

# Nordea



## **Solvency and Financial Condition Report 2022**

Nordea Life Holding AB

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# Summary

In accordance with the Solvency II directive 2009/138/EC, Nordea Life Holding AB (NLH AB) publishes this Solvency and Financial Condition Report. Solvency and Financial Condition Reports are also available for each of the Nordic subsidiaries within the Nordea Life & Pensions Group and for the non-life subsidiary of NLP in Finland.

The purpose of this report is to deliver information to customers and other stakeholders promoting comparability and transparency regarding the business, performance, governance, risk profile, solvency and capital management of the Nordea Life & Pensions Group.

Nordea Life & Pensions (NLP) is an insurance group and a leading provider of life and pension products in the Nordic countries. On 01 December 2022, NLH AB completed the acquisition of Topdanmark Liv Holding A/S in Denmark. A new legal entity was formed and has started to operate under the name Nordea Pension (also referred to as NLP-DK in this report). NLH AB is now represented in each of the Nordic countries. As of 31 December 2022, total Assets under Management (AuM) were EUR 67,376m, and Gross Written Premiums (GWP) were EUR 5,189m.

NLP is part of the Nordea Group and has in place a system of governance based on the overall governance framework of Nordea Bank Abp and additional governing documents to cover the life and pension business.

Through its insurance and pension activities NLP is exposed to a variety of risks. The two largest risks in terms of contribution to the solvency capital requirement are market risk and underwriting risk.

As part of the risk and capital management process NLP performs various stress and scenario tests both overnight and over the business planning period. The results prove that NLP

has a strong capital position and is resilient even towards more severe stress scenarios.

During 2022 NLP had a stable solvency ratio well above the regulatory solvency limit. At the end of November 2022, NLP had a solvency ratio of 158%. Due to the acquisition of Nordea Pension, the solvency ratio decreased to 138% at the end of December 2022 and has remained stable since.

The acquisition did not change the composition of risks at NLP Group significantly. Market risk remained the largest risk category, followed by underwriting risk.

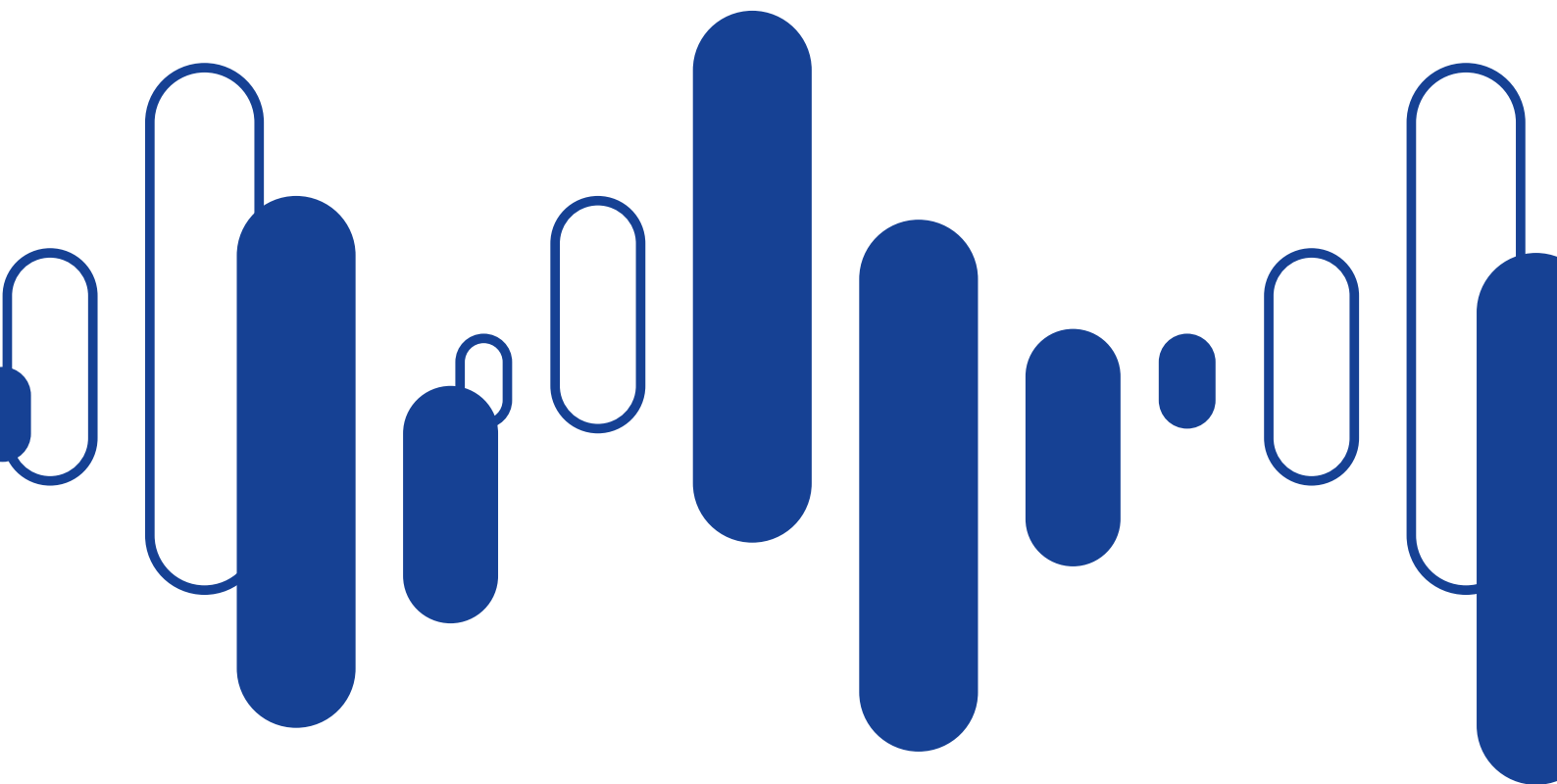
As a consequence of rising interest rates and inflation, NLP incurred a development of AuM, GWP and operating profit that was below the targets set for 2022. However, net flows remained distinctly positive, confirming the stable position of NLP and enabling the group to continue to act as a competent business partner for its customers and to fill its role in society as a strong supporter and anchor for lifelong financial well-being.

NLP calculates a Group solvency position by applying the Solvency II standard formula as defined in the Solvency II regulation. The calculation of the solvency position of NLP Group takes into account a volatility adjustment applied in the Danish, Finnish and Norwegian subsidiaries and transitional measures for technical provisions (TMTP) applied in the Norwegian subsidiary.

All amounts in the text of this report are presented in millions of Euros (EURm), whereas amounts in tables and figures are reported in thousands of Euros (EURk) in accordance with commission implementing regulation (EU) 2015/2452.

On 19 May 2023 the Board of Directors of NLH AB approved this Solvency and Financial Condition Report for publication.

# A Business and Performance



# A Business and Performance

NLP is a leading provider of insurance and pension products in the Nordic countries. The business strategy is set at a local legal entity level adhering to the overall NLP mission to inspire lifelong financial well-being for our customers throughout the Nordics.

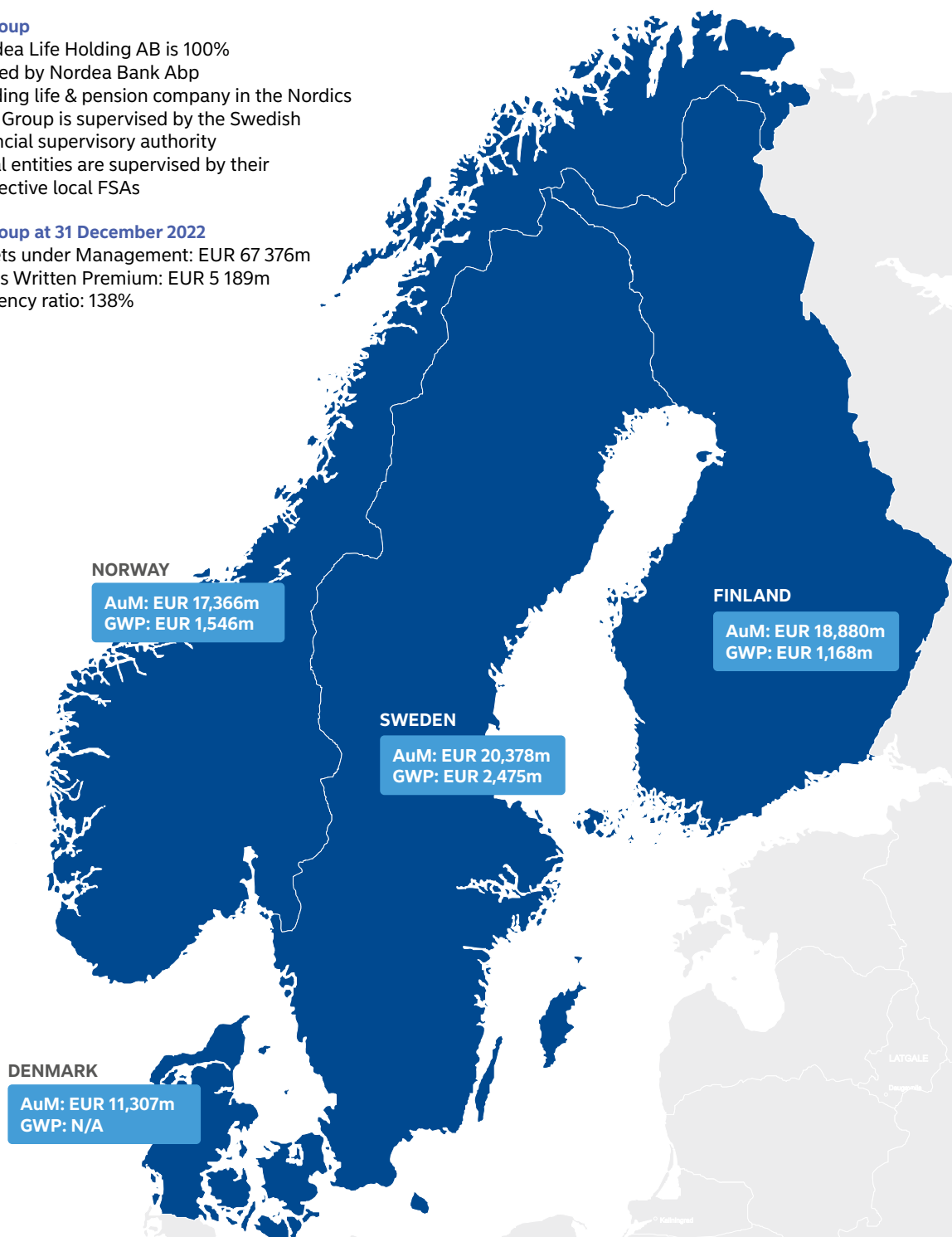
Figure A1 NLP Group overview, 31 December 2022<sup>1</sup>

## NLP Group

- Nordea Life Holding AB is 100% owned by Nordea Bank Abp
- Leading life & pension company in the Nordics
- NLP Group is supervised by the Swedish financial supervisory authority
- Local entities are supervised by their respective local FSAs

## NLP Group at 31 December 2022

- Assets under Management: EUR 67 376m
- Gross Written Premium: EUR 5 189m
- Solvency ratio: 138%



1) NLP Group AuM is lower than the sum of AuM in the local entities due to group eliminations of EUR 555m.

## A1 Business

### Legal structure

On 01 December 2022, NLH AB completed the acquisition of Topdanmark Liv Holding A/S in Denmark. Through acquiring 100% of the shares in Topdanmark Liv Holding A/S, NLH AB also acquired the 100% subsidiary of Topdanmark Liv Holding A/S, Topdanmark Livsforsikring A/S. Following the closing of the acquisition, Topdanmark Liv Holding A/S was renamed to Nordea Pension Holding Danmark A/S and Topdanmark Livsforsikring A/S was renamed to Nordea Pension Livsforsikringsselskab A/S.

On 31 December 2022, NLH AB fully owned its four local subsidiaries in Denmark (NLP-DK), Finland (NLP-FI), Norway (NLP-NO) and Sweden (NLP-SE). Each of the Nordic subsidiaries owns several companies, mainly related to property investments or property investment funds. NLP-FI also fully owns a non-life insurance company, which started operating in 2017.

NLH AB is a 100% owned subsidiary of Nordea Bank Abp located in Finland. NLH AB is domiciled in Sweden.

The business of NLP Group focuses on the Nordic region.

### Business composition

The life and pension business of NLP generally consists of a range of different life and health products, from endowments with a duration of a few years, to very long-term pension savings contracts with durations exceeding 40 years.

Total AuM was EUR 67,376m and GWP was EUR 5,189m at 31 December 2022. The year-on-year progression of AuM and GWP in the past year is shown in Table A1.1. In 2022, AuM increased by +4% while GWP decreased by -21%. This strong change is mainly driven by the development in index-linked and unit-linked insurance.

For the three existing subsidiaries as well as for Nordea Pension, the index-linked and unit-linked contracts (unit-linked savings products) constitute the majority of the total

GWP. This is in line with the overall strategy of being a market return company.

The distribution channels vary by country with a combination of own sales force, external distribution partners and the Nordea Bank branch network.

**Table A1.1 Key financials for NLP**

EURk	31 Dec 2021	31 Dec 2022	Change
Total AUM	65,069,409	67,376,401	4%
Total GWP	6,605,509	5,189,422	-21%
Insurance with profit participation	111,796	100,722	-10%
Index-linked and unit-linked insurance	6,297,602	4,879,945	-23%
Other life insurance	96,223	99,289	3%
Health insurance (direct business)	58,327	66,218	14%
Non-Life	41,560	43,248	4%
Legal operating profit	311,886	262,966	-16%

Table A1.1 shows that legal operating profit has decreased during 2022.

### Material operations and transactions within NLP Group

Subordinated loans from NLH AB to the subsidiaries represent an amount equivalent to EUR 407m at 31 December 2022.

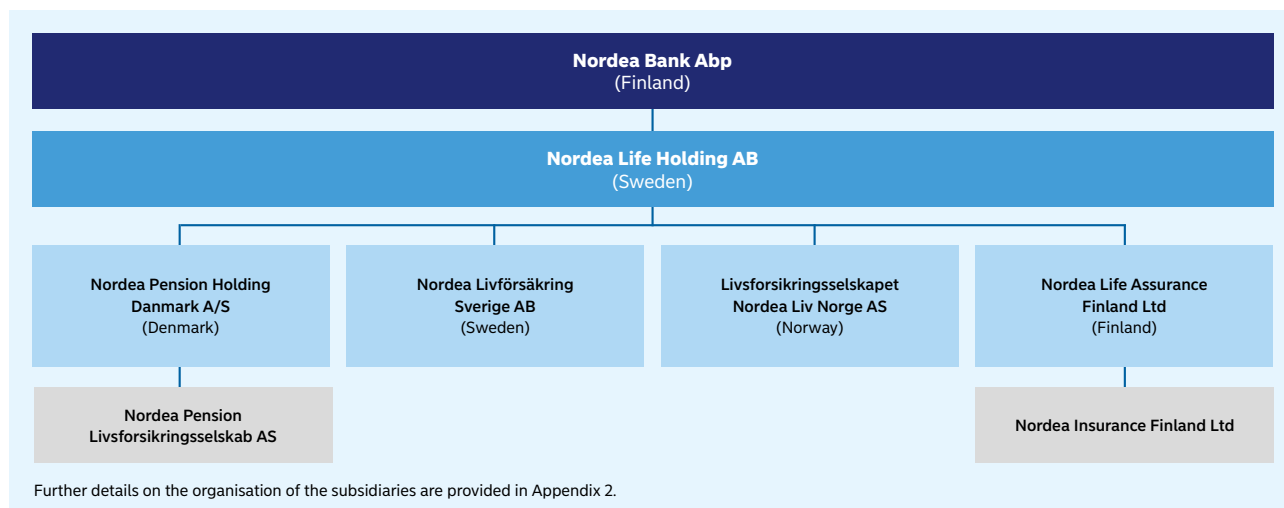
NLP has established an intragroup service agreement describing services provided between the legal entities within the NLP Group. The services and related functions are further described in section B1 "General information on the system of governance".

For material transactions within NLP see section B1 "General information on the system of governance".

**Table A1.2 GWP for NLP Group by line of business**

EURk	Finland	Norway	Sweden	NLP Group
Insurance with profit participation	8,205	38,409	54,108	100,722
Index-linked and unit-linked insurance	1,119,786	1,375,938	2,384,221	4,879,945
Other life insurance	20,200	42,367	36,722	99,289
Health insurance (direct business)	0	66,218	0	66,218
Non-life	20,055	23,193	0	43,248
<b>Total GWP</b>	<b>1,168,245</b>	<b>1,546,126</b>	<b>2,475,051</b>	<b>5,189,422</b>

**Figure A1.1 Legal structure of NLP at 31 December 2022**



### Financial supervisory authority and external audit

NLH AB is under group supervision headed by the Swedish Financial Supervisory Authority, Finansinspektionen<sup>1</sup>. Each local entity within NLP Group is under the supervision of the local financial supervisory authority in each respective country.

The external auditor of NLH AB is Öhrlings PricewaterhouseCoopers AB.<sup>2</sup>

### A2 Underwriting performance

The underwriting performance at an aggregated level is reflected by the gross earned premiums for each line of business compared with the claims and expenses as shown in table A2.1.

Insurance with profit participation (participating savings products) shows an decrease in Gross earned premiums of EUR –11m. Unit-linked insurance shows a decrease in Gross earned premiums of EUR –1,417m, while there was an increase of EUR +8m in the Health insurance business. The business lines other life insurance and non-life showed increasing Gross earned premiums as well. New contracts are mainly issued in unit-linked savings products at NLP Group.

**Table A2.1 Underwriting performance**

EURk	Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance	Health insurance (direct business)	Non-life	Total
<b>31 Dec 2022</b>						
Gross premium earned	100,722	4,879,945	99,229	66,218	43,488	5,189,602
Claims and expenses	-440,760	-3,190,627	-43,456	-48,052	-17,194	-3,740,090
<b>31 Dec 2021</b>						
Gross premium earned	111,796	6,297,602	96,163	58,327	41,830	6,605,719
Claims and expenses	-507,846	-2,569,571	-52,479	-47,670	-21,922	-3,199,488

**Table A3.1 Investment performance**

EURk	31 Dec 2021	31 Dec 2022
Return on bonds	112,879	-507,882
Gain/loss on interest rate derivatives	-31,388	-72,812
Other interest expenses	-24,399	-37,680
Adjustment to market value	-142,406	210,532
<b>Total return on interest bearing securities</b>	<b>-85,314</b>	<b>-407,842</b>
Gain/loss on foreign exchange derivatives	-101,214	-114,363
Currency gain/loss on deposits	191	-2,259
Other interest income	34,695	42,863
<b>Return on deposits and derivatives</b>	<b>-66,328</b>	<b>-73,759</b>
Return on shares	1,135,856	-959,544
Return on pension funds	6,716,755	-5,548,236
Gain/loss on equity derivatives	-8,212	4,973
<b>Total return on shares</b>	<b>7,844,398</b>	<b>-6,502,807</b>
Gain/loss on private equity	115,513	47,899
Gain/loss on hedge funds	1,692	7,809
Gain/loss on high yield bonds	4,217	-6,184
Gain/loss on structured credit	-24	1,087
Gain/loss on other alternative investments	6,833	0
<b>Return on alternative investments</b>	<b>128,230</b>	<b>50,611</b>
<b>Return on investment properties</b>	<b>200,763</b>	<b>-30,430</b>
<b>Total investment return</b>	<b>8,021,749</b>	<b>-6,964,227</b>

### A3 Investment performance

The investment returns shown in table A3.1 are aggregated across NLP's local subsidiaries and across product types. Across the Group, the majority of investment return (loss) came from exposures to shares and pension funds.

#### Securitisation

NLP does not invest directly in securitised credit structures but has exposure through credit fund managers.

### A4 Performance of other activities

No other significant activities were undertaken in 2022.

### A5 Any other information

There is no other material information to report for 2022.

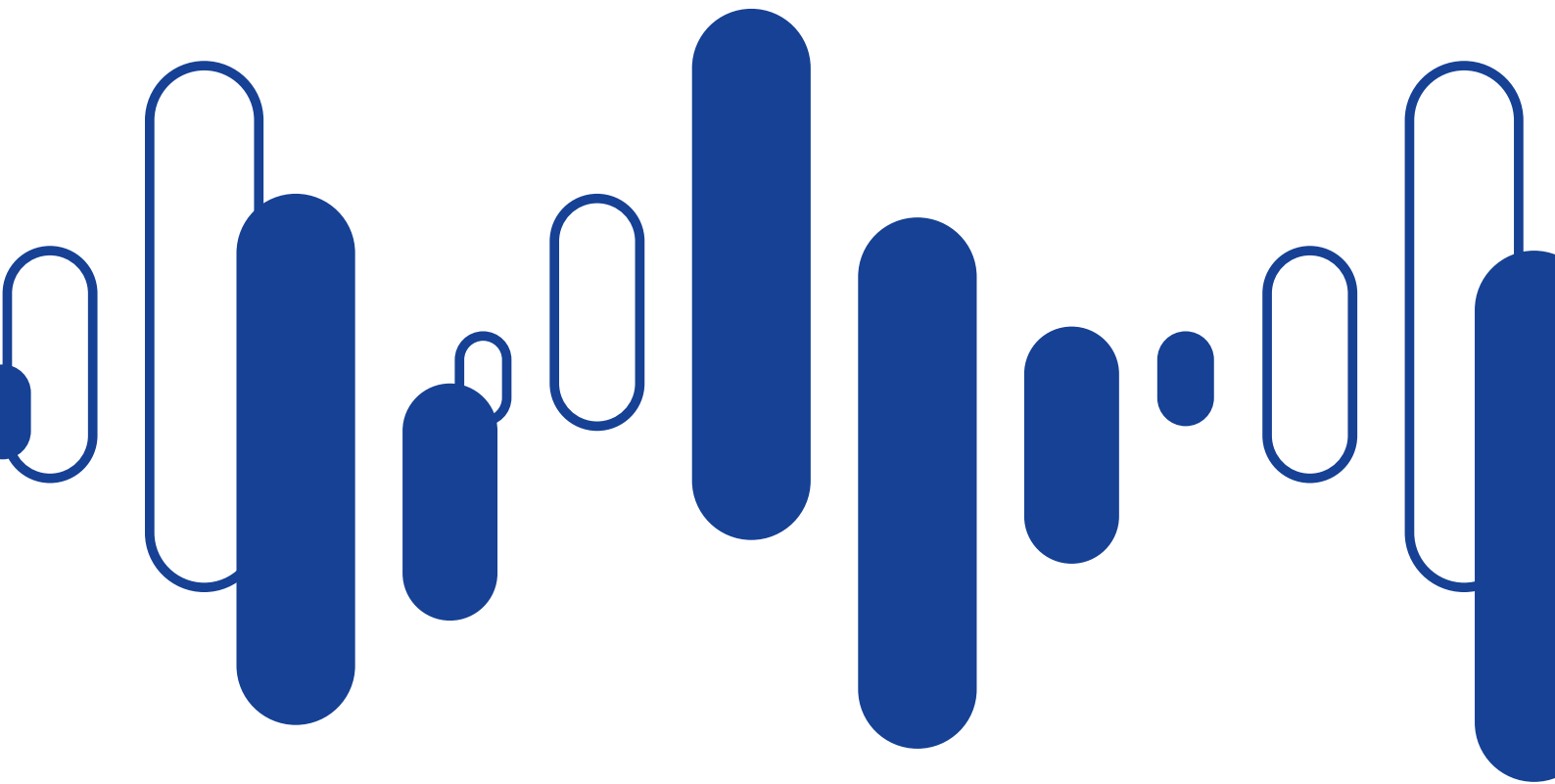
Note: Table A3.1 shows the overall investment performance in absolute numbers. The numbers from the different countries have been aligned to the accounting standards used on a group level. The table shows aggregated numbers for all countries and all products.

