

187th year

Solvency and Financial Condition Report Generali Group 2018



**Solvency and Financial
Condition Report
Generali Group 2018**

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Group highlights¹

Solvency II ratio

Regulatory
+10 pps

217 %

Solvency Capital Requirement (SCR)

20,407 mln (-8.0%)

Minimum Capital Requirement (MCR)

15,639 mln (-9.7%)

Group Own Funds

-3.7%

€ 44,191 mln

Group Own Funds to meet the SCR

€ 44,191 mln

Group Own Funds to meet the MCR

€ 40,656 mln

Gross written premiums

+4.9%

€ 66,691 mln

Operating result

+3.0%

€ 4,857 mln

Average operating return on equity

2015-2018

13.4%

Net profit

+9.4%

€ 2,309 mln

Total Assets Under Management (AUM)

+0.4%

€ 488 bln

Our people

70,734 (-0.8%)

Our clients

61 mln (+7.0%)

Our distributors

155 thousand (n.m)

¹ The changes in Life net inflows and premiums are on equivalent terms, i.e. at constant exchange rates and consolidation scope pursuant to IFRS 5. The changes in Operating Result, Investments/Assets Under Management and Operating RoE consider, in application with IFRS 5, 2017 comparative data restated following the disposal of assets. Instead, 2017 data for New Business, Group own funds and Solvency capital requirement are equal to those published last year: in line with regulations currently in force, they are not restated in application of IFRS 5.



Life

Good performance: both net cash inflows and gross written premiums increased. Both operating result and Life new business profitability grew.

Gross written premiums

+5.7%

€ 46,084 mln

Life net inflows € 11,369 mln (+5.2%)

NBV

+4.3%

€ 1,877 mln

Operating result

+2.8%

€ 3,067 mln



P&C

Premiums increased in both lines of business. Operating result grew; CoR conformed at excellent level.

Gross written premiums

+3.3%

€ 20,607 mln

CoR

+0.1 pps

93.0%

Operating result

+2.5%

€ 1,992 mln

Summary

INTRODUCTION

The Generali Group - falling under the scope of Directive 2009/138/EC of the European Parliament and of the Council of 25 November 2009 on the taking-up and pursuit of the business of Insurance and Reinsurance (Solvency II) (hereinafter Solvency II Directive) - is required to prepare its own Solvency and Financial Condition Report (SFCR).

This is in accordance with the Solvency II Directive as implemented by the Legislative Decree 209/2005 as well as with the Delegated Regulation 2015/35/EC ('Delegated Act') and related Guidelines. In addition to the European Regulation requirements, the report also contains information pertinent to IVASS Regulation no. 33/2016.

The SFCR specific content is defined by primary legislation and its implementing measures. For solvency purposes, the latter provide detailed information on the essential aspects of its businesses, such as a description of activities and performance of the undertaking, the system of governance, the risk profile, the valuation of assets and liabilities as well as capital management.

The objective of the SFCR is to increase transparency in the insurance market, requiring insurance and reinsurance undertakings to disclose publicly, at least on an annual basis, a report on their solvency and financial condition.

Policyholders and beneficiaries are the main addressees of SFCR benefitting from an increased market discipline that encourages best practices as well as from a higher market confidence that leads to an improved understanding of the business.

Where possible, consistency is guaranteed with the public information already made available in order to ensure an integrated and consistent overview of the Generali Group.

Section D "Valuation for solvency purposes" and paragraph E.1. "Own funds" within section E "Capital management" are subject to audit by EY S.p.A. pursuant to art. 47-septies, paragraph 7 of the Legislative Decree 209/2005, as required by IVASS in a letter to the market dated 7 December 2016.

The present document follows the structure required by the Appendix XX of the Delegated Acts.

All the amounts in this report are presented in million euro (€ million), unless otherwise reported. Therefore, the sum of each rounded amount may sometimes differ from the rounded total. All Quantitative Reporting Templates (QRT) are presented in thousand euro (€ thousand).

Terms and acronyms used are available in the Glossary at the end of this report.

This report was approved by the Board of Directors on 15 May 2019.

BUSINESS AND PERFORMANCE (SECTION A)

Since 1831 we are an Italian, independent Group, with a strong international presence. We are one of the largest global players in the insurance industry, a strategic and highly relevant sector for the growth, development and welfare of modern societies. In almost 200 years we have built a Group that operates in 50 countries through more than 400 companies and almost 71 thousand employees.

Our activities span the Life business (savings, individual and family protection policies, unit-linked policies) and the Property & Casualty (P&C) business (mass market coverage like motor third-party liability (MTPL), home, accident and health policies, as well as sophisticated coverage for commercial and industrial risks); both businesses have great development prospects. We are among the leaders in the retail sector and over time we have strengthened our position in the corporate sector with a dedicated international unit.

In line with the Group strategy announced in 2017, the Investments, Asset & Wealth Management business unit aims at becoming the unique managerial entity of the Group operating in the area of investments, asset management and financial planning consultancy. Its ambition is to expand its current customer base, today for the most part captive, to third-party customers, thus evolving from its role of insurance business service to a benchmark in the asset management market.

We operate through a multichannel strategy to meet our customers' different needs. Alongside our international network of agents and financial advisors, we have added brokers, bancassurance and direct phone and web channels, in which we have become the European leader.

From a management and organisational perspective, the new Group organisation fully reflects the Group country managers' responsibilities and consists of business units operating in three main markets - Italy, France and Germany - and the following regional structures:

- ACEER: Austria, Central Eastern Europe (CEE) countries - Czech Republic, Poland, Hungary, Slovakia, Serbia/Montenegro, Romania, Slovenia, Bulgaria and Croatia - and Russia;
- International, consisting of Spain, Switzerland, Americas and Southern Europe, Asia, Europ Assistance and Other companies (including, Generali Global Health, Generali Employee Benefits and Vitality);
- Investments, Asset & Wealth Management, which includes the main Group entities operating in investment advisory, asset management and financial planning;
- Group holding and other companies, which includes the Parent Company's management and coordination activities, including Group reinsurance, other financial holding companies and suppliers of international services not included in the previous geographical areas.

Thanks to 2018 performance, the Group finalizes the 2018-2015 strategic plan surpassing all the targets.

In particular, the Group's gross written premiums amount to € 66,691 million, showing an increase of 4.9%. With reference to the lines of business, the Life gross written premiums stand at €46,084 million (+5.7%), confirming the growth observed during the year. The Life net inflows (+5.2%) amount to € 11,369 million, among the best figures in the market, mainly benefiting from the growth observed in the last quarter. Life technical reserves (+ 2.2%) reach € 343 billion. The Life New Business Margin improves by 0.26 pps to 4.35%, following the increase in profitability of both protection and savings products. The P&C gross written premiums reach € 20,607 million (+3.3%), confirming the growth observed during the year thanks to the positive performance of both business lines. The combined ratio remains stable at 93%, resulting the best amongst peers in the market.

In 2018 the Group's operating result, equal to € 4,857 million, shows a 3% increase, thanks to the contribution of all business segments. The average Operating RoE for the 2015-2018 period stands at 13.4%, confirming the achievement of the strategic objective (>13%).

The non-operating result comes to € -1,361 million (€ -1,109 million at YE 2017), mainly due to higher impairments on equity investments and lower net realized gains that reflect the planned policy of supporting future returns on investments.

The Group's result of the period stands at € 2,309 million (+9.4%) and reflects the improvement in the operating result and the contribution of the result from discontinued operations.

Save for the aforementioned changes in the breakdown by geography, there are no further changes to the business model adopted by the Group.

SYSTEM OF GOVERNANCE (SECTION B)

Assicurazioni Generali S.p.A. (AG), in its role as the Parent Company of the Generali Group, has issued internal regulations for its system of governance, with a view to ensuring an appropriate level of consistency within the Group. In particular, these internal regulations include rules on: the qualitative and quantitative composition of the Administrative, Management or Supervisory Body (AMSB), its competences and relevant committees; the roles and responsibilities to be assigned to senior management and management committees; the way in

which the internal control and risk management system must be structured and implemented; the main principles governing remuneration; fit and proper requirements and outsourcing.

No material changes to the system of governance occurred during the reference period.

RISK PROFILE (SECTION C)

The Generali Group is mostly exposed to financial, credit, underwriting and operational risks. The nature of these risks and the overall Generali's risk profile description are provided in section C.

The Generali Group measures its risks by means of the Group's Partial Internal Model (PIM) for financial, credit as well as life and non-life underwriting risks. Operational risks are measured by means of the Standard Formula, complemented by quantitative and qualitative risk assessments. The PIM provides an accurate representation of the main risks to which the Group is exposed, measuring not only the impact of each risk taken individually but also their combined impact on the Group's own funds.

The sensitivity and scenarios analyses conducted confirm that the Group is mostly vulnerable to financial market trends, in particular to low/negative interest rates and credit spread widening (mostly on Italian government bonds). The Group shows a solid position, even in stressed scenarios, thanks to a limited duration gap, a good loss absorption capacity of technical provisions and an average minimum guarantee return that is lower than the average portfolio return.

The main changes occurred during the period include a slight increase in financial risks and a decrease in credit risk. Moreover, the extension of the PIM scope to Austrian and Swiss companies has led to an overall decrease in SCR, as provided in section E.

VALUATION FOR SOLVENCY PURPOSES (SECTION D)

Section D includes a complete overview on the valuation of Solvency II assets and liabilities. The general principle for the valuation is an economic, market-consistent approach using assumptions that market participants would use in valuing the same asset or liability (article 75 of the Solvency II Directive).

In particular, assets and liabilities other than technical provisions are recognised in compliance with IFRS standards and the IFRS interpretations by the related Committee approved by the European Union before the balance sheet date, provided they include valuation methods that are consistent with the market approach.

In accordance with the Solvency II regulation, the consolidated Solvency II technical provisions of the Generali Group at 31 December 2018 have been calculated as the sum of the best estimate of liabilities and the risk margin, adopting the same methodologies used at 31 December 2017.

The following table shows a comparison between year-end 2018 and year-end 2017 Solvency II balance sheet². From year-end 2017 to the year-end 2018 the excess of assets over liabilities decreases by € -1,181 million, from € 39,520 million to € 38,339 million: this change is mainly attributable to the payment of the 2017 dividend made during 2018.

SII balance sheet

(€ million)	31/12/2018	31/12/2017
Goodwill, DAC and intangible assets	0	0
Deferred tax assets	1,233	1,317
Property, plant & equipment held for own use	3,304	3,443
Investments (other than assets held for index-linked and unit-linked contracts)	380,083	387,645
Assets held for index-linked and unit-linked contracts	72,433	86,978
Loans and mortgages	7,678	6,697
Reinsurance recoverables	3,152	3,617
Deposits to cedants	1,264	1,271

² According to current regulatory framework, IFRS 5 is not applicable for SII purposes. For this reason, Solvency II balance sheet figures at year-end 2017 are the official ones reported for regulatory and disclosure purposes without any adjustment related to IFRS discontinued operations in-force at year-end 2018.

Receivables	14,238	14,810
Own shares	3	3
Cash and cash equivalents	5,653	6,289
Any other assets, not elsewhere shown	1,678	1,791
Total assets	490,719	513,860

(€ million)	31/12/2018	31/12/2017
Technical provisions	408,929	428,710
Contingent liabilities	3	8
Provisions other than technical provisions	1,497	1,603
Pension benefit obligations	3,774	4,134
Deposits from reinsurers	852	702
Deferred tax liabilities	8,716	9,296
Liabilities derivatives	1,299	1,444
Financial liabilities	6,340	6,385
Payables	10,803	11,615
Subordinated liabilities	8,625	8,931
Any other liabilities, not elsewhere shown	1,541	1,512
Total liabilities	452,380	474,340

(€ million)	31/12/2018	31/12/2017
Excess of assets over liabilities	38,339	39,520

The decrease in the Solvency II life technical provisions, net of reinsurance, from 31 December 2017 to 31 December 2018 (-4.6%) is mostly explained by the changes in scope occurred during 2018 (mainly the disposal of the entities in Ireland and in the Netherlands) and the negative economic variances linked to the unfavourable financial markets' development (especially due to the widening of spreads and the worsening of equity performance). The decrease in the non-life technical provisions, net of reinsurance, from 31 December 2017 to 31 December 2018 (-3.2%) is mainly due to changes in scope occurred during 2018 (mainly the disposal of the entities in the Netherlands and in Colombia), the decrease of risk margin due to the entrance of Austria and Switzerland in the Internal Model scope, the decrease of IFRS reserves in Italy mainly due to the increase of settlement speed (change in legislative framework), and the depreciation of pesos on euro in Argentina. Compared to previous year-end valuation, the total technical provisions have not been significantly impacted by the updates in the best estimate operating assumptions.

