of matter – Basis of preparation, purpose and restriction on use

We draw attention to section “D. Valuation for solvency purposes” which describes the basis of preparation. The MVBS and OF reporting templates and related disclosures have been prepared for solvency supervision purposes in accordance with the applicable European Union regulations and the national sectoral regulation, which results in a special purpose framework. As a result, they may not be suitable for other purposes. Our opinion is not modified in respect of this matter.

Other matters

The Company has prepared the financial statements as at December 31, 2021 in accordance with Italian regulations governing financial statements on which we issued our independent auditor's report dated March 2, 2022.

The Company has prepared the reporting templates “S.25.01.21 Solvency Capital Requirement – for undertakings on Standard Formula” and “S.28.02.01 Minimum Capital Requirement – Both life and non-life insurance activity” and the related disclosure presented in section “E.2 Solvency capital requirement and minimum capital requirement” included in the SFCR in accordance with the applicable European Union regulations and the national sectoral regulation, which were subject to our limited review pursuant to article 4, paragraph 1, letter c) of IVASS Regulation n. 42, dated 2 August 2018, following which we have issued today a limited review report attached to the SFCR.

Other Information included in the SFCR

The Directors are responsible for the preparation of the other information included in the SFCR in accordance with the applicable laws and regulations governing the basis of preparation.

The other information included in the SFCR are:

- reporting templates “S.05.01.02 Premiums, claims and expenses by line of business”, “S.12.01.02 Life and Health SLT Technical Provisions”, “S.17.01.02 Non-life Technical Provisions”, “S.19.01.21 Non-life Insurance Claims Information”, “S.22.01.21 Impact of long term guarantees and transitional measures”, S.25.01.21 Solvency Capital Requirement – for undertakings on Standard Formula” and “S.28.02.01 Minimum Capital Requirement - Both life and non-life insurance activity”;
- sections “A. Activities and Results”, “B. Governance system”, “C. Risk profile”, “E.2 Solvency capital requirement and minimum capital requirement”, “E.3 Use of the share price risk submodule based on the duration in the SCR calculation”, “E.4 Differences between the Standard Formula and the internal model”, “E.5 Failure to meet the MCR and SCR” and “E.6 Other information”.

Our opinion on the MVBS and OF reporting templates and related disclosures does not cover the other information.

In connection with our audit of the MVBS and OF reporting templates and related disclosures, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the MVBS and OF reporting templates and related disclosures or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify possible inconsistencies or material misstatement, we are required to determine if there is a material misstatement in the MVBS and OF reporting templates and related disclosures or in the other information. If, based on the work performed, we conclude that there is a material misstatement, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of Directors and Those Charged with Governance for the MVBS and OF reporting templates and related disclosures

The Directors are responsible for the preparation of the MVBS and OF reporting templates and related disclosures in accordance with the applicable laws and regulations governing the basis of preparation, and, within the terms provided by the law, for such internal control as they determine is necessary to enable the preparation of MVBS and OF reporting templates and related disclosures that are free from material misstatement, whether due to fraud or error.

The Directors are responsible for assessing the Company's ability to continue as a going concern and, in preparing the MVBS and OF reporting templates and related disclosures, for the appropriateness of the use of the going concern and for disclosing related matters.

The Directors use the going concern basis of accounting in the preparation of MVBS and OF reporting templates and related disclosures unless they either intend to liquidate the Company or to cease operations or have no realistic alternative but to do so.

The statutory audit committee ("Collegio Sindacale") is responsible, within the terms provided by the law, for overseeing the Company's financial reporting process.

Auditor's Responsibilities for the Audit of the MVBS and OF reporting templates and related disclosures

Our objectives are to obtain reasonable assurance about whether the MVBS and OF reporting templates and related disclosures as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with International Standards on Auditing (ISAs) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the MVBS and OF reporting templates and related disclosures.

As part of an audit in accordance with International Standards on Auditing (ISAs), we have exercised professional judgment and maintained professional skepticism throughout the audit. In addition:

- we have identified and assessed the risks of material misstatement of the MVBS and OF reporting templates and related disclosures, whether due to fraud or error; have designed and performed audit procedures responsive to those risks and obtained audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;
- we have obtained an understanding of internal control relevant to the audit of the MVBS and OF reporting templates and related disclosures in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control;
- we have evaluated the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Directors;
- we have concluded on the appropriateness of Directors' use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures or, if such disclosures are inadequate, to consider this matter in forming our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.

We have communicated with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identified during our audit.

Milan, 20th May 2022

EY S.p.A.

Signed by: Paolo Ancona, Auditor

This independent auditor's report has been translated into the English language solely for the convenience of international readers. Accordingly, only the original text in Italian language is authoritative.

Intesa Sanpaolo Vita S.p.A.

Solvency and Financial Condition Report
as at December 31, 2021

Independent auditor's review report pursuant to article 47-septies,
paragraph 7 of Legislative Decree n. 209, dated 7 September 2005, and
article 4, paragraph 1, letter c) of IVASS Regulation n. 42,
dated 2 August 2018

Independent auditor's review report pursuant to article 47-septies, paragraph 7 of Legislative Decree n. 209, dated 7 September 2005, and article 4, paragraph 1, letter c) of IVASS Regulation n. 42, dated 2 August 2018

(Translation from the original Italian text)

To the Board of Directors of
Intesa Sanpaolo Vita S.p.A.

Introduction

We have reviewed the accompanying reporting templates “S.25.01.21 Solvency Capital Requirement – for undertakings on Standard Formula” and “S.28.02.01 Minimum Capital Requirement – Both life and non-life insurance activity” (the “SCR and MCR reporting templates”) and the related disclosures presented in the section “E.2 Solvency capital requirement and minimum capital requirement” (the “disclosures” or the “related disclosures”) of Intesa Sanpaolo Vita S.p.A. (the “Company”) included in the Single Solvency and Financial Condition Report of the Intesa Sanpaolo Vita Insurance Group (the “SFCR”) as at December 31, 2021, pursuant to article 47-septies of Legislative Decree n. 209, dated 7 September 2005.

The SCR and MCR reporting templates and related disclosures have been prepared by the Management in accordance with the applicable European Union regulations and the national sectoral regulation.