1) Finansinspektionen, Box 7821, SE-103 97 Stockholm, Sweden.  
Visiting Address: Brunnsgratan 3, Stockholm. E-mail: finansinspektionen@fi.se or firstname.lastname@fi.se Tel: +46 8 408 980 00 (switchboard).

2) Öhrlings PricewaterhouseCoopers AB, 113 97 Stockholm. Visiting address:  
Torsgatan 21, 113 21 Stockholm, Tel: +46 10 212 40 00, Fax: +46 10 214 30 00.



# B System of Governance



# B System of Governance

## B1 General information on the system of governance

### Overall governance at NLP

As part of the Nordea Group, NLP and its employees are governed by an integrated framework of rules. Nordea Group Board Directives represent the supreme set of rules in which NLP Group Instructions (i.e. charters, policies, instructions), the NLP Risk Appetite Framework (RAF), guidelines, routines and standard operating procedures are embedded<sup>3</sup>. The local entities have additional policies, guidelines and procedures in place as needed to comply with local legislation and business requirements.

As far as the new local entity, NLP-DK, is concerned, an integration programme has been established, and Nordea Group internal rules will be implemented according to a comprehensive plan.

### Board of Directors

The Board of Directors of NLH AB (the Board) and the Boards of Directors of the local subsidiaries bear overall responsibility for NLP's operations. The Board ensures that NLP's organisational structure is appropriate and transparent with a clear division of duties and areas of responsibility ensuring effective and sound governance.

The Board holds the responsibility for overseeing a robust and comprehensive governance structure and for ensuring the effectiveness of the risk management system and control framework. It ensures that the organisation of NLP with respect to accounting, management of funds, and the financial position in general includes satisfactory controls. The Board is ultimately responsible for ensuring that an adequate and effective system of internal control is established and maintained.

To ensure segregation of duties and allocation of responsibilities to the Head of NLP (NLH AB CEO), the Board has set and approved instructions for the Head of NLP which clearly define the areas of responsibility and obligations in relation to the Board.

The Head of NLP leads the executive management of the company in accordance with the instructions and orders issued by the Board. The Head of NLP ensures that the accounts of the company comply with the law and that its financial affairs have been reliably arranged. The Head of NLP supplies the Board with the information necessary for the Board to perform its duties.

The Board has established a remuneration committee.

### Life Executive Management Group

The strategic direction for NLP across the Group is set by the Board of NLH AB and supported by the Life Executive Management Group (LEMG). The forum also shares best practice across the Group and acts as a steering committee for strategic initiatives. LEMG consists of:

- the CEO of NLH AB
- the CEOs of the legal entities NLP-DK, NLP-FI, NLP-NO and NLP-SE
- the Head of Life & Pensions Denmark PRU
- the NLP People Business Partner
- the Head of Capital & Investment
- the Head of Strategy & Governance
- the NLP Group CFO
- the Head of Life Law
- the NLP Group CRO

Other members may be appointed from time to time.

### Life Group Functions

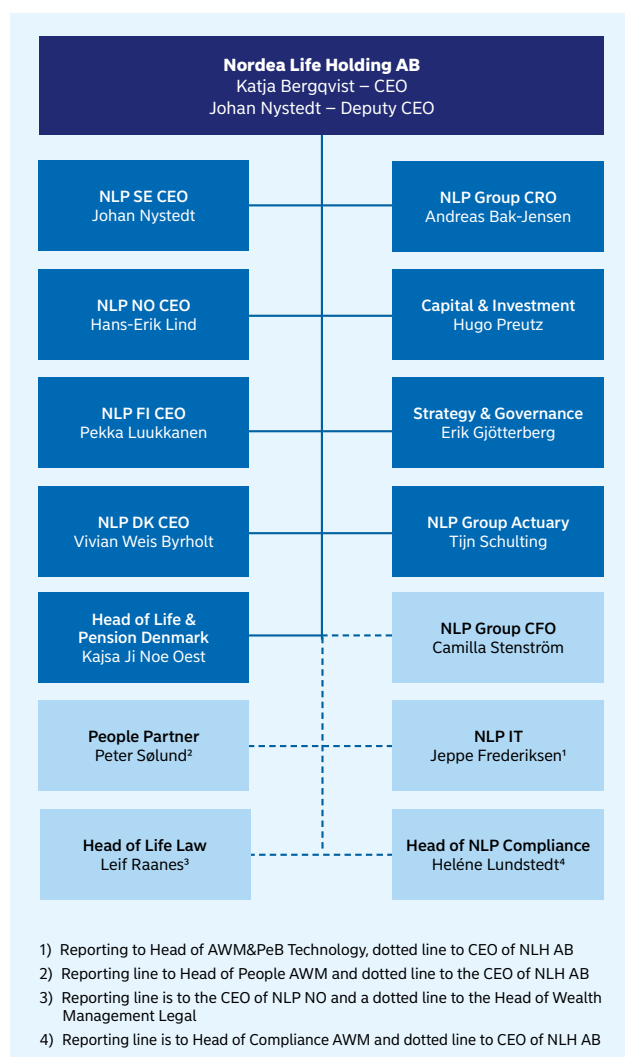
NLP maintains Group functions that perform tasks related to managing and protecting NLH AB's ownership interests in its subsidiaries. The Group functions also conduct NLP Group related reporting obligations. In addition, the Group functions support the local entities in reporting, monitoring, IT, investment, compliance and risk management. The organisation and reporting lines of the Life Group Functions are shown in figure B1.1.

### NLP Risk Management & Control

NLP Risk Management & Control is headed by the Chief Risk Officer (NLP Group CRO) who bears overall responsibility for risk management in terms of modelling, assessments and monitoring at the NLP Group level.

Independence of the NLP Group CRO is ensured by dual reporting lines, one to the Head of NLP Group and one to the Nordea Group CRO. The NLP Group CRO attends all regular NLH Board meetings. The NLP Group CRO also has the possibility of communicating directly with the Board on his/her own initiative.

Figure B1.1 Life Group Functions



3) The Board of NLP Group decides about approval or adaption of Nordea's internal rules within NLP Group.

Local CROs also report directly to local Boards. Coordination between the Group Risk Office and the local Risk Management Functions is facilitated through a CRO Forum and the Risk & Compliance Committee.

### Capital & Investment

The Head of Capital & Investment reports to the Head of NLP Group and has overall responsibility for NLP Group capital management, sustainability, investment operations and solvency calculations. Financial reporting and related financial queries are managed by Group Finance Life & Pensions in Nordea Group, and the Head of Capital & Investment oversees this relationship.

Investments are managed by the local investment teams in the four Nordic subsidiaries. The local Heads of the investment teams report directly to the Head of Capital & Investment. Cross-border responsibilities of the local teams are coordinated by Nordic working groups for specific areas of competence.

The Head of Capital & Investment has overall responsibility for the investment processes within NLP and is supported by the Nordic Investment Committee (NICO). Investment processes within NLP follow a common group investment strategy which is submitted annually to the Board of NLH AB by the Head of Capital & Investment. This investment strategy is embedded in the NLP risk management policy and the overall business strategy of NLP.

### Sustainability

Sustainability and Environmental, Social and Governance (ESG) issues are an integrated part of the investment process and considered in all investment decisions. NLP's policy framework, consisting of the Responsible Investment Policy, the Climate Change Policy and the Engagement Policy, acts as the foundation for NLP's ESG integration and outlines the principles and minimum standards which all NLP-managed investments must comply with. NLP Group has established a Sustainability Committee, chaired by the Group CEO, in order to implement and monitor responsible investment practices across NLP. The committee shall also support the local entities of NLP with implementing the responsible investment principles and being compliant with sustainability related targets.

ESG issues are integrated in both pre- and post-investment processes and instructions. Engagement and voting practices act as a central part of managing risk and driving positive change. All asset managers are assessed and rated with regards to their ESG practices before investment and all investment products and mandates are assessed against policy compliance and ESG standards.

NLP is a signatory to the Principles for Responsible Investment (PRI) and has, as a founding member of the UN Net-Zero Asset Owner Alliance (NZAOA), made an ambitious commitment to transition its assets to net-zero by 2050 at the latest. In addition, NLP is actively contributing to driving positive change across the industry and has leading roles in several important international initiatives such as PRI, Partnership for Carbon Accounting Financials (PCAF), Glasgow Financial Alliance for Net Zero (GFANZ), Science Based Targets initiative (SBTi) and Carbon Risk Real Estate Monitor (CRREM).

In order to address the significant regulatory changes related to ESG and sustainability, NLP has launched its own group-wide ESG programme. This programme consists of several cross-functional workstreams which involve key functions and units across the organisation to ensure a holistic implementation approach.

During 2022, local entities disclosed information on the

integration of sustainability risks in the investment decision-making process, and on adverse sustainability impacts in accordance with Sustainable Finance Disclosure Regulation. On product level, local entities disclosed information on the integration of sustainability risks, sustainability characteristics and the methodologies used in measuring sustainability-related characteristics. The implementation of the sustainability amendments to the Insurance Distribution Directive was completed in 2022.

NLP discloses its climate related financial reporting according to the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD).

### Strategy & Governance

The Head of Strategy & Governance employs a team of experts with a NLP Group focus. They are monitoring and reporting on non-financial risks, implementing new regulations and supporting with improvement initiatives. The Head of Strategy & Governance reports to the Head of NLP Group.

### Finance

NLP finance is responsible for the internal and external financial reporting for the life and pension group. The NLP Group CFO is part of the Nordea Abp Group Finance organisation. Each legal entity has a locally responsible CFO and finance teams.

### IT

IT at NLP is part of the Nordea Bank IT platform. Asset & Wealth Management (AWM) receives IT support from Group Business Support Technology. Within the sub-unit AWM & PeB Technology<sup>4</sup> of Group Business Support Technology there is a unit called Others (Subsidiaries) which is responsible for NLP. Local IT officers in this unit have dual reporting lines, one to the Head of Others (Subsidiaries) and one to the local business owner.

### People

The Nordea Group People Organisation is responsible for implementing and facilitating the processes relating to Human Resources (HR) within NLP. The People organisation consists of the People Business Partners which are responsible for NLP and other subsidiaries and units within Nordea. The People Business Partner for NLP Group is responsible for the strategic People agenda within NLP and is part of the AWM & Personal Banking People organisation, with a reporting line to the Head of AWM & Personal Banking People. The Group People units, such as Reward, Talent, Leadership Support and People Direct support NLP on a local level. The AWM People team has dedicated leadership consultants from Leadership Support and Reward partners who support the implementation of HR processes in NLP.

### Legal

NLP Legal (Life Law) consists of legal counsels that are situated in the local entities. Life Law is headed by the Head of Life Law. Life Law has an overall responsibility to make legal assessments of applicable legislation. In addition, Life Law performs other legal services to NLP Group such as (but not limited to) assisting with the review and analyses of agreements, reporting, disputes handling, Nordea Internal Rules and external guidelines.

### Solvency II key functions

The key functions Risk Management, Compliance and the Actuarial Function are all an integral part of NLP's organisation. The Group Compliance Officer reports to the Head of NLP Group. The NLP Group CRO has a dual reporting line to

4) AWM & PeB: Asset & Wealth Management and Personal Banking.

both the Head of NLP Group and the Nordea Group CRO to ensure independence and transparency. The Head of the Actuarial Function reports to the Head of NLP Group.

The Internal Audit Function is outsourced to and conducted by Nordea Group Internal Audit (GIA). The roles and responsibilities as well as the implementation of the key functions are described in sections B3 to B6.

### Organisational and governance changes at NLP in 2022

The following changes to NLP's organisational set-up and governance were made in 2022:

- Management Team of NLH AB:
  - Hugo Preutz joined NLP in August 2022 as Head of Capital & Investment. Since then, the CIO's of the local entities and the Head of Sustainability have reported to him.
  - Camilla Stenström changed roles in the management team from Head of Capital Management to NLP Group CFO
  - As CEO of the acquired Danish legal entity Nordea Pension, Vivian Weis Byrholt joined the NLP management team in December 2022
  - Thorben Sander became a member of the board of NLH AB in June 2022
  - Tijn Schulting was appointed CRO of NLP-NO as of 01 March 2023. He maintained his role as NLP Group Actuary while NLP searched for a permanent replacement. Sejla Ackar was appointed Head of the NLP Group Actuarial Function as of 01 April 2023.

### Remuneration

The Board of Directors of Nordea Bank Abp decides on the Nordea Group Board Directive on Remuneration, and ensures that it is applied and followed up as proposed by the Nordea Bank Board Remuneration Committee. The directive is adopted by the Board of Directors of NLH AB. NLP Group has its own Board Remuneration Committee.

The Nordea Group Remuneration Framework supports NLP's ability to recruit, develop and retain highly motivated, competent and performance-oriented employees. NLP aims to offer competitive, but not market-leading compensation packages.

NLP has a total remuneration approach to compensation that recognises the importance of well-balanced but varied remuneration structures based on business and local market needs, and of compensation being consistent with and promoting sound and effective risk management, and not encouraging excessive risk-taking or counteracting NLP's long-term interests. NLP makes use of the following variable remuneration components:

- Nordea Incentive Programme (NIP) may be offered to recruit, motivate and retain selected managers and key employees, and aim to reward strong performance and efforts. The programmes contain predefined financial and non-financial performance criteria at Group, Business Area, Group Function, unit and individual level.
- One Time Recognition Payment (OTRP) have been created to reward for the extraordinary performance of employees not being a part of the Nordea Incentive Programme. An extraordinary performance could be taking on additional responsibilities for a period, creating extraordinary results or deliveries. The maximum outcome is one month salary and never more than EUR 10.000.
- Profit Sharing aims to stimulate value creation for customers and shareholders and is offered to all employees not participating in other variable pay schemes (EIP, VSP), or employees being identified as material risktakers in the Nordea Group. The performance criteria for the programme reflect the long-term targets of Nordea Group: Return on Equity, Cost Income Ratio and Customer Satisfaction.

The Nordea Group Board Directive on Remuneration does not

define any supplementary pension or early retirement schemes for members of the Board or other key function holders. Nordea does not use any discretionary pension benefits.

### Material transactions during the report period

Table B1.1 gives an overview over the dividend payments made during 2022.

Table B1.1: Dividend transactions during 2022

Transaction type	From	To	Transaction Date	Amount EURk
Annual dividend 2022	Nordea Life Assurance Finland Ltd	Nordea Life Holding AB	Dec 2022	126,000
Annual dividend 2022	Nordea Livförsäkring Sverige AB	Nordea Life Holding AB	Dec 2022	73,163
Annual dividend 2022	Livsfor-sikrings-selskapet Nordea Liv Norge AS	Nordea Life Holding AB	Jun 2022	59,464
Annual dividend 2021	Nordea Life Holding AB	Nordea Bank Abp	Mar 2022	270,000

## B2 Fit and proper requirements

NLP operates in accordance with the fit and proper principles set out in the Nordea Bank Board Directive on Suitability. In addition, NLH AB has issued a policy for selecting and assessing its members of the Board of Directors, its CEO and its key function holders. The policy describes the fit and proper requirements and assessments in more detail.

The abovementioned NLH AB policy requires that the fit and proper assessments are carried out as part of the recruitment process and as a regular assessment of each Board member, CEO and Key Function Holder.

The assessment process of whether the person is 'fit' includes an assessment of the person's professional and formal qualifications, knowledge and relevant experience within the insurance sector, other financial sectors and/or other businesses and shall take into account the respective duties allocated to that person and, where relevant, the insurance, financial, accounting, actuarial and management skills of the person.

The assessment process of whether a person is 'proper' includes an assessment of that person's honesty and financial soundness based on evidence regarding their character, personal behaviour and business conduct including any criminal, financial or supervisory aspects relevant for the purpose of the assessment.

## B3 Risk management system including the own risk and solvency assessment

### Overarching NLP risk management system and control framework

Risk and capital management at NLP is governed by principles and procedures stated in charters, policies, instructions and guidelines in effect throughout the organisation. All legal entities within NLP are subject to the same internal control and risk management environment.

The NLP Risk Management System and Control Framework is governed overall by the NLP Risk Management Strategy, the NLP Risk Management Policy, the NLP Risk Appetite Framework and Nordea Group Directives. It is operationally embedded through the key risk and capital management processes, regular reports to key stakeholders and additional instructions and documentation.

The NLP Risk Management System and Control Frame-

work is underpinned by the Nordea Group Board Directive on Internal Governance and the NLP Policy on Internal Governance. They include principles for the control environment in which the business operates, including a clear and transparent organisational structure and the framework of internal rules and controls.

The internal control framework is further described in section B4 "Internal control system".

**Risk culture**

NLP adheres to the Nordea Group Board Directive on Internal Governance through setting clear roles and responsibilities and maintaining a transparent governance structure. NLP is committed to having in place a sound risk culture to support the successful implementation of the NLP Risk Management Strategy. Regular employee training, communication and appropriate incentives and rewards are initiatives taken to support a sound risk culture.

Under the Nordea Group Board Directive on Internal Governance, the business is responsible for its own daily proactive risk management, including raising issues as appropriate, and for operating the business within agreed limits. This includes putting effective controls into place and monitoring these controls.

**Risk management strategy**

The NLP Risk Management Strategy is approved by the Board. The key principles underlying the NLP Risk Management Strategy are:

- Taking on risks that are within the NLP Risk Appetite Framework/limits/budget and return considerations, which can be understood, controlled, monitored and reported on. Risks beyond the scope of these considerations should be avoided.
- Having a coherent and consistent global/local NLP risk management system and control framework.
- Having a Risk Management Function that acts as a risk partner for the business.
- Meeting future regulatory requirements that affect the management of risk and capital.

**Risk appetite**

The Board is ultimately responsible for the overall risk appetite of NLP and for deciding on principles for how risk appetite should be managed.

The starting point for defining NLP's risk appetite is the overall business strategy and the available capital base. The RAF considers key risks relevant to NLP and is on an aggregated level represented in terms of financial risk, insurance

risk, business risk, model risk, operational risk, solvency, ESG and compliance risk.

For each type of risk, overall lines and limits are cascaded to the local entities and are further delegated within the entities as appropriate. Further lines and limits exist in local entities as required by legislation or for business reasons.

The RAF is updated at least annually to ensure the adequacy and effectiveness of the risk management strategies.

**Risk management process**

NLP has in place a consistent and coherent risk and capital management process which includes activities for identifying, measuring, monitoring, managing and reporting on risks and their capital implications.

**Risk identification**

Risk identification is embedded within the business and risks are identified through top-down as well as bottom-up processes. As part of the top-down assessments emerging risks as well as strategic risks are covered. The bottom-up processes include but are not restricted to Risk Control Self-assessment (RCSA), risk identification and assessments as part of Change Risk Management Approvals.

**Risk measurement**

Risk measurement is carried out on a quantitative and/or qualitative basis to estimate the likelihood and impact of the different types of risks. Methods used to measure risks include, but are not limited to:

- exposure analysis
- stress and scenario testing
- expert judgements
- forward-looking assessments

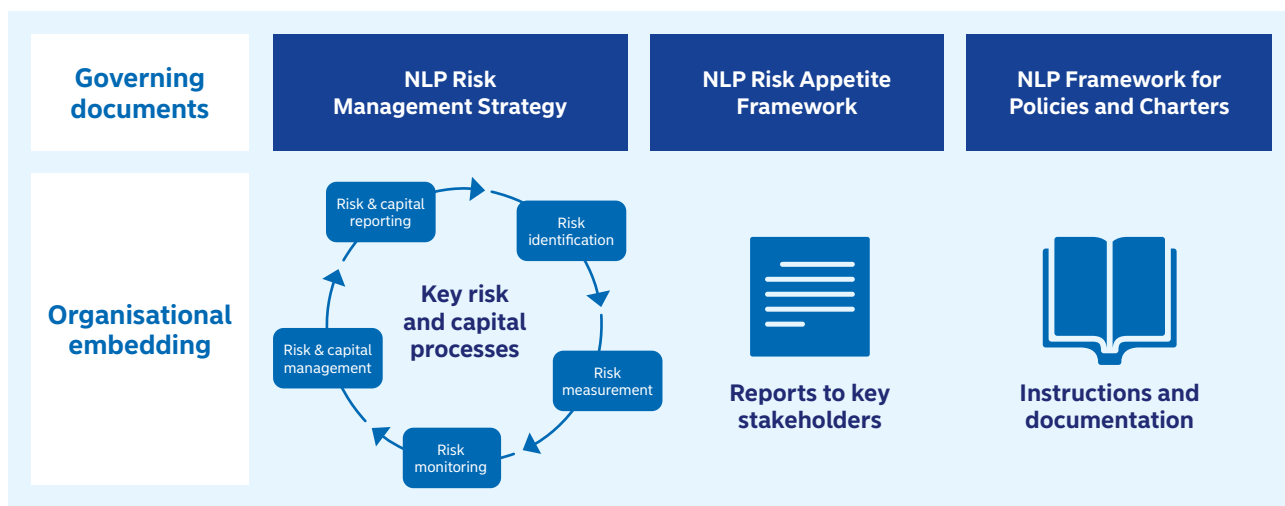
**Risk monitoring**

Risks are monitored against risk appetite statements, lines and limits.

**Risk management**

Risks are managed at all levels of the organisation both through strategic decision making and through daily management of the business. When managing the risks, the identified risks are either accepted at the current risk level, avoided by eliminating the cause of the risk or managed by taking measures that either mitigate the likelihood or the impact of the event should the risk occur (e.g. reinsurance, hedging).

Figure B3.1 NLP's risk management system and control framework



### Risk reporting

Risk and capital reporting is carried out regularly to support the business decisions and to monitor/control that the business is in line with the risk appetite as well as existing lines and limits. The frequency of the different types of reports varies from weekly to annual reports. The audience depends on the report content and ranges from the risk organisation to the executive management in NLP, the NLH AB Board, NB Abp and the supervisory authorities.

### Framework for risk and capital decision-making

The Asset Liability Management (ALM) square in the lower part of figure B3.2 is key to the implementation of NLP's risk management strategy in the day-to-day business. The ALM square sets out the various considerations that should be balanced when making business decisions at NLP in a short-term as well as long-term perspective, including competitiveness, legal requirements, profitability and capital requirements (including economic value and regulatory/solvency requirements).

### Risk management function

NLP Risk Management & Control is a key function under Solvency II and is a collective term for Group and local risk management resources. Consistency and coherency in the risk management framework and methodology are ensured through the CRO Forum. The CRO Forum Charter sets out its purpose and scope.

Risk Management & Control provides risk input into business decision-making through decision-making bodies. At the NLP Group level, this occurs through the NLP Group CRO providing independent risk advice and reporting to the Board and management of NLP Group. In addition, the Group CRO is involved in the core decision-making meetings at group level. At the local entity level, the local CRO provides independent risk advice to the local Board.

### Risk and capital management

The capital management process, as illustrated in figure B3.2, is intended to ensure that NLP has sufficient capital to cover all risks taken over the business planning period, including during periods of stress. The level of capital needs to be adequate from an internal and regulatory perspective.

The capital planning is based on key components of NLP's business plan/Rolling Financial Forecast (RFF). An active capital planning process ensures that NLP is prepared to make necessary capital arrangements regardless of the state of the economy, the introduction of new capital adequacy regulations and to accommodate strategic and business objectives. The process covers exposure to macroeconomic, business and emerging risks.

NLP's own solvency capital needs are assessed based on:

- NLP's risk profile compared to the underlying assumptions of the Solvency II standard formula
- Areas within the business which are not taken into account with the solvency capital requirement of NLP based on the Solvency II standard formula calculation

NLP's capital policy determines target capitalisation levels in NLP. The current capital position and capital policy are described in Section E "Capital management".