There are no significant changes to be reported with regard to the valuation of assets and liabilities compared to the previous period.

Solvency ratio without application of volatility adjustment

Among possible long-term guarantee measures allowed within the Solvency II framework, the Generali Group adjusts the valuation curve used in the technical provisions calculation with the volatility adjustment, to consider the additional return that can be achieved in a risk-free manner by the assets backing insurance liabilities.

The impacts due to the change to zero of the volatility adjustment on solvency position of the Generali Group are reported below.

Impacts of a change to zero of the volatility adjustment at 31/12/2018

(€ million)	Amount with volatility adjustment	Impact of change to zero of the volatility adjustment
Technical provisions - net of reinsurance	405,777	3,537
Basic own funds after deduction	42,939	-2,116
Group own funds to meet the SCR	44,191	-2,116
Solvency capital requirement (SCR)	20,407	7,505

CAPITAL MANAGEMENT (SECTION E)

The Group defines principles for capital management activities of the Parent Company and Group Legal Entities.

Capital management activities aim to establish common guiding principles and standards for carrying out management and control procedures of own funds in accordance with the relevant regulatory requirements and legislative frameworks at both Group and local level, and in line with the level of risk appetite and strategy of the Generali Group.

The capital position at 31 December 2018 is presented below. Section E provides a detailed overview of the structure of own funds as well as components related to solvency capital requirements.

Solvency ratio

The strengthening of the solvency ratio of the Group from 206.7% at 31 December 2017 to 216.6% at 31 December 2018 is mainly attributable to the significant contribution of the normalised capital generation and to the extension of the partial internal model, that exceed the negative economic variances deriving from financial markets and the foreseeable dividend of the year.

Solvency ratio

(€ million)	31/12/2018	31/12/2017
Group own funds (GOF)	44,191	45,880
Solvency capital requirement (SCR)	20,407	22,191
Excess of GOF over SCR	23,784	23,689
Solvency ratio	216.6%	206.7%

Group own funds

The Group own funds amount to € 44,191 million at 31 December 2018. Compared to the result at 31 December 2017, the Group own funds decrease by 3.7%, with an overall € -1,688 million net variation led by the allowance for the 2018 foreseeable dividend (€ -1,413 million, to be paid in 2019) and the early redemption of part of the subordinated debt eligible in the basic own funds (€ -250 million).

2018 Group own funds are mainly composed by high-quality capital. Tier 1 counts for about 87.8% of the total (88.2% in 2017), tier 2 represents 12.1% (11.6% in 2017) and tier 3 only 0.1% of the total (0.2% in 2017).

Group own funds by tiering

(€ million)	Total	Tier 1 – unrestricted	Tier 1 - restricted	Tier 2	Tier 3
Group own funds to meet the SCR - 31/12/2018	44,191	35,505	3,276	5,349	61
Group own funds to meet the SCR - 31/12/2017	45,880	36,870	3,603	5,328	79
Change	-3.7%	-3.7%	-9.1%	0.4%	-22.4%

Solvency Capital Requirement

The Solvency Capital Requirement (SCR) amounts to € 20,407 million (€ 22,191 million at YE17). Main risks are represented by financial and credit risks, which count after diversification with other risks respectively for 49.0% (43.4% at YE2017) and 27.3% (30.0% at YE2017). Life and non-life underwriting risk incidence after diversification is equal to 4.5% (5.1% at YE2017) and 10.3% (12.3% at YE2017), respectively.

A. Business and Performance

A.1. BUSINESS

A.1.1. INFORMATION ON THE GROUP

Assicurazioni Generali S.p.A. is the parent company of the Generali Group, an independent Italian Group, with a strong international presence, established in Trieste in 1831. We are one of the largest global players in the insurance industry, a strategic and highly relevant sector for the growth, development and welfare of modern societies. In almost 200 years we have built a Group that operates in 50 countries through more than 400 companies.

OUR PURPOSE, OUR VALUES AND OUR NEW BEHAVIOURS

In defining its new strategic plan, Generali has identified a new **purpose** representing an evolution of its previous vision and mission: **Enable people to shape a safer future by caring for their lives and dreams.**

VALUES

Deliver on the promise
Value our people
Live the community
Be open

NEW BEHAVIOURS

Ownership
Simplification
Human touch
Innovation

BRAND

LIFE-TIME
PARTNER

Our Values

Deliver on the promise: We tie a long-term contract of mutual trust with our people, clients and stakeholders; all of our work is about improving the lives of our clients.

We commit with discipline and integrity to bringing this promise to life and making an impact within a long lasting relationship.

Value our people: We value our people, encourage diversity and invest in continuous learning and growth by creating a transparent, cohesive and accessible working environment. Developing our people will ensure our company's long term future.

Live the community: We are proud to belong to a global Group with strong, sustainable and long lasting relationships in every market in which we operate. Our markets are our homes.

Be open: We are curious, approachable and empowered people with open and diverse mindsets who want to look at things from a different perspective.

Our Behaviours

Our behaviours describe how we all want to do things and complete our tasks every day, they are our way of doing that makes us different from the rest. They are our commitment, as a community and as individuals. They are the way we want to measure how we achieve results.

OWNERSHIP: act with proactivity and passion for excellent performance

SIMPLIFICATION: make things simple, adapt quickly and take smart decisions

HUMAN TOUCH: partner with others, showing empathy and team spirit

INNOVATION: embrace differences to make innovation happen

OUR STRATEGY³

Being a life-time partner to customers, offering innovative, personalized solutions thanks to an unmatched distribution network

Profitable Growth

STRENGTHEN LEADERSHIP IN EUROPE:

reinforce #1 market position⁹

FOCUS ON HIGH POTENTIAL INSURANCE MARKETS:

15%-25% earnings CAGR 2018-2021 depending on country/segment

Capital Management and Financial Optimization

INCREASE CAPITAL GENERATION:

> € 10,5 billion cumulative capital generation 2019-2021

ENHANCE CASH REMITTANCE:

+35% cumulative cash remitted to holding 2019-2021 compared to period 2016-2018

Innovation and Digital Transformation

BECOME LIFE-TIME PARTNER TO CUSTOMERS

ENABLE DIGITAL TRANSFORMATION OF DISTRIBUTION

about € 1 billion total investment in internal strategic initiatives 2019-2021

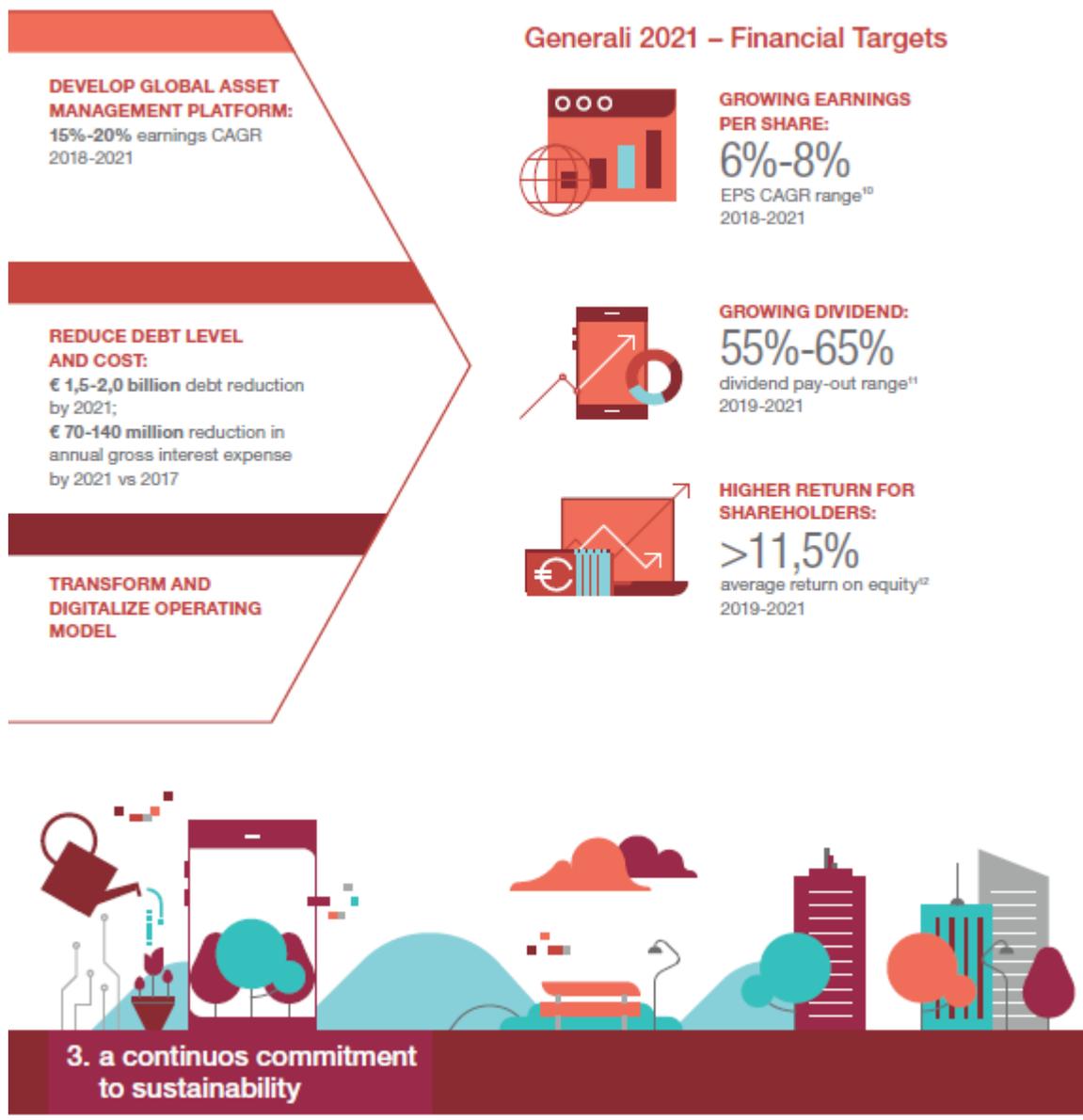
Three key enablers which will drive the execution of the strategy:

1. our people

2. a strong brand

³ All information reported in the document refers to 31 December 2018. Please refer to the Annual Integrated Report and Consolidated Financial Statements 2018 for further information.

Leading the European insurance market for individuals, professionals and SMEs, while building a focused, global asset management platform and pursuing opportunities in high potential markets



9 Based on IAS-IFRS gross written premiums in Europe at year-end 2017.
10 3 year CAGR; adjusted for impact of gains and losses related to disposals.
11 Adjusted for impact of gains and losses related to disposals.
12 Based on IFRS Equity excluding OCI and on total net result.

GROUP ORGANISATION AND ACTIVITIES

GROUP ORGANISATION

Generali's organisational model consolidates the role of Group Head Office (GHO) and simplifies its approach to the management and coordination of the Business Units at global level. In line with the Group strategy, it promotes a greater focus on customers in the creation of new products, design of services and activation of distribution channels. The model:

- promotes entrepreneurial skills and local independence;
- promotes the integration of best practices as regards insurance, financial and investment methods, together with activation of Group synergies and focus on operational efficiency at global level;
- pursues functional excellence through the Centers of Expertise set up to support the whole organisation.

The Group's organisational system is based on two pillars: GHO and the Business Units.

GHO provides strategic management at global level and maximises synergies, taking every opportunity to support the business. In particular the GHO functions:

- direct, lead and coordinate the Business Units;
- act as a competence center, ensuring functional excellence and promoting key skills and synergies at Group level;
- lead Group projects.

The Business Units promote entrepreneurship and local independence, providing monitoring at international level based on:

- geographical areas, which lead local strategies and establish a more targeted approach by customer segments in the creation of products, implementation of distribution channels and provision of services;
- global lines, which leverage business opportunities by developing insurance solutions at global level.