Management's Responsibility

Management is responsible for the preparation of the SCR and MCR reporting templates and related disclosures in accordance with the applicable European Union regulations and the national sectoral regulation, and, within the terms provided by the law, for such internal control as they determine is necessary to enable the preparation of SCR and MCR reporting templates and related disclosures that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express a conclusion on SCR and MCR reporting templates and related disclosures. We conducted our review in accordance with International Standard on Review Engagements (*ISRE*) n. 2400 (*Revised*), *Engagements to review Historical Financial Statements. ISRE 2400 (Revised)* requires us to conclude whether anything has come to our attention that causes us to believe that the SCR and MCR reporting templates and related disclosures are not prepared, in all material respects, in accordance with the applicable European Union regulations and the national sectoral regulation. This Standard also requires us to comply with relevant ethical requirements. The review of SCR and MCR reporting templates and related disclosures in accordance with *ISRE 2400 (Revised)* is a limited assurance engagement. The auditor performs procedures, primarily consisting of making inquiries of management and others within the entity, as appropriate, and applying analytical procedures, and evaluates the evidence obtained.

The procedures performed in a review are substantially less than those performed in an audit conducted in accordance with International Standards on Auditing (ISA). Accordingly, we do not express an audit opinion on SCR and MCR reporting templates and related disclosures.

Conclusion

Based on our review, nothing has come to our attention that causes us to believe that SCR and MCR reporting templates of Intesa Sanpaolo Vita S.p.A. and related disclosures included in the SFCR of the Intesa Sanpaolo Vita Insurance Group as at December 31, 2021 are not prepared, in all material respects, in accordance with the applicable European Union regulations and the national sectoral regulation.

Basis of preparation, purpose and restriction on use

Without modifying our conclusion, we draw attention to section “E.2 Solvency capital requirement and minimum capital requirement” included in the SFCR, which describes the basis of preparation of SCR and MCR reporting templates.

The SCR and MCR reporting templates and the related disclosures are prepared, for solvency supervision purposes, in accordance with the applicable European Union regulations and the national sectoral regulation, which results in a special purpose framework. Consequently, they may not be suitable for other purposes.

Milan, 20th May 2022

EY S.p.A.

Signed by: Paolo Ancona, Auditor

This independent auditor's report has been translated into the English language solely for the convenience of international readers. Accordingly, only the original text in Italian language is authoritative.

Intesa Sanpaolo Assicura S.p.A.

Solvency and Financial Condition Report
as at December 31, 2021

Independent auditor's report pursuant to article 47-septies,
paragraph 7 of Legislative Decree n. 209, dated 7 September 2005, and
article 4, paragraph 1, letters a) and b) of IVASS Regulation
n. 42, dated 2 August 2018

Independent auditor's report pursuant to article 47-septies,
paragraph 7 of Legislative Decree n. 209, dated 7 September 2005, and article 4,
paragraph 1, letters a) and b) of IVASS Regulation n. 42,
dated 2 August 2018

(Translation from the original Italian text)

To the Board of Directors of
Intesa Sanpaolo Assicura S.p.A.

Opinion

We have audited the following elements of the Single Solvency and Financial Condition Report of the Intesa Sanpaolo Vita Insurance Group (the "SFCR") as at December 31, 2021, prepared pursuant to article 47-septies of Legislative Decree n. 209, dated 7 September 2005:

- reporting templates "S.02.01.02 Balance sheet" and "S.23.01.01 Own funds" (the "reporting templates") of Intesa Sanpaolo Assicura S.p.A. (the "Company");
- sections "D. Valuation for solvency purposes" and "E.1 Own funds" (the "disclosures") of Intesa Sanpaolo Assicura S.p.A..

Our procedures do not extend to:

- the components of technical provisions related to Risk Margin (items R0550 and R0590) of the reporting template "S.02.01.02 Balance sheet";
- the Solvency Capital Requirement (item R0580) and to the Minimum Capital Requirement (item R0600) of the reporting template "S.23.01.01 Own funds";

consequently, they are excluded from our opinion.

The reporting templates and the disclosures, with the exclusions above mentioned, constitute "the MVBS and OF reporting templates and related disclosures" as a whole.

In our opinion, the MVBS and OF reporting templates and related disclosures of Intesa Sanpaolo Assicura S.p.A. included in the SFCR of the Intesa Sanpaolo Vita Insurance Group as at December 31, 2021 have been prepared, in all material respects, in accordance with the applicable European Union regulations and the national sectoral regulation.

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the MVBS and OF reporting templates and related disclosures* section of our report.

We are independent of the Company in accordance with the regulations and standards on ethics and independence of the Code of Ethics for Professional Accountants (IESBA Code) issued by the International Ethics Standards Board for Accountants applicable to the audit of the MVBS and OF reporting templates and related disclosures.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Emphasis of matter – Basis of preparation, purpose and restriction on use

We draw attention to section “D. Valuation for solvency purposes” which describes the basis of preparation. The MVBS and OF reporting templates and related disclosures have been prepared for solvency supervision purposes in accordance with the applicable European Union regulations and the national sectoral regulation, which results in a special purpose framework. As a result, they may not be suitable for other purposes. Our opinion is not modified in respect of this matter.

Other matters

The Company has prepared the financial statements as at December 31, 2021 in accordance with Italian regulations governing financial statements on which we issued our independent auditor’s report dated March 2, 2022.

The Company has prepared the reporting templates “S.25.01.21 Solvency Capital Requirement – for undertakings on Standard Formula” and “S.28.01.01 Minimum Capital Requirement – Only life or only non-life insurance or reinsurance activity” and the related disclosure presented in section “E.2 Solvency capital requirement and minimum capital requirement” included in the SFCR in accordance with the applicable European Union regulations, the national sectoral regulation and the undertaking specific parameters, which were subject to our limited review pursuant to article 4, paragraph 1, letter c) of IVASS Regulation n. 42, dated 2 August 2018, following which we have issued today a limited review report attached to the SFCR.

Other Information included in the SFCR

The Directors are responsible for the preparation of the other information included in the SFCR in accordance with the applicable laws and regulations governing the basis of preparation.

The other information included in the SFCR are:

- reporting templates “S.05.01.02 Premiums, claims and expenses by line of business”, “S.17.01.02 Non-life Technical Provisions”, “S.19.01.21 Non-life Insurance Claims Information”, “S.25.01.21 Solvency Capital Requirement – for undertakings on Standard Formula” and “S.28.01.01 Minimum Capital Requirement – Only life or only non-life insurance or reinsurance activity”;
- sections “A. Activities and Results”, “B. Governance system”, “C. Risk profile”, “E.2 Solvency capital requirement and minimum capital requirement”, “E.3 Use of the share price risk submodule based on the duration in the SCR calculation”, “E.4 Differences between the Standard Formula and the internal model”, “E.5 Failure to meet the MCR and SCR” and “E.6 Other information”.

Our opinion on the MVBS and OF reporting templates and related disclosures does not cover the other information.