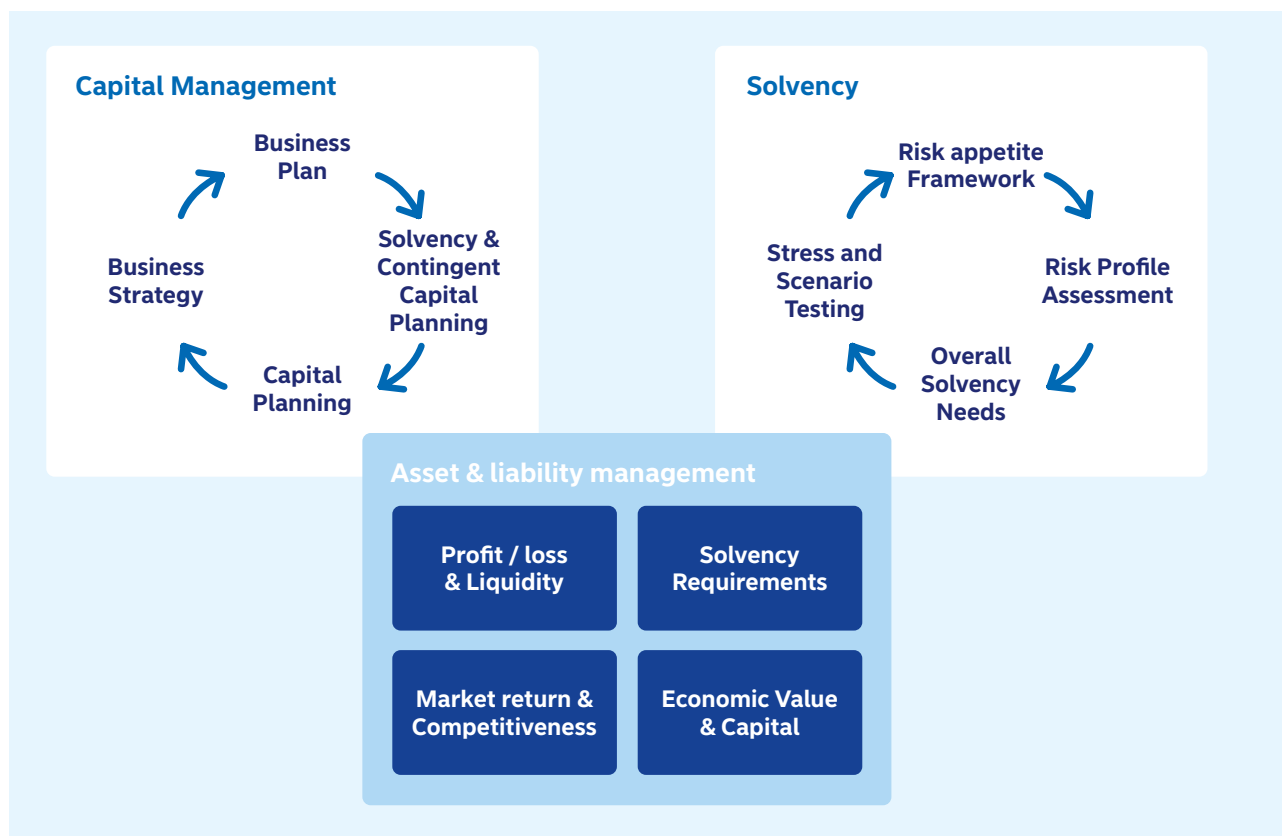
The outcome of the capital management process is included in the Own Risk and Solvency Assessment (ORSA) report.

### Frequency and timing of the ORSA report

The ORSA report is, at minimum, prepared on an annual basis and submitted to the Board for challenge and approval. The types of circumstances which could trigger the need for a non-regular ORSA report are set out in the NLP Own Risk and Solvency Assessment (ORSA) Policy.

Once approved, the ORSA report is submitted to the supervisor concerned within two weeks after Board approval. The outcome of the ORSA assessment is distributed to key stakeholders and the assessment is documented in an ORSA record.

Figure B3.2 Capital Management Process



### Roles and responsibilities in the ORSA process

The Board plays an active part in the risk and capital management of NLP. This includes identifying risks, steering how risk assessment is to be performed, challenging the results and ensuring that the results and conclusions are documented and communicated within the business. The Board's activities relating to the risk and capital processes, as well as the NLP Risk Management System and Control Framework, are also documented in the Board's annual wheel.

The business areas are involved in the assessment of appropriate scenarios to be tested, by identifying potential threats to the business and strategic scenarios.

### Material intra- group outsourcing arrangements

Material intra-group outsourcing arrangements are described in section B7 "Outsourcing".

## B4 Internal control system

NLP's internal control framework is overall governed by the Nordea Group Board Directive on Internal Governance and the NLP Policy on Internal Governance. These and their underlying internal rules address:

- Control environment
- Risk assessment
- Control activities
- Information and communication
- Monitoring

This includes principles for the control environment in which the business operates including a clear and transparent organisational structure, appropriate segregation of duties and application of the four-eyes principle.

As part of an effective system of governance, NLP adheres to a "three lines of defence" model which forms the basis for a clear division of roles and responsibilities in the organisation. This is a key principle of the internal control framework at NLP. The first line of defence at NLP is represented by the business.

The second line of defence at NLP Group level is represented by the following Group functions: Risk Management Function, Compliance Function and the Actuarial Function. The third line of defence is represented by Group Internal Audit (GIA). The three lines of defence model is illustrated in figure B4.1.

### Compliance function

The Compliance Function at NLP is defined as an independent key function subject to Solvency II requirements, but is at the same time organised as an integrated part of the Compliance Function in Nordea Group (Group Compliance).

Group Compliance is organised in divisions covering all compliance risk types, with compliance divisions both centralised and in each Business Area. The purpose of the Compliance Function is to provide an independent risk-based view on the compliance with laws, regulations, business principles, rules of conduct, good business practice and related internal rules applicable to NLP. The responsible risk owners (1st line of defence) contribute to an effective and efficient compliance risk management by identifying compliance risks and supporting follow-up measures.

The Head of NLP Compliance has a functional reporting line to the head of AWM Compliance at Nordea Group and a legal reporting line to the CEO and to the Board of Directors in NLH AB.

The Compliance Officers in the local entities of NLP are employed locally and have a functional reporting line to the Head of NLP Compliance and a legal reporting line to the local CEO and to the local Boards of Directors.

The Compliance Function shall have necessary authority, expertise, resources and access to all relevant information in order to be effective. The level of adequate resources for the Compliance Function shall be based on the size and complexity of NLP.

The responsibilities of the NLP Compliance Function are described in the NLP Directive for Compliance and include identifying, assessing, monitoring, controlling and reporting on compliance risks in NLP. The Directive for Compliance is approved by the Board of Directors in NLP and is reviewed annually.

Figure B4.1 Lines of Defence in NLP

<b>First line of defence</b>	Business	Responsible for managing own risks and operating business in accordance with the framework for internal control and risk management and the defined limits for risk exposure.  Responsible for ensuring performance quality.  Responsible for identifying, assessing and reporting all issues related to material financial and non-financial risks.
<b>Second line of defence</b>	Risk management	Independent control and risk functions with the purpose and authority to support and challenge the first line of defence.
	Compliance	Responsible for identifying, assessing, monitoring, controlling and reporting on compliance risks.
	Actuarial function	To verify effective and efficient operations, prudent conduct of business and reliability of financial and non- financial information reported internally and externally.  To ensure compliance with laws, regulations, supervisory requirements and internal rules.
<b>Third line of defence</b>	Group internal audit	Independent control unit which assesses the internal control framework and processes for risk identification, control and reporting.  GIA supports the BoD in protecting the assets, reputation and sustainability of the organisation.

## B5 Internal Audit function

The Internal Audit Function at NLP is handled by Nordea's Group Internal Audit (GIA). The internal rules for the Internal Audit function consist of the Group Board Directive for Group Internal Audit, the methodology manual "the Nordea Way" and supporting Standard Operating Procedures.

In accordance with the Group Board Directive for Group Internal Audit, the purpose of GIA is to support management in protecting the assets, reputation and sustainability of the organisation by:

- Assessing whether all significant risks are identified and appropriately reported by management and the risk functions to the Board, its committees and Executive Management
- Assessing whether all significant risks are adequately controlled
- Challenging Executive Management to improve the effectiveness of governance, risk management and internal controls if necessary.

The Group Board Directive for Group Internal Audit is adopted by the Board and includes information regarding the purpose, scope, organization, authority, independence, professional competence, confidentiality, responsibilities, reporting and follow-up activities of Group Internal Audit and Quality Assurance. As outlined in the directive, the staff of GIA does not participate in the work of other functions, in the operating activities or in the work on preparing and selecting risk models or other risk management tools. The Group Board Directive for Group Internal Audit recognises the International Standards for the Professional Practice of Internal Auditing, and the Code of Ethics, published by the Institute of Internal Auditors.

## B6 Actuarial function

Actuarial functions are established at Group level and for each local entity. The Actuarial Function is governed by the NLP Actuarial Function Charter. The Actuarial Function works in close cooperation across the Group, exchanges experiences and agrees on frameworks to ensure efficiency. Coordination is facilitated by regular meetings.

The Actuarial Function at NLP:

- Assesses that the calculation of technical provisions is consistent with regulatory requirements
- Performs specific model validation procedures to ensure that the assumptions and models used in the calculation of technical provisions are appropriate
- Expresses an opinion on the applicable underwriting policy and reinsurance arrangements

The Group Actuarial Function is responsible for developing a consistent framework across the group, as well as supporting and challenging the local Actuarial Function. The Group Actuarial Function reports to the CRO.

The Actuarial Function Report is presented to the Board at least annually. The report summarises the tasks performed by the Actuarial Function and their outcomes, as well as possible deficiencies and recommendations for improvement. In addition, the Group Actuarial Function has the ability to communicate directly with the Board on their own initiative.

## B7 Outsourcing

NLP Group relies on a number of services provided by Nordea Bank Abp. The NLP Group Outsourcing framework is described in the NLP Outsourcing Instruction and the Nordea Group Board Directive on Procurement. Following this framework, service providers shall comply with the NLP Group outsourcing requirements, applicable laws, regulatory requirements and guidelines.

The NLP Outsourcing framework sets the principles for:

- Decision-making about outsourcing and outsourcing of cloud services
- Criteria for assessing criticality and importance of outsourced relationships
- The risk management process when selecting a service provider
- The contractual content with outsourcing providers
- Reporting to the supervisory authority
- Monitoring and reporting of the outsourced activities

Within NLP Group the following critical or important outsourcing arrangements are in place:

- IT function has been partly outsourced to Nordea Bank Abp (domiciled in Finland).
- Distribution channel has been outsourced to Nordea Bank Abp (domiciled in Finland) and its Nordic branches (domiciled in Denmark, Norway and Sweden).
- Investment management services and order reception, transmission and execution services have been outsourced to Nordea Investment Management AB (domiciled in Sweden).
- Internal audit has been outsourced to Nordea Bank Abp (domiciled in Finland).
- Know Your Customer (KYC) controls, Anti-money laundering, Counter terrorist financing and Sanctions Due Diligence have been partly outsourced to Nordea Bank Abp (domiciled in Finland).

Additional outsourcing arrangements exist at local entity level. For details, please refer to the SFCR reports of the local entities which are available from our websites<sup>5</sup>.

## B8 Any other information

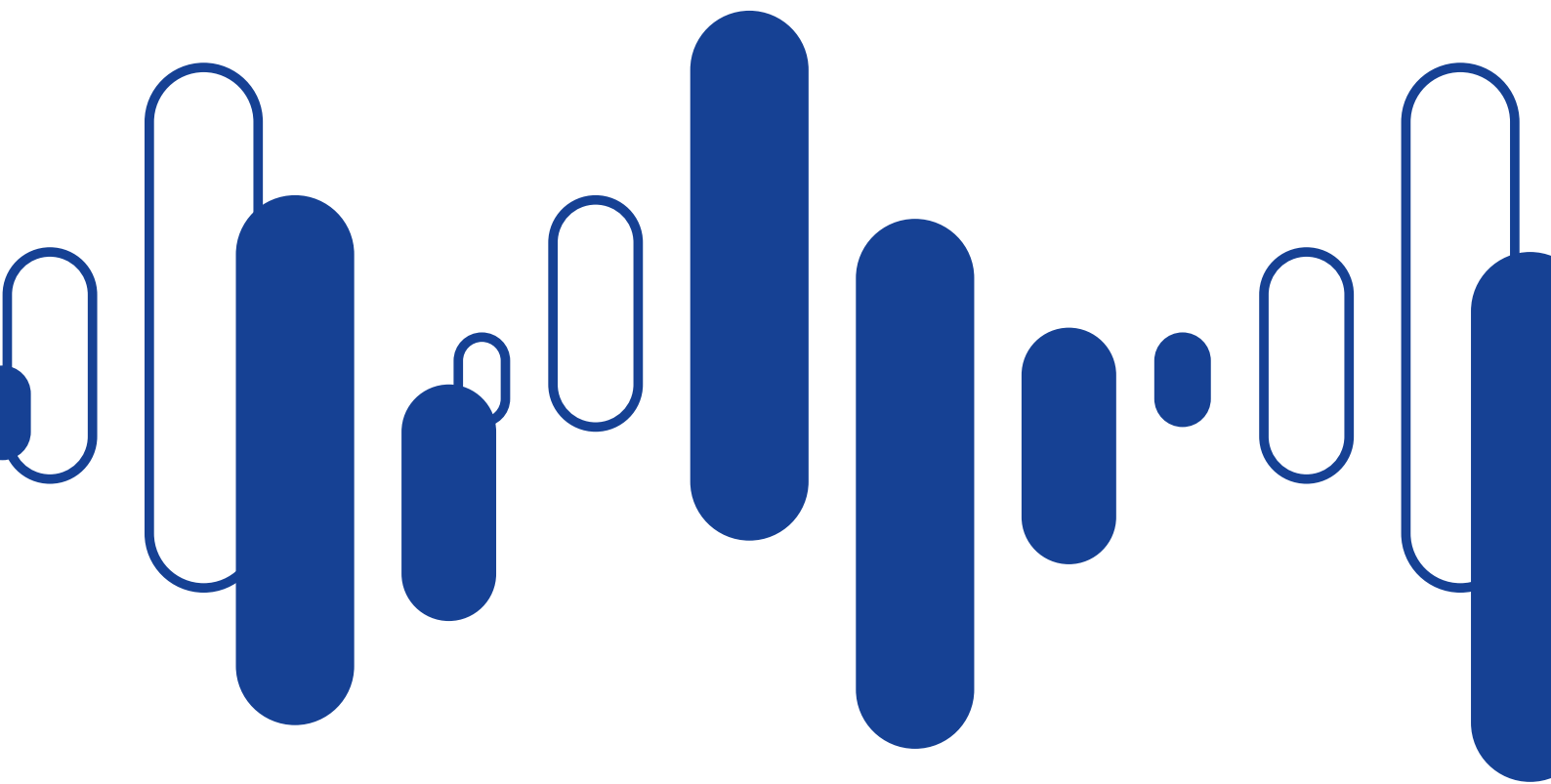
The Board reviews the governance structure and resources annually in order to ensure a robust and comprehensive governance structure, and to ensure the effectiveness of the risk management system and control framework.

A programme for the integration of Nordea Pension into Nordea Group has been established. A plan addressing the implementation of the internal rules of NLP and Nordea Group has been established and will be followed through in a systematic way.

5) <https://www.nordea.com/en/investors/solvency-and-financial-condition-report>



# C Risk Profile



## C Risk Profile

NLP is exposed to a variety of risks through life and insurance activities. These include underwriting, market, credit, liquidity, operational, business and strategic risks. The two largest risks in terms of contribution to NLP's solvency capital requirement (SCR) are:

- Market risks arising from embedded investment guarantees and duration mismatch between assets and liabilities for participating savings products. Unit-linked savings products also expose NLP to market risk as future profits are dependent on the size of the unit-linked business which would decline following a drop in market values. Market risks represent approximately 63% of the SCR. At 31 December 2022, NLP holds a significant capital requirement for currency risk related to NLP having EUR as reporting currency while equity in the Swedish and Norwegian subsidiaries is held in SEK and NOK.
- Life underwriting risks result primarily from lapse uncertainty, longevity and expense risk. Life underwriting risks represent approximately 28% of the SCR.

NLP Group assessed the impact of the acquisition of NLP-DK on its risk profile. Since the risk composition of NLP-DK is similar to the composition at the level of NLP Group, the impact of the acquisition was found to be minimal.

**Figure C1 Solvency II SCR split by risk types at 31 December 2022**

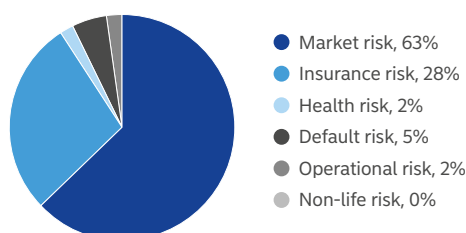


Figure C1 shows the risk composition of NLP Group after the acquisition of NLP-DK. The SCR by risk types takes into account diversification effects between the risk types.

The management of risks is governed by NLP's Risk Management System and Control Framework as described in section B3 "Risk management system including the own risk and solvency assessment".

### Stress and scenario testing

As part of NLP's regular risk and capital reporting, NLP performs various stress and scenario tests including:

- Solvency II standard formula stresses
- Overnight stress and scenario tests
- Reverse stress tests
- Business risk scenarios taking into account the key risk themes across the business
- Macro-economic scenarios investigating emerging trends and stress-testing the resilience of NLP to historical and potential future macro crises

Stress and scenario testing are discussed by the executive management and the Board. In developing the stress and scenario tests, NLP collaborates across NLP Group and with Nordea Bank Abp.

### C1 Underwriting risk

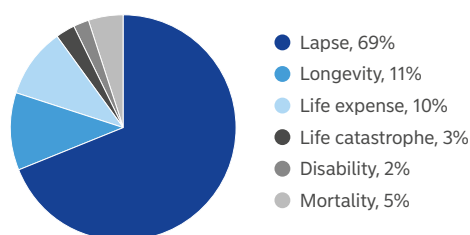
Underwriting risk is defined as the risk of loss, or of adverse change in the value of insurance liabilities, resulting from changes in the level, trend, or volatility of mortality rates, longevity rates, disability rates and stress surrenders and lapses, with such a change leading to an increase in the value of insurance liabilities or a reduction in available own funds.

#### Measurement and analysis of underwriting risk

Underwriting risks are primarily controlled using actuarial methods, i.e. through tariffs, rules for acceptance of customers, reinsurance contracts, stress testing, and setting adequate provisions for risks. Experience analyses and benchmarking are performed at least annually for each underwriting risk.

NLP measures underwriting risks via the Solvency II standard formula and by measuring the sensitivity of the Solvency II balance sheet to stressed underwriting scenarios via regular stress and scenario testing. The results prove that NLP is resilient to the stresses performed.

**Figure C1.1 Life underwriting SCR by risk type<sup>6</sup> at 31 December 2022**



Measuring underwriting risks in accordance with the Solvency II standard formula results in lapse, longevity, and expense risk being the most significant components of NLP's SCR for underwriting risk. Neither NLP's underwriting risk exposures nor the approach to measurement have changed materially over the reporting period. The acquisition of NLP-DK did not have any significant impact on the composition of underwriting risks.

#### Lapse risk

Lapse risk includes the risk of lapses and transition to paid-up. Exposure to lapse risk is due to the potential deviation between the actual lapse rates and expected lapse rates.

Lapse risk is linked to policyholder behaviour. It is mitigated by ensuring that products meet customers' needs. Lapses are stress tested, monitored and reported regularly. Monitoring helps NLP to identify and address emerging trends.

#### Longevity

Longevity risk arises from the annuities in payment and in deferral within NLP's participating savings products. Mortality rates and life expectancies are updated and benchmarked annually.

#### Concentration of underwriting risks

NLP's insurance portfolios comprise individual and group policies, all of which are well diversified by industry, geography and demography as well as by product type and risk. Within NLP's insurance portfolios, large companies may pose a geographic risk concentration. Concentration risk is managed on local entity level and mitigated by reinsurance wherever deemed necessary.

<sup>6</sup> The SCR by risk types has been determined before applying loss absorbing capacity from technical provisions and deferred tax. It takes into account diversification effects between the risk types.

### Management of underwriting risk

Management of underwriting risk includes, among others, underwriting procedures, reinsurance programme and product approval processes.

### Changes to the underwriting risk profile

The acquisition of the life and pension business from Danish insurer Topdanmark contributed to increase absolute underwriting risk for NLP Group. As per current assessment, the acquisition did not materially change the relative exposure to underwriting risk. Work is ongoing to ensure that NLP-DK is integrated in the existing framework for managing underwriting risk.

### Underwriting procedures

Underwriting is performed in compliance with the local entity's strategic documents for underwriting and insurance risks. These documents are established to ensure strong underwriting processes and sound advice to customers.

Underwriting procedures intend to ensure the fair and ethical treatment of all new customers and the acceptance or rejection of individual risks on an informed basis. Sound underwriting ensures that the right products are offered to the customers to meet their needs. Individual underwriting is used for life and health policies. Depending on the nature of the risk coverage and the level of benefits, underwriting may include a health assessment.

The Actuarial Function highlights risks and makes recommendations regarding underwriting in its annual report. The Actuarial Function reviews the strategic documents governing underwriting annually and ad hoc whenever deemed necessary.

### Reinsurance

NLP's reinsurance programme covers individual and aggregate mortality and disability risks, including mortality catastrophe cover in Finland and Norway. It includes individual risk retention limits and aggregate stop loss cover. Reinsured risks include mortality, disability and mortality catastrophe. The aim of the reinsurance programme is to minimise claims volatility, stabilise annual results and protect NLP from underwriting risk concentrations and catastrophes. New business with large individual risk exposures are underwritten with facultative reinsurance.

The reinsurance programme is monitored monthly via the risk result by product line. The Actuarial Function is responsible for reviewing the reinsurance strategy and programme as a minimum once a year.

### Product approval

NLP has implemented an overall approach to the management of changes which is further described in section C5 "Operational Risk". As part of this, a product approval process is in place for new products. This includes the assessment of the potential profitability and capital requirements as well as fit within NLP's risk appetite.

### Special purpose vehicles

NLP does not use any special purpose vehicles for the management of underwriting risks.

## C2 Market risk

Market risk arises at NLP mainly due to the mismatch between assets and liabilities and the sensitivity of the values of these assets and liabilities to changes in the level or in the volatility of the market prices or rates.

### Measurement and analysis of market risk

Market risk mainly originates from investments in products with embedded guarantees and investments in market return

products where policyholders have been promised a benefit or an absolute return under these portfolios. NLP carries the risk of fulfilling these guarantees to policyholders.

In addition, the unit-linked business generates future profits that are included in the Solvency II balance sheet. A potential reduction in the size of the unit-linked business would reduce these future profits and thereby the available own funds in the Solvency II balance sheet.

Market risk also arises from the investment of shareholder capital. Shareholder capital is invested separately from policyholder assets and NLP bears the direct market risk. Shareholder capital in the Swedish and Norwegian subsidiaries is to a large degree held in SEK and NOK, while NLP uses EUR as reporting currency. This is reflected by a capital requirement for currency risk at NLP Group level.

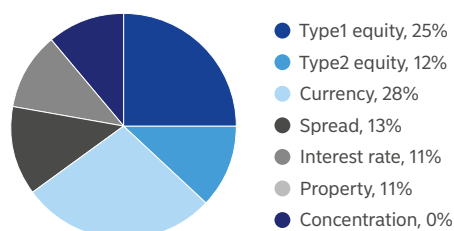
Market risks are measured via the Solvency II standard formula, exposure measurement on investment assets, forward-looking balance sheet projections, and stress and sensitivity analysis. The results prove that NLP is resilient to the stresses performed. Market risks are monitored against the risk appetite and risk limits.