The Business Units are represented by⁴:

- 3 main countries (Italy, France and Germany)

and four regional structures

- ACEER: Austria, Central Eastern Europe (CEE) countries - Czech Republic, Poland, Hungary, Slovakia, Serbia/Montenegro, Romania, Slovenia, Bulgaria and Croatia - and Russia;
- International consisting of Spain, Switzerland, Americas and Southern Europe, Asia, Europ Assistance and Other companies (including, Generali Global Health and Generali Employee Benefits);
- Investments, Asset & Wealth Management - which includes the main Group entities operating in investment advisory, asset management and financial planning;
- Group holding and other companies, which includes the Parent Company's management and coordination activities, including Group reinsurance, other financial holding companies and suppliers of international services not included in the previous geographical areas.

⁴ The details by geographical area highlighted in this document reflect the Group's managerial structure in place at the beginning of 2018 and effective for a large part of the year.

GROUP ACTIVITIES

The Group is committed to achieving the optimal customer segmentation and enhancing product innovation in order to deliver a targeted approach to customers, using a multi-channel distribution strategy through a global proprietary sales network of agents and financial advisors, supported by brokers, bancassurance and direct channels. Generali aims to be best-in-class for customer retention and satisfaction, offering the range of products described below:

LIFE: In the Life segment, the offer ranges from savings and family protection policies to unit-linked policies and complex plans for multinationals.

PROPERTY & CASUALTY: In the Property & Casualty segment, the well-balanced portfolio goes from mass-market coverage such as Car, Home, Accident & Health, to sophisticated commercial and industrial risk coverage.

Europe Assistance and GLOBAL BUSINESS LINES

EUROP ASSISTANCE: Established in 1963, Europ Assistance (EA) is only of the leading global brands in the field of private assistance. Today EA boasts over 300 million customers in more than 200 countries, supported by its 35 assistance centres and its network of 750,000 partner suppliers. EA offers insurance coverage and assistance in the travel sector, the automotive area with road-side assistance, and personalised coverage for assisting the elderly, cyber-security, and medical and concierge services.

With the aim of developing businesses with global outreach, the Group has developed an insurance platform named Global Business Lines (GBL) that provides access to integrated insurance solutions to cover the business risks regarding employees and assets linked to property and people. It comprises three units: Generali Global Corporate & Commercial, Generali Employee Benefits and Generali Global Health.

GLOBAL CORPORATE & COMMERCIAL (GC&C): is one of the Group's Global Business Lines. GC&C offers medium to large companies and intermediaries in over 160 countries around the world, insurance solutions and P&C services. Backed by its solid global experience, knowledge of the local markets and of the corporate sector, integrated solutions that can be personalised in properties, casualty, engineering, marine, aviation, cyber and specialty risks are offered. Furthermore, GC&C guarantees companies the same level of assistance and protects everywhere in the world through its Multinational Programs, Claims and Loss Prevention experts.

GENERALI EMPLOYEE BENEFITS (GEB): is an integrated network that offers services for employee benefits of multinational companies consisting of protection, life and health coverage, and pension plans for both local and ex-pat employees. Located in over 100 countries and with more than 400 coordinated multinational programmes (of which about 40 captive).

GENERALI GLOBAL HEALTH: (GGH) was set up in 2015 as the General group brand and division dedicated to the International Private Medical Insurance (IPMI) sector. GGH stands out from the rest due to the innovative nature of its products and services and to the high degree of digitalisation of its processes.

INVESTMENTS, ASSET & WEALTH MANAGEMENT

In line with the Group strategy announced in 2017, the Investments, Asset & Wealth Management business unit aims at becoming the unique managerial entity of the Group operating in the area of investments, asset management and financial planning consultancy. Its ambition is to expand its current customer base, today for the most part captive, through third-party customers, in this way evolving from its role of insurance business service to a benchmark in the asset management market.

The business unit operates in the three areas depicted by its name:

- Investment Management: implementation of the Asset Liability Management (ALM) and Strategic Asset Allocation (SAA) models for the Group Insurance Companies;
- Asset Management: asset management for the most part addressed to insurance customers, with its customer base expanded to comprise external customers, both institutional (such as pension funds and foundations) and retail;
- Wealth Management: financial planning and asset protection services for the Private customers, mainly offered through the Banca Generali Group.

HOLDING AND OTHER BUSINESS SEGMENT

The holding and other businesses cluster includes the Parent Company's management and coordination activities, including Group reinsurance, other financial holding companies and suppliers of international services not included in the previous geographic areas.

DISTRIBUTION

Generali has been operating as a multichannel Group for years, gradually extending the distribution model through traditional channels to more innovative channels.

TRADITIONAL CHANNELS

Traditional channels are based on physical contact with customers and include different professionals. Agents directly represent the Group and are mainly focused to meet the needs of retail customers and SMEs. Brokers are the main independent channel and directly represent customers, whether they are companies or individuals, with a focus on the non-life segment. Financial advisors are above all independent and represent a channel specialized in offering life insurance and pensions. Bancassurance, through partnerships with some institutions, enables to provide complete, integrated insurance consulting.

DIRECT CHANNELS

Direct channels do not involve intermediaries and allow to reach Group clients in a dynamic and fast manner, through phone and digital services via call centres and web. In an increasingly connected world, digital channels have established themselves as a major alternative - for certain product types - to traditional channels.

Generali is Europe's leader in direct channels (Internet and telephone) and intends to further improve its position by launching new initiatives in high-growth markets.

- Leader in Italy, where it created, through Genertel, the first Italian online Life, P&C and Pension insurance portal
- Leader in Germany, where it has been present since 1982 through COSMOS Direkt
- Leader in France in the online Life insurance segment
- First operator in Hungary, where Genertel.hu was launched in 2007
- Rapidly growing in Slovakia, where Genertel.sk was launched in 2010, and in Turkey, where the multi-access platform started in 2014

BANCASSURANCE

Generali plans to enhance its bancassurance channel by maximising the full potential of the existing partnerships as well as exploring new initiatives. Bancassurance will be key in the Life segment to increase the share of capital-light products and in the P&C segment to boost sales.

GLOBAL PRESENCE AND MAIN MARKETS

Since the very beginning, our strong international vocation has set us apart and is one of our greatest strengths. Our geographical diversification is balanced between mature countries such as Italy, Germany and France, where the Group boasts a leadership position, and a strong presence in Central and Eastern European countries and Asia.

The Group's gross written premiums at year-end 2018 amounted to € 67 billion, of which 64% outside Italy.

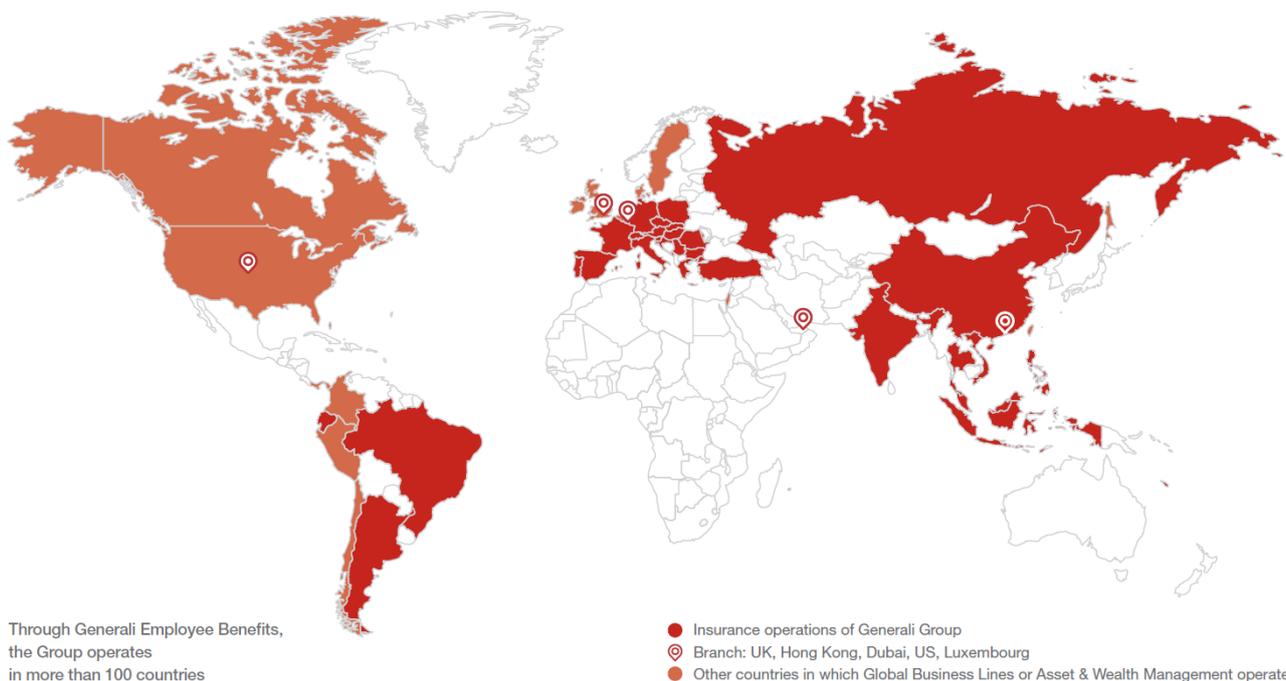
We are the leading insurer in Italy, the second largest in Germany, while we are the eighth in both the life and P&C and the fifth in the Health & Accident in France.

We have a more diversified presence in ACEER: in CEE the Group is an undisputed leader in terms of profitability, with a combined ratio among the best in the sector. We are among the top three market leaders in Austria, the Czech Republic, Hungary and Slovakia.

International is the business unit mainly including Spain, Switzerland and two regions (Asia and Americas & Southern Europe).

In addition to what above mentioned, the Group operated both through entities and branches⁵ of Assicurazioni Generali.

⁵ The United Kingdom branch is the significant branch of Assicurazioni Generali accordingly with article 354 of Delegated Acts. A description of its activity and main source of income is included in the SFCR of Assicurazioni Generali S.p.A..



In the Annex, you can find a simplified Group structure.

The main indicators for the most important countries (Italy, France and Germany) and regional structures are presented below:

Italy

Gross written premiums € 23,781 mln (+4.1%)	Life market share 16.8%	Total ranking 1° (2 nd Life and 2 nd P&C)
Total operating result € 1,801 mln (-2.2%)	P&C market share 14.7%	Our people 12,926

Generali holds the leadership in the Italian insurance market with an overall share of 16.2% thanks to the complete range of insurance solutions the Group offers its clients in both the Life and P&C segments. At the distribution level, a multi-channel strategy strongly hinged on agents has been developed. It has a strong position in the direct Life and P&C channel, through Genertel and Genertellife, the first online insurance launched in Italy. Thanks to its partnership with Banca Generali, the Group is able to offer its customers a broad and complete variety of insurance, pension and savings products. Generali presents itself on the Italian market with three distinct brands marked by a clear strategic positioning - Generali (retail market and SME), Alleanza (households) and Genertel and Genertellife (alternative channels).

During 2018, Generali Italia further developed its simplification programme with the goal to improve the customer experience by simplifying the relationship between customers and agents for the entire process by providing more and more accessible and innovative services. Furthermore, at the end of 2018 Generali Italia launched Jeniot, a company that develops innovative services in the Internet of Things and connected insurance area tied to mobility, home, health and work.

Within The Human Safety Net, the Group's global initiative for the society, Generali Italian launched Ora di Futuro, an innovative project for educating children and families that involves teachers, primary schools and non-profit networks throughout Italy. The purpose is to help families sustain responsible growth of their children.

Germany

Gross written premiums € 13,577 min (+3.6%)	Life market share 9.5%	Ranking 2nd
Total operating result € 821 mln (+9.4%)	P&C market share 5.3%	Our people 9,972

In Germany, where Generali has been operating since 1837, the Group ranks second in terms of total premium income due to a 9.5% market share in the Life business (also including health business), in which it plays a leadership role in the unit-linked and protection lines, and to a 5.3% P&C share, distinguished by high premium profitability.

In 2018, after having successfully concluded a preliminary strategic and organisation revision (with the Simpler Smarter for You programme), Generali sped up implementation of the strategy in Germany by starting up the second phase of the strategic programme, called Simpler, Smarter for You to Lead. This phase is aimed at making full use of the growth potential and the competitive edges that were still unexpressed in order to create value in terms of:

- maximisation of operational;
- maximisation of the distribution power;
- mitigation of the interest rate risk

During the year, the Group retained its positioning on the market in the product innovation area and in customer services thanks to the Smart Insurance programme, with the Generali Vitality programme extended to all of the distribution networks, the offer of products in telematics (Generali Mobility), domotics (Generali Domocity), and legal protection, and also thanks to digitalisation in health services and claims.