In connection with our audit of the MVBS and OF reporting templates and related disclosures, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the MVBS and OF reporting templates and related disclosures or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify possible inconsistencies or material misstatement, we are required to determine if there is a material misstatement in the MVBS and OF reporting templates and related disclosures or in the other

information. If, based on the work performed, we conclude that there is a material misstatement, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of Directors and Those Charged with Governance for the MVBS and OF reporting templates and related disclosures

The Directors are responsible for the preparation of the MVBS and OF reporting templates and related disclosures in accordance with the applicable laws and regulations governing the basis of preparation, and, within the terms provided by the law, for such internal control as they determine is necessary to enable the preparation of MVBS and OF reporting templates and related disclosures that are free from material misstatement, whether due to fraud or error.

The Directors are responsible for assessing the Company's ability to continue as a going concern and, in preparing the MVBS and OF reporting templates and related disclosures, for the appropriateness of the use of the going concern and for disclosing related matters.

The Directors use the going concern basis of accounting in the preparation of MVBS and OF reporting templates and related disclosures unless they either intend to liquidate the Company or to cease operations, or have no realistic alternative but to do so.

The statutory audit committee ("Collegio Sindacale") is responsible, within the terms provided by the law, for overseeing the Company's financial reporting process.

Auditor's Responsibilities for the Audit of the MVBS and OF reporting templates and related disclosures

Our objectives are to obtain reasonable assurance about whether the MVBS and OF reporting templates and related disclosures as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with International Standards on Auditing (ISAs) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the MVBS and OF reporting templates and related disclosures.

As part of an audit in accordance with International Standards on Auditing (ISAs), we have exercised professional judgment and maintained professional skepticism throughout the audit. In addition:

- we have identified and assessed the risks of material misstatement of the MVBS and OF reporting templates and related disclosures, whether due to fraud or error; have designed and performed audit procedures responsive to those risks, and obtained audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;
- we have obtained an understanding of internal control relevant to the audit of the MVBS and OF reporting templates and related disclosures in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control;

- we have evaluated the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Directors;
- we have concluded on the appropriateness of Directors' use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures or, if such disclosures are inadequate, to consider this matter in forming our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.

We have communicated with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identified during our audit.

Milan, 20th May 2022

EY S.p.A.

Signed by: Mauro Agnolon, Auditor

This independent auditor's report has been translated into the English language solely for the convenience of international readers. Accordingly, only the original text in Italian language is authoritative.

Intesa Sanpaolo Assicura S.p.A.

Solvency and Financial Condition Report
as at December 31, 2021

Independent auditor's review report pursuant to article 47-septies,
paragraph 7 of Legislative Decree n. 209, dated 7 September 2005, and
article 4, paragraph 1, letter c) of IVASS Regulation n. 42,
dated 2 August 2018

Independent auditor's review report pursuant to article 47-septies, paragraph 7 of Legislative Decree n. 209, dated 7 September 2005, and article 4, paragraph 1, letter c) of IVASS Regulation n. 42, dated 2 August 2018

(Translation from the original Italian text)

To the Board of Directors of
Intesa Sanpaolo Assicura S.p.A.

Introduction

We have reviewed the accompanying reporting templates "S.25.01.21 Solvency Capital Requirement – for undertakings on Standard Formula" and "S.28.01.01 Minimum Capital Requirement – Only life or only non-life insurance or reinsurance activity" (the "SCR and MCR reporting templates") and the related disclosures presented in the section "E.2 Solvency capital requirement and minimum capital requirement" (the "disclosures" or the "related disclosures") of Intesa Sanpaolo Assicura S.p.A. (the "Company") included in the Single Solvency and Financial Condition Report of the Intesa Sanpaolo Vita Insurance Group (the "SFCR") as at December 31, 2021, pursuant to article 47-septies of Legislative Decree n. 209, dated 7 September 2005.

The SCR and MCR reporting templates and related disclosures have been prepared by the Management in accordance with the applicable European Union regulations, the national sectoral regulation and the undertaking specific parameters, as described in the disclosures included in the SFCR and as approved by IVASS.

Management's Responsibility

Management is responsible for the preparation of the SCR and MCR reporting templates and related disclosures in accordance with the applicable European Union regulations, the national sectoral regulation and the undertaking specific parameters, as described in the disclosures included in the SFCR and as approved by IVASS, and, within the terms provided by the law, for such internal control as they determine is necessary to enable the preparation of SCR and MCR reporting templates and related disclosures that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express a conclusion on SCR and MCR reporting templates and related disclosures. We conducted our review in accordance with International Standard on Review Engagements (ISRE) n. 2400 (Revised), *Engagements to review Historical Financial Statements*. ISRE 2400 (Revised) requires us to conclude whether anything has come to our attention that causes us to believe that the SCR and MCR reporting templates and related disclosures are not prepared, in all material respects, in accordance with the applicable European Union regulations, the national sectoral regulation and the undertaking specific parameters, as described in the disclosures included in the

SFCR and as approved by IVASS. This Standard also requires us to comply with relevant ethical requirements.

The review of SCR and MCR reporting templates and related disclosures in accordance with *ISRE 2400 (Revised)* is a limited assurance engagement. The auditor performs procedures, primarily consisting of making inquiries of management and others within the entity, as appropriate, and applying analytical procedures, and evaluates the evidence obtained.

The procedures performed in a review are substantially less than those performed in an audit conducted in accordance with International Standards on Auditing (ISA). Accordingly, we do not express an audit opinion on SCR and MCR reporting templates and related disclosures.

Conclusion

Based on our review, nothing has come to our attention that causes us to believe that SCR and MCR reporting templates of Intesa Sanpaolo Assicura S.p.A. and related disclosures included in the SFCR of the Intesa Sanpaolo Vita Insurance Group as at December 31, 2021 are not prepared, in all material respects, in accordance with the applicable European Union regulations, the national sectoral regulation and the undertaking specific parameters, as described in the disclosures included in the SFCR and as approved by IVASS.

Basis of preparation, purpose and restriction on use

Without modifying our conclusion, we draw attention to section “E.2 Solvency capital requirement and minimum capital requirement” included in the SFCR, which describes the basis of preparation of SCR and MCR reporting templates.

The SCR and MCR reporting templates and the related disclosures are prepared, for solvency supervision purposes, in accordance with the applicable European Union regulations, the national sectoral regulation and the undertaking specific parameters, as described in the disclosures included in the SFCR and as approved by IVASS, which collectively results in a special purpose framework. Consequently, they may not be suitable for other purposes. In particular, in accordance with article 45-sexies, paragraph 7 of Legislative Decree n. 209, dated 7 September 2005, the use of undertaking specific parameters briefly described within the disclosures of the SFCR were approved by IVASS within the scope of its supervisory functions. As provided for by the article 13 of IVASS Regulation n. 42 dated 2 August 2018, our conclusions are not expressed with regard to the decisions made by IVASS within the scope of its supervisory functions and therefore, in particular, to the suitability of the undertaking specific parameters for the purposes of the applicable European Union regulations and the national sectoral regulation.