### Solvency II standard formula

Measuring market risk in accordance with the Solvency II standard formula results in currency, credit spreads and equities being the most significant components of NLP's market risk. The occurrence of currency risk as a significant component of market risk is primarily due to the fact that shareholder capital in the Swedish and Norwegian subsidiaries is held in SEK and NOK.

Neither NLP's other market risk exposures nor the approach to their measurement have changed materially over the reporting period. The acquisition of NLP-DK at the end of 2022 did not change the composition of market risk.

Figure C2.1 Market SCR by risk type at 31 December 2022



The SCR by risk types has been determined before applying loss absorbing capacity from technical provisions and deferred tax. It takes into account diversification effects between the risk types.

### Equity risk

NLP is exposed to falls in equity prices impacting financial guarantees on participating savings products and some guaranteed unit-linked savings products. NLP is also exposed to falls in equity prices through reduced market values of non-guaranteed unit-linked savings products and thereby a reduction of future profits impacting the available own funds for solvency purposes.

### Credit spread risk

NLP is exposed to movements in credit spreads via their credit portfolios within the participating savings products and the unit-linked savings products. The widening of credit spreads reduces market values and thus the expectations of future profits.

**Table C2.1 Fixed income holdings split by rating at 31 December 2022**

Fixed income holdings according to credit rating, %	
AAA	52%
AA	13%
A	13%
BBB	8%
BB and below	2%
Not rated	12%

### Market concentration risk

NLP is exposed to the concentration of market risks by counterparty, region and industry. Under the Solvency II regulation, market concentration by counterparty covers equities, properties and assets exposed to credit risk.

### Interest rate risk

NLP is exposed to movements in interest rates, mainly through the duration mismatch between assets and liabilities within the participating savings products in Norway.

### Property risk

NLP holds commercial, industrial and residential NLP properties within its participating and unit-linked savings products. In the Solvency II calculation, the effect of NLP's property exposures is analogous to equities.

### Currency risk

NLP invests actively in global assets. Virtually all of the currency exposure in the local entities is hedged towards the local reporting currencies. An additional exposure to currency risk at NLP Group level originates from shareholders' equity of the local entities in NOK (NLP-NO) and SEK (NLP-SE).

Shareholders' equity held in currencies other than the Group reporting currency EUR contributes significantly to the SCR for market risk at NLP Group. As of 31 December 2022, the SCR for currency risk constituted the second largest part of the total SCR for market risks.

### Exposure measurement on investment assets

Investment portfolios backing policyholder liabilities are monitored in terms of exposure to different asset classes and currencies to ensure proper diversification.

### Protecting shareholders' equity

Shareholders' equity in subsidiaries and in NLH is invested in low risk assets. Market risk in shareholders' equity is captured by Solvency II calculations. In addition, the risk is measured and monitored by solvency calculation methods.

### Stress and sensitivity analysis

NLP regularly performs stress tests of available own funds, the solvency position and buffers to assess the impact of overnight stress. The stress tests are conducted by applying equity and interest rate shocks as well as combinations thereof. Due to the long-term nature of the life and pension business NLP is most sensitive to interest rate movements. The solvency ratio decreases with falling interest rates but is stabilised in the event by an increased impact of TMTP.

**Table C2.2 Stressed solvency ratio at 31 December 2022**

Solvency ratio, %	Incl. TMTP	Excl. TMTP
Base case	138%	138%
Equity drop 20%	141%	141%
Interest rates down -50bp	130%	130%
Interest rates up +50bp	147%	147%
Combined sensitivity IR -50bp, Eq -20%	130%	130%

As part of the capital management process, NLP projects the development of the business including capital plans and applies macroeconomic and business risk scenarios.

### Management of market risk

Management of market risk at NLP is well illustrated by the integrated ALM square in Figure B3. 2. Business decisions are formed balancing short-term and long-term objectives, customers, considerations for competitiveness, legal requirements, profitability, liquidity and capital.

At the same time, the liability-driven investment strategy, risk considerations and the Prudent Person Principle must be observed.

In order to ensure that all aspects are considered continuously, market risks are monitored regularly against the risk appetite and risk limits.

### Liability-driven investment

Market risk in the participating savings products is mitigated through liability-driven investment, where appropriate, aiming at reducing the asset-liability mismatch while at the same time creating an investment return that enables NLP to meet customer expectations and any guarantees offered.

### The investment process and the Prudent Person Principle

The Prudent Person Principle is integral to NLP's investment process. NLP utilises both a bottom-up and a top-down approach to the Prudent Person Principle.

The bottom-up approach is used to address the prudence of each building block, such as a mandate or type of fund. The prudence of each building block is addressed in the investment sourcing process, which consists of three steps: investment due diligence; operational due diligence of the asset manager and legal assessment and agreements. Consideration for environmental, social and governance (ESG) factors are integrated into the investment sourcing process and evaluation of investments and asset managers.

The top-down approach looks at the portfolio as a whole and ensures that the combination of assets is prudent and in line with the objective for each portfolio. The top-down approach consists of five steps: specifying asset composition and mix of asset classes; choosing the levels of risks and composition there among; determining the expected risk-return characteristics over the long term; assessing performance in various risk scenarios; and balancing short-term performance and long-term asset assumptions.

The overall asset sourcing process supports NLP's ability to adhere to the Prudent Person Principle requirements by only investing in assets for which NLP can properly identify, measure, monitor, manage and control the resulting risks. The combination of bottom-up and top-down approaches ensures that the investment process is prudent.

NLP's unit-link trading process ensures that the assets in the unit-linked portfolios are linked to the technical provisions. The trading of unit-link products within NLP is governed by the investment guidelines and limits and is monitored as part of risk management activities.

### Concentration of market risks

Concentration risk is both addressed in each investment mandate and on an aggregated level. NLP manages concentration risk by setting upper limits for the size of individual investments and for aggregate investments by category. Concentration risks are also addressed on an aggregated level and managing these risks is an integrated part of the investment strategy.

NLP reduces concentration risk on an ongoing basis in the revision and adjustment of asset portfolios. Due to the diversification across the portfolios in the local entities NLP has no significant unmanaged concentration of market risk at Group level.

### C3 Credit risk

Counterparty default risk reflects potential losses from unexpected default of NLP's counterparties and debtors, bringing into account risk-mitigating contracts, reinsurance, securitisations and derivatives as well as receivables from intermediaries, and any other credit exposures which are not covered in the credit spread risk sub-module.

This section addresses counterparty default risk while credit spreads are addressed in the market risk section.

NLP is exposed to counterparty default through cash and deposits held by counterparties as well as the derivatives used to hedge portfolios.

NLP measures the sensitivity of the Solvency II balance sheet to stressed market scenarios via regular stress and scenario testing. NLP also monitors counterparty derivative exposures on a daily basis. The results prove that NLP is resilient to the stresses performed.

#### Measurement and analysis of counterparty default risk

NLP's counterparty default risks originate from cash, deposits and derivative holdings in various international banks with high credit ratings and very low probabilities of default. NLP's counterparty default exposure is minor, corresponding to a 5% diversified contribution to the total SCR.

NLP's derivatives exposure is collateralised to a large part. The collateral is balanced daily based on marked-to-market valuations. In addition, a set of market shocks are used to assess the increased counterparty default risk under stressed scenarios. An increased exposure could arise in the event of an overnight stress with a counterparty unable to post the incremental collateral based on the stressed marked-to-market value of the derivative.

#### Management of counterparty default risk

Counterparty default risk is managed in accordance with investment guidelines and limits that outline the detailed risk appetite for counterparty default risk. NLP sets counterparty limits for the total amount of deposits and exposure limits to counterparty default for each individual counterparty. The limits are monitored on a daily basis and procedures are in place in case of breach or near breach.

To mitigate the exposure to unexpected defaults, NLP ensures diversification by counterparty. Concentrations to individual counterparties are mitigated through the investment limit framework.

NLP has bilateral agreements with derivatives counterparties which define the nature, timing and quality of eligible collateral. NLP manages and monitors collateral for derivatives weekly and ad-hoc as necessary.

### C4 Liquidity risk

Liquidity risk is the risk of being able to meet liquidity commitments only at increased cost or, ultimately, being unable to meet obligations as they fall due.

Liquidity risk arises both from illiquidity of investment assets (market liquidity risk) and from changed cash-flows on liabilities as a result of changed claims and/or lapses (funding liquidity risk). Liquidity risk can also arise from short-term payments affecting the short-term liquidity need. Liquidity risk derives primarily from traditional and new traditional products.

### Measurement of liquidity risk

NLP's exposure to liquidity risk is managed based on local liquidity rules, investment guidelines and limits. Liquidity risk is monitored through

- liquidity scoring of current investment assets
- calculation of forward-looking liquidity risk indicators under both normal and stressed conditions
- calculation of a liquidity ratio for the participating savings portfolios.

Liquidity risk is monitored as part of the Risk Appetite Framework of NLP Group and its local entities. Moreover, the liquidity risk indicators are integrated into Nordea Group's overall monitoring of liquidity risk.

#### Liquidity scoring

Investments backing policyholder liabilities are assigned a target liquidity score to ensure that the liquidity profile of any new investment fits with the liquidity profile of the relevant asset portfolio and the applicable investment strategy. After implementation of the new investment, the liquidity scores are reassessed as part of the monitoring and evaluation process.

#### Liquidity risk indicators

The forward-looking liquidity risk indicators evaluate how sustainable the liquidity positions of NLP Group and its subsidiaries are over a 90-day horizon. They are calculated quarterly for each local entity and for NLP Group as a whole under both normal and stressed conditions respectively. The results prove that NLP has been resilient to the stresses performed during 2022.

#### Liquidity ratio for participating savings

The liquidity ratio is used to monitor the share of liquid assets in the portfolios covering participating savings. The liquidity ratios have been stable and above limits in all local entities during 2022.

#### Management of liquidity risk

Liquidity risk is mitigated through the lines and limits allocated to the individual asset classes, which ensures appropriate allocation of investment capital in liquid asset classes.

Within NLP, local entities have in place liquidity contingency plans specifying how to manage changes in expected cash in- and out-flows or how to act in a stressed liquidity situation. These contingency plans consider the need for a liquidity buffer and specify the size and composition of such a buffer. Alternative financing sources and related costs are considered. NLP reviews the local liquidity contingency plans to assess any Group level actions that may be required.

#### Expected profit included in future premiums

NLP's expected profit included in future premiums (EPIFP) is EUR 494m at 31 December 2022. Note that by definition EPIFP does not include company tax, hence the actual contribution to the reconciliation reserve from EPIFP will be less than the EUR 494m.

NLP's liquidity projections prove that changes to the nature or level of future premiums are not materially impacting NLP's liquidity position.

### C5 Operational risk

Operational risk means the risk of direct or indirect loss, or damaged reputation, resulting from inadequate or failed internal processes, or from people, systems or external events. Regarding capital requirements, operational risk also covers legal risk and compliance risk.

Operational risk is inherent in all activities within the organisation, in outsourced activities and in all interactions with external parties. Managing operational risks is the day-to-day responsibility of the business and is a proactive discipline, which emphasises training and risk awareness from all employees across NLP.

### Measurement of operational risk

Operational risk is measured through the operational risk appetite, incident reporting and stress and scenario testing.

Operational risk appetite is defined through limits on operational risk losses in the risk appetite statements issued by the Board.

### Incident reporting

Incidents and security weaknesses are immediately handled in order to minimise damage. Upon detection of an incident, handling the incident has top priority. Unit managers are responsible for the proper handling, documentation and reporting of incidents. Incident reporting is a Nordea Group-wide process which is performed in the operational and compliance risk system. Aggregated incident information is included in regular risk reports to the Executive Management and the Board.

### Management of operational risk

The management of operational risk is centred on the RCSA and change management processes.

### RCSA

The RCSA is a recurring self-assessment of non-financial risk in the business. The RCSA is designed to enhance awareness of risks in the operations, spot weaknesses in controls and support prioritisation of mitigating actions related to these weaknesses. The RCSA also serves as input for scenarios to be included in the business continuity and contingency plans, which are frequently tested to ensure learning and preparedness.

### Business Continuity & Crisis Management

Business Continuity & Crisis Management (BC&CM) is the overall risk management process under which Nordea ensures building and maintaining the appropriate levels of resiliency and readiness for a wide range of expected and unexpected operational and financial risk events. The BC&CM ensures that crisis events are identified, escalated and managed to minimise impact on the organisation.

Continuity and crisis management is tested regularly and is seen as an effective method to safeguard employees, reputation and brand as well as the interests of key stakeholders and customers, value creating activities and the ability to perform processes and services. This guides NLP in how to respond, recover and restore to a predefined level of operation following a disruption or extraordinary event.

### Change management

A change approval process captures all changes in a unified and disciplined manner. It is applicable to new or materially altered products, services, markets, processes, IT systems and major changes to the operations and organisation. The quality and risk analysis (QRA) is used to analyse risk and quality aspects related to changes on a case by case basis, for example new programmes, significant changes to organisations, processes and systems.

The QRA is performed in order to limit new risks and to ensure disciplined change management. It aims to document decision-making regarding risk and quality aspects connected to changes, explicit responsibility for decisions and actions taken, and systematic follow-up.

The QRA is mandatory when a change is assessed to be significant as well as when a change is run within a programme or project.

### Dependencies between risks

The dependencies between risks are analysed through patterns in incidents, RCSA findings and remarks from GIA. The dependencies are taken into account when defining and setting up scenarios for testing.

### Cyber risk

Cyber risk is a subtype of operational risk that has gained more and more attention during recent years. With an increasingly digitalised financial service sector, shared infrastructure between Nordea bank and NLP and the enhanced accessibility of financial services and products, cyber risk has also increased.

At NLP Group, cyber risk is handled in the context of Business Continuity Management, which includes a number of mandatory scenarios such as disturbance due to cyber-attacks and disturbance of IT systems. NLP is fully supported by the Cyber Security unit within Group Business Support Technology.

Detection and response to cyber security events and incidents are performed on Nordea Group level.

### C6 Other material risks

Other material risks at NLP are business risk, strategic risk and risks related to the legal environment. Furthermore, NLP regards Environmental, Social and Governance risks (ESG risk) as a risk which is quickly gaining importance.

### Business, strategic and regulatory risk

Business risk is defined as the risk associated with uncertainty in the business conditions such as market environment, client behaviour and technological progress as well as the financial effects of reputational risk.

Strategic risk is defined as long-term implications associated with the selected business strategy such as product range, customer segments, markets, distribution channels and technological platforms. These may arise due to improper implementation of decisions or lack of responsiveness to industry changes.

Risks related to regulatory changes arise as a result of inadequate or imperfect implementation of new or changed regulation. This could potentially impact reputation, processes and costs.

Business and strategic risks are mitigated through actions such as monitoring sales, costs and risk results regularly and analysing the drivers of profit.

Risks related to the legal environment are mitigated through continuous monitoring of the regulatory developments and through establishing specific programs to handle the implementation. The Compliance function at NLP monitors compliance with existing laws, regulations and internal rules applicable to NLP.

### ESG risk

ESG risk is a risk category that has gained importance in recent years. NLP Group considers the double materiality of ESG, i.e. the fact that NLP Group is exposed to ESG risk while its own actions and investment decisions impact ESG factors and has developed a consistent approach to sustainability risk and the consideration of ESG factors in the investment process.

The perception of ESG risk at NLP Group comprises:

- the physical impact of climate change
- the transition to a low-carbon and climate resilient economy
- an increasing awareness for social objectives, working and safety conditions and human rights
- an increasing importance of good governance practices within companies, anti-bribery and corruption practices and compliance with relevant laws and regulations.

While the short-term impact of ESG factors on market risk is considered minor, they are considered to have a high impact on market risk in the long-term. ESG-related market risk may arise from disruptions and shifts associated with the transition to a low-carbon and climate resilient economy. Key examples of transition risks include wrong assessments of cli-

mate-induced changes in investment risks and opportunities. Policy changes and regulatory reforms, such as carbon pricing may have significant impact on carbon-intensive sectors, including energy, transport and industry. Physical risks will occur both from an increased occurrence of extreme weather events, but also from long-term chronic changes to the climate. They will impact supply chains and production lines as well as real assets such as properties and facilities.

NLP is also aware of the impact ESG risk may have on the group's reputation and stakeholder trust. Failure to assess the shortcomings of investments or business partners with regard to ESG factors correctly, or failure to act in an ethical way to such shortcomings may lead to negative attention from customers and media, claims and lawsuits and ultimately to increased lapses and reduced new business.

The table below shows how NLP regards the impact of ESG risks on different risk types:

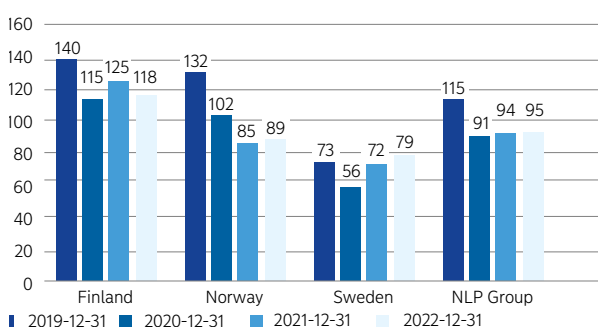
**Table C6.1 ESG risk as a factor in other risk types**

Risk type	Impact of ESG risk
Market risk	High
Underwriting risk	Low
Operational and compliance risk	Medium
Reputational risk	High

ESG risks related to investment are in general assumed to be captured in the market value of assets. An asset composition heavily weighted towards sectors that are vulnerable to climate changes or investments in companies with governance and social issues may therefore have a negative impact on the market value of assets and the reputation of NLP as a trustworthy partner for clients seeking sustainable investments.

NLP has established a comprehensive database for ESG risk indicators for greenhouse gas emissions (GHG emissions), the Climate Value at Risk (Climate VaR), Implied Temperature Rise (ITR), human and labour rights compliance, compliance with established reporting standards and regulation, ESG scores and many others. External data providers include, among others, MSCI, CDP and TPI. The database is updated regularly and developed continuously in order to achieve a good coverage of NLP assets with available best practice indicators of ESG risk.

**Figure C6.1 GHG emission intensity, scope 1 and 2, NLP-managed equity and corporate bonds**

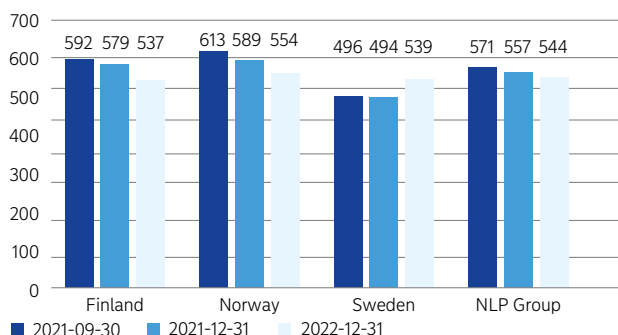


Emission intensity is measured in tons of CO<sub>2e</sub> per USDm of sales.

In Figure C6. 1, emission intensity of scope 1 and 2<sup>7</sup> is shown for NLP-managed equity and corporate bonds for years 2019 to 2022. The figure illustrates that emission intensity attributed to the investments of NLP Group has already started to reduce, showing the effort of NLP Group to align investment decisions to the targets of the Paris Agreement.

Figure C6. 2 shows the development for scope 3 emission intensity observed for NLP-managed equity and corporate bonds until 2022. As accurate estimation of scope 3 emissions is complex and data available to us covers a shorter time period, we will not conclude on a general trend for scope 3 emissions at this time.

**Figure C6.2 GHG emission intensity of scope 3, NLP-managed equity and corporate bonds**



NLP monitors the possible future impact of climate change and the transition to a less carbon-intensive economy in several ways. For listed equities and corporate bonds, NLP has integrated the MSCI Climate VaR<sup>8</sup> into its investment monitoring and reporting. NLP uses a variety of climate scenarios based on different Integrated Assessment Models and transition pathways. The primary set of scenarios consists of three different scenarios developed by the Network for Greening the Financial System (NGFS); a 1.5°C Orderly scenario, a 2°C disorderly scenario and a 3°C scenario. For a description of the three scenarios, please see Appendix 2.

**Figure C6.3 Climate VaR for NLP Group at 31 December 2022, global warming 1.5°C**

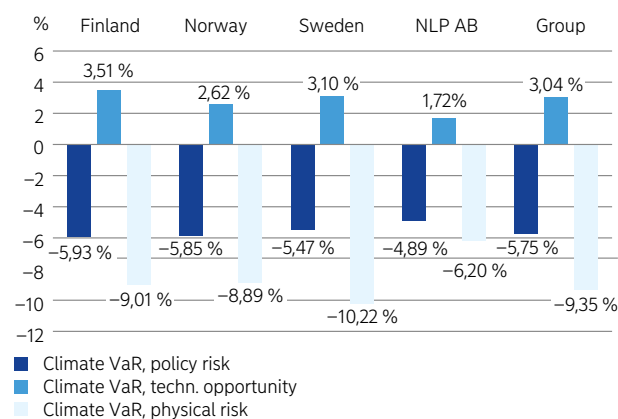


Figure C6. 3 shows the Climate VaR for the 1.5°C Orderly scenario and physical risk that corresponds to an increase of extreme weather events assuming a materialisation of low to moderate global warming.

7) GHG emissions are categorised into scope 1, 2 and 3.  
 Scope 1: direct emissions from owned or controlled sources.  
 Scope 2: indirect emissions from production process due to purchased electricity, steam, heating or cooling.  
 Scope 3: all other emissions that occur in a company's value chain.  
 8) The Climate VaR expresses the downside of the exposure to climate risk and the upside of opportunities for technological advances as a percentage of AuM.

For the Orderly scenario with an assumed target of limiting global warming to 1.5°C<sup>9</sup>, the negative development of the aggregated market value of the investment portfolios due to changed climate regulation (policy risk) is estimated to be around -6%. The impact from physical risk in the form of extreme weather events is estimated to be around -9% in an "average" scenario<sup>10</sup>. A counteracting effect of an estimated +3% may materialise in the form of opportunities due to technological advances<sup>11</sup>.

NLP observes the social and governance aspects of ESG risk through a set of explicit social and governance related metrics and has established a set of minimum requirements for asset managers and investee companies. Own screenings are conducted on a regular basis and an escalation process for breaches is in place. In addition to committing to minimum safeguards, NLP sets clear expectations on ESG management as part of its active ownership practices, due diligence process and manager selection procedure.

NLP aspires to be a leading supplier of sustainable investments and refines its methods to measure, control and mitigate ESG risk continuously. Mitigation of ESG risk is achieved through appropriate decisions regarding capital allocation and investment decisions, developing internal policies, frameworks and tools for quantifying ESG risk and the engagement of asset managers with investee companies with the aim of communicating ESG-related goals and setting the focus on sustainable development.

### **C7 Any other information**

One task of integration programme which has been established to integrate NLP-DK into NLP-Group is to identify and manage risks that may occur. Any such risks will be prioritised and dealt with in a systematic way.