Generali also successfully launched many initiatives in different cities as part of The Human Safety Net programme, which was also presented to the Office of the President of the German Republic during Berlin's Bürgerfest held in September. The programme supports refugees and their start-ups by providing co-working space, training courses and access to a wide range of trade contacts.

France

Gross written premiums € 12,264 min (+3.0%)	Life market share 4.7%	Ranking 8th Life, 8th P&C and 5th A&H
Total operating result € 703 mln (-5.5%)	P&C market share 4.5%	Our people 6,855

Generali has been active in France since 1831 with one of the Group's first foreign branches. The operating structure was consolidated in the mid-2000s, when the merger of the various brands forming the Group led to the creation of one of the country's largest insurance companies. Generali France operates with a multi-channel approach of agents, employed sales persons, brokers, financial advisors, banks, direct channels and affinity groups.

The multiplicity of the distribution forms reflects the market segment served and the type of product sold, with focus always placed on the customer. Generali France boasts a leadership position in savings Life products distributed through the Internet and for the so-called affluent customers, just as holds true in the market of supplementary pensions for self-employed workers. The presence of professionals, SMEs and personal risks in the segment is also significant.

ACEER⁶

Gross written premiums	Life market share	Ranking
€ 6,429 mln (+3.2%)	At: 14.2% Cz: 24.4% Hu: 9.4% Sk: 7.6% Pl: 4.0%	At: 3rd Cz: 2nd Hu: 2nd Sk: 3rd Pl: 9th
Total operating result	P&C market share	Our people
€ 776 mln (+4.3%)	At: 16.1% Cz: 32.2% Hu: 18.6% Sk: 11.6% Pl: 3.6%	16,376

The new ACEER regional structure is the fourth most important market for Generali, in which the Group has strengthened its presence up to becoming one of the top insurance companies of the entire area. Twelve nations fall within the ACEER scope: Austria (At), Czech Republic (Cz), Poland (Pl), Hungary (Hu), Slovakia (Sk), Serbia, Montenegro, Romania, Slovenia, Bulgaria, Croatia and the recent Russia Regional Office.

The Group can boast its presence in the Eastern Europe territories since 1989. In 2008, a joint venture collaboration with PPF Holding started and ended in 2015, the year in which Generali acquired full control and powers over Generali CEE Holding. Two important entities entered the area in 2018: Austria, where Generali has been present since 1832, the year after the company's foundation in Trieste, and Russia, where Generali is expanding. Generali reinforced its competitive and income position last year thanks to the acquisition of Adriatic Slovenica, in this way becoming the number two insurance group in Slovenia, and Concordia Insurance together with Concordia Polska Tuw in Poland, and to the bancassurance agreement with Unicredit for the distribution of insurance solutions mainly related to Credit Protection Insurance (CPI) in the whole region. The Group also takes top rankings in the Czech Republic, Hungary, Serbia, Austria and Slovakia, and among the top ten in the other countries. In terms of volumes, on the other hand, main insurance markets are Austria, Czech Republic, Poland, Hungary and Slovakia. The contribution of the minor markets has improved during the last years, resulting in an increase of the premium income on the total volume of the area.

Generali is also leader in terms of technical profitability thanks to a medium-long term net combined ratio at around 90%.

International⁷

Gross written premiums	Total operating result	Our people
€ 10,539 mln (+11.6%)	€ 814 mln (+11.4%)	19,450

Spain

Generali, in Spain since 1834, operates through Generali España, a wholly-owned subsidiary, and through two bancassurance agreements with Cajamar (Life and P&C), which guarantee the Group exposure to the major Life distribution channel and continuous expansion in P&C.

Generali is one of the main insurance groups in Spain, with a market share in 2017 of 3.2% in the Life segment and 4.4% in the P&C segment. The Generali España group offers a wide range of Life and P&C policies dedicated to private individuals and companies, using a multi-channel distribution strategy including not only bank offices, but also a network of agents and brokers which is among the most extensive in Spain. All in all, the Group ranks eighth in the Spanish insurance market in terms of total premiums (sixth place in the P&C market).

Switzerland

The Generali Group has been operating in Switzerland since 1987, where it has been able to consolidate its position through the acquisition and merger of several insurance companies. In following the Group strategy, Generali Switzerland focuses on the retail business and provides high quality and innovative services through various distribution channels: agents, brokers, financial promoters and direct channels.

⁶ ACEER includes Austria (At), Central Eastern Europe (CEE) countries - Czech Republic (Cz), Poland (Pl), Hungary (Hu), Slovakia (Sk), Serbia, Montenegro, Romania, Slovenia, Bulgaria and Croatia - and Russia.

⁷ International includes Spain, Switzerland, Americas and Southern Europe, Asia, Europ Assistance and Other companies (including, Generali Global Health and Generali Employee Benefits).

In 2017, Generali Switzerland ranked as the number two insurance group on the market in terms of premium income in the Individual Life segment with a 15.3% market share, and was eighth in the P&C segment with a 5% market share. The company does not operate in the Collective Life segment.

Americas and Southern Europe

Argentina, where Generali is ranked as the fourth operator, is the main south-American market for the Group. It is marked by a historically high inflation rate and a volatile financial situation. Despite this tough scenario for the insurance business, the Group has implemented best practices in its Argentinian subsidiaries, enabling them to stand out in terms of service quality and innovation. The company Caja leads the market in Argentina, excluding the business lines in which it does not operate (Workers Compensation and Annuities).

Brazil ranks second most important country of the region. Following an extended period of economic crisis and political instability, the country has started to show signs of improvement, bolstered by infrastructure investments and optimistic forecasts of the macroeconomic indicators. Specifically, the insurance sector today is characterised by significant expansion potential and a hike in the penetration level. The Generali Group also operates in Chile, Ecuador and the USA. Sale of the investment in the Panama branch was completed in 2018, as well as the sale of the company in Colombia.

In Southern Europe, the Group operates in Portugal, Greece and Turkey. The Turkish insurance market and the company in the country were impacted by the macroeconomic developments linked to the inflationary trend and depreciation of the local currency.

Asia⁸

Generali is one of the key European insurers in the Asian market, and currently operates in eight territories. The predominant segment is Life, with premium income mostly concentrated in the savings and protection lines and, to a lesser extent, in the unit-linked lines. Generali offers its products in the entire region adopting a distribution strategy that includes agents, brokers and agreements with banking groups.

Generali operates in China with Generali China Life, one of the five most important Life countries, in partnership with China National Petroleum Corporation (CNPC), which is one of the largest Chinese state-owned companies as well as one of the major energy groups in the world. Generali has a joint venture agreement with CNPC for the P&C products offer as well. Owing to its prominent presence in the Chinese market, Generali China Life is the leading contributor to the turnover and operating result of the entire region. A 100% owned distribution company was formed in 2018, which focuses on the agency channel.

Future Generali Insurance is a Life and P&C joint venture with Future Group, one of

India's major retailers. In December 2018, the Generali Group increased its share in the Indian joint venture to 49% by investing up to € 120 million in the partnership with the goal of intensifying use of Future Group's vast distribution network in order to offer insurance solutions throughout the Indian market with a focus on digital.

Generali operates as Life insurer also in the emerging markets of the Philippines, Indonesia, Thailand and Vietnam, and as P&C insurer in Thailand and Malaysia, in the latter market with a 49% investment in MPI Generali. The companies China P&C, India Life, India P&C and in Malaysia are not fully consolidated since a non-controlling interest is held.

CONSOLIDATION PERIMETER

The Group operates in over 50 countries through 455 companies. For Group IFRS consolidation purposes 419 companies are consolidated line by line and 36 valued at equity method.

The consolidation perimeter for the Solvency II Balance Sheet is different reflecting the presentation rules mainly for the entities of other financial sectors (financial and credit institutions, IORP and UCITS) which are not consolidated line by line but classified as participations valued at:

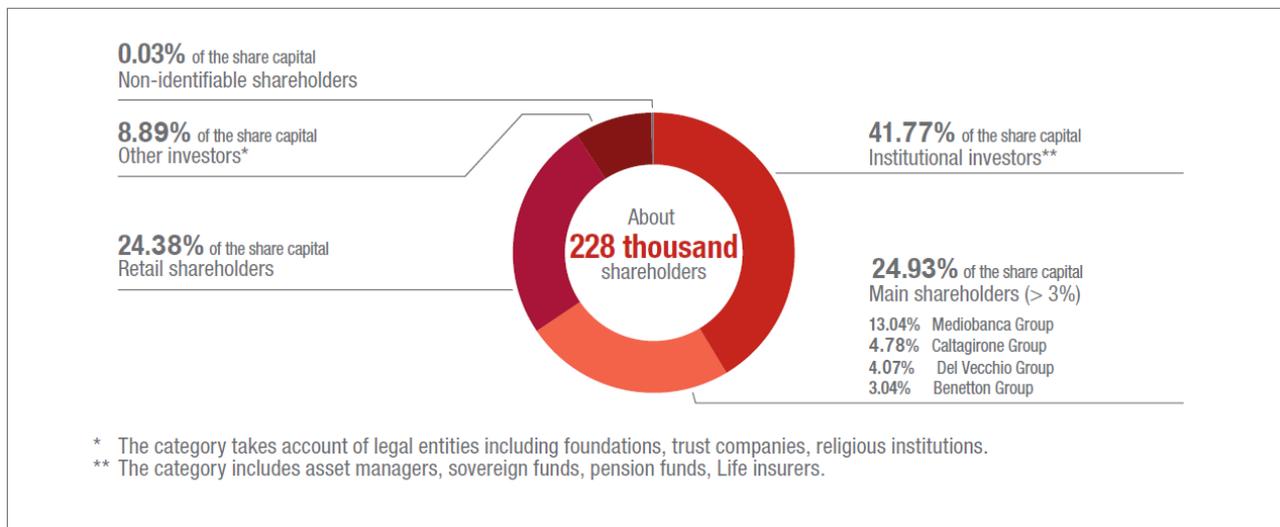
- quoted market price for listed entities (currently only Banca Generali); or
- adjusted IFRS equity method.

For more detailed information please refer to Group QRT S.32.01.22 'Undertakings in the scope of the Group', in the Annex section of this document.

⁸ Asia includes China, Indonesia, India, Hong Kong, Vietnam, Thailand, Philippines, Malaysia and Japan.

A.1.2. OWNERSHIP STRUCTURE

Our shareholder structure as of 31 December 2018 as well as a list of our significant shareholders is reported below.



LIST OF SIGNIFICANT SHAREHOLDERS (EXCEEDING 3% OF THE CAPITAL)

Company Name	Shares held	Ownership ⁽¹⁾	Registered office
Mediobanca	204,109,160	13.041%	Piazzetta Enrico Cuccia, 1 20121 MILANO
Gruppo Caltagirone	74,900,000	4.785%	
CALTAGIRONE EDITORE S.P.A.	3,350,000	0.214%	Via Barberini, 28 - 00187 ROMA
CALTAGIRONE S.P.A.	3,200,000	0.204%	Via Barberini, 28 - 00187 ROMA
CAPITOLUM S.P.A.	500,000	0.032%	Via Barberini, 28 - 00187 ROMA
ECHETLO S.R.L.	450,000	0.029%	Via Barberini, 28 - 00187 ROMA
F G C S.P.A.	520,000	0.033%	Via Barberini, 28 - 00187 ROMA
FGC FINANZIARIA S.R.L.	2,500,000	0.160%	Via Barberini, 28 - 00187 ROMA
FINANZIARIA ITALIA 2005 S.P.A.	2,900,000	0.185%	Via Barberini, 28 - 00187 ROMA
FINCAL S.P.A.	32,950,000	2.105%	Via Barberini, 28 - 00187 ROMA
FINCED S.R.L.	3,150,000	0.201%	Via Barberini, 28 - 00187 ROMA
Francesco Gaetano Caltagirone	115,000	0.007%	Via Ulisse Aldrovandi, 25 - 00197 ROMA
GAMMA S.R.L.	6,365,000	0.407%	Via Barberini, 28 - 00187 ROMA
MANTEGNA 87 S.R.L.	5,000,000	0.319%	Via Montello, 10 - 00195 ROMA
PANTHEON 2000 S.P.A.	4,100,000	0.262%	Via Barberini 28 - 00187 ROMA
QUARTA IBERICA S.R.L.	1,700,000	0.109%	Via Barberini 28 - 00187 ROMA
SO.CO.GE.IM. S.P.A.	200,000	0.013%	Via Barberini 28 - 00187 ROMA
VM 2006 S.R.L.	7,900,000	0.505%	Via Montello, 10 - 00195 ROMA
DELFIN S.A.R.L. (Gruppo Leonardo Del Vecchio)	63,696,000	4.070%	Rue de la Chapelle, 7 - 1325 Luxembourg, Lussemburgo
SCHEMATRENTATRE S.P.A. (Gruppo Benetton)	47,616,056	3.042%	Piazza del Duomo, 19 - 31100 TREVISO

A.1.3. DETAILED INFORMATION ON THE GROUP, SUPERVISORY AUTHORITY AND EXTERNAL AUDITOR

Parent Company References:

Assicurazioni Generali S.p.A.