Milan, 20th May 2022

EY S.p.A.

Signed by: Mauro Agnolon, Auditor

This independent auditor's report has been translated into the English language solely for the convenience of international readers. Accordingly, only the original text in Italian language is authoritative.

Fideuram Vita S.p.A.

Solvency and Financial Condition Report
as at December 31, 2021

Independent auditor's report pursuant to article 47-septies,
paragraph 7 of Legislative Decree n. 209, dated 7 September 2005, and
article 4, paragraph 1, letters a) and b) of IVASS Regulation
n. 42, dated 2 August 2018

Independent auditor's report pursuant to article 47-septies,
paragraph 7 of Legislative Decree n. 209, dated 7 September 2005, and article 4,
paragraph 1, letters a) and b) of IVASS Regulation n. 42,
dated 2 August 2018

(Translation from the original Italian text)

To the Board of Directors of
Fideuram Vita S.p.A.

Opinion

We have audited the following elements of the Single Solvency and Financial Condition Report of the Intesa Sanpaolo Vita Insurance Group (the "SFCR") as at December 31, 2021, prepared pursuant to article 47-septies of Legislative Decree n. 209, dated 7 September 2005:

- reporting templates "S.02.01.02 Balance sheet" and "S.23.01.01 Own funds" (the "reporting templates") of Fideuram Vita S.p.A. (the "Company");
- sections "D. Valuation for solvency purposes" and "E.1 Own funds" (the "disclosures") of Fideuram Vita S.p.A..

Our procedures do not extend to:

- the components of technical provisions related to Risk Margin (items R0680 and R0720) of the reporting template "S.02.01.02 Balance sheet";
- the Solvency Capital Requirement (item R0580) and to the Minimum Capital Requirement (item R0600) of the reporting template "S.23.01.01 Own funds";

consequently, they are excluded from our opinion.

The reporting templates and the disclosures, with the exclusions above mentioned, constitute "the MVBS and OF reporting templates and related disclosures" as a whole.

In our opinion, the MVBS and OF reporting templates and related disclosures of Fideuram Vita S.p.A. included in the SFCR of the Intesa Sanpaolo Vita Insurance Group as at December 31, 2021 have been prepared, in all material respects, in accordance with the applicable European Union regulations and the national sectoral regulation.

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the MVBS and OF reporting templates and related disclosures* section of our report.

We are independent of the Company in accordance with the regulations and standards on ethics and independence of the Code of Ethics for Professional Accountants (IESBA Code) issued by the International Ethics Standards Board for Accountants applicable to the audit of the MVBS and OF reporting templates and related disclosures.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Emphasis of matter – Basis of preparation, purpose and restriction on use

We draw attention to section “D. Valuation for solvency purposes” which describes the basis of preparation. The MVBS and OF reporting templates and related disclosures have been prepared for solvency supervision purposes in accordance with the applicable European Union regulations and the national sectoral regulation, which results in a special purpose framework. As a result, they may not be suitable for other purposes. Our opinion is not modified in respect of this matter.

Other matters

The Company has prepared the financial statements as at December 31, 2021 in accordance with Italian regulations governing financial statements on which we issued our independent auditor’s report dated March 1, 2022.

The Company has prepared the reporting templates “S.25.01.21 Solvency Capital Requirement – for undertakings on Standard Formula” and “S.28.01.01 Minimum Capital Requirement – Only life or only non-life insurance or reinsurance activity” and the related disclosure presented in section “E.2 Solvency capital requirement and minimum capital requirement” included in the SFCR in accordance with the applicable European Union regulations and the national sectoral regulation, which were subject to our limited review pursuant to article 4, paragraph 1, letter c) of IVASS Regulation n. 42, dated 2 August 2018, following which we have issued today a limited review report attached to the SFCR.

Other Information included in the SFCR

The Directors are responsible for the preparation of the other information included in the SFCR in accordance with the applicable laws and regulations governing the basis of preparation.

The other information included in the SFCR are:

- reporting templates “S.05.01.02 Premiums, claims and expenses by line of business”, “S.12.01.02 Life and Health SLT Technical Provisions”, “S.22.01.21 Impact of long term guarantees and transitional measures”, “S.25.01.21 Solvency Capital Requirement – for undertakings on Standard Formula” and “S.28.01.01 Minimum Capital Requirement – Only life or only non-life insurance or reinsurance activity”;
- sections “A. Activities and Results”, “B. Governance system”, “C. Risk profile”, “E.2 Solvency capital requirement and minimum capital requirement”, “E.3 Use of the share price risk submodule based on the duration in the SCR calculation”, “E.4 Differences between the Standard Formula and the internal model”, “E.5 Failure to meet the MCR and SCR” and “E.6 Other information”.

Our opinion on the MVBS and OF reporting templates and related disclosures does not cover the other information.

In connection with our audit of the MVBS and OF reporting templates and related disclosures, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the MVBS and OF reporting templates and related disclosures or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify possible inconsistencies or material misstatement, we are required to determine if there is a material

misstatement in the MVBS and OF reporting templates and related disclosures or in the other information. If, based on the work performed, we conclude that there is a material misstatement, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of Directors and Those Charged with Governance for the MVBS and OF reporting templates and related disclosures

The Directors are responsible for the preparation of the MVBS and OF reporting templates and related disclosures in accordance with the applicable laws and regulations governing the basis of preparation, and, within the terms provided by the law, for such internal control as they determine is necessary to enable the preparation of MVBS and OF reporting templates and related disclosures that are free from material misstatement, whether due to fraud or error.

The Directors are responsible for assessing the Company's ability to continue as a going concern and, in preparing the MVBS and OF reporting templates and related disclosures, for the appropriateness of the use of the going concern and for disclosing related matters.

The Directors use the going concern basis of accounting in the preparation of MVBS and OF reporting templates and related disclosures unless they either intend to liquidate the Company or to cease operations, or have no realistic alternative but to do so.

The statutory audit committee ("Collegio Sindacale") is responsible, within the terms provided by the law, for overseeing the Company's financial reporting process.

Auditor's Responsibilities for the Audit of the MVBS and OF reporting templates and related disclosures

Our objectives are to obtain reasonable assurance about whether the MVBS and OF reporting templates and related disclosures as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with International Standards on Auditing (ISAs) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the MVBS and OF reporting templates and related disclosures.