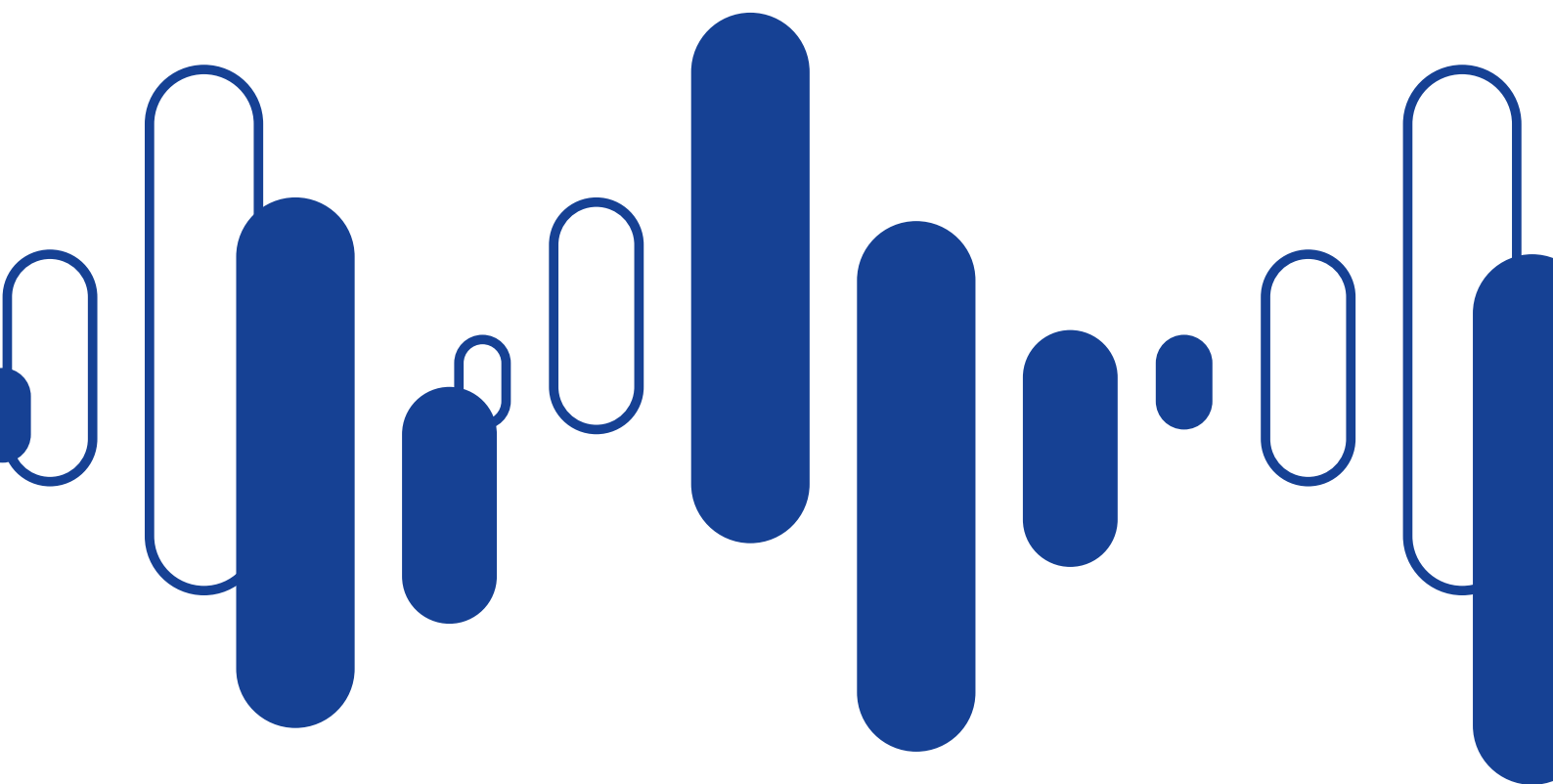
9) The 1.5°C Orderly scenario assumes that new climate policies are introduced early and gradually become more stringent to limit warming.

10) The Climate VaR model estimates physical risk in a scenario with moderate global warming and is modelled using a combination of short-term projections of historical climate data and a high-emissions long-term scenario. The model uses a stochastic approach to estimating damages and explores the 50th ("average") and 95th ("aggressive") percentile.

11) Upside technology opportunities assume a global 1.5°C target from the NGFS 1.5°C Orderly scenario. For the estimation, current green revenues are identified as well as the low carbon patents held by companies, the relative quality score of each patent over time. Green revenues and profits of corporations are forecasted based on their low carbon innovative capacities.



# D Valuation for Solvency Purposes



# D Valuation for Solvency Purposes

The NLP Solvency II balance sheet is prepared on an International Financial Reporting Standards (IFRS) basis as endorsed by the European Commission and adjusted to Solvency II measurement requirements. The valuation of assets and liabilities in the NLP Solvency II balance sheet is established on a market consistent valuation approach in accordance with article 75 of the Solvency II Directive (2009/138/EC).

## D1 Assets

The measurement principles in the Solvency II Directive are based on IFRS with a focus on fair value measurement in arm's length principles.

A fair value hierarchy classifies the measurement techniques in accordance with the quality of the methodology used.

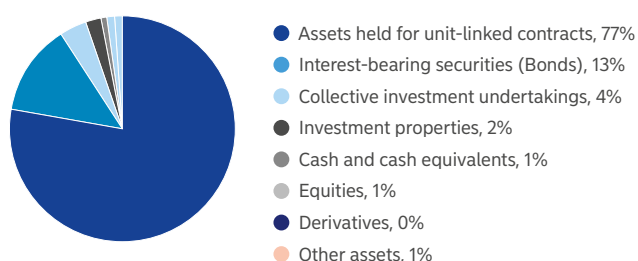
The classification is broken down as follows:

- Market prices:
  - Quoted prices in an active market
- Valuation techniques:
  - Observable prices in an active market
  - Non-observable prices

Intra-group balances and transactions are eliminated in preparing the consolidated Solvency II balance sheet.

Assets broken down by category in the Solvency II balance sheet at 31 December 2022 are presented in figure D1.1.

**Figure D1.1 Breakdown of Solvency II balance sheet assets at 31 December 2022**



The composition of assets at NLP on an IFRS and Solvency II basis is shown in table D1.1.

For each material Solvency II balance sheet item, the IFRS

measurement principles as well as the valuation technique and the adjustments from IFRS to Solvency II are described below.

The full financial accounting and Solvency II balance sheets at 31 December 2022 are shown in Appendix 4.

### Assets held for unit-linked contracts

Assets held for unit-linked contracts include financial instruments and investment properties, cash, cash equivalents and other financial assets and represent the investment portfolio that backs policyholders' unit-linked insurance contracts and investment contracts. The valuation of these assets follows the same principles as financial instruments, investment properties, cash and cash equivalents as assets held for life and non-life contracts as described in the next sections.

### Financial instruments

Financial instruments include listed and unlisted equities, collective investment undertakings, interest-bearing securities and derivatives.

Financial instruments are classified in different accounting policy categories which follow different valuation principles according to the underlying business model:

- Hold: Amortised cost (AC)
- Trading: Fair value through profit and loss (FVTPL)
- Hold and sell: Fair value option (FVO) or Fair value through other comprehensive income (FVTOCI), not actively used for NLP assets

Classification is determined by combination of contractual cash flow test (SPPI) and business model assessment.

Depending on the accounting category, the valuation according to IFRS is re-measured in the Solvency II balance sheet in accordance with the requirement in the Solvency II Directive.

Listed equities, unlisted equities, collective investment undertakings and part of the interest-bearing securities are classified under IFRS as FVTPL and FVO and measured at fair value.

Measurement of the remaining part of interest-bearing securities is classified as AC and includes transaction costs, gains/losses at maturity and adjustment for credit risk. Those interest-bearing securities are re-measured to Fair Value in the Solvency II balance sheet.

Interest-bearing instruments that fail the SPPI test or business model test are classified as FVTPL. For those interest-bearing instruments, interest income, currency gains/losses

**Table D1.1 Value of assets in accordance with Solvency II and IFRS at 31 December 2022**

Assets, EURk	Solvency II	IFRS	% of total SII assets
Assets held for unit-linked contracts	53,416,304	53,416,304	77%
Interest-bearing securities (bonds)	9,111,385	9,321,917	13%
Collective investment undertakings	2,891,099	2,891,099	4%
Investment properties	133,154	133,156	2%
Cash and cash equivalents	1,598,861	1,598,861	1%
Equities	633,719	633,719	1%
Derivatives	724,644	724,644	0%
Other assets	623,536	1,299,120	1%
<b>Total assets</b>	<b>69,132,702</b>	<b>70,018,820</b>	<b>100%</b>

and impairment gains/losses are recognised through profit and loss.

Derivatives are classified under IFRS as FVTPL and measured at fair value.

Fair value is defined as the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction under current market conditions in the principal market for the equities, or in the absence of a principal market, in the most advantageous market.

The existence of published quoted prices in an active market is the best evidence of fair value.

An active market is a market in which transactions for the assets occur with sufficient frequency and volume to provide pricing information on an ongoing basis. Market activity is assessed regularly. Trade frequency and volume are monitored frequently. Published quoted prices are predominantly used to establish fair value for the items disclosed under the following balance sheet items:

- Interest-bearing securities (listed)
- Equities (listed)
- Derivatives (listed)

If quoted prices fail to represent actual or regular market transactions or if quoted prices are not available, fair value is established using an appropriate valuation technique. These valuation techniques are designed to use observable market prices or unobservable parameters as input.

Valuation techniques are predominantly used to establish fair value for the financial instruments disclosed under the following balance sheet items:

- Interest-bearing securities (unlisted or quoted prices not available)
- Equities (unlisted or quoted prices not available)
- Derivatives (OTC derivatives)

### Investment properties

Investment properties are properties other than properties bought for own use.

Investment properties are measured at fair value. The best estimate is based on quoted prices in an active market for similar properties in the same location and condition. As these prices are rarely available, discounted cash flow projection models, based on reliable estimates of future cash flows, are used.

The discounted cash flow model includes assumptions about future rents, vacancy levels, operating costs and maintenance costs, yield requirements and interest rates.

### Cash and cash equivalents

The item includes cash and short-term deposits available on demand. These assets are measured at nominal value, corresponding to Fair Value measurement.

### Deferred tax assets

Deferred tax assets arise from overpayment or advance payment of taxes in relation to taxable income. In 2022, NLP records a deferred tax asset in its balance sheet (see Appendix 4). NLP does not utilise deferred tax assets as Tier 3 capital as these are redeemed on an annual basis within Nordea Group.

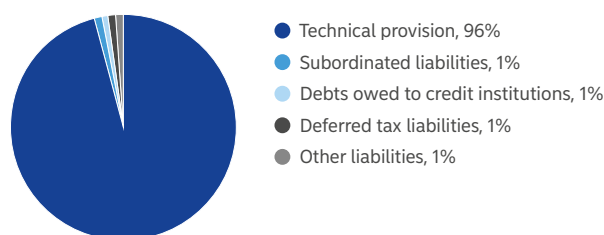
### Other assets

Other assets include loans and mortgages as well as receivables measured at nominal value taking account of credit risk and time to maturity. The difference between IFRS and Solvency II concerns goodwill and other intangible assets that are measured to zero according to the measurement principles in Solvency II.

## D2 Technical provisions

Liabilities broken down by category in the Solvency II balance sheet at 31 December 2022 are presented in Figure D2.1.

**Figure D2.1 Breakdown of Solvency II balance sheet liabilities at 31 December 2022**



The composition of liabilities at NLP on an IFRS and Solvency II basis is shown in Table D2.1.

**Table D2.1 Value of liabilities in accordance with Solvency II and IFRS at 31 December 2022**

Liabilities, EURk	Solvency II	IFRS	% of total SII liabilities
Technical provision	63,620,160	66,160,477	96.2%
Subordinated liabilities	650,000	650,000	1.0%
Debts owed to credit institutions	708,545	708,545	1.1%
Deferred tax liabilities	364,687	50,569	0.6%
Other liabilities	813,266	815,324	1.2%
<b>Total liabilities</b>	<b>66,156,658</b>	<b>68,384,915</b>	<b>100.0%</b>

The valuation methodology of technical provisions is described in this section, whereas the valuation methodology of other liabilities is described in section D3 "Other liabilities".

### Valuation methodology for technical provisions

The valuation of technical provisions under Solvency II follows a market value-consistent approach based on a best estimate and additional risk margin. All lines of business are valued using this methodology. A summary of the value of technical provisions at 31 December 2022 is shown in Table D2.2 and further details on the value of technical provisions by main line of business at 31 December 2022 are included in Appendix 4.

**Table D2.2 Valuation of technical provisions at 31 December 2022**

EURk	Solvency II	IFRS
Best estimate liability	62,914,160	
Risk margin	706,000	
Technical provisions as a whole	0	66,160,477
<b>Total technical provisions</b>	<b>63,620,160</b>	<b>66,160,477</b>

### Valuation under IFRS

Under IFRS as applied by the NLP Group, liabilities for policies classified as investment contracts are accounted for at the fair value of the assets linked to those contracts. For insurance contracts, a non-uniform accounting policy is used under IFRS.

For NLP-SE and NLP-FI, the IFRS measurements are prepared by calculating the present value of future benefits to which policyholders are entitled. The calculation includes assumptions about market-consistent discounting rates as

well as expenses and life risk. For NLP-NO, the technical provisions related to participating savings products for IFRS are valued based on a prospective method. The discount rate used is equal to the original tariff rates. The value of technical provisions related to unit-linked products is based on the fair value of the assets linked to those products. Local regulatory provisions or market-related future added value are recognised in technical provisions as bonus potential.

### Valuation under Solvency II

The Solvency II valuation is based on a set of stochastic projections of the local balance sheet assets, the retrospective reserve and relevant financial and actuarial buffers for the next 50–75 years. In each projection, the future benefits paid to the policyholders (net of premiums), profits and taxes are calculated and discounted. Stochastic valuation is performed on products with policyholder options and/or guarantees. Products without guarantees are calculated on a deterministic basis at NLP-DK, NLP-NO and NLP-SE and on a stochastic basis at NLP-FI.

Work is ongoing to integrate NLP-DK into the common valuation framework.

The best estimate of liabilities and risk margin by line of business for NLP is presented in table D2.3.

**Table D2.3 Best estimate liabilities and risk margin by line of business at 31 December 2022**

EURk	Technical provisions as a whole	Best estimate liability	Risk margin
Insurance with profit participation	0	11,441,004	195,645
Index-linked and unit-linked insurance	0	50,994,894	477,801
Other life insurance	0	447,728	29,902
Health insurance	0	30,366	2,618
Non-life	0	169	34

For participating savings products, best estimate discretionary bonuses are included.

The risk margin is the discounted cost of capital for projected non-hedgeable capital requirements. Life and health underwriting risks are assumed non-hedgeable whereas market risks are assumed as hedgeable.

The risk margin calculation has been simplified by using the appropriate risk carriers to project the non-hedgeable capital requirement into the future.

The stochastic modelling of the technical provisions is performed by using risk-neutral scenarios generated using a third-party Economic Scenario Generator calibrated to market data.

### Assumptions underlying the calculation of technical provisions

Assumptions on interest rates, lapse, mortality, longevity and expense assumptions have a material impact on the value of liabilities. Best estimate assumptions underlying the valuation of technical provisions are reviewed at least annually.

In addition assumptions regarding the bonus strategy impact the level of discretionary bonus. These are subject to regular review.

### Valuation uncertainty

By nature, the calculation of the best estimate liabilities and risk margin involves an estimation of a future uncertain event. The precision of the calculation will depend on the quality of the underlying inputs and the extent to which the calculation model reflects reality. For example, interest rates, expenses, lapses and management actions cannot be projected over a long-time horizon without uncertainty. There are also uncertainties arising from the number of simulations and the chosen model logic, although these factors are assessed to have less impact.

A general source of uncertainty is appropriateness of data/data quality, either due to lack of available data to deduce a reliable estimate for future development or that historical data may not be descriptive of the future. The company uses both internal and external data sources, as well as expert judgement to set appropriate assumptions.

The level of uncertainty for technical provisions has been assessed by performing sensitivity calculations on the solvency position. These sensitivity scenarios include the major SCR risk components. The sensitivity to changes in the level of interest rates, shocks on equity positions and mass lapse rates is measured on a regular basis.

### Transitionals and long-term guarantee measures

Long-term guarantee measures are used in the valuation. Volatility adjustment (VA) is used at NLP-DK, NLP-FI and NLP-NO. Long-term guarantee measures applied at local level also impact the position of NLP Group.

NLP uses TMTP, however, transitional measures have no impact on the Group's solvency position at 31 December 2022.

Excluding the effect of TMTP in NLP-NO (0% at 31 December 2022), technical provisions increased by +4.2% during 2022. The SCR decreased by –7.2% during 2022. Excluding the effect of both TMTP (0% at 31 December 2022) and VA, technical provisions increased by +4.2% (insignificant effect of VA) and the SCR decreased by –8.4% during 2022.

Removal of the effect of VA would have the strongest effect on solvency by increasing technical provisions and reducing eligible own funds. When excluding the effect of TMTP and VA, eligible own funds still remain in excess of the SCR.

**Table D2.4 Impact from long-term guarantee and transitional measures at 31 December 2022**

EURk	With volatility adjustment, with transitional measures on technical provisions	With volatility adjustment, without transitional measures on technical provisions	Without volatility adjustment, without transitional measures on technical provisions
Technical Provisions	63,620,160	63,620,160	63,722,527
Available own funds	3,172,152	3,172,152	3,165,721
SCR	2,275,692	2,275,692	2,292,232
Eligible Own Funds to meet SCR	3,172,152	3,172,152	3,645,832

### Recoverables from reinsurance contracts and special purpose vehicles

There are a number of reinsurance arrangements that follow the principles and guidelines laid down in local underwriting policies. Reinsurance recoverables are calculated consistently with the best estimate liability.

NLP does not use any special purpose vehicles.

### D3 Other liabilities

Other liabilities are valued on an IFRS basis as endorsed by the European Commission and adjusted to Solvency II measurement requirements. The descriptions in this section include the IFRS measurement principles, the valuation technique and the adjustments from IFRS to Solvency II of material other liability balance sheet items.

#### Debt to credit institutions

Debt to credit institutions contains loans from credit institutions covering a minor part of the investment in Group companies at NLP and repo debt concerning collateral covering interest-bearing securities on the balance sheet, but lent to external parties in a repo transaction. Debt to credit institutions also includes mortgage debt regarding investment properties.

Debt to credit institutions is categorised as Loans and Receivables, which is measured at amortised cost, similar to nominal value. Repo debt is short-term debt measured at nominal value and mortgage debt is measured at market value.

#### Derivatives

Derivatives with negative market values are recognised as a liability and valued at fair value in accordance with the same principles as described for derivatives with positive market values in section D1 "Assets" under "Financial instruments".

#### Subordinate debt

Subordinate debt consists of loans from third parties that are subordinate to other debtors but fulfilled before shareholders.

The interest rate on the loans is adjusted periodically by the debtors as part of the loan agreements and in accordance with the market interest rate.

#### Deferred tax liabilities

Deferred tax liabilities arise from temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and the amounts used for taxation purposes, including adjustments of assets and liabilities between IFRS and Solvency II. Deferred tax is calculated using local tax rates, measured at nominal value.

#### Other liabilities

Other liabilities include financial liabilities other than debt owed to credit institutions, provisions regarding defined benefit pension plans, current tax liabilities and other liabilities. Financial liabilities other than debt owed to credit institutions are measured at nominal value.

Defined benefit pension plans are funded schemes covered by assets in pension funds. Defined benefit obligations are determined using the projected unit credit method; the net amount is recognised in the balance sheet. The projected unit method is a fair value methodology that includes the projected salary level, inflation and the interest rate in the calculation of the obligations.

Current tax liabilities are calculated by each individual unit according to the local tax regulations and tax rates. Taxes are measured at nominal value.

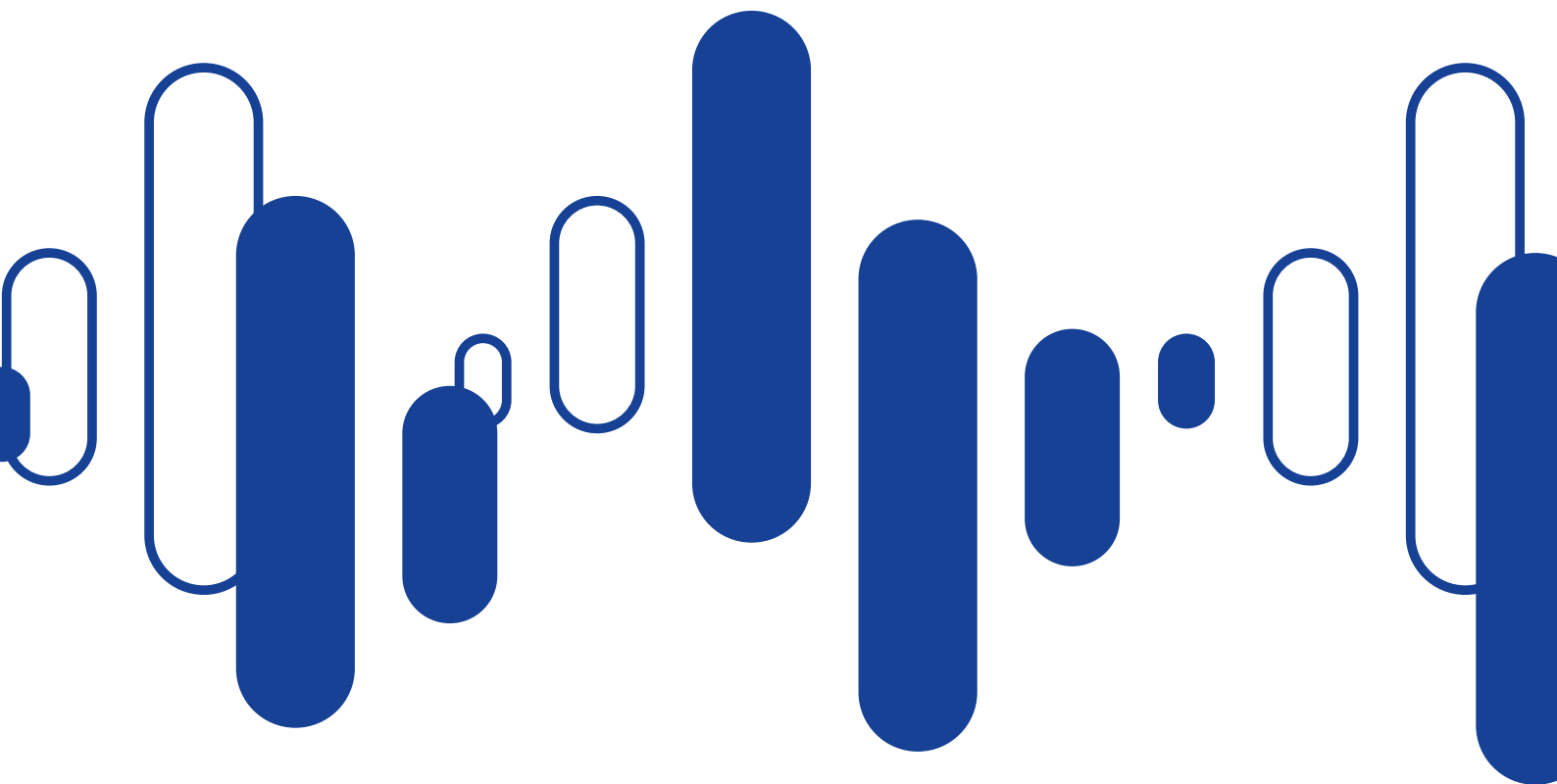
### D4 Alternative methods for valuation

This section is not applicable to this report, as content is only required in the regular supervisory report (RSR) as per regulatory requirements.

### D5 Any other information

No other information is relevant to include.

# E Capital Management



# E Capital Management

## E1 Own funds

### Overall capital management process

The capital management process is described and illustrated in section B3 "Risk Management System including the Own Risk and Solvency Assessment". Capital management is governed by the NLP Capital Policy specifying an internal solvency ratio limit and dividend limits for NLP Group and its subsidiaries. The policy also specifies the actions that need to be enacted in case of any breaches of the internal or regulatory limits.

The internal solvency ratio limit of 125% in the policy reflects NLP's decision to manage the business by defining a required buffer on top of the 100% solvency ratio to provide a 'cushion' to be able to deal with the volatility in the Solvency II balance sheet. This is done to ensure that actions are enacted immediately when the limit is breached, and that some volatility in the figures can be absorbed without breaching the 100% level.