Company established in Trieste in 1831

Registered Office in Trieste (Italy), Piazza Duca degli Abruzzi 2

Share capital of €1,565,165,364.00 fully paid-up

Fiscal code, VAT and Venezia Giulia Companies' Register no. 00079760328

Company entered in Section I of the Register of Italian Insurance and Reinsurance Companies under no. 1.00003

Parent Company of Generali Group, entered in the Register of Italian Insurance groups under no. 026.

Phone: +39 040 671111

Fax: +39 040 671600

E-mail: assicurazionigenerali@pec.generaligroup.com; contact@generali.com

Name and contact details of the supervisory authority:

IVASS – Istituto per la vigilanza sulle assicurazioni

Address: Via del Quirinale 21, 00187 Rome

Phone number: +39 06 421331

e-mail: scrivi@ivass.it

Name and contact details of the external auditor:**EY S.p.A.**

Registered office: Via Po, 32 - 00198 Rome

Share capital € 2,525,000.00 fully paid-up

Registered in the Ordinary Section of the Chamber of Commerce Business Register in Rome

Tax code and registration number 00434000584 - R.E.A. number 250904

VAT number 00891231003

Company registered in the Register of external auditors under no. 70945 published in Suppl. 13 - IV Special Series of the Official Gazette dated 02/17/1998.

Company registered in the Special Register of Consob external auditors under no. 2, pursuant to resolution no. 10831 dated 07/16/1997.

A member firm of Ernst & Young Global Limited

A.1.4. IMPORTANT EVENTS

February

Customer re-engage

The **Net Promoter Score** programme of Generali was recognized as the **world's best one** by Medallia during the Experience Europe 2017 event held in London. The programme enables to listen to client feedback in real time and act on that feedback in order to resolve issues and improve services. It covers retail and corporate customers as well as distributors.

NFS

Sale completed of the entire shareholding in Generali Nederland N.V. (and its subsidiaries). Generali remains active in the Netherlands through Europ Assistance and its Global Business Lines, continuing to provide insurance services to its international customers.

During the Board of Directors' meeting on 21 February, Generali approved its **climate change strategy** including actions in its core activities, i.e. investments and underwriting.

NFS

The Generali 2021 strategy, p. 21

March

Launch of Generali Global Infrastructure (GGI), a cornerstone of the Group's multi-boutique asset management strategy. It is a platform that employs internal know-how and also creates partnerships to invest in infrastructure debt across a wide geographical and sectorial investment scope and develop a range of products and solutions for investors.

The investment selection approach is rigorous both from a credit quality and ESG (Environmental, Social, and Governance) factors perspective.

NFS

Investment, Asset & Wealth Management, p. 67

April

Sale completed of operations both in Panama and Colombia, countries where Generali is still present through Europ Assistance and its Global Business Lines.



On 19 April, the Shareholders' Meeting of Assicurazioni Generali approved the 2017 financial statements, the remuneration policy, the 2018 Group Long Term Incentive Plan (LTIP) and the amendments to the Articles of Association. It also approved the proposal to delegate the Board of Directors to increase the share capital with free issues in one or several transactions, for the purposes of the 2018 LTIP. For the first time, Generali transmitted via streaming the initial speeches, thus confirming its focus on digital development and the integration of technology into the business.



In execution of the 2015 Long Term Incentive Plan the share capital of Assicurazioni Generali increased to € 1,565,165,364.

May

Geographical presence pushed forward in the Central and Eastern European countries acquiring control of Concordia Capital SA e Concordia Polska TUW, Polish Life and P&C companies respectively, as well as acquiring the entire capital of Adriatic Slovenica and its subsidiaries providing a full suite of P&C, health, life and pension products. The former transaction was approved in November and the latter was completed in February 2019.

Austria, CEE & Russia, p. 62

Revolving credit facilities renewed, initially signed in 2013 and last renewed in 2015, increasing their overall amount and adopting innovative sustainable and green features: their cost is linked both to targets on green investments and to progress made on sustainability initiatives.

NFS

June

Generali CEE Holding B.V. and UniCredit signed a bancassurance agreement for the distribution of insurance solutions in Central and Eastern Europe.

Sale completed of the entire shareholding in Generali PanEurope. Generali remains active in Ireland through its Global Business Lines.



July

Sale launched of 89.9% of Generali Leben and transaction signed with Viridium Gruppe, with which Generali established a broader industrial partnership in the German insurance market. The transaction is subject to the approval by the German Federal Financial Supervisory Authority (BaFin) and to the clearance by the competent German antitrust authorities.

Announcement of the Group's new organizational structure, which will boost the Group's capacity to face the significant challenges of the 2019-2021 strategic plan. Amongst the other organizational modifications in force as of 1 September, the position of General Manager was created, reporting directly to the Group CEO, assigned to Frédéric de Courtois, and Cristiano Borean was appointed to the position of Group CFO and joined the Group Management Committee (GMC). Luigi Lubelli resigned from the Group at the end of the year.

 Corporate Governance and Share Ownership Report 2018, p. 30-33

September

Generali included in the Dow Jones Sustainability World Index (DJSI), the most prestigious international index that identifies leading businesses based on their sustainability performance. Generali is the only Italian insurance company in this index.

NFS

A new innovative asset management company headquartered in New York launched with Aperture Investors, aligning client and manager interests through an innovative performance-linked fee model.



October

New function dedicated to Cyber Insurance launched along with a start-up to satisfy client needs in the field of cyber risks. The new function will combine broad-scale insurance offerings in the IT realm with the support of a tech start-up, GeneraliCyberSecurTech, wholly owned by the Group and created to offer clients innovative cyber risk assessment methods.

 Challenges and opportunities of the market context, p. 30

NFS

Option of early redemption announced on all perpetual subordinated notes outstanding belonging to ISIN XS0399861326 exercised in November. The exercise of this option was authorized by the Italian insurance regulatory agency (IVASS) and will take place with respect to all notes outstanding, in compliance with the respective terms and conditions. Another early redemption relating to notes belonging to ISIN XS0406159623 was exercised in December. Agreement signed for the acquisition of 100% of the Polish asset management company Union Investments TFI S.A., that will significantly strengthen Generali's position in asset management in central and eastern Europe. The transaction is subject to the approval of the regulatory authorities.

Moody's confirmed the IFS rating of Assicurazioni Generali at Baa1 and of the notes issued or guaranteed by Generali (Baa2 senior debt; Baa3 senior subordinated debt; Ba1(hyb) junior subordinated debt). The outlook is stable.

November

Launch of Generali Global Pension, a new business unit capable of offering innovative long-term asset management and environmental, social and governance (ESG) skills, funds for multi-boutique platforms, cross-border services and a new generation of defined contribution plans and selective risk transfer.

The Generali Group's new strategy presented to investors, in line with the Group's desire to become a life-time partner for its customers, offering innovative and customized solutions relying on its unequalled distribution network; and to be a leader in the European insurance market for private individuals, professionals and SMEs, while also creating a global and focused asset management platform and pursuing opportunities in high-potential markets.

 The Generali 2021 strategy, p. 16-17



The Italian insurance regulatory agency (IVASS) authorized the extension of the scope of application of the Group's internal model to Austria and Switzerland as of December 2018.

December

100% of CM Investment Solutions Limited acquired. This transaction represents an acceleration of Generali's multi-boutique strategy, strengthening its capacity to reach sophisticated clients and distribution partners in Europe and worldwide.

Completion of the process of transferring the P&C portfolio of the UK branch announced after the Italian insurance regulatory agency (IVASS) expressed its favourable opinion.

Generali was amongst the main investors in the project for the construction of the new Trieste Convention Centre, the multifunctional centre which aims to become a hub of innovation and knowledge amongst research and training entities and businesses in Central and Eastern Europe as well as the Balkans.

NFS

Share held in the Indian insurance joint ventures with Future Group increased to 49%. Through this transaction Generali will accelerate the leverage of the far-reaching distribution network of Future Group to offer insurance protection solutions in the Indian market with a focus on digital.

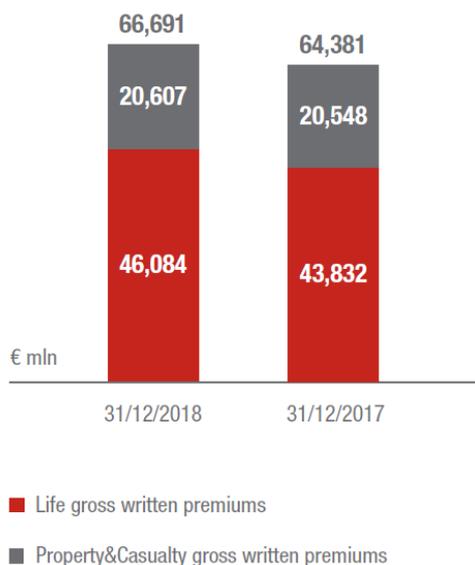
A.2. UNDERWRITING PERFORMANCE

2017 comparative data in this chapter differ from those published last year, since the main KPIs, among which Premiums, Investments, Assets Under Management, Operating Result, Operating RoE, are restated in application of IFRS 5, thus excluding data related to discontinued operations - the divestment of Belgian, German and Guernsey businesses as well the disposal of the Dutch and Irish operations completed in February and June 2018, respectively - that are included in a specific item in the Income Statement and Balance Sheet.

Instead, 2017 data for New Business, Group own funds and Solvency capital requirement are equal to those published last year: in line with regulations currently in force, they are not restated in application of IFRS 5.

A.2.1. OUR PERFORMANCE⁹

TOTAL GROSS WRITTEN PREMIUMS¹⁰



The **gross written premiums** of the Group amounted to € 66,691 million, showing an increase of 4.9% as a result of growth both in the Life (+5.7%) and P&C (+3.3%) segments.

The **Life gross written premiums**¹¹ continued the growth posted during the year, standing at €46,084 million (+5.7%). With reference to the lines of business, positive trend in savings policies (+5.7%), specifically in Italy (+8.2%, reflecting the renewal actions undertaken on the existing portfolio of collective policies for € 1.2 billion), Asia (+23.8% due to growth in the banking channel) and France (+1.3%). Unit-linked also posted growth of 1.8%, reflecting the excellent performance in Germany and France. Protection products showed a 10.7% increase, confirming the broad growth in countries in which the Group operates.

The Life net cash inflows (+5.2%) amounted to € 11.4 billion, strengthening the growth observed in the first nine months due to the performance for the quarter.

The **Property & Casualty gross written premiums** reached € 20,607 million, growing by 3.3%, thanks to the positive performance of both business lines.

The 3.4% growth in the motor business is attributable to the growth observed in ACEER (+5.7%), France (+4.2%) and in the Americas and Southern Europe region (+19.2%), reflecting the tariff adjustments implemented in Argentina following inflation. In spite of a recovery

⁹ Data are based on IFRS accounting principles. For the definition of segments, please refer to the Annual Integrated Report and Consolidated Financial Statements 2018, that is available on the Group corporate website.

¹⁰ 2017 comparative data for Premiums and Net inflows differ from those published last year, since they are restated in application of IFRS 5, thus excluding data related to discontinued operations. The changes in Life net inflows and premiums are on equivalent terms, i.e. at constant exchange rates and consolidation scope pursuant to IFRS 5.