As part of an audit in accordance with International Standards on Auditing (ISAs), we have exercised professional judgment and maintained professional skepticism throughout the audit. In addition:

- we have identified and assessed the risks of material misstatement of the MVBS and OF reporting templates and related disclosures, whether due to fraud or error; have designed and performed audit procedures responsive to those risks, and obtained audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;
- we have obtained an understanding of internal control relevant to the audit of the MVBS and OF reporting templates and related disclosures in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control;

- we have evaluated the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Directors;
- we have concluded on the appropriateness of Directors' use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures or, if such disclosures are inadequate, to consider this matter in forming our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.

We have communicated with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identified during our audit.

Milan, 20th May 2022

EY S.p.A.

Signed by: Mauro Agnolon, Auditor

This independent auditor's report has been translated into the English language solely for the convenience of international readers. Accordingly, only the original text in Italian language is authoritative.

Fideuram Vita S.p.A.

Solvency and Financial Condition Report
as at December 31, 2021

Independent auditor's review report pursuant to article 47-septies,
paragraph 7 of Legislative Decree n. 209, dated 7 September 2005, and
article 4, paragraph 1, letter c) of IVASS Regulation n. 42,
dated 2 August 2018

Independent auditor's review report pursuant to article 47-septies, paragraph 7 of Legislative Decree n. 209, dated 7 September 2005, and article 4, paragraph 1, letter c) of IVASS Regulation n. 42, dated 2 August 2018

(Translation from the original Italian text)

To the Board of Directors of
Fideuram Vita S.p.A.

Introduction

We have reviewed the accompanying reporting templates "S.25.01.21 Solvency Capital Requirement – for undertakings on Standard Formula" and "S.28.01.01 Minimum Capital Requirement – Only life or only non-life insurance or reinsurance activity" (the "SCR and MCR reporting templates") and the related disclosures presented in the section "E.2 Solvency capital requirement and minimum capital requirement" (the "disclosures" or the "related disclosures") of Fideuram Vita S.p.A. (the "Company") included in the Single Solvency and Financial Condition Report of the Intesa Sanpaolo Vita Insurance Group (the "SFCR") as at December 31, 2021, pursuant to article 47-septies of Legislative Decree n. 209, dated 7 September 2005.

The SCR and MCR reporting templates and related disclosures have been prepared by the Management in accordance with the applicable European Union regulations and the national sectoral regulation.

Management's Responsibility

Management is responsible for the preparation of the SCR and MCR reporting templates and related disclosures in accordance with the applicable European Union regulations and the national sectoral regulation, and, within the terms provided by the law, for such internal control as they determine is necessary to enable the preparation of SCR and MCR reporting templates and related disclosures that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express a conclusion on SCR and MCR reporting templates and related disclosures. We conducted our review in accordance with International Standard on Review Engagements (*ISRE*) n. 2400 (*Revised*), *Engagements to review Historical Financial Statements*. *ISRE 2400 (Revised)* requires us to conclude whether anything has come to our attention that causes us to believe that the SCR and MCR reporting templates and related disclosures are not prepared, in all material respects, in accordance with the applicable European Union regulations and the national sectoral regulation. This Standard also requires us to comply with relevant ethical requirements. The review of SCR and MCR reporting templates and related disclosures in accordance with *ISRE 2400 (Revised)* is a limited assurance engagement.

The auditor performs procedures, primarily consisting of making inquiries of management and others within the entity, as appropriate, and applying analytical procedures, and evaluates the evidence obtained.

The procedures performed in a review are substantially less than those performed in an audit conducted in accordance with International Standards on Auditing (ISA). Accordingly, we do not express an audit opinion on SCR and MCR reporting templates and related disclosures.

Conclusion

Based on our review, nothing has come to our attention that causes us to believe that SCR and MCR reporting templates of Fideuram Vita S.p.A. and related disclosures included in the SFCR of the Intesa Sanpaolo Vita Insurance Group, as at December 31, 2021 are not prepared, in all material respects, in accordance with the applicable European Union regulations and the national sectoral regulation.

Basis of preparation, purpose and restriction on use

Without modifying our conclusion, we draw attention to section “E.2 Solvency capital requirement and minimum capital requirement” included in the SFCR, which describes the basis of preparation of SCR and MCR reporting templates.

The SCR and MCR reporting templates and the related disclosures are prepared, for solvency supervision purposes, in accordance with the applicable European Union regulations and the national sectoral regulation, which results in a special purpose framework. Consequently, they may not be suitable for other purposes.

Milan, 20th May 2022

EY S.p.A.

Signed by: Mauro Agnolon, Auditor

This independent auditor’s report has been translated into the English language solely for the convenience of international readers. Accordingly, only the original text in Italian language is authoritative.

Intesa Sanpaolo RBM Salute S.p.A.

Solvency and Financial Condition Report
as at December 31, 2021

Independent auditor's report pursuant to article 47-septies,
paragraph 7 of Legislative Decree n. 209, dated 7 September 2005, and
article 4, paragraph 1, letters a) and b) of IVASS Regulation n. 42,
dated 2 August 2018

**Independent auditor's report pursuant to article 47-septies,
paragraph 7 of Legislative Decree n. 209, dated 7 September 2005, and article 4,
paragraph 1, letters a) and b) of IVASS Regulation n. 42,
dated 2 August 2018**

(Translation from the original Italian text)

To the Board of Directors of
Intesa Sanpaolo RBM Salute S.p.A.

Opinion

We have audited the following elements of the Single Solvency and Financial Condition Report of the Intesa Sanpaolo Vita Insurance Group (the "SFCR") as at December 31, 2021, prepared pursuant to article 47-septies of Legislative Decree n. 209, dated 7 September 2005:

- reporting templates "S.02.01.02 Balance sheet" and "S.23.01.01 Own funds" (the "reporting templates") of Intesa Sanpaolo RBM Salute S.p.A. (the "Company");
- sections "D. Valuation for solvency purposes" and "E.1 Own funds" (the "disclosures") of Intesa Sanpaolo RBM Salute S.p.A..

Our procedures do not extend to:

- the components of technical provisions related to Risk Margin (items R0550 and R0590) of the reporting template "S.02.01.02 Balance sheet";
- the Solvency Capital Requirement (item R0580) and to the Minimum Capital Requirement (item R0600) of the reporting template "S.23.01.01 Own funds";

consequently, they are excluded from our opinion.

The reporting templates and the disclosures, with the exclusions above mentioned, constitute "the MVBS and OF reporting templates and related disclosures" as a whole.