NLP defines a dividend limit for the solvency ratio, above which NLP wishes to operate. Dividend payments towards Nordea Bank Abp would be inhibited, should the solvency ratio of NLP Group fall below this dividend limit. The dividend limit has been set applying expert judgement using results from performed stress and scenarios tests.

The decision on capital across the Group is managed through the LEMG, the Board and the Balance Sheet Committee. Monitoring and reporting of solvency ratios and capital limits are the responsibility of the NLP Group CRO. Tiering of capital items is the responsibility of the Head of Capital & Investment.

### Tiering of own funds

The available own funds breakdown into tiers of capital at 31 December 2022 is shown in table E 1.1.

As of 31 December 2022, Tier 1 capital constitutes 79% of the total amount of available own funds. The share of Tier 1 capital has decreased by -3% during 2022. Overall available own funds have decreased by -15% to EUR 3,172m in this time period. As a significant part of this decrease is attributable to the acquisition of NLP-DK, the solvency ratio of NLP Group declined accordingly.

The components of NLP's available own funds are ordinary share capital, reconciliation reserve, Tier 1 and Tier 2 subordinated debt.

**Table E1.1 Own funds**

EURk	Own Fund item	31 Dec 2021	31 Dec 2022
Tier 1	Ordinary share capital	12	12
	Reconciliation reserve	3,067,559	2,522,140
	Non-controlling interest	0	
	Subordinated debt	0	
Tier 2	Subordinated debt	650,000	650,000
<b>Total</b>	<b>Available own funds</b>	<b>3,717,571</b>	<b>3,172,152</b>

All own fund items are available and free of restrictions and the Tier 1 and Tier 2 subordinated debt is undated. NLP holds no ancillary own fund items. The reconciliation reserve is broken down in table E1.2.

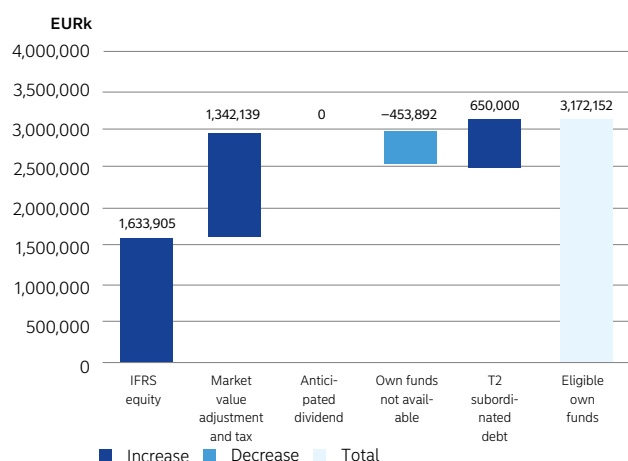
**Table E1.2 Reconciliation reserve at 31 December 2022**

EURk	31 Dec 2022
Excess of assets over liabilities	
IFRS equity	1,633,905
Market value adjustment and tax	1,342,139
Anticipated dividend	0
Own funds not available at Group level	-453,892
Ordinary share capital	-12
<b>Reconciliation reserve</b>	<b>2,522,140</b>

The market value adjustment and tax are mainly market value adjustments of technical provisions and hold-to-maturity bonds, as well as deferred taxes. Own funds not available at Group level cover an adjustment for own funds at NLP-FI and NLP-SE not fungible in the Group's eligible own funds.

These adjustments together with the subordinated debt and the anticipated dividend make up the differences between the IFRS equity and the eligible own funds as presented in figure E1.1.

**Figure E1.1 Bridge from IFRS equity to eligible own funds**



### Eligible own funds

The SCR at 31 December 2022 was EUR 2,276m. The total eligible own funds held to cover the SCR were at EUR 3,150m. Total available own funds equally amounted to EUR 3,172m.

## E2 Solvency capital requirement and minimum capital requirement

### Solvency position

NLP uses the Solvency II standard formula and accounting consolidation method 1. In the calculation of the Group SCR the following is taken into account:

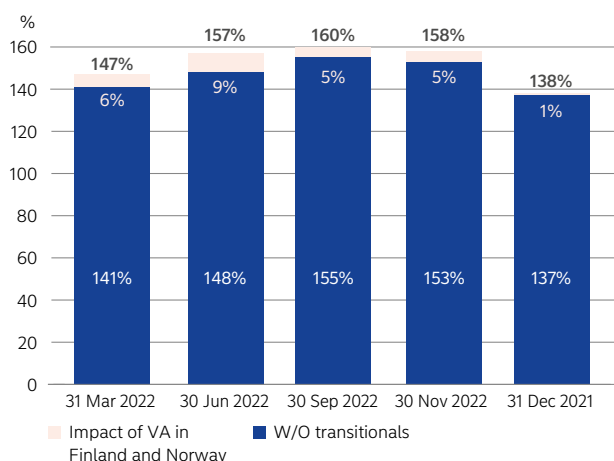
- Volatility Adjustment VA at NLP-DK, NLP-FI and NLP-NO, and
- TMTP at NLP-NO.

For NLP, the solvency position at 31 December 2022 was 138% compared to 151% at the end of 2021. The figure below illustrates that the overall solvency ratio has remained well above the regulatory solvency limit of 100% throughout 2022.

This was mainly due to the positive effect from rising interest rates in a situation where the impact of TMTP had declined to zero and no longer counterbalanced the benefit from higher interest.

The solvency ratio dropped by –20%-points between 30 November 2022 and 31 December 2022 due to the acquisition of NLP-DK. When excluding both the effects of TMTP (zero at 31 December 2022) and VA, the solvency position was 137% at 31 December 2022, well above the regulatory solvency limit of 100%.

**Figure E2.1 Impact of transitional and long-term guaranteed measures on the solvency position during 2022**



The SCR of each risk module shown in table E2.1 takes into account diversification effects between the underlying risk types within the module. Comparing the SCR values as of 30 November 2022 to 31 December 2022 shows, that the risk composition did not change significantly with the acquisition of NLP-DK. The calculation of the total SCR takes into account diversification effects between the different risk modules and therefore does not represent the sum of the SCR calculated for each risk module separately.

**Table E2.1 Split for SCR at 31 December 2022**

SCR by risk type, EURk	31 Dec 2021	30 Nov 2022	31 Dec 2022
Market risk	3,472,307	2,821,558	2,982,766
Life risk	1,323,307	1,205,279	1,332,592
Operational risk	65,740	58,775	84,113
Default risk	245,848	229,120	223,994
Health risk	61,787	60,070	108,969
Non-life risk	409	525	535
<b>Total SCR<sup>1</sup></b>	<b>2,452,598</b>	<b>2,121,123</b>	<b>2,275,692</b>

1) Diversification effect and other adjustments are included in the calculation of total SCR. The sum of SCRs per risk type is therefore not equal to the total SCR.

### Group consolidation of the solvency capital requirement

In consolidating the Solvency II capital, NLP uses the accounting consolidation-based method (method 1) as described in Article 230 of the Solvency II Directive (2009/138/EC).

In line with relevant regulation, NLP does not calculate a

Group minimum capital requirement (MCR). However, as required, the Group SCR exceeds the sum of local MCRs.

### Simplifications of the Solvency II standard formula

NLP Group does not use any simplifications in the calculation of the SCR according to the Solvency II standard formula.

### E3 Use of the duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement

NLP does not apply the duration-based equity risk sub-module in the calculation of the SCR.

### E4 Differences between the standard formula and any internal model used

NLP does not apply internal models in the calculation of the solvency position of the Group.

### E5 Non-compliance with the Minimum Capital Requirement and non-compliance with the Solvency Capital Requirement

NLP's eligible own funds have exceeded the SCR throughout 2022.

### E6 Any other information

In line with local regulations for institutional investors in Finland, Norway and Sweden, NLP Group publicly discloses how the main elements of their equity investment strategy are consistent with the profile and duration of their liabilities, in particular long-term liabilities, and how they contribute to the medium to long-term performance of their assets. Where an asset manager invests on behalf of NLP, NLP publicly discloses how the asset manager is incentivised to align with NLP's investment strategy and performance targets, how performance, turnover costs and portfolio turnover are monitored and what durations of arrangements with asset managers are incurred.

### Disclosure of equity investment strategy

NLP provides long-term savings and insurance products with the ambition to inspire and enable our clients' lifelong financial well-being. NLP's investment objective is to maximize long term risk adjusted return in a responsible way. Although different NLP savings products have different liabilities and different duration of liabilities, we have some common basic principles as the foundation for the NLP investment philosophy. One of our key principles when investing is to integrate sustainability in the investment decision. We believe that integrating ESG considerations into our investment decisions ensures that we provide long term competitive return. We believe that investing responsibly contributes to long-term attractive risk adjusted returns, both by mitigating the long-term risk as well as potentially creating values finding companies with sustainable business models.

NLP utilizes both internal and external managers, active and passive strategies to diversify and implement the portfolios in the best way. We cooperate closely with Nordea Asset Management in incorporating sustainability in our internal mandates. When selecting external investment managers, the managers' willingness and ability to address ESG is one of the factors we use in our selection process.



### Disclosure of arrangements with asset managers

NLP uses multiple asset managers to manage its equity investments. This is mainly done through fund formats, but some are in the format of mandates where the asset managers trade equities on NLP's behalf.

Being part of the Nordea Group, NLP naturally has a close relationship with Nordea Funds, and Nordea Investment Management, and these are the largest asset managers used by NLP.

NLP remunerates asset managers through regular management fees and as such does not incentivise them to manage the assets in a certain way by way of remuneration. When issuing mandates, NLP sets limits and guidelines as to how the mandate shall be managed. NLP follows up on this through monitoring and meetings with asset managers. The limits and guidelines are set to ensure that the asset managers invest in line with NLP's Investment Strategy. The overall responsibility for aligning the duration of liabilities with the asset management rests fully with NLP.

When using publicly traded funds NLP does not have a possibility to dictate the funds strategy. Instead, NLP chooses funds and managers that fit NLP's Investment Strategy. NLP follows up and monitor the performance of asset managers and evaluate the manager selection continuously. When assessing performance, NLP's focus is on long term performance, but NLP also takes short term performance into account to catch possible trend changes. NLP conducts regular meetings with asset managers used in our managed portfolios and address any issues related to the management of funds. The methods and time horizon for the monitoring are not explicitly agreed with the asset manager as NLP wants to retain a large degree of freedom when evaluating its asset managers. The goals may also differ between NLP's products. Concerns arising from the evaluation are further addressed with the asset managers before NLP acts upon them, giving the asset managers ample time to respond or adjust their management.

When choosing asset managers for managed portfolios, NLP always considers how the asset manager works with ESG and corporate governance and whether they actively engage with the companies they invest in on such matters.

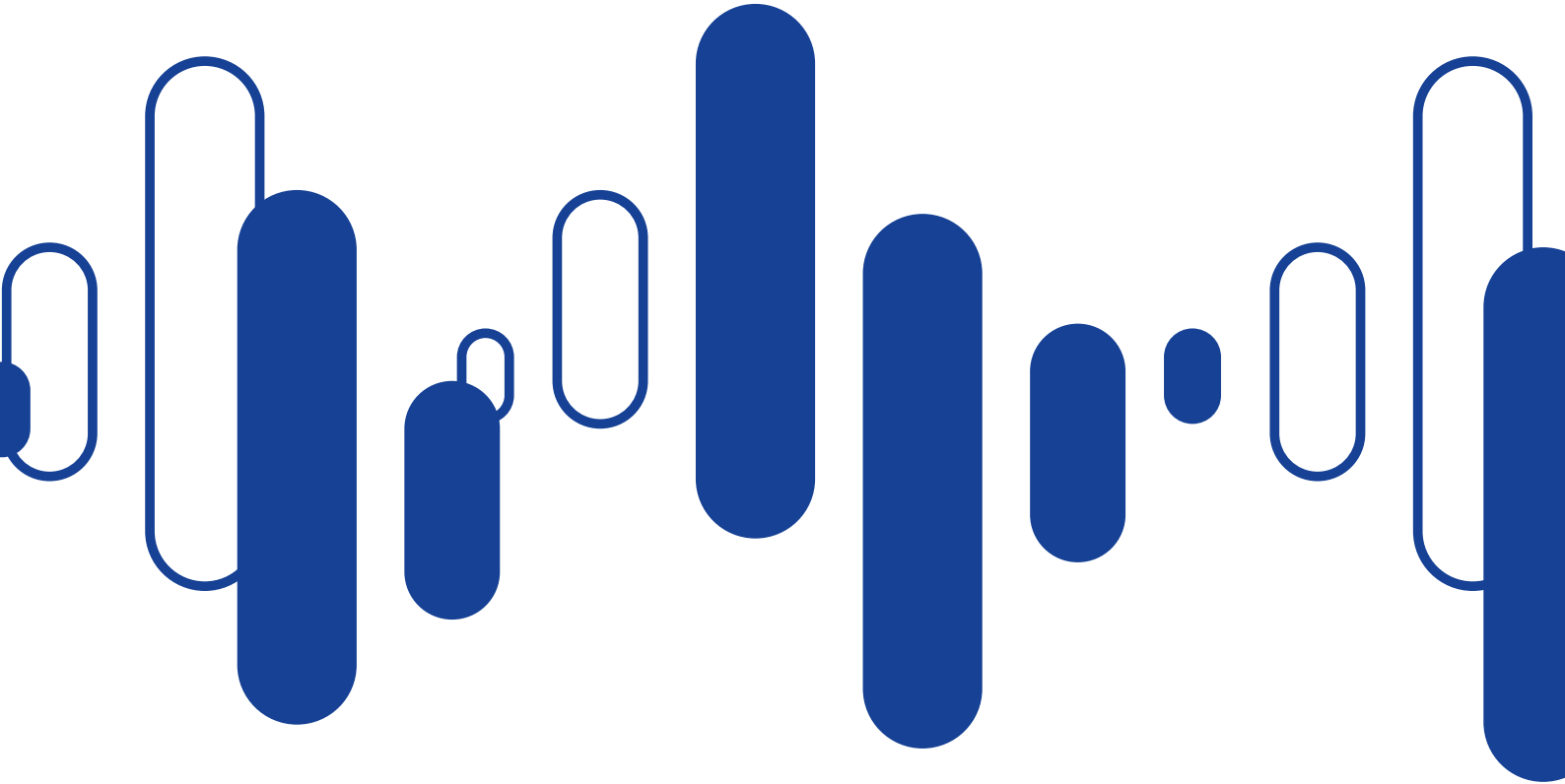
Although not all portfolios are ESG enhanced products, NLP requires all managers to have a policy on Corporate Governance and to include ESG-aspects as part of their investment process, as we consider this to be an important factor in generating long term returns. We also prefer managers that actively engage with the companies they invest in.

The mandate guidelines, manager selection and monitoring of managers and their performance are NLP's main tools for ensuring the asset managers' compliance with NLP's investments strategy and decisions with the profile and duration of NLP's liabilities, in particular long-term liabilities as well as the managers financial and non-financial performance. NLP does generally not enter into any agreement according to which a specific element of the agreement incentivises the asset managers with respect to any of the aforementioned items. NLP considers these issues to best be addressed through mandate guidelines, manager selection and monitoring and follow up of managers, in which issues can be addresses directly with the asset managers.

NLP is unlikely to invest with managers who have a strategy leading to high turnover as we do not believe such strategies lead to long term returns. Asset managers are continuously being evaluated with regards to performance as well as management fees and managers not performing from a risk-, return- and cost-perspective will be considered for disinvestment. NLP considers that this regular evaluation captures any manager that incur unnecessary high turnover costs. Therefore, NLP does generally not enter into any agreement with asset managers specifically on how NLP monitors portfolio turnover costs incurred by the asset managers and how NLP defines and monitors a targeted portfolio turnover or turnover range.

Asset managers and funds used in our managed portfolios are continuously being evaluated, focusing mainly on long term performance (3-10 years), but also reviewing short term performance and changes to strategy or management to uncover changes in trend. If a manager is found to not be performing at the desired level, divestment will be initiated. Therefore, NLP does generally not enter into any agreement with asset managers specifically regarding the duration of the arrangement.

# Appendices



# Appendix 1

## Abbreviations

AC	Amortised Cost
ALM	Asset Liability Management
AuM	Assets under Management
AWM	Asset & Wealth Management
BC&CM	Business Continuity & Crisis Management
Board	Board of Directors
CEO	Chief Executive Officer
CIO	Chief Investment Officer
Climate VaR	Climate Value at Risk
CRO	Chief Risk Officer
EPIFP	Expected Profit Included in Future Premiums
ESG risk	Environmental, Social and Governance risk
FVTOCI	Fair Value through Other Comprehensive Income
FVTPPL	Fair Value through Profit and Loss
GHG emissions	Greenhouse Gas emissions
GIA	Group Internal Audit
GWP	Gross Written Premiums
HR	Human Resources
IFRS	International Financial Reporting Standards
KYC	Know Your Customer
LEMG	Life Executive Management Group
MCR	Minimum Capital Requirement
NICO	Nordic Investment Committee
NIP	Nordea Incentive Programme
NLH AB	Nordea Life Holding AB
NLP	Nordea Life & Pensions
NLP-FI	Nordea Life Assurance Finland Ltd
NLP-NO	Livsforsikringselskapet Nordea Liv Norge AS
NLP-SE	Nordea Livförsäkring Sverige AB
ORSA	Own Risk and Solvency Assessment
OTC	Over the Counter
OTRP	One Time Recognition Payment
PRU	Product Responsible Unit
QRA	Quality and Risk Analysis
RAF	Risk Appetite Framework
RCSA	Risk Control Self Assessment
RFF	Rolling Financial Forecast
RSR	Regular Supervisory Report
SCR	Solvency Capital Requirement
SPPI	Solely Payments of Principal and Interest
TCFD	Task Force on Climate Related Financial Disclosure
TMTPL	Transitional Measures on Technical Provisions
VA	Volatility Adjustment
VSP	Variable Salary Part

## Appendix 2

The 1.5°C Orderly scenario assumes that new climate policies are introduced early and gradually become more stringent in order to limit global warming. The 2°C Disorderly scenario assumes that most new climate policies are delayed until 2030, which means that emissions reductions need to be sharper and more drastic than in the Orderly scenario. The 3°C scenario mostly represents already announced but not yet implemented climate policy efforts and hence assumes that some climate policies are implemented in some jurisdictions, but that global efforts are insufficient to halt significant global warming.

Policy risk is defined as being zero in a business-as-usual scenario where global warming amounts to 4°C. In lower temperature scenarios the policy risk is defined as a differential relative to this baseline. It is measured by translating climate-related policy costs into valuation impacts on companies and their publicly tradable securities. Hence, the values in the table below express the aggregated potential impact on market valuations of investment portfolios as a result of the climate policies associated with each scenario.

For extreme weather risk, financial damages resulting from

extreme heat and cold; heavy precipitation and snow; coastal and fluvial flooding; and wind gusts and tropical cyclones over the next 80 years are considered. The MSCI Climate VaR model estimates physical risk in a 4°C scenario, which represents a continuation of business-as-usual and is modelled using a combination of short-term projections of historical climate data and a high-emissions long-term scenario. Extreme weather risk is defined as being zero in a scenario where there is no future change in the frequency and severity of extreme weather events, and in the 4°C scenario extreme weather risk is defined as a differential relative to this baseline. It is measured by translating extreme weather-related damages to physical assets into valuation impacts on companies and their publicly tradable securities. For extreme weather risk, the model uses a stochastic approach to estimating damages, where the 50th percentile represents an "Average" 4°C scenario and the 95th percentile represents an "Aggressive" 4°C scenario. This means that the "Aggressive" scenario explores the less likely but more extreme potential damages in a 4°C global warming scenario.