¹¹ Including premiums from investment contracts for € 1,457 million.

in the second half of the year, motor premium income in Italy was down by 1.7%, following the contraction of the portfolio as a result of measures adopted to restore portfolio profitability.

Non-motor premium income also grew (+2.7%), with positive trends broadly extended across the Group's various areas of operations. Premiums increased in the ACEER region (+4.1%) with diversified growth in the territory, France (+2.7%), Germany (+1.8%) and in the International cluster (+ 7.2%), driven by Europ Assistance and Spain. The decrease observed in Italy (-1.5%) persisted, related to the reduction of the Global Corporate & Commercial lines as well as in the A&H line, which reflected strong competition in a market characterized by sustained price competition.

Total gross written premiums by country (*)

(€ million)	31/12/2018	31/12/2017
Italy	23,781	22,836
France	12,264	11,904
Germany	13,577	13,107
Austria, CEE & Russia	6,429	6,191
International	10,539	10,260
Spain	2,378	2,427
Switzerland	1,696	1,817
Americas and Southern Europe	1,427	1,858
Asia	2,894	2,359
Europ Assistance	834	753
Other	1,310	1,047
Group holding and other companies	102	82
Total	66,691	64,381

(*) Total gross written premium for Global Business Lines (GBL), taking into consideration the business underwritten in the various countries, amounted to € 4,332 million and broken down as follows:

- Global Corporate&Commercial € 1,991 million;
- Generali Employee Benefits and Generali Global Health € 1,507 million;
- Europ Assistance € 834 million.

2017 comparative data for Premiums and Net inflows differ from those published last year, since they are restated in application of IFRS 5, thus excluding data related to discontinued operations.

OPERATING RESULT¹²

The Group's operating result, equal to € 4,857 million, showed 3.0% increase (€ 4,713 million at 31 December 2017), reflecting the positive trend of all segments. Operating Return on Equity¹³ amounted to 12.6% at 31 December 2018 (-0.2 pps), reflecting the impact of the accounting method for divestment according to IFRS 5¹⁴. The average operating Return on Equity for the 2015-2018 period stood at 13.4%, confirming the achievement of the strategic objective (>13%).

¹² For the definition of operating result, please refer to the Annual Integrated Report and Consolidated Financial Statements 2018, that is available on the Group corporate website. 2017 comparative data are restated; for further information, please refer to the paragraph Changes in the presentation of the performance indicators of the Group in the Notes to the Management Report.

¹³ The Operating Return on Equity indicates the return on capital in terms of the Group operating result. It is calculated as the ratio of the adjusted consolidated operating result to the average Group shareholders' equity.

¹⁴ The accounting method for divestment according to IFRS 5 reclassifies Operating result from discontinued operations into Result of discontinued operations, effectively reducing the numerator.

Total operating result by segment

(€ million)	31/12/2018	31/12/2017	Change
Total operating result	4,857	4,713	3.0%
Life	3,067	2,982	2.8%
Property & Casualty	1,992	1,944	2.5%
Asset Management	335	261	28.2%
Holding and other business	-70	-163	n.m
Consolidation adjustments	-467	-311	50.0%

2017 comparative data for the Operating Result differ from those published last year, since they are restated in application of IFRS 5, thus excluding data related to discontinued operations.

In particular, the Life operating result, equal to € 3,067 million, grew by 2.8% thanks to the trend of technical margin net of insurance operating expenses. The investment result was down due to the higher impairments on financial instruments, especially posted in the last quarter of the year.

The P&C operating result, equal to € 1,992 million, increased by 2.5%, reflecting the contribution from investment result, albeit in the context of a persistently low level of interest rates, and other operating components. The combined ratio stood at 93.0% (92.9% at 31 December 2017), confirming its position amongst our peers, in line with the Group's strategic technical excellence directive.

The Asset Management segment, introduced starting from 31 December 2018 to better reflect the results of the Group's asset manager activities in line with the strategic communication to the market, achieved an operating result of € 335 million thanks to the increase in revenues arising from portfolio management activities.

The improvement in the Holding and other businesses operating result reflected the positive result of other private equity and real estate activities. Finally, the change in the consolidation adjustments was mainly due to higher dividends and intra-group realized gains.

Operating result by country

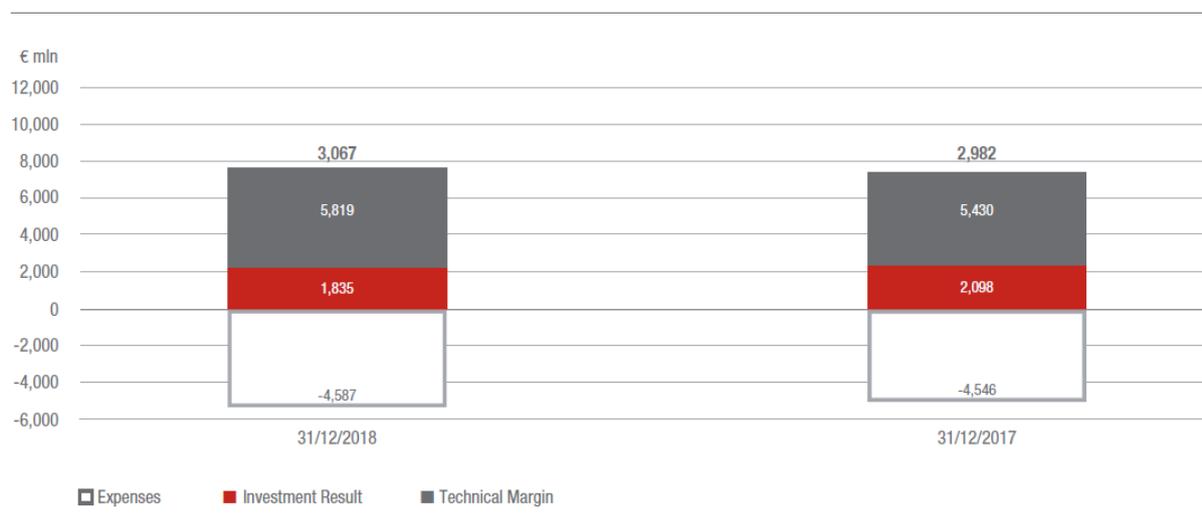
(€ million)	31/12/2018	31/12/2017
Italy	1,801	1,841
France	703	744
Germany	821	750
Austria, CEE & Russia	776	744
International	814	731
Spain	294	289
Switzerland	273	258
Americas and Southern Europe	116	85
Asia	79	39
Europ Assistance	86	88
Other	-33	-28
Investments, Asset & Wealth Management (*)	527	468
Group holding, other companies and consolidation adjustments	-585	-565
Total	4,857	4,713

(*) Investments, Asset & Wealth Management area includes the main Group entities operating in investment advisory, asset management and financial planning; it includes, among others, Banca Generali. Adding the operating result of AM of the Central and Eastern European countries to that of Investments, Asset & Wealth Management reported in the table, the total operating amounts to € 542 million (€ 482 million at 31 December 2017).

2017 comparative data for the Operating Result differ from those published last year, since they are restated in application of IFRS 5, thus excluding data related to discontinued operations.

LIFE OPERATING RESULT

The operating result of the Life segment stood at € 3,067 million, up 2.8% compared to € 2,982 million at year-end 2017¹⁵. Specifically, the technical margin net of insurance operating expenses grew.



The **technical margin**, equal to € 5,819 million, was experiencing strong growth; in particular, note the increase in loadings, the improvement in the impact of longevity risk in France, and the increase in fees from the sale of unit-linked products in Italy. This margin does not include the insurance operating expenses, reported under the item insurance and other operating expenses.

The **net investment result**, amounting to € 1,835 million, was down (-12.6%) from the € 2,098 million at 31 December 2017. This trend was, in particular, determined by the reduction in net income from investments, impacted by an increase in impairments and a drop in the realized component.

The net income from financial assets and liabilities related to unit and index-linked contracts fell from € 3,849 million at 31 December 2017 to € -5,834 million. This trend reflected the change in the value of investments caused by a rise in spreads on corporate bonds and the negative performance of some equity markets compared to the corresponding period of the previous year.

The policyholders' interests on operating income from own investments rose from € -11,508 million at 31 December 2017 to € -807 million, mainly due to the related decrease in income from financial instruments at fair value through profit or loss related to linked contracts.

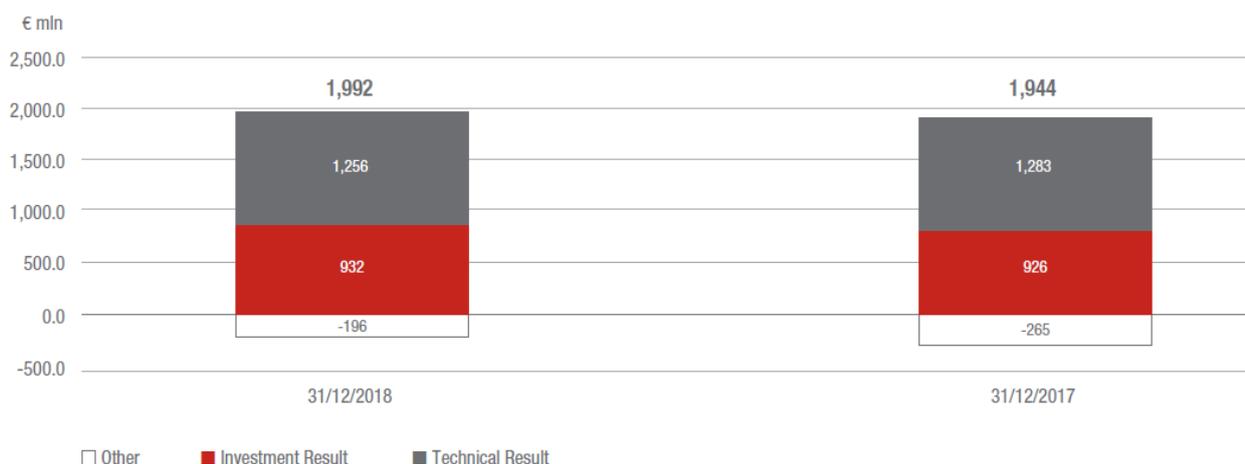
The **insurance and other operating expenses** increased from € -4,546 million at 31 December 2017 to € -4,587 million. In particular, insurance operating expenses amounted to € -4,497 million (+1.0%). The acquisition costs, which amounted to € -3,592 million, remained essentially stable. Administrative costs increased, to € -906 million (+ 3.8%), for the trends observed in Italy and France. The ratio of the acquisition and administration costs to premiums stood at 10.2% (10.1% at December 2017). The percentage of the total administration costs related to insurance business to the average insurance provisions remained substantially stable at 0.27%.

The net other operating expenses fell slightly to € -90 million (€ -94 million at 31 December 2017).

¹⁵ 2017 comparative data for the Operating Result differ from those published last year, since they are restated in application of IFRS 5, thus excluding data related to discontinued operations.

PROPERTY AND CASUALTY OPERATING RESULT

The operating result of the P&C segment amounted to € 1,992 million (€ 1,944 million at 31 December 2017¹⁶). The 2.5% increase was mainly attributable to the investment result and the positive contribution of the other operating items.



The **technical result** amounted to € 1,256 million, down by 2.1% compared to 31 December 2017. This result included the impact of natural catastrophe claims for approximately € 342 million, mainly deriving from storms, floods and bad weather in Italy and Central Europe. Similar events had had an impact of approximately € 416 million at 31 December 2017. The technical result was influenced by a higher impact of large man-made claims of around € 125 million and the increase in the acquisition costs, resulting from the growth in premiums previously discussed.

The **investment result** in the P&C segment amounted to € 932 million (+0.7% compared to 31 December 2017). In particular, current income from investments increased by 1.7% to € 1,230 million, thanks to income from equity instruments. However, the actions by the Group led to a current return of 3.1% (3.0% at 31 December 2017).

The **other operating items** of the P&C segment, which primarily include non-insurance operating expenses, depreciation and amortization of tangible assets and multi-annual costs, provisions for recurring risks and other taxes, amounted to € -196 million (€ -265 million at 31 December 2017) mainly due to lower allocation to provisions in Germany.