In our opinion, the MVBS and OF reporting templates and related disclosures of Intesa Sanpaolo RBM Salute S.p.A. included in the SFCR of the Intesa Sanpaolo Vita Insurance Group as at December 31, 2021 have been prepared, in all material respects, in accordance with the applicable European Union regulations and the national sectoral regulation.

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the MVBS and OF reporting templates and related disclosures* section of our report.

We are independent of the Company in accordance with the regulations and standards on ethics and independence of the Code of Ethics for Professional Accountants (IESBA Code) issued by the International Ethics Standards Board for Accountants applicable to the audit of the MVBS and OF reporting templates and related disclosures.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Emphasis of matter – Basis of preparation, purpose and restriction on use

We draw attention to section “D. Valuation for solvency purposes” which describes the basis of preparation. The MVBS and OF reporting templates and related disclosures have been prepared for solvency supervision purposes in accordance with the applicable European Union regulations and the national sectoral regulation, which results in a special purpose framework. As a result, they may not be suitable for other purposes. Our opinion is not modified in respect of this matter.

Other matters

The Company has prepared the financial statements as at December 31, 2021 in accordance with Italian regulations governing financial statements on which we issued our independent auditor’s report dated March 1, 2022.

The Company has prepared the reporting templates “S.25.01.21 Solvency Capital Requirement - for undertakings on Standard Formula” and “S.28.01.01 Minimum Capital Requirement – Only life or only non-life insurance or reinsurance activity” and the related disclosure presented in section “E.2 Solvency capital requirement and minimum capital requirement” included in the SFCR in accordance with the applicable European Union regulations and the national sectoral regulation, which were subject to our limited review pursuant to article 4, paragraph 1, letter c) of IVASS Regulation n. 42, dated 2 August 2018, following which we have issued today a limited review report attached to the SFCR.

Other Information included in the SFCR

The Directors are responsible for the preparation of the other information included in the SFCR in accordance with the applicable laws and regulations governing the basis of preparation.

The other information included in the SFCR are:

- reporting templates “S.05.01.02 Premiums, claims and expenses by line of business”, “S.17.01.02 Non-life Technical Provisions”, “S.19.01.21 Non-life Insurance Claims Information”, “S.25.01.21 Solvency Capital Requirement – for undertakings on Standard Formula” and “S.28.01.01 Minimum Capital Requirement – Only life or only non-life insurance or reinsurance activity”;
- sections “A. Activities and Results”, “B. Governance system”, “C. Risk profile”, “E.2 Solvency capital requirement and minimum capital requirement”, “E.3 Use of the share price risk submodule based on the duration in the SCR calculation”, “E.4 Differences between the Standard Formula and the internal model”, “E.5 Failure to meet the MCR and SCR” and “E.6 Other information”.

Our opinion on the MVBS and OF reporting templates and related disclosures does not cover the other information.

In connection with our audit of the MVBS and OF reporting templates and related disclosures, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the MVBS and OF reporting templates and related disclosures or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify possible inconsistencies or material misstatement, we are required to determine if there is a material misstatement in the MVBS and OF reporting templates and related disclosures or in the other information. If, based on the work performed, we conclude that there is a material misstatement, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of Directors and Those Charged with Governance for the MVBS and OF reporting templates and related disclosures

The Directors are responsible for the preparation of the MVBS and OF reporting templates and related disclosures in accordance with the applicable laws and regulations governing the basis of preparation, and, within the terms provided by the law, for such internal control as they determine is necessary to enable the preparation of MVBS and OF reporting templates and related disclosures that are free from material misstatement, whether due to fraud or error.

The Directors are responsible for assessing the Company's ability to continue as a going concern and, in preparing the MVBS and OF reporting templates and related disclosures, for the appropriateness of the use of the going concern and for disclosing related matters.

The Directors use the going concern basis of accounting in the preparation of MVBS and OF reporting templates and related disclosures unless they either intend to liquidate the Company or to cease operations, or have no realistic alternative but to do so.

The statutory audit committee ("Collegio Sindacale") is responsible, within the terms provided by the law, for overseeing the Company's financial reporting process.

Auditor's Responsibilities for the Audit of the MVBS and OF reporting templates and related disclosures

Our objectives are to obtain reasonable assurance about whether the MVBS and OF reporting templates and related disclosures as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with International Standards on Auditing (ISAs) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the MVBS and OF reporting templates and related disclosures.

As part of an audit in accordance with International Standards on Auditing (ISAs), we have exercised professional judgment and maintained professional skepticism throughout the audit. In addition:

- we have identified and assessed the risks of material misstatement of the MVBS and OF reporting templates and related disclosures, whether due to fraud or error; have designed and performed audit procedures responsive to those risks, and obtained audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;
- we have obtained an understanding of internal control relevant to the audit of the MVBS and OF reporting templates and related disclosures in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control;
- we have evaluated the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Directors;
- we have concluded on the appropriateness of Directors' use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures or, if such disclosures are inadequate, to consider this matter in forming our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.

We have communicated with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identified during our audit.

Milan, 20th May 2022

EY S.p.A.

Signed by: Mauro Agnolon, Auditor

This independent auditor's report has been translated into the English language solely for the convenience of international readers. Accordingly, only the original text in Italian language is authoritative.

Intesa Sanpaolo RBM Salute S.p.A.

Solvency and Financial Condition Report as at December 31, 2021

Independent auditor's review report pursuant to article 47-septies, paragraph 7 of Legislative Decree n. 209, dated 7 September 2005, and article 4, paragraph 1, letter c) of IVASS Regulation n. 42, dated 2 August 2018

Independent auditor's review report pursuant to article 47-septies, paragraph 7 of Legislative Decree n. 209, dated 7 September 2005, and article 4, paragraph 1, letter c) of IVASS Regulation n. 42, dated 2 August 2018

(Translation from the original Italian text)

To the Board of Directors of
Intesa Sanpaolo RBM Salute S.p.A.

Introduction

We have reviewed the accompanying reporting templates "S.25.01.21 Solvency Capital Requirement – for undertakings on Standard Formula" and "S.28.01.01 Minimum Capital Requirement – Only life or only non-life insurance or reinsurance activity" (the "SCR and MCR reporting templates") and the related disclosures presented in the section "E.2 Solvency capital requirement and minimum capital requirement" (the "disclosures" or the "related disclosures") of Intesa Sanpaolo RBM Salute S.p.A. (the "Company") included in the Single Solvency and Financial Condition Report of the Intesa Sanpaolo Vita Insurance Group (the "SFCR") as at December 31, 2021, pursuant to article 47-septies of Legislative Decree n. 209, dated 7 September 2005. The SCR and MCR reporting templates and related disclosures have been prepared by the Management in accordance with the applicable European Union regulations and the national sectoral regulation.