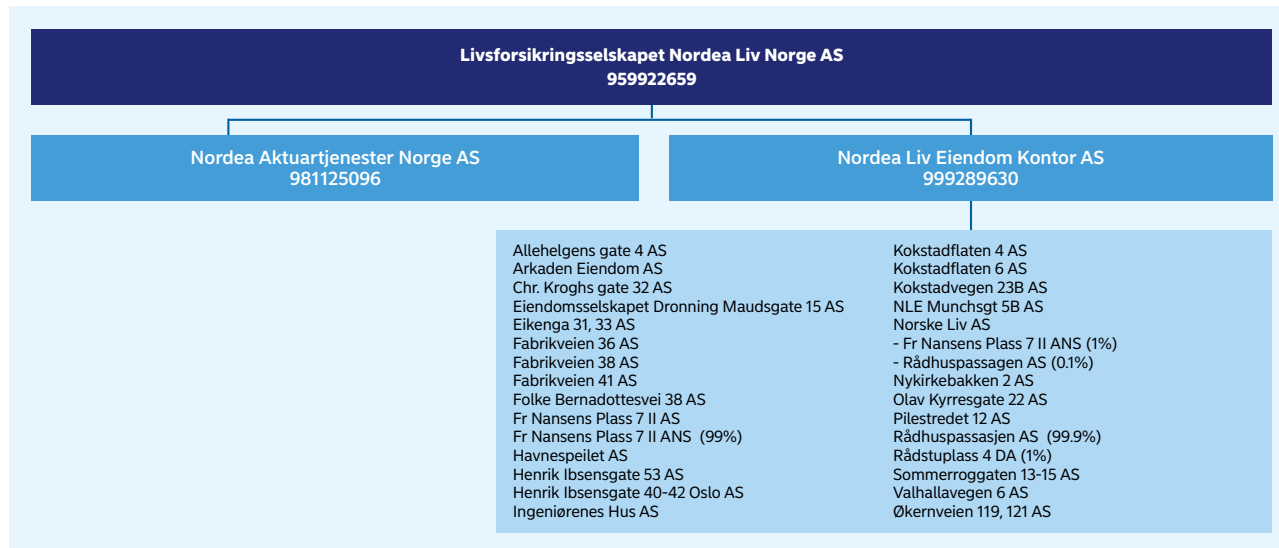
# Appendix 3

## Legal structure of Nordea Life & Pensions

### NLP Finland

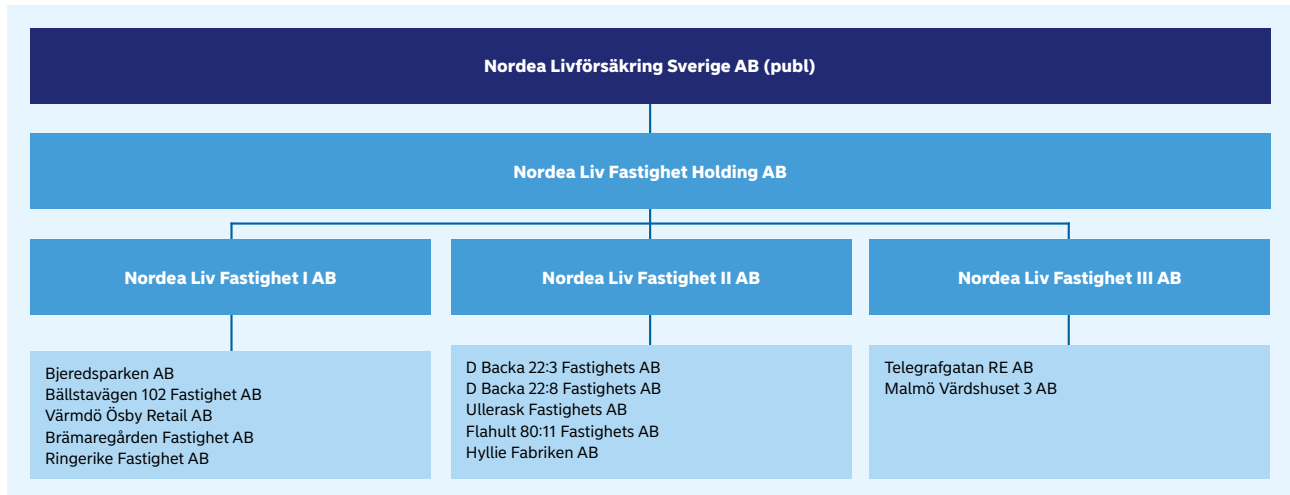


### NLP Norway

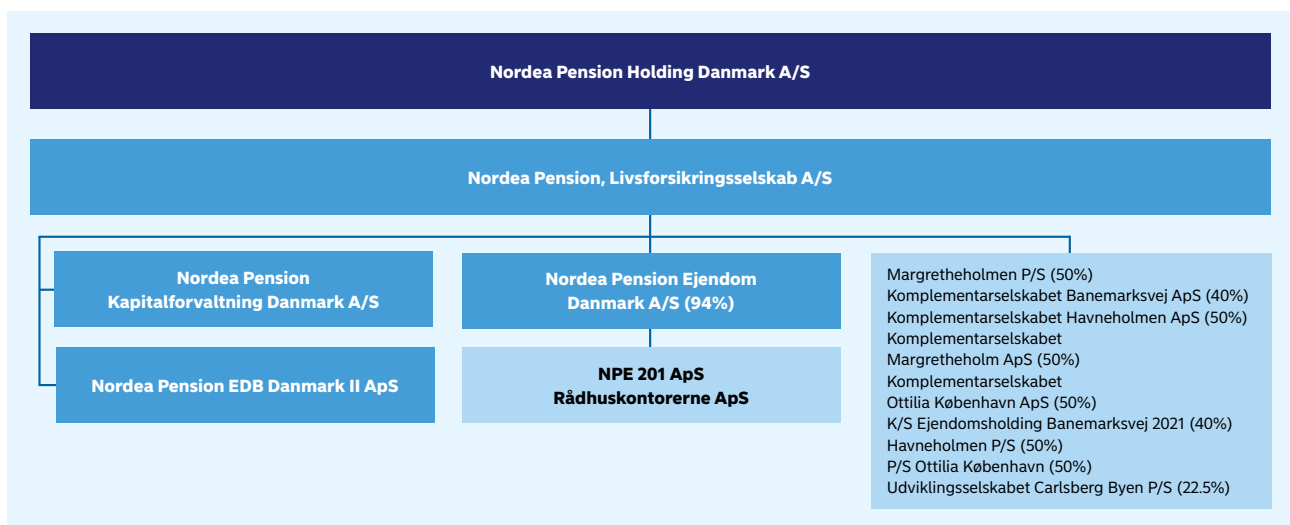


## Legal structure of Nordea Life & Pensions, cont.

### NLP Sweden



### NLP Denmark



# Appendix 4

## Balance Sheet as at 31 December 2022

### Assets

Assets, EURk	Solvency II	Financial accounting
Goodwill	0	471,987
Deferred acquisition costs	0	25,313
Intangible assets	0	130,841
Deferred tax assets	10,051	49,546
Pension benefit surplus	0	0
Property, plant & equipment held for own use	35,350	35,350
Investments (other than assets held for index-linked and unit-linked contracts)	14,648,120	14,858,653
Property (other than for own use)	1,598,861	1,598,861
Holdings in related undertakings, including participations	310,381	310,381
Equities	414,262	414,262
Equities – listed	402,268	402,268
Equities – unlisted	11,994	11,994
Bonds	9,111,385	9,321,917
Government bonds	2,121,486	2,161,109
Corporate bonds	6,966,646	7,137,555
Structured notes	11,339	11,339
Collateralised securities	11,914	11,914
Collective investments undertakings	2,891,099	2,891,099
Derivatives	133,154	133,156
Deposits other than cash equivalents	188,978	188,978
Other investments	0	0
Assets held for index-linked and unit-linked contracts	53,416,304	53,416,304
Loans and mortgages	24,602	24,602
Loans on policies	0	0
Loans and mortgages to individuals	0	0
Other loans and mortgages	24,602	24,602
Reinsurance recoverables from:	13,035	13,035
Non-life and health similar to non-life	2,648	2,648
Non-life excluding health	0	0
Health similar to non-life	2,648	2,648
Life and health similar to life, excluding health and index-linked and unit-linked	10,388	10,388
Health similar to life	8,556	8,556
Life excluding health and index-linked and unit-linked	1,832	1,832
Life index-linked and unit-linked	0	0
Deposits to cedants	0	0
Insurance and intermediaries receivables	16,274	24,221
Reinsurance receivables	5,896	5,896
Receivables (trade, not insurance)	36,177	36,177
Own shares (held directly)	0	0
Amounts due in respect of own fund items or initial fund called up but not yet paid in	0	0
Cash and cash equivalents	633,719	633,719
Any other assets, not elsewhere shown	293,174	293,174
<b>Total assets</b>	<b>69,132,702</b>	<b>70,018,820</b>

## Balance Sheet as at 31 December 2022, cont.

### Liabilities

EURk	Solvency II	Financial accounting
Technical provisions – non-life	33,186	140,418
Technical provisions – non-life (excluding health)	202	–
Technical provisions calculated as a whole	0	–
Best estimate	169	–
Risk margin	34	–
Technical provisions – health (similar to non-life)	32,983	140,418
Technical provisions calculated as a whole	0	–
Best estimate	30,366	–
Risk margin	2,618	–
Technical provisions – life (excluding index-linked and unit-linked)	12,114,279	12,597,991
Technical provisions – health (similar to life)	477,630	489,941
Technical provisions calculated as a whole	0	–
Best estimate	447,728	–
Risk margin	29,902	–
Technical provisions – life (excluding health and index-linked and unit-linked)	11,636,649	12,108,050
Technical provisions calculated as a whole	0	–
Best estimate	11,441,004	–
Risk margin	195,645	–
Technical provisions – index-linked and unit-linked	51,472,695	53,422,068
Technical provisions calculated as a whole	0	–
Best estimate	50,994,894	–
Risk margin	477,801	–
Other technical provisions	0	–
Contingent liabilities	0	–
Provisions other than technical provisions	0	–
Pension benefit obligations	15,385	15,385
Deposits from reinsurers	891	891
Deferred tax liabilities	364,687	50,569
Derivatives	152,592	152,592
Debts owed to credit institutions	708,545	708,545
Financial liabilities other than debts owed to credit institutions	210,540	210,540
Insurance & intermediaries payables	33,467	33,467
Reinsurance payables	12,256	12,256
Payables (trade, not insurance)	17,984	17,984
Subordinated liabilities	650,000	650,000
Subordinated liabilities not in basic own funds	0	–
Subordinated liabilities in basic own funds	650,000	650,000
Any other liabilities, not elsewhere shown	370,151	372,209
<b>Total liabilities</b>	<b>66,156,659</b>	<b>68,384,915</b>
<b>Excess assets over liabilities</b>	<b>2,976,043</b>	<b>1,633,905</b>



# Appendix 5

## Quantitative reporting template

The following quantitative reporting templates are required to be disclosed with the Solvency and Financial Conditions Report.

All amounts are in EURk.

QRT ref	QRT title
S.02.01.02	Balance sheet
S.05.01.02	Premiums, claims and expenses
S.05.02.01	Premiums, claims and expenses by country
S.22.01.22	Impact of the long term guarantee and transitional measures
S.23.01.22	Own funds
S.25.01.22	Solvency Capital Requirement, calculated using the standard formula
S.25.02.22	Solvency Capital Requirement, calculated using the standard formula and a partial internal model – <i>not applicable to NLP</i>
S.25.03.22	Solvency Capital Requirement, calculated using a full internal model – <i>not applicable to NLP</i>
S.32.01.22	Undertakings in the scope of the group

### S.02.01.02.01 Balance sheet

#### Assets

	Solvency II value
	C0010
	<del>                    </del>
Goodwill	R0010 <del>                    </del>
Deferred acquisition costs	R0020 <del>                    </del>
Intangible assets	R0030 0
Deferred tax assets	R0040 10,051
Pension benefit surplus	R0050 0
Property, plant & equipment held for own use	R0060 35,350
Investments (other than assets held for index-linked and unit-linked contracts)	R0070 14,648,120
Property (other than for own use)	R0080 1,598,861
Holdings in related undertakings, including participations	R0090 310,381
Equities	R0100 414,262
Equities – listed	R0110 402,268
Equities – unlisted	R0120 11,994
Bonds	R0130 9,111,385
Government Bonds	R0140 2,121,486
Corporate Bonds	R0150 6,966,646
Structured notes	R0160 11,339
Collateralised securities	R0170 11,914
Collective Investments Undertakings	R0180 2,891,099
Derivatives	R0190 133,154
Deposits other than cash equivalents	R0200 188,978
Other investments	R0210 0
Assets held for index-linked and unit-linked contracts	R0220 53,416,304
Loans and mortgages	R0230 24,602
Loans on policies	R0240 0
Loans and mortgages to individuals	R0250 0
Other loans and mortgages	R0260 24,602
Reinsurance recoverables from:	R0270 13,035
Non-life and health similar to non-life	R0280 2,648
Non-life excluding health	R0290 0
Health similar to non-life	R0300 2,648
Life and health similar to life, excluding health and index-linked and unit-linked	R0310 10,388
Health similar to life	R0320 8,556
Life excluding health and index-linked and unit-linked	R0330 1,832
Life index-linked and unit-linked	R0340 0
Deposits to cedants	R0350 0
Insurance and intermediaries receivables	R0360 16,274
Reinsurance receivables	R0370 5,896
Receivables (trade, not insurance)	R0380 36,177
Own shares (held directly)	R0390 0
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400 0
Cash and cash equivalents	R0410 633,719
Any other assets, not elsewhere shown	R0420 293,174
<b>Total assets</b>	<b>R0500 69,132,702</b>

## S.02.01.02.01

## Balance sheet, cont.

## Liabilities

	Solvency II value
	C0010
	<del> </del>
Technical provisions – non-life	R0510 33,186
Technical provisions – non-life (excluding health)	R0520 202
Technical provisions calculated as a whole	R0530 0
Best Estimate	R0540 169
Risk margin	R0550 34
Technical provisions – health (similar to non-life)	R0560 32,983
Technical provisions calculated as a whole	R0570 0
Best Estimate	R0580 30,366
Risk margin	R0590 2,618
Technical provisions – life (excluding index-linked and unit-linked)	R0600 12,114,279
Technical provisions – health (similar to life)	R0610 477,630
Technical provisions calculated as a whole	R0620 0
Best Estimate	R0630 447,728
Risk margin	R0640 29,902
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650 11,636,649
Technical provisions calculated as a whole	R0660 0
Best Estimate	R0670 11,441,004
Risk margin	R0680 195,645
Technical provisions – index-linked and unit-linked	R0690 51,472,695
Technical provisions calculated as a whole	R0700 0
Best Estimate	R0710 50,994,894
Risk margin	R0720 477,801
Other technical provisions	<del> </del>
Contingent liabilities	R0740 0
Provisions other than technical provisions	R0750 0
Pension benefit obligations	R0760 15,385
Deposits from reinsurers	R0770 891
Deferred tax liabilities	R0780 364,687
Derivatives	R0790 152,592
Debts owed to credit institutions	R0800 708,545
Financial liabilities other than debts owed to credit institutions	R0810 210,540
Insurance & intermediaries payables	R0820 33,467
Reinsurance payables	R0830 12,256
Payables (trade, not insurance)	R0840 17,984
Subordinated liabilities	R0850 650,000
Subordinated liabilities not in Basic Own Funds	R0860 0
Subordinated liabilities in Basic Own Funds	R0870 650,000
Any other liabilities, not elsewhere shown	R0880 370,151
<b>Total liabilities</b>	<b>R0900 66,156,659</b>
<b>Excess of assets over liabilities</b>	<b>R1000 2,976,043</b>

## S.05.01.02

## Premiums, claims and expenses by line of business

	Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)												Line of Business for: accepted non-proportional reinsurance				Total
	Medical expense insur- ance	Income protec- tion insur- ance	Workers' compen- sation insur- ance	Motor vehicle liability insur- ance	Other motor insur- ance	Marine, aviation and transport insur- ance	Fire and other damage to prop- erty insur- ance	General liability insur- ance	Credit and surety- ship insur- ance	Legal expenses insur- ance	Assis- tance	Miscel- laneous financial loss	Health	Casualty	Marine, aviation, transport	Property	
	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0200
<b>Premiums written</b>																	
Gross – Direct Business	R0110	0	42,469	-	-	-	-	-	-	-	-	779					43,248
Gross – Proportional reinsurance accepted	R0120	-	-	-	-	-	-	-	-	-	-	-					0
Gross – Non-proportional reinsurance accepted	R0130																0
Reinsurers' share	R0140	0	7,394	-	-	-	-	-	-	-	-	0					7,394
Net	R0200	0	35,075	-	-	-	-	-	-	-	-	779					35,853
<b>Premiums earned</b>																	
Gross – Direct Business	R0210	0	42,803	-	-	-	-	-	-	-	-	685					43,488
Gross – Proportional reinsurance accepted	R0220	-	-	-	-	-	-	-	-	-	-	-					0
Gross – Non-proportional reinsurance accepted	R0230																0
Reinsurers' share	R0240	0	7,394	-	-	-	-	-	-	-	-	0					7,394
Net	R0300	0	35,409	-	-	-	-	-	-	-	-	685					36,094
<b>Claims incurred</b>																	
Gross – Direct Business	R0310	0	10,435	-	-	-	-	-	-	-	-	160					10,594
Gross – Proportional reinsurance accepted	R0320	-	-	-	-	-	-	-	-	-	-	-					0
Gross – Non-proportional reinsurance accepted	R0330																0
Reinsurers' share	R0340	0	2,677	-	-	-	-	-	-	-	-	0					2,677
Net	R0400	0	7,758	-	-	-	-	-	-	-	-	160					7,917
<b>Changes in other technical provisions</b>																	
Gross – Direct Business	R0410	0	0	-	-	-	-	-	-	-	-	0					0
Gross – Proportional reinsurance accepted	R0420	-	-	-	-	-	-	-	-	-	-	-					0
Gross – Non-proportional reinsurance accepted	R0430																0
Reinsurers' share	R0440	0	0	-	-	-	-	-	-	-	-	0					0
Net	R0500	0	0	-	-	-	-	-	-	-	-	0					0
<b>Expenses incurred</b>	R0550	0	9,086	-	-	-	-	-	-	-	-	206					9,292
<b>Administrative expenses</b>																	
Gross – Direct Business	R0610	-	1,357	-	-	-	-	-	-	-	-	49					1,406
Gross – Proportional reinsurance accepted	R0620	-	0	-	-	-	-	-	-	-	-	0					0
Gross – Non-proportional reinsurance accepted	R0630																-
Reinsurers' share	R0640	-	0	-	-	-	-	-	-	-	-	0					0
Net	R0700	-	1,357	-	-	-	-	-	-	-	-	49					1,406
<b>Investment management expenses</b>																	
Gross – Direct Business	R0710	-	75	-	-	-	-	-	-	-	-	3					78
Gross – Proportional reinsurance accepted	R0720	-	0	-	-	-	-	-	-	-	-	0					0
Gross – Non-proportional reinsurance accepted	R0730																0
Reinsurers' share	R0740	-	0	-	-	-	-	-	-	-	-	0					0
Net	R0800	-	75	-	-	-	-	-	-	-	-	3					78

## S.05.01.02

## Premiums, claims and expenses by line of business, cont.

<b>Claims management expenses</b>																				
Gross – Direct Business	R0810	-	697	-	-	-	-	-	-	-	-	-	-	-	27	-	-	-	-	724
Gross – Proportional reinsurance accepted	R0820	-	0	-	-	-	-	-	-	-	-	-	-	-	0	-	-	-	-	0
Gross – Non-proportional reinsurance accepted	R0830															-	-	-	-	-
Reinsurers' share	R0840	-	0	-	-	-	-	-	-	-	-	-	-	-	0	-	-	-	-	0
Net	R0900	-	697	-	-	-	-	-	-	-	-	-	-	-	27	-	-	-	-	724
<b>Acquisition expenses</b>																				
Gross – Direct Business	R0910	-	5,004	-	-	-	-	-	-	-	-	-	-	-	81	-	-	-	-	5,085
Gross – Proportional reinsurance accepted	R0920	-	0	-	-	-	-	-	-	-	-	-	-	-	0	-	-	-	-	0
Gross – Non-proportional reinsurance accepted	R0930															-	-	-	-	-
Reinsurers' share	R0940	-	0	-	-	-	-	-	-	-	-	-	-	-	0	-	-	-	-	0
Net	R1000	-	5,004	-	-	-	-	-	-	-	-	-	-	-	81	-	-	-	-	5,085
<b>Overhead expenses</b>																				
Gross – Direct Business	R1010	-	1,953	-	-	-	-	-	-	-	-	-	-	-	46	-	-	-	-	1,999
Gross – Proportional reinsurance accepted	R1020	-	0	-	-	-	-	-	-	-	-	-	-	-	0	-	-	-	-	0
Gross – Non-proportional reinsurance accepted	R1030															-	-	-	-	-
Reinsurers' share	R1040	-	0	-	-	-	-	-	-	-	-	-	-	-	0	-	-	-	-	0
Net	R1100	-	1,953	-	-	-	-	-	-	-	-	-	-	-	46	-	-	-	-	1,999
<b>Other expenses</b>	R1200																			-15
<b>Total expenses</b>	R1300																			9,277

**S.05.01.02.02**  
**Life**

	Line of Business for: life insurance obligations						Life reinsurance obligations		Total	
	Health insurance	Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	Health reinsurance	Life reinsurance		
	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280		
<b>Premiums written</b>										
Gross	R1410	66,218	100,722	4,879,945	99,289	–	–	0	0	5,146,175
Reinsurers' share	R1420	698	698	698	7,929	–	–	0	0	10,024
Net	R1500	65,520	100,024	4,879,247	91,360	–	–	0	0	5,136,151
<b>Premiums earned</b>										
Gross	R1510	66,218	100,722	4,879,945	99,229	–	–	0	0	5,146,114
Reinsurers' share	R1520	698	254	–	8,136	–	–	0	0	9,088
Net	R1600	65,520	100,468	4,879,945	91,093	–	–	0	0	5,137,026
<b>Claims incurred</b>										
Gross	R1610	29,795	411,245	3,113,166	26,275	–	–	0	0	3,580,481
Reinsurers' share	R1620	583	19	–	4,224	–	–	0	0	4,825
Net	R1700	29,212	411,226	3,113,166	22,051	–	–	0	0	3,575,655
<b>Changes in other technical provisions</b>										
Gross	R1710	–	–	–	956	–	–	0	0	956
Reinsurers' share	R1720	–	–	–	728	–	–	0	0	728
Net	R1800	–	–	–	228	–	–	0	0	228
<b>Expenses incurred</b>	R1900	18,841	30,175	76,574	22,037	–	–	0	0	147,626
<b>Administrative expenses</b>										
Gross	R1910	1,427	3,200	10,287	2,422	0	0	0	0	17,336
Reinsurers' share	R1920	–	–	–	–	0	0	0	0	0
Net	R2000	1,427	3,200	10,287	2,422	0	0	0	0	17,336
<b>Investment management expenses</b>										
Gross	R2010	2,143	11,132	12,574	1,538	–	–	–	0	27,387
Reinsurers' share	R2020	–	–	–	–	0	0	0	0	0
Net	R2100	2,143	11,132	12,574	1,538	0	0	0	0	27,387
<b>Claims management expenses</b>										
Gross	R2110	496	992	2,750	1,435	0	0	0	0	5,673
Reinsurers' share	R2120	–	–	–	–	0	0	0	0	0
Net	R2200	496	992	2,750	1,435	0	0	0	0	5,673
<b>Acquisition expenses</b>										
Gross	R2210	9,389	3,294	24,055	9,926	0	0	0	0	46,664
Reinsurers' share	R2220	–	–	–	–	0	0	0	0	0
Net	R2300	9,389	3,294	24,055	9,926	0	0	0	0	46,664
<b>Overhead expenses</b>										
Gross	R2310	5,385	11,557	26,908	6,716	0	0	0	0	50,565
Reinsurers' share	R2320	–	–	–	–	0	0	0	0	0
Net	R2400	5,385	11,557	26,908	6,716	0	0	0	0	50,565
<b>Other expenses</b>	R2500									
<b>Total expenses</b>	R2600									
<b>Total amount of surrenders</b>	R2700	0	530,084	11,556,837	0	0	0	0	0	12,086,920

## S.05.02.01

## Premiums, claims and expenses by country

	Home country	Country (by amount of gross premiums written) – non-life obligations	Finland	Norway	Total Top 5 and home country	
	C0080	C0090	C0090	C0090	C0140	
<b>Premiums written</b>						
Gross – Direct Business	R0110	0	43,248	20,055	23,193	43,248
Gross – Proportional reinsurance accepted	R0120	0	0	0	0	0
Gross – Non-proportional reinsurance accepted	R0130	0	0	0	0	0
Reinsurers' share	R0140	0	7,394	65	7,329	7,394
Net	R0200	0	35,853	19,990	15,864	35,853
<b>Premiums earned</b>						
Gross – Direct Business	R0210	0	43,488	20,295	23,193	43,488
Gross – Proportional reinsurance accepted	R0220	0	0	0	0	0
Gross – Non-proportional reinsurance accepted	R0230	0	0	0	0	0
Reinsurers' share	R0240	0	7,394	65	7,329	7,394
Net	R0300	0	36,094	20,230	15,864	36,094
<b>Claims incurred</b>						
Gross – Direct Business	R0310	0	10,594	3,598	6,996	10,594
Gross – Proportional reinsurance accepted	R0320	0	0	0	0	0
Gross – Non-proportional reinsurance accepted	R0330	0	0	0	0	0
Reinsurers' share	R0340	0	2,677	0	2,677	2,677
Net	R0400	0	7,917	3,598	4,319	7,917
Changes in other technical provisions						
Gross – Direct Business	R0410	0	0	0	0	0
Gross – Proportional reinsurance accepted	R0420	0	0	0	0	0
Gross – Non-proportional reinsurance accepted	R0430	0	0	0	0	0
Reinsurers' share	R0440	0	0	0	0	0
Net	R0500	0	0	0	0	0
<b>Expenses incurred</b>	R0550	0	9,292	5,307	3,985	9,292
<b>Other expenses</b>	R1200					0
<b>Total expenses</b>	R1300					9,292

	Home country	Country (by amount of gross premiums written) – life obligations	Finland	Norway	Total Top 5 and home country	
	C0220	C0230	C0230	C0230	C0280	
<b>Premiums written</b>						
Gross	R1410	2,475,051	2,671,123	1,148,191	1,522,933	5,146,175
Reinsurers' share	R1420	931	9,093	6,300	2,793	10,024
Net	R1500	2,474,120	2,662,031	1,141,891	1,520,140	5,136,151
<b>Premiums earned</b>						
Gross	R1510	2,475,051	2,671,063	1,148,130	1,522,933	5,146,114
<b>Reinsurers' share</b>	R1520	931	8,157	6,300	1,857	9,088
Net	R1600	2,474,120	2,662,906	1,141,830	1,521,076	5,137,026
<b>Claims incurred</b>						
Gross	R1610	1,425,521	2,154,960	1,173,253	981,707	3,580,481
Reinsurers' share	R1620	249	4,577	3,975	602	4,825
Net	R1700	1,425,272	2,150,383	1,169,278	981,105	3,575,655
<b>Changes in other technical provisions</b>						
Gross	R1710	956	0	0	0	956
Reinsurers' share	R1720	728	0	0	0	728
Net	R1800	228	0	0	0	228
<b>Expenses incurred</b>	R1900	46,805	100,821	26,031	74,790	147,626
<b>Other expenses</b>	R2500					4,381
<b>Total expenses</b>	R2600					152,007