NON-OPERATING RESULT¹⁷

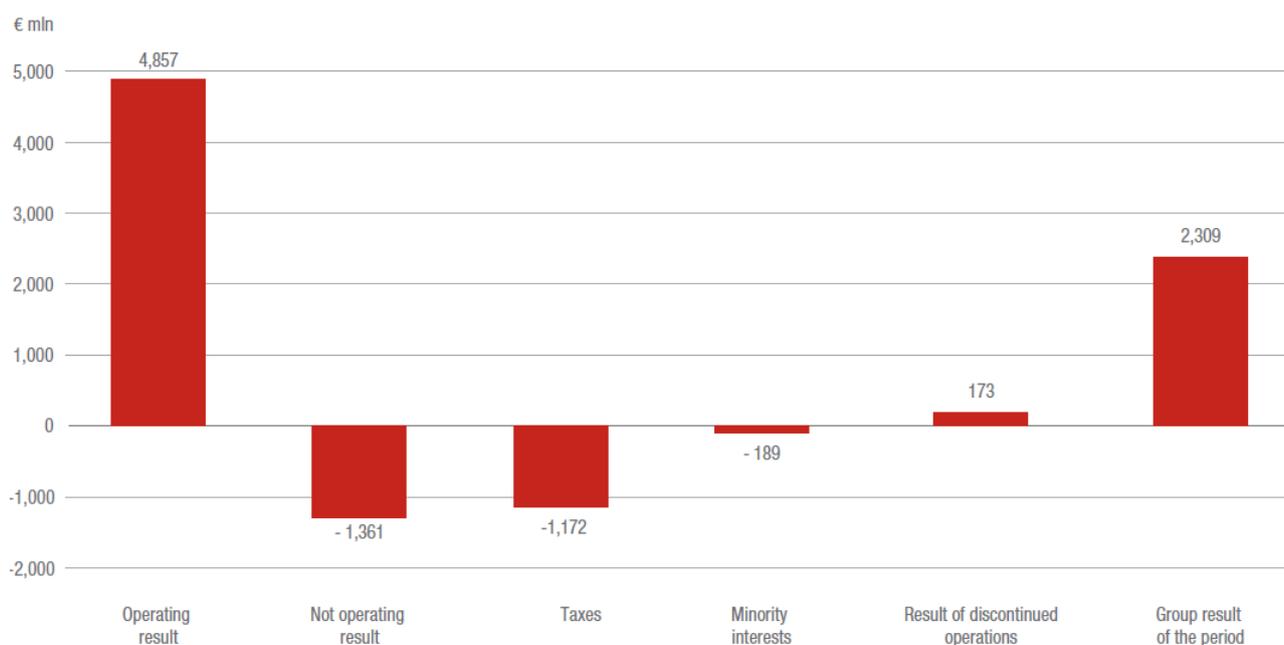
The non-operating result of the Group came to € -1,361 million (€ -1,109 million at 31 December 2017). In particular:

- net impairment losses increased to € -431 million (€ -271 million at 31 December 2017) mainly due to higher impairments on equity financial investments, especially posted in the last quarter of the year;
- net realized gains amounted to € 265 million (€ 311 at 31 December 2017), benefiting € 113 million from the disposal of the investment in Italo - Nuovo Trasporto Viaggiatori. The decrease in realized gains compared to the previous period is mainly due to the bond and real estate component, reflecting the planned policy of supporting future returns on investments;
- net non-operating income from financial instruments at fair value reached € 11 million (€ 26 million at 31 December 2017);
- other net non-operating expenses decreased slightly to € -411 million (€ -419 million at 31 December 2017). The item comprised € -98 million for the amortization on the value of the acquired portfolios (€ -106 at 31 December 2017), € -211 million for restructuring costs (€ -297 at 31 December 2017), decreasing mainly in Germany, and € -102 million in other net non-operating expenses (€ -16 million at 31 December 2017). The latter included € 77 million in gains from the disposal of operations in Panama, while last year the item had achieved € 196 million in gains from the disposal of the run-off P&C portfolio of the UK branch;
- non-operating holding costs amounted to € -795 million (€ -755 million at 31 December 2017) due to expected restructuring costs (mainly due to the transfer of the Generali Employee Benefits operations and the closure of the branch in Japan), as well as the result of the development of asset management activities. Interest expense on financial debt decreased from € -673 million to € -666 million.

¹⁶ 2017 comparative data for the Operating Result differ from those published last year, since they are restated in application of IFRS 5, thus excluding data related to discontinued operations.

¹⁷ 2017 comparative data for the Non-Operating Result differ from those published last year, since they are restated in application of IFRS 5, thus excluding data related to discontinued operations.

GROUP RESULT



The **result of the period attributable to the Group** stood at € 2,309 million, showing an increase of 9.4% over the € 2,110 million posted at 31 December 2017, and reflected:

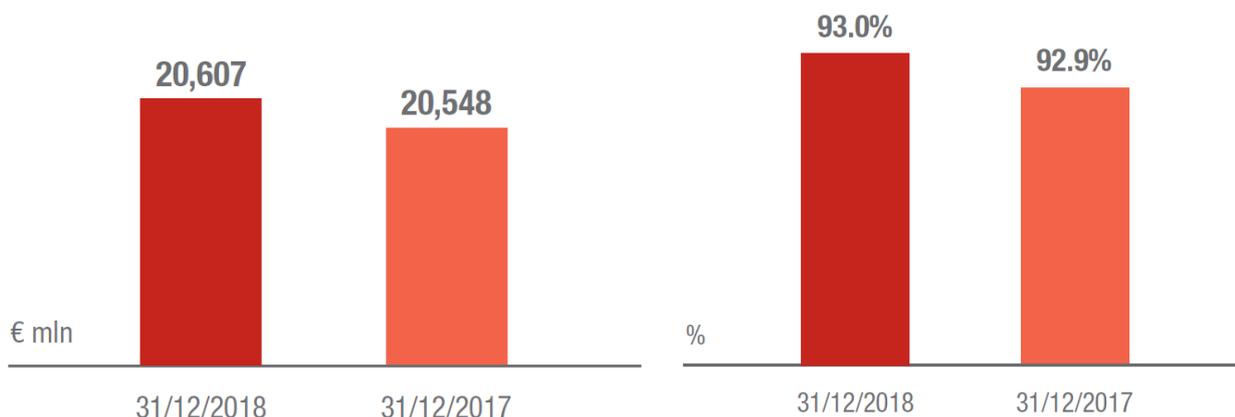
- the improvement in the aforementioned operating result;
- the result of discontinued operations of € 173 million, related to the disposal of the German, Belgian and Guernsey businesses and to the gain from the disposal of the Irish company for € 49 million. In 2017, the item had included the impairment on the Dutch operations;
- a slight decline in taxation. The tax rate remained substantially unchanged, going from 32.7% to 32.6%;
- the result attributable to minority interests, equal to € 189 million, which corresponded to a minority rate of 7.6% (8.1% at 31 December 2017) and which increased compared to last year (€ 185 million), mainly reflecting the trend of Asia.

A.2.2. UNDERWRITING PERFORMANCE¹⁸

PROPERTY & CASUALTY SEGMENT

Gross written premiums

Combined Ratio



2017 comparative data in this Report differ from those published last year, since the main KPIs, among which Premiums, Operating Result, CoR, are restated in application of IFRS 5, thus excluding data related to discontinued operations.

PROPERTY & CASUALTY GROSS WRITTEN PREMIUMS

The gross written premiums of the Property & Casualty (P&C) segment continued the growth observed during the year, standing at € 20,607 million, growing by 3.3%, thanks to the positive performance of both business lines.

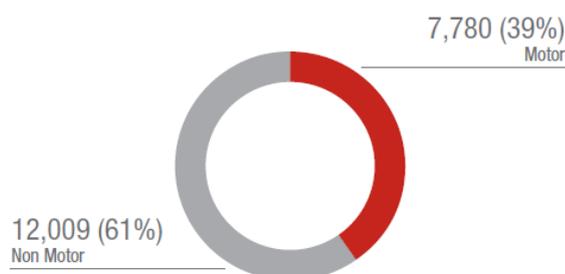
The increase in the motor line (+3.4%) was supported by the growth observed in ACEER (+5.7%), which reflected the positive trend in the Czech Republic for pricing policies and the development of partnerships in fleets and leasing, the increase in car sales in Hungary and the growth observed in Austria. France also increased (+4.2%), partly as a result of new distribution partnerships, and Americas and Southern Europe (+19.2%), mainly due to the pricing adjustments made in Argentina following inflation. In spite of recovering in the second half of the year, motor premium income in Italy was down by 1.7%, following the measures adopted to recover the portfolio profitability.

Non-motor premiums also rose by 2.7%, thanks to the positive trends broadly extended across the Group's various areas of operations. Premium income in ACEER increased (+4.1%), led by Poland (+16.4% deriving from the corporate business and by the development of travel products), Hungary (+7.7% which mostly benefits from growth in home products and in the health business volumes), Austria (+1.9% driven by the accident & health business) and Croatia (+51% thanks to the business underwritten through Unicredit). Performance was positive in France (+2.7%) thanks to the performance of the accident & health line, Germany (+1.8%) due to the growth in Global Corporate & Commercial lines, as well as in the home and commercial lines, and International cluster (+7.2%), driven by Europ Assistance thanks to the development of travel insurance and roadside assistance in mature markets. The decrease observed in Italy (-1.5%) was mainly related to the reduction of the Global Corporate & Commercial lines as well as the health business which were affected by heavy competition in a market characterized by sustained price competition.

¹⁸ Data are based on IFRS accounting principles. For the definition of segments, please refer to the Annual Integrated Report and Consolidated Financial Statements 2018, that is available on the Group corporate website.

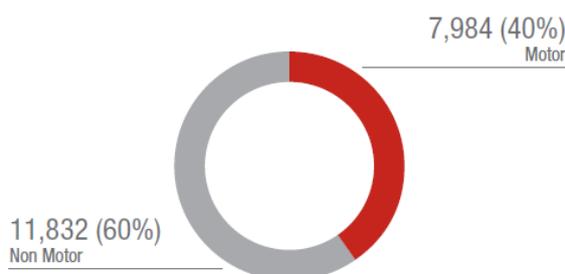
Gross direct premiums by line of business at 31 December 2018

€ mln



Gross direct premiums by line of business at 31 December 2017

€ mln



2017 comparative data for Premiums differ from those published last year, since they are restated in application of IFRS 5, thus excluding data related to discontinued operations.

The geographical footprint of the Property & Casualty premium income is summarised in the table below:

(€ million)	Gross direct written premiums					
	Gross written premiums		Motor		Non-motor	
	31/12/2018	31/12/2017	31/12/2018	31/12/2017	31/12/2018	31/12/2017
Italy	5,450	5,537	2,051	2,086	3,281	3,330
France	2,706	2,626	1,009	968	1,634	1,591
Germany	3,757	3,708	1,491	1,489	2,255	2,215
Austria, CEE & Russia	3,818	3,626	1,784	1,678	1,986	1,900
International	4,810	4,989	1,441	1,760	2,806	2,754
Spain	1,517	1,490	456	465	1,016	986
Switzerland	687	744	271	291	416	451
Americas and Southern Europe	1,067	1,438	678	970	388	464
Asia	210	204	6	13	104	90
Europ Assistance	834	753	29	21	678	610
Other	495	360	1	0	203	153
Group holding and other companies (*)	67	63	4	3	48	41
Total	20,607	20,548	7,780	7,984	12,009	11,832

2017 comparative data for Premiums differ from those published last year, since they are restated in application of IFRS 5, thus excluding data related to discontinued operations.

In **Italy** the decrease in gross written premiums is attributable to both the motor segment (-1.7%), which is affected by the continued decline in the portfolio linked to the policy of improving profitability in a market still suffering from a crisis in profitability, and to the non-motor segment. The contraction of the latter (-1.5%) is mainly attributable to the Corporate business component as well as to the A&H sector, reflecting heavy competition in a market characterized by sustained price competition.

The P&C segment volumes in **Germany** are driven by the positive performance of the non-motor segment (+1.8%), which benefits from the increase in policies mainly in the home and commercial lines, in particular supported by the Global Corporate & Commercial lines. The motor segment was slightly positive (+0.1%), in spite of the drop in third-party liability lines (-1.4%) following the pruning of the portfolio.

In **France** P&C volumes for the year grew by 3.1%, accelerating compared to the previous year, driven by the performance of the motor segment (+4.2%), also thanks to new distribution partnerships. The non-motor segment (+2.7%) recorded a significant recovery compared to the decline in the previous year, also supported by the positive performance of the accident and protection business (+3.9%).