Management's Responsibility

Management is responsible for the preparation of the SCR and MCR reporting templates and related disclosures in accordance with the applicable European Union regulations and the national sectoral regulation, and, within the terms provided by the law, for such internal control as they determine is necessary to enable the preparation of SCR and MCR reporting templates and related disclosures that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express a conclusion on SCR and MCR reporting templates and related disclosures. We conducted our review in accordance with International Standard on Review Engagements (*ISRE*) n. 2400 (*Revised*), *Engagements to review Historical Financial Statements*. *ISRE* 2400 (*Revised*) requires us to conclude whether anything has come to our attention that causes us to believe that the SCR and MCR reporting templates and related disclosures are not prepared, in all material respects, in accordance with the applicable European Union regulations and the national sectoral regulation. This Standard also requires us to comply with relevant ethical requirements.

The review of SCR and MCR reporting templates and related disclosures in accordance with *ISRE 2400 (Revised)* is a limited assurance engagement.

The auditor performs procedures, primarily consisting of making inquiries of management and others within the entity, as appropriate, and applying analytical procedures, and evaluates the evidence obtained.

The procedures performed in a review are substantially less than those performed in an audit conducted in accordance with International Standards on Auditing (ISA). Accordingly, we do not express an audit opinion on SCR and MCR reporting templates and related disclosures.

Conclusion

Based on our review, nothing has come to our attention that causes us to believe that SCR and MCR reporting templates of Intesa Sanpaolo RBM Salute S.p.A. and related disclosures included in the SFCR of the Intesa Sanpaolo Vita Insurance Group, as at December 31, 2021 are not prepared, in all material respects, in accordance with the applicable European Union regulations and the national sectoral regulation.

Basis of preparation, purpose and restriction on use

Without modifying our conclusion, we draw attention to section “E.2 Solvency capital requirement and minimum capital requirement” included in the SFCR, which describes the basis of preparation of SCR and MCR reporting templates.

The SCR and MCR reporting templates and the related disclosures are prepared, for solvency supervision purposes, in accordance with the applicable European Union regulations and the national sectoral regulation, which results in a special purpose framework. Consequently, they may not be suitable for other purposes.

Milan, 20th May 2022

EY S.p.A.

Signed by: Mauro Agnolon, Auditor

This independent auditor’s report has been translated into the English language solely for the convenience of international readers. Accordingly, only the original text in Italian language is authoritative.

Cargeas Assicurazioni S.p.A.

Solvency and Financial Condition Report
as at December 31, 2021

Independent auditor's report pursuant to article 47-septies,
paragraph 7 of Legislative Decree n. 209, dated 7 September 2005, and
article 4, paragraph 1, letters a) and b) of IVASS Regulation
n. 42, dated 2 August 2018

Independent auditor's report pursuant to article 47-septies,
paragraph 7 of Legislative Decree n. 209, dated 7 September 2005, and article 4,
paragraph 1, letters a) and b) of IVASS Regulation n. 42,
dated 2 August 2018

(Translation from the original Italian text)

To the Board of Directors of
Cargeas Assicurazioni S.p.A.

Opinion

We have audited the following elements of the Single Solvency and Financial Condition Report of the Intesa Sanpaolo Vita Insurance Group (the "SFCR") as at December 31, 2021, prepared pursuant to article 47-septies of Legislative Decree n. 209, dated 7 September 2005:

- reporting templates "S.02.01.02 Balance sheet" and "S.23.01.01 Own funds" (the "reporting templates") of Cargeas Assicurazioni S.p.A. (the "Company");
- sections "D. Valuation for solvency purposes" and "E.1 Own funds" (the "disclosures") of Cargeas Assicurazioni S.p.A..

Our procedures do not extend to:

- the components of technical provisions related to Risk Margin (items R0550 and R0590) of the reporting template "S.02.01.02 Balance sheet";
- the Solvency Capital Requirement (item R0580) and to the Minimum Capital Requirement (item R0600) of the reporting template "S.23.01.01 Own funds";

consequently, they are excluded from our opinion.

The reporting templates and the disclosures, with the exclusions above mentioned, constitute "the MVBS and OF reporting templates and related disclosures" as a whole.

In our opinion, the MVBS and OF reporting templates and related disclosures of Cargeas Assicurazioni S.p.A. included in the SFCR of the Intesa Sanpaolo Vita Insurance Group as at December 31, 2021 have been prepared, in all material respects, in accordance with the applicable European Union regulations and the national sectoral regulation.

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the MVBS and OF reporting templates and related disclosures* section of our report.

We are independent of the Company in accordance with the regulations and standards on ethics and independence of the Code of Ethics for Professional Accountants (IESBA Code) issued by the International Ethics Standards Board for Accountants applicable to the audit of the MVBS and OF reporting templates and related disclosures.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Emphasis of matter – Basis of preparation, purpose and restriction on use

We draw attention to section “D. Valuation for solvency purposes” which describes the basis of preparation. The MVBS and OF reporting templates and related disclosures have been prepared for solvency supervision purposes in accordance with the applicable European Union regulations and the national sectoral regulation, which results in a special purpose framework. As a result, they may not be suitable for other purposes. Our opinion is not modified in respect of this matter.

Other matters

The Company has prepared the financial statements as at December 31, 2021 in accordance with Italian regulations governing financial statements on which we issued our independent auditor's report dated February 28, 2022.

The Company has prepared the reporting templates “S.25.01.21 Solvency Capital Requirement – for undertakings on Standard Formula” and “S.28.01.01 Minimum Capital Requirement – Only life or only non-life insurance or reinsurance activity” and the related disclosure presented in section “E.2 Solvency capital requirement and minimum capital requirement” included in the SFCR in accordance with the applicable European Union regulations and the national sectoral regulation, which were subject to our limited review pursuant to article 4, paragraph 1, letter c) of IVASS Regulation n. 42, dated 2 August 2018, following which we have issued today a limited review report attached to the SFCR.

Other Information included in the SFCR

The Directors are responsible for the preparation of the other information included in the SFCR in accordance with the applicable laws and regulations governing the basis of preparation.

The other information included in the SFCR are:

- reporting templates “S.05.01.02 Premiums, claims and expenses by line of business”, “S.17.01.02 Non-life Technical Provisions”, “S.19.01.21 Non-life Insurance Claims Information”, “S.25.01.21 Solvency Capital Requirement – for undertakings on Standard Formula” and “S.28.01.01 Minimum Capital Requirement – Only life or only non-life insurance or reinsurance activity”;
- sections “A. Activities and Results”, “B. Governance system”, “C. Risk profile”, “E.2 Solvency capital requirement and minimum capital requirement”, “E.3 Use of the share price risk submodule based on the duration in the SCR calculation”, “E.4 Differences between the Standard Formula and the internal model”, “E.5 Failure to meet the MCR and SCR” and “E.6 Other information”.