## S.22.01.22

## Impact of long term guarantees measures and transitionals

	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	63,620,160	0	0	102,367	0
Basic own funds	R0020	3,172,152	0	0	-6,431	0
Eligible own funds to meet Solvency Capital Requirement	R0050	3,172,152	0	0	-6,431	0
Solvency Capital Requirement	R0090	2,275,692	0	0	16,539	0

## S.23.01.22

## Own funds

	Total	Tier 1 – unrestricted	Tier 1 – restricted	Tier 2	Tier 3
	C0010	C0020	C0030	C0040	C0050
<b>Basic own funds before deduction for participations in other financial sector</b>					
Ordinary share capital (gross of own shares)	R0010	12	12	0	
Non-available called but not paid in ordinary share capital at group level	R0020	0	0	0	
Share premium account related to ordinary share capital	R0030	0	0	0	
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	0	0		
Non-available surplus funds at group level	R0080	-	-		
Preference shares	R0090	-	-	-	-
Non-available preference shares at group level	R0100	-	-	-	-
<b>Share premium account related to preference shares</b>	R0110	-	-	-	-
Non-available share premium account related to preference shares at group level	R0120	-	-	-	-
Reconciliation reserve	R0130	2,522,140	2,522,140		
Subordinated liabilities	R0140	650,000		650,000	0
Non-available subordinated liabilities at group level	R0150	-	-	-	-
An amount equal to the value of net deferred tax assets	R0160	0			0
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	0	0	0	0
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	0	0	0	0
<b>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</b>					
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	0			
<b>Deductions</b>					
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	0	0	0	0
Deductions for participations where there is non-availability of information (Article 229)	R0250	0	0	0	0
Deduction for participations included by using D&A when a combination of methods is used	R0260	-	-	-	-
Total of non-available own fund items	R0270	-	-	-	-
<b>–Total deductions</b>	R0280	0	0	0	0
<b>Total basic own funds after deductions</b>	R0290	3,172,152	2,522,152	0	650,000



## S.23.01.22

## Own funds, cont.

## Ancillary own funds

	Total	Tier 1 – unrestricted	Tier 1 – restricted	Tier 2	Tier 3
	C0010	C0020	C0030	C0040	C0050
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	0	–	0	0
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340	0	–	0	–
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350	0	–	0	0
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	0	–	0	0
Other ancillary own funds	R0390	0	–	0	0
<b>Total ancillary own funds</b>	R0400	0	–	0	0
<b>Own funds of other financial sectors</b>					
Credit institutions, investment firms, financial institutions, alternative investment fund managers, UCITS management companies – total	R0410	–	–	–	–
Institutions for occupational retirement provision	R0420	–	–	–	–
Non regulated entities carrying out financial activities	R0430	–	–	–	–
Total own funds of other financial sectors	R0440	–	–	–	–
<b>Own funds when using the D&amp;A, exclusively or in combination of method 1</b>					
Own funds aggregated when using the D&A and combination of method	R0450	–	–	–	–
Own funds aggregated when using the D&A and 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	3,172,152	2,522,152	–	650,000
Total available own funds to meet the minimum consolidated group SCR	R0530	3,172,152	2,522,152	–	650,000
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	3,172,152	2,522,152	–	650,000
Total eligible own funds to meet the minimum consolidated group SCR	R0570	2,655,068	2,522,152	–	132,916
<b>Minimum consolidated Group SCR</b>	R0610	2,275,692	–	–	–
<b>Ratio of Eligible own funds to Minimum Consolidated Group SCR</b>	R0650	664,582	–	–	–
<b>Total eligible own funds to meet the group SCR (including own funds from other financial sector and from the undertakings included via D&amp;A)</b>	R0660	3,172,152	2,522,152	–	650,000
<b>Group SCR</b>	R0680	2,275,692	–	–	–
<b>Ratio of Eligible own funds to group SCR including other financial sectors and the undertakings included via D&amp;A</b>	R0690	1,3939	–	–	–

## Reconciliation reserve

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## Reconciliation reserve

	C0060	
Excess of assets over liabilities	R0700	2,976,043
Own shares (held directly and indirectly)	R0710	–
Foreseeable dividends, distributions and charges	R0720	–
Other basic own fund items	R0730	12
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	–
Other non available own funds	R0750	453,892
<b>Reconciliation reserve</b>	R0760	2,522,140
<b>Expected profits</b>		
Expected profits included in future premiums (EPIFP) – Life business	R0770	482,386
Expected profits included in future premiums (EPIFP) – Non-life business	R0780	11,431
<b>Total Expected profits included in future premiums (EPIFP)</b>	R0790	493,817

## S.25.01.22

## Solvency Capital Requirement – for groups on Standard Formula

	Gross solvency capital requirement	Simplifications
	C0110	C0120
Market risk	R0010 2,982,766	–
Counterparty default risk	R0020 223,994	
Life underwriting risk	R0030 1,332,592	–
Health underwriting risk	R0040 108,969	–
Non-life underwriting risk	R0050 535	–
Diversification	R0060 –980,928	
Intangible asset risk	R0070 –	
<b>Basic Solvency Capital Requirement</b>	R0100 3,667,929	

## Calculation of Solvency Capital Requirement

	Value
	C0100
Operational risk	R0130 84,113
Loss-absorbing capacity of technical provisions	R0140 –1,225,395
Loss-absorbing capacity of deferred taxes	R0150 –250,954
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160 0
Solvency Capital Requirement excluding capital add-on	R0200 2,275,695
Capital add-ons already set	R0210 0
Solvency capital requirement for undertakings under consolidated method	R0220 2,275,695
<b>Other information on SCR</b>	
Capital requirement for duration-based equity risk sub-module	R0400 0
Total amount of Notional Solvency Capital Requirements for remaining part	R0410 0
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420 0
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430 0
Diversification effects due to RFF nSCR aggregation for article 304	R0440 0
Minimum consolidated group solvency capital requirement	R0470 664,582
<b>Information on other entities</b>	
Capital requirement for other financial sectors (Non-insurance capital requirements)	R0500 0
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 0
Capital requirement for other financial sectors (Non-insurance capital requirements) – Institutions for occupational retirement provisions	R0520 0
Capital requirement for other financial sectors (Non-insurance capital requirements) – Capital requirement for non-regulated entities carrying out financial activities	R0530 0
Capital requirement for non-controlled participation requirements	R0540 0
Capital requirement for residual undertakings	R0550 0
<b>Overall SCR</b>	
SCR for undertakings included via D and A	R0560 0
Solvency capital requirement	R0570 2,275,692

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## Undertakings in the scope of the group

Identification code and type of code of the undertaking	Country	Legal Name of the undertaking	Type of undertaking	Legal form	Category (mutual/non mutual)	Supervisory Authority	Criteria of influence							Inclusion in the scope of Group supervision		Group solvency calculation
							% capital share	% used for the establishment of consolidated accounts	% voting rights	Other criteria	Level of influence	Proportional share used for group solvency calculation	Yes/No	Date of decision if art. 214 is applied		
C0020	C0010	C0040	C0050	C0060	C0070	C0080	C0180	C0190	C0200	C0210	C0220	C0230	C0240	C0250	C0260	
SC/95922659	NORWAY	Livsfor- søkningselska- pet Nordea Liv Norge AS	Life undertakings	Akjeselskab	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/912893537	NORWAY	Nykirkebak- ken 2 AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/913886216	NORWAY	Fr Nansens Plass 7 II AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/914664381	NORWAY	NLE Munchsgate 5B AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/919060271	NORWAY	Rådhuspas- sajen AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/955122690	NORWAY	FR Nansens Plass 7 II ANS	Other	Ansvarlig selskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/971227575	NORWAY	Arkaden Eiendom AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/981125096	NORWAY	Nordea Aktuærten- ester AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/981143159	NORWAY	Olav Kyrres- gate 22 AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/985094691	NORWAY	Norske Liv AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/995556790	NORWAY	Folke Berna- dottesvei 38 AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/995557665	NORWAY	Kokstad- flaten 4 AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/995557754	NORWAY	Henrik Ibsensgate 53 AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/997953312	NORWAY	Kokstad- flaten 6 AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/998077052	NORWAY	Havnespeilet AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/999289630	NORWAY	Nordea Liv Eiendom AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/990651213	NORWAY	Sommerro- gaten 13-15 AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/937731469	NORWAY	Økernveien 119/121 AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/913921437	NORWAY	Haslevangen 28/30 AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/912195996	NORWAY	Eiendoms- selskapet Dronning Maudsgt 15 AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/918042830	NORWAY	Chr. Kroghs gate 32 AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/989990659	NORWAY	Vallhallave- gen 6 AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/966246634	NORWAY	Ingeniernes Hus AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/914776120	NORWAY	Henrik Ibsensgate 40-42 AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/996922243	NORWAY	Fabrikkveien 41 AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	
SC/912808629	NORWAY	Fabrikkveien 36 AS	Other	Akjeselskap	Non-mutual	Finanstil- synet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group super- vision		Method 1: Full consoli- dation	

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## Undertakings in the scope of the group, cont.

SC/996197441	NORWAY	Fabrikkeveien 38 AS	Other	Aksjeselskap	Non-mutual	Finanstilsynet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
SC/998171350	NORWAY	Kokstadsveien 23B AS	Other	Aksjeselskap	Non-mutual	Finanstilsynet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
SC/922155623	NORWAY	Pilestredet 12 AS	Other	Aksjeselskap	Non-mutual	Finanstilsynet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
SC/921680902	NORWAY	Allehelgens gate 4 AS	Other	Aksjeselskap	Non-mutual	Finanstilsynet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
SC/959498695	NORWAY	Rådstuplass 4 DA	Other	Ansvarlig selskap	Non-mutual	Finanstilsynet	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
LEI/529900K08EYX3I3MTH59	FINLAND	Nordea Life Assurance Finland Ltd	Life undertakings	Försäkring Aktie Bolag	Non-mutual	Finanssivaltonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
LEI/7437002CRMXZ1FNUA72	FINLAND	Nordea Insurance Finland Ltd	Non life insurance undertakings	Försäkring Aktie Bolag	Non-mutual	Finanssivaltonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
SC/LEI/5299004I849IRJRSQ572/DK/0140	DENMARK	Nordea Liv Holding A/S	Insurance holding company as defined in Art. 2125 [f] of Directive 2009/138/EC	Aktieselskaber	Non-mutual		100	100	100	None	Dominant	100	Included into scope of group supervision	Method 1: Full consolidation
LEI/75T1A7ZVEIQ2WQNG812	DENMARK	Nordea Livsforsikring A/S	Life undertakings	Aktieselskaber	Non-mutual	Finanstilsynet	100	100	100	None	Dominant	100	Included into scope of group supervision	Method 1: Full consolidation
SC/LEI/75T1A7ZVEIQ2WQNG812/DK/0090	DENMARK	Nordea Kapitalforvaltning A/S	Other	Aktieselskaber	Non-mutual		100	100	100	None	Dominant	100	Included into scope of group supervision	Method 1: Full consolidation
SC/LEI/75T1A7ZVEIQ2WQNG812/DK/0016	DENMARK	Nordea EDB II ApS	Other	Anpartsselskab	Non-mutual		100	100	100	None	Dominant	100	Included into scope of group supervision	Method 1: Full consolidation
SC/LEI/75T1A7ZVEIQ2WQNG812/DK/0013	DENMARK	Nordea Ejendom A/S	Other	Aktieselskaber	Non-mutual		100	100	100	None	Dominant	100	Included into scope of group supervision	Method 1: Full consolidation
SC/LEI/75T1A7ZVEIQ2WQNG812/DK/0051	DENMARK	Rådhuskontorene ApS	Other	Anpartsselskab	Non-mutual		100	100	100	None	Dominant	100	Included into scope of group supervision	Method 1: Full consolidation
SC/LEI/75T1A7ZVEIQ2WQNG812/DK/0121	DENMARK	NPE201 ApS	Other	Anpartsselskab	Non-mutual		100	100	100	None	Dominant	100	Included into scope of group supervision	Method 1: Full consolidation
SC/LEI/75T1A7ZVEIQ2WQNG812/DK/0100	DENMARK	Margrethesholmen P/S	Other	Partnerselskab	Non-mutual		50	50	50	None	Dominant	50	Included into scope of group supervision	Method 1: Full consolidation
SC/LEI/75T1A7ZVEIQ2WQNG812/DK/0101	DENMARK	Komplementarselskabet Margrethesholm ApS	Other	Anpartsselskab	Non-mutual		50	50	50	None	Dominant	50	Included into scope of group supervision	Method 1: Full consolidation
SC/LEI/75T1A7ZVEIQ2WQNG812/DK/0104	DENMARK	Havneholmen P/S	Other	Partnerselskab	Non-mutual		50	50	50	None	Dominant	50	Included into scope of group supervision	Method 1: Full consolidation
SC/LEI/75T1A7ZVEIQ2WQNG812/DK/0105	DENMARK	Komplementarselskabet Havneholmen ApS	Other	Anpartsselskab	Non-mutual		50	50	50	None	Dominant	50	Included into scope of group supervision	Method 1: Full consolidation
SC/LEI/75T1A7ZVEIQ2WQNG812/DK/0110	DENMARK	K/S Ejendomsolding Banemarksvej 2021	Other	Kommanditselskab	Non-mutual		40	40	40	None	Dominant	40	Included into scope of group supervision	Method 1: Full consolidation
SC/LEI/75T1A7ZVEIQ2WQNG812/DK/0107	DENMARK	Komplementarselskabet Banemarksvej ApS	Other	Anpartsselskab	Non-mutual		40	40	40	None	Dominant	40	Included into scope of group supervision	Method 1: Full consolidation
SC/LEI/75T1A7ZVEIQ2WQNG812/DK/0108	DENMARK	P/S Ottilia København	Other	Partnerselskab	Non-mutual		50	50	50	None	Dominant	50	Included into scope of group supervision	Method 1: Full consolidation
SC/LEI/75T1A7ZVEIQ2WQNG812/DK/0109	DENMARK	Komplementarselskabet Ottilia København ApS	Other	Anpartsselskab	Non-mutual		50	50	50	None	Dominant	50	Included into scope of group supervision	Method 1: Full consolidation
SC/LEI/75T1A7ZVEIQ2WQNG812/DK/0213	DENMARK	Carlsberg Bøen P/S	Other	Partnerselskab	Non-mutual		23	23	23	None	Dominant	23	Included into scope of group supervision	Method 1: Full consolidation
LEI/5299004I849IRJRSQ572	SWEDEN	Nordea Life Holding AB	Insurance holding company as defined in Art. 2125 [f] of Directive 2009/138/EC	Aktie bolag	Non-mutual	Finansinspektionen							Included into scope of group supervision	Method 1: Full consolidation
LEI/529900MUOVW4H06TQA34	SWEDEN	Nordea Livförsäkring Sverige AB	Life undertakings	Försäkring Aktie Bolag	Non-mutual	Finansinspektionen	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
SC/556606-3839	SWEDEN	D Backa 22:8 Fastighets AB	Other	Aktiebolag	Non-mutual	Finansinspektionen	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
SC/556643-0905	SWEDEN	Bjeredsparken AB	Other	Aktiebolag	Non-mutual	Finansinspektionen	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
SC/556660-7551	SWEDEN	D Backa 22:3 Fastighets AB	Other	Aktiebolag	Non-mutual	Finansinspektionen	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
SC/5590681846	SWEDEN	Bältstävågen 102 Fastighets AB	Other	Aktiebolag	Non-mutual	Finansinspektionen	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation

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## Undertakings in the scope of the group, cont.

SC/556747-8218	SWEDEN	Värmdö Östby Retail AB	Other	Aktiebolag	Non-mutual	Finansinspektionen	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
SC/556883-6224	SWEDEN	Bråmaregården Fastighet AB	Other	Aktiebolag	Non-mutual	Finansinspektionen	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
SC/556972-6804	SWEDEN	Nordea Liv Fastighet Holding AB	Other	Aktiebolag	Non-mutual	Finansinspektionen	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
SC/556972-6812	SWEDEN	Nordea Liv Fastighet I AB	Other	Aktiebolag	Non-mutual	Finansinspektionen	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
SC/559073-4116	SWEDEN	Ringerike Fastighets AB	Other	Aktiebolag	Non-mutual	Finansinspektionen	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
SC/559106-4695	SWEDEN	Nordea Liv Fastighet II AB	Other	Aktiebolag	Non-mutual	Finansinspektionen	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
SC/556803-0133	SWEDEN	Ullerask Fastighets AB	Other	Aktiebolag	Non-mutual	Finansinspektionen	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
SC/556908-9641	SWEDEN	Tolust Berget AB	Other	Aktiebolag	Non-mutual	Finansinspektionen	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
SC/559252-0752	SWEDEN	Hyllie Fabriken AB	Other	Aktiebolag	Non-mutual	Finansinspektionen	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
SC/556691-9428	SWEDEN	Telegrafgatan RE AB	Other	Aktiebolag	Non-mutual	Finansinspektionen	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
SC/556762-0546	SWEDEN	Malmö Vårdshuset 3 AB	Other	Aktiebolag	Non-mutual	Finansinspektionen	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
SC/559347-6285	SWEDEN	Nordea Liv Fastighet III AB	Other	Aktiebolag	Non-mutual	Finansinspektionen	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0101766-4	FINLAND	Asunto Oy Kalliomatti	Other	Aktie bolag	Non-mutual	Finanssivaltovnta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0119588-2	FINLAND	Asunto Oy Lapinlahdenkatu 14	Other	Aktie bolag	Non-mutual	Finanssivaltovnta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0667245-7	FINLAND	Asunto Oy Malminkatu 36	Other	Aktie bolag	Non-mutual	Finanssivaltovnta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0784057-1	FINLAND	Asunto Oy Munkkiniemen puistotie 14	Other	Aktie bolag	Non-mutual	Finanssivaltovnta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0654453-5	FINLAND	Asunto Oy Hämeentie 5 B	Other	Aktie bolag	Non-mutual	Finanssivaltovnta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0117272-8	FINLAND	Kiinteistö Oy Alfred	Other	Aktie bolag	Non-mutual	Finanssivaltovnta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0118149-9	FINLAND	Kiinteistö Oy Hitsaajankatu 4	Other	Aktie bolag	Non-mutual	Finanssivaltovnta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0122852-5	FINLAND	Kiinteistö Oy Lauttasaaren Horisontti	Other	Aktie bolag	Non-mutual	Finanssivaltovnta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0845149-8	FINLAND	Kiinteistö Oy Kasarminkatu 44	Other	Aktie bolag	Non-mutual	Finanssivaltovnta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0635892-7	FINLAND	Kiinteistö Oy Vantaan Muuntotie 1	Other	Aktie bolag	Non-mutual	Finanssivaltovnta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0778111-0	FINLAND	Kiinteistö Oy Vantaan Mestariintie 11	Other	Aktie bolag	Non-mutual	Finanssivaltovnta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0398083-3	FINLAND	Kiinteistö Oy Helsingin Kuortaneenkatu 7	Other	Aktie bolag	Non-mutual	Finanssivaltovnta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0358877-8	FINLAND	Kiinteistö Oy Piispankuitti	Other	Aktie bolag	Non-mutual	Finanssivaltovnta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
1453184-9	FINLAND	Kiinteistö Oy Helsingin Lämmitäjäkatu 2	Other	Aktie bolag	Non-mutual	Finanssivaltovnta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
1639916-7	FINLAND	Kiinteistö Oy Helsingin Kaisaniemenkatu 6	Other	Aktie bolag	Non-mutual	Finanssivaltovnta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0602076-6	FINLAND	Kiinteistö Oy Espoon Sinkkiallontie 9	Other	Aktie bolag	Non-mutual	Finanssivaltovnta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
1638910-2	FINLAND	Kiinteistö Oy Helsingin Annankatu 27	Other	Aktie bolag	Non-mutual	Finanssivaltovnta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation

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## Undertakings in the scope of the group, cont.

1602960-9	FINLAND	Kiinteistö Oy Strömberginkuja 2	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0747930-9	FINLAND	Kiinteistö Oy Pakkalan Kartanonkoski 6	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0293117-5	FINLAND	Fastighets Ab Unionsgatan 17	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0844814-1	FINLAND	Kiinteistö Oy Eteäläranta 12	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0117975-1	FINLAND	Oy Helsingfors Saluhallar Ab	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
1757189-7	FINLAND	Kiinteistö Oy Helsingin Siltasaarencatu 16	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
1771691-0	FINLAND	Kiinteistö Oy Vantaan Tikkurilantie 154	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0688219-8	FINLAND	Kiinteistö Oy Ratavaritjankatu 3	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
1864628-0	FINLAND	Kiinteistö Oy Espoon Keilaranta 9A	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
1913491-4	FINLAND	Kiinteistö Oy Espoon Retail Park Glomson	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0628066-4	FINLAND	Kiinteistö Oy Helsingin Kivaidankatu 2	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
2032774-8	FINLAND	Kiinteistö Oy Helsingin Tyynylaanantie 20	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
2043182-8	FINLAND	Kiinteistö Oy Vantaan Vehkatie 29	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
2212496-0	FINLAND	Kiinteistö Oy Turvesaarencatu 17	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0863366-2	FINLAND	Kiinteistö Oy Helsingin Museokatu 8	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0797857-0	FINLAND	Kiinteistö Oy Pirkkalan Keidas	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
2085495-1	FINLAND	Kiinteistö Oy Helsingin Kalevankatu 20	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
2449838-4	FINLAND	Kiinteistö Oy Espoon Portti 1-5	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
2323820-6	FINLAND	Asunto Oy Helsingin Kapteeninranta	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
2291435-6	FINLAND	Asunto Oy Keravan Heikkiärrinne	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
2040011-6	FINLAND	Asunto Oy Helsingin Vanhalinna	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0736664-6	FINLAND	Asunto Oy Kitaportti	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0480542-0	FINLAND	Kiinteistö Oy Metsänpöjankuja 4	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
1503456-1	FINLAND	Kiinteistö Oy Oulun Kallisuusua 12	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0701941-7	FINLAND	Kiinteistö Oy Harkkokuja 2	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
2126808-1	FINLAND	Kiinteistö Oy Turun Centrum	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
2028590-4	FINLAND	Asunto Oy Espoon Malmiportti 4 A-B	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
2028592-0	FINLAND	Asunto Oy Espoon Malmiportti 4 C-D	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
2431966-5	FINLAND	Asunto Oy Vantaan Vanha Kaarelantie 26	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation

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## Undertakings in the scope of the group, cont.

2259237-7	FINLAND	Asunto Oy Pormalaisten Jokilaakso	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
1538961-0	FINLAND	Asunto Oy Espoon Ruukinranta 24	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0609026-2	FINLAND	Kiinteistö Oy Lintulahdenkallio	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
2302716-9	FINLAND	Kiinteistö Oy Sörnäistenkatu 10	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
2158729-3	FINLAND	Kiinteistö Oy Hermanninpuisto	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
1961946-0	FINLAND	Kiinteistö Oy Katajanokan Linnanpuisto	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
2586364-6	FINLAND	Myrskyläntien Palvelukodi Kiinteistö Oy	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
2859055-9	FINLAND	Kiinteistö Oy Tampereen Vehmaskoti	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
2810653-6	FINLAND	Kiinteistö Oy Jyväskylän Ahjokatu	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
2769901-8	FINLAND	Asunto Oy Turun Kansleri 2	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0877971-7	FINLAND	Kiinteistö Oy Keskuskatu 1B	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
2769831-4	FINLAND	Asunto Oy Turun Kansleri 4	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
2546887-3	FINLAND	Asunto Oy Turun Yliopistonkadun Kruunu	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
3012791-8	FINLAND	KKOy Sähkötie 14-16	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
2790328-5	FINLAND	KKOy Tampereen Tietohallinnonkatu 19	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation
0763412-9	FINLAND	Asunto Oy Helsingin Väinämöinen	Other	Aktie bolag	Non-mutual	Finanssivalvonta	100,00	100,00	100,00	None	Dominant	100,00	Included into scope of group supervision	Method 1: Full consolidation