Our opinion on the MVBS and OF reporting templates and related disclosures does not cover the other information.

In connection with our audit of the MVBS and OF reporting templates and related disclosures, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the MVBS and OF reporting templates and related disclosures or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify possible inconsistencies or material misstatement, we are required to determine if there is a material misstatement in the MVBS and OF reporting templates and related disclosures or in the other

information. If, based on the work performed, we conclude that there is a material misstatement, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of Directors and Those Charged with Governance for the MVBS and OF reporting templates and related disclosures

The Directors are responsible for the preparation of the MVBS and OF reporting templates and related disclosures in accordance with the applicable laws and regulations governing the basis of preparation, and, within the terms provided by the law, for such internal control as they determine is necessary to enable the preparation of MVBS and OF reporting templates and related disclosures that are free from material misstatement, whether due to fraud or error.

The Directors are responsible for assessing the Company's ability to continue as a going concern and, in preparing the MVBS and OF reporting templates and related disclosures, for the appropriateness of the use of the going concern and for disclosing related matters.

The Directors use the going concern basis of accounting in the preparation of MVBS and OF reporting templates and related disclosures unless they either intend to liquidate the Company or to cease operations, or have no realistic alternative but to do so.

The statutory audit committee ("Collegio Sindacale") is responsible, within the terms provided by the law, for overseeing the Company's financial reporting process.

Auditor's Responsibilities for the Audit of the MVBS and OF reporting templates and related disclosures

Our objectives are to obtain reasonable assurance about whether the MVBS and OF reporting templates and related disclosures as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with International Standards on Auditing (ISAs) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the MVBS and OF reporting templates and related disclosures.

As part of an audit in accordance with International Standards on Auditing (ISAs), we have exercised professional judgment and maintained professional skepticism throughout the audit. In addition:

- we have identified and assessed the risks of material misstatement of the MVBS and OF reporting templates and related disclosures, whether due to fraud or error; have designed and performed audit procedures responsive to those risks, and obtained audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;
- we have obtained an understanding of internal control relevant to the audit of the MVBS and OF reporting templates and related disclosures in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control;

- we have evaluated the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Directors;
- we have concluded on the appropriateness of Directors' use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures or, if such disclosures are inadequate, to consider this matter in forming our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.

We have communicated with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identified during our audit.

Milan, 20th May 2022

EY S.p.A.

Signed by: Mauro Agnolon, Auditor

This independent auditor's report has been translated into the English language solely for the convenience of international readers. Accordingly, only the original text in Italian language is authoritative.

Cargeas Assicurazioni S.p.A.

Solvency and Financial Condition Report
as at December 31, 2021

Independent auditor's review report pursuant to article 47-septies,
paragraph 7 of Legislative Decree n. 209, dated 7 September 2005, and
article 4, paragraph 1, letter c) of IVASS Regulation n. 42,
dated 2 August 2018

**Independent auditor's review report pursuant to article 47-septies,
paragraph 7 of Legislative Decree n. 209, dated 7 September 2005,
and article 4, paragraph 1, letter c) of IVASS Regulation n. 42,
dated 2 August 2018**

(Translation from the original Italian text)

To the Board of Directors of
Cargeas Assicurazioni S.p.A.

Introduction

We have reviewed the accompanying reporting templates "S.25.01.21 Solvency Capital Requirement – for undertakings on Standard Formula" and "S.28.01.01 Minimum Capital Requirement – Only life or only non-life insurance or reinsurance activity" (the "SCR and MCR reporting templates") and the related disclosures presented in the section "E.2 Solvency capital requirement and minimum capital requirement" (the "disclosures" or the "related disclosures") of Cargeas Assicurazioni S.p.A. (the "Company") included in the Single Solvency and Financial Condition Report of the Intesa Sanpaolo Vita Insurance Group (the "SFCR") as at December 31, 2021, pursuant to article 47-septies of Legislative Decree n. 209, dated 7 September 2005.

The SCR and MCR reporting templates and related disclosures have been prepared by the Management in accordance with the applicable European Union regulations and the national sectoral regulation.

Management's Responsibility

Management is responsible for the preparation of the SCR and MCR reporting templates and related disclosures in accordance with the applicable European Union regulations and the national sectoral regulation, and, within the terms provided by the law, for such internal control as they determine is necessary to enable the preparation of SCR and MCR reporting templates and related disclosures that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express a conclusion on SCR and MCR reporting templates and related disclosures. We conducted our review in accordance with International Standard on Review Engagements (*ISRE*) n. 2400 (*Revised*), *Engagements to review Historical Financial Statements*. *ISRE 2400 (Revised)* requires us to conclude whether anything has come to our attention that causes us to believe that the SCR and MCR reporting templates and related disclosures are not prepared, in all material respects, in accordance with the applicable European Union regulations and the national sectoral regulation. This Standard also requires us to comply with relevant ethical requirements. The review of SCR and MCR reporting templates and related disclosures in accordance with *ISRE 2400 (Revised)* is a limited assurance engagement.

The auditor performs procedures, primarily consisting of making inquiries of management and others within the entity, as appropriate, and applying analytical procedures, and evaluates the evidence obtained.

The procedures performed in a review are substantially less than those performed in an audit conducted in accordance with International Standards on Auditing (ISA). Accordingly, we do not express an audit opinion on SCR and MCR reporting templates and related disclosures.

Conclusion

Based on our review, nothing has come to our attention that causes us to believe that SCR and MCR reporting templates of Cargeas Assicurazioni S.p.A. and related disclosures included in the SFCR of the Intesa Sanpaolo Vita Insurance Group, as at December 31, 2021 are not prepared, in all material respects, in accordance with the applicable European Union regulations and the national sectoral regulation.

Basis of preparation, purpose and restriction on use

Without modifying our conclusion, we draw attention to section “E.2 Solvency capital requirement and minimum capital requirement” included in the SFCR, which describes the basis of preparation of SCR and MCR reporting templates.

The SCR and MCR reporting templates and the related disclosures are prepared, for solvency supervision purposes, in accordance with the applicable European Union regulations and the national sectoral regulation, which results in a special purpose framework. Consequently, they may not be suitable for other purposes.

Milan, 20th May 2022

EY S.p.A.

Signed by: Mauro Agnolon, Auditor

This independent auditor’s report has been translated into the English language solely for the convenience of international readers. Accordingly, only the original text in Italian language is authoritative.