In the **ACEER** regional structure P&C segment premiums grew by 4.8%, supported by good performance of the main lines of business. The motor segment grew (+5.7%), as a result of contributions mainly from the Czech Republic (+10.8%, following the pricing policies on

the in-force portfolio, as well as higher volumes recorded by the fleet and leasing segments resulting from cooperation with Volkswagen Financial Services), from Hungary (+14.4%, growth sustained by the increase in vehicles) and Austria (+3.3%). The non-motor sector recorded 4.1% growth, led by Poland (+16.4% driven by the corporate business and growth in travel products), Hungary (+7.7% which mostly benefits from growth in home products in the Health business volumes), Austria (+1.9% driven by the protection business) and Croatia (+51% thanks to the business underwritten through Unicredit).

PROPERTY & CASUALTY COMBINED RATIO

Technical indicators

(€ million)	31/12/2018	31/12/2017	Change
Combined ratio	93.0%	92.9%	0.1
Loss ratio	65.1%	65.1%	0.0
Current year loss ratio excluding natural catastrophes	68.9%	68.5%	0.4
Natural catastrophes impact	1.7%	2.1%	-0.4
Prior year loss ratio	-5.6%	-5.6%	-0.1
Expense ratio	27.9%	27.8%	0.1
Acquisition cost ratio	22.6%	22.3%	0.4
Administration cost ratio	5.3%	5.5%	-0.3

2017 comparative data for the Combined Ratio differ from those published last year, since they are restated in application of IFRS 5, thus excluding data related to discontinued operations.

The combined ratio of the Group stood at 93.0% (+0.1 pps compared to 31 December 2017), the best amongst peers in the market. The change was entirely attributable to the trend in the expense ratio.

With reference to the total loss ratio, which remained stable at 65.1%, the current year non-catastrophe loss ratio increased by 0.4 pps due to the higher impact of the aforementioned large man-made claims of 0.6 pps, mainly concentrated in the Global Corporate & Commercial lines. The impact from natural catastrophe claims was 1.7% (2.1% at 31 December 2017). The prior year loss ratio remained stable at -5.6%. As usual, the Group maintained its prudent reserving approach, confirmed by the reserving ratio of 148%.

Acquisition and administration costs related to insurance business amounted € 5,468 million (€ 5,419 million at 31 December 2017). In detail, acquisition costs increased to € 4,437 million (+2.2%), reflecting the increase in costs resulting from the growth in premiums observed in Central and Eastern European countries, in France and in Europ Assistance, as well as that in Italy to support non-motor premiums. The ratio of acquisition costs to net earned premiums therefore increased from 22.3% to 22.6%. Administration costs rose from € 1,076 million to € 1,030 million, showing a drop of 4.2% due mainly to the reduction observed in Germany, as a result of efficiency from the SSYtL transformation program, and Americas. The ratio of administration costs to net earned premiums was down slightly at 5.3% (-0.3 pps).

Therefore, the expense ratio stood at 27.9% (27.8% at 31 December 2017).

The development of combined ratio through the Group is summarised in the table below:

Technical indicators by country

	Combined ratio (*)		Loss ratio		Expense ratio	
	31/12/2018	31/12/2017	31/12/2018	31/12/2017	31/12/2018	31/12/2017
Italy	91.0%	90.0%	65.0%	65.2%	25.9%	24.8%
France	99.9%	98.4%	72.2%	70.8%	27.7%	27.6%
Germany	92.7%	92.6%	65.3%	65.1%	27.4%	27.5%
Austria, CEE & Russia	88.1%	89.1%	58.3%	59.6%	29.8%	29.5%
International	95.6%	97.9%	66.2%	68.0%	29.4%	29.9%
Spain	92.2%	92.7%	65.2%	65.3%	27.0%	27.4%
Switzerland	93.0%	92.4%	65.5%	66.3%	27.6%	26.1%
Americas and Southern Europe	101.6%	103.4%	66.2%	66.6%	35.4%	36.8%
Asia	104.5%	103.8%	70.2%	68.4%	34.2%	35.4%
Europ Assistance	91.4%	89.4%	60.9%	60.8%	30.5%	28.7%
Other	101.2%	115.0%	76.8%	89.2%	24.4%	25.9%
Group holding and other companies	76.5%	52.6%	65.8%	42.1%	10.7%	10.5%
Total	93.0%	92.9%	65.1%	65.1%	27.9%	27.8%

(*) CAT claims impacted on the Group combined ratio for 1.7 pps, of which 1.5 pps in Italy, 2.6 pps in France, 2.7 pps in Germany and 9.4 pps attributable to Group holding and other companies (at 31 December 2017 CAT claims impacted on the Group combined ratio for 2.1 pps, of which 1.9 pps in Italy, 1.8 pps in France and 1.7 pps in Germany and 6.4 pps in Group holding and other companies).

In **Italy** the combined ratio increased slightly due to the increase in the expense ratio component, mainly linked to growth in the non-motor portfolio, only partially offset by the slight improvement in both the current year loss ratio and prior year loss ratio.

The combined ratio in **Germany** shows a slight worsening compared to the previous fiscal year (+0.2 pps), attributable to the increase in the loss ratio following higher impacts from catastrophes (+1.0 pps) registered in Germany, a lower contribution from prior year loss ratio, all partly mitigated by the positive trend of contributions from the current year loss ratio.

In **France** the increase in the combined ratio is affected by trends in the loss ratio, linked, on the one hand, to the greater weight of natural catastrophe claims and, on the other, to the increase in the loss ratio of the corporate sector due to a different reinsurance structure compared to the previous year.

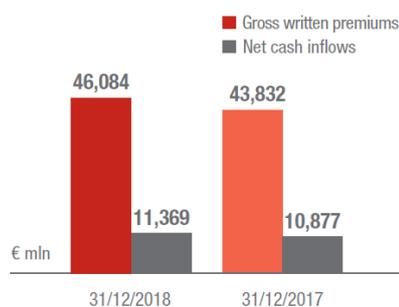
The improvement in the combined ratio, in the new regional structure **ACEER** down by 1 pps compared to 2017, is attributable to the drop in the loss ratio (-1.3 pps), which benefits from lower impacts related to natural catastrophe claims. The expense ratio remained stable compared to the previous year (+0.3 pps), reflecting ongoing cost reduction measures.

The combined ratio of the **International** region improved by 2.3 pps thanks to the trends observed in Americas and Southern Europe, compared to the previous year when there was a strengthening of reserves in Argentina, and in Spain thanks to the improvement in the expense ratio.

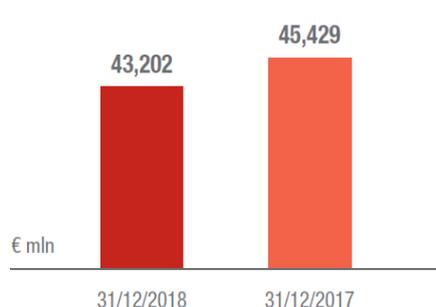
The full overview of all Solvency II lines of business premium income, claims and expenses for P&C segment is shown in the reporting template S.05.01.02 (see annex).

LIFE SEGMENT¹⁹

Gross written premiums and net cash inflows



PVNB²⁰



NBV

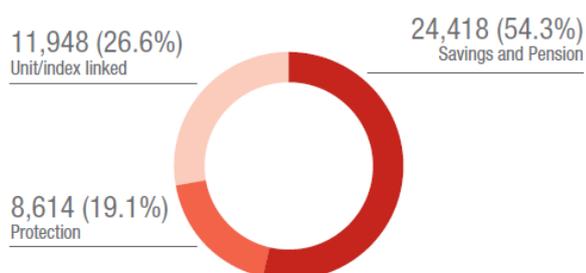


LIFE GROSS WRITTEN PREMIUMS²⁰

The gross written premiums in the Life segment continued the growth in place during the year, standing at € 46,084 million (+5.7%). With reference to the lines of business, positive trend in savings policies, (+5.7%), specifically in Italy (+8.2%, reflecting the actions undertaken on the existing portfolio of collective policies which offset the reduction of the premiums relating to hybrid products), Asia (+23.8%) and France (+1.3%). Unit-linked premiums also grew by 1.8%, driven in particular by the performance in Germany and France consistent with the Group strategy aimed at the growth of this line. The protection products show a 10.7% increase, confirming the broad growth in countries in which the Group operates.

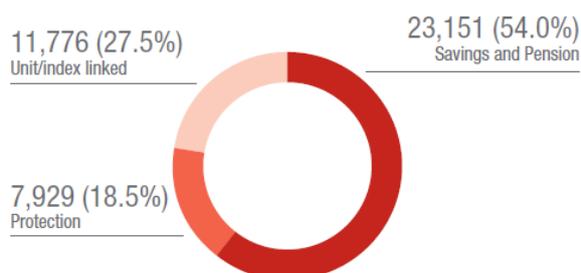
Gross direct premiums by line of business at 31 December 2018

€ mln



Gross direct premiums by line of business at 31 December 2017

€ mln



The geographical footprint of Life gross written premiums is summarised in the table below:

¹⁹ 2017 comparative data for Premiums and Net Inflows differ from those published last year, since they are restated in application of IFRS 5, thus excluding data related to discontinued operations, that are included in a specific item in the Income Statement and Balance Sheet. Similarly, changes of these KPIs consider 2017 data restated. 2017 data for New Business are at constant exchange rates and consolidation scope, thus including discontinued operations.

NBV, New Business Value: it is an indicator of value created by the 'new business' of the Life segment.

PVNB²⁰, present value of new business premiums: expected present value of future new business premiums.

²⁰ Including premiums from investment contracts for € 1,457 million.

(€ million)	Gross direct written premiums							
	Gross written premium		Savings and Pension		Protection		Unit/index linked	
	31/12/2018	31/12/2017	31/12/2018	31/12/2017	31/12/2018	31/12/2017	31/12/2018	31/12/2017
Italy	18,332	17,299	14,259	13,181	312	264	3,760	3,854
France	9,558	9,279	4,347	4,291	1,959	1,867	2,841	2,696
Germany	9,821	9,399	2,230	2,219	3,903	3,690	3,687	3,490
Austria, CEE & Russia	2,611	2,565	1,206	1,216	772	704	633	645
International	5,729	5,271	2,373	2,241	1,660	1,397	1,026	1,089
Spain	861	936	529	656	237	223	95	58
Switzerland	1,009	1,073	190	203	131	139	688	730
Americas and Southern Europe	359	419	81	82	273	332	5	5
Asia	2,685	2,155	1,573	1,301	910	608	189	247
Europ Assistance	0	0	0	0	0	0	0	0
Other	815	687	0	0	109	95	50	50
Group Holding and other companies	35	19	3	3	9	9	0	0
Total	46,084	43,832	24,418	23,151	8,614	7,929	11,948	11,776

The growth of Generali's Life premiums in **Italy** shows the excellent performance of protection premiums (+18.3%) and traditional savings products (+8.2%), while unit-linked products (-2.4%) were affected by the volatility in financial markets that characterized the second half of the year.

In **Germany** in line with the Group's strategic initiatives, Life premiums show a growth in protection products (+5.8%, supported by the increase in single premium policies), as well as unit-linked policies (+5.6%, thanks mainly to regular premium policies), only partly offset by the decline in savings products with regular premiums (-5.8%).

In **France** as regards volume trends, the Group strategy aimed at developing unit-linked and prevention insurance coverage is reflected in the performance of unit-linked products (+5.4%), after the exceptional growth in 2017 and the pure risk and protection line (+4.9%), while traditional savings policies recovered (+1.3%), following the decline in the previous year.

In the new regional structure **ACEER** there was a decline in savings products (-2.1%, linked to the performance of regular premium policies), followed by a decline in unit-linked products (-1.8%, mainly due to the decline in single premium policies), only partially offset by the positive performance of the protection lines (+9.1%). This trend is explained by the slowdown in premiums in the Czech Republic (-2.2% due to the continued decline in new savings products production mainly in Ceska Pojistovna) and in Poland (-4.3% due to the decline in individual unit-linked products), offset by a growth in volumes in the rest of the region and especially in Slovakia (+8% due to the protection lines), Austria (+1.6% benefiting from the boost of Health products), as well as Romania (+69.5%, as a result of protection products launched as of July 2018 through the partnership with Unicredit) and Serbia (+15.3% supported by the growth in savings products following the renewals initiatives).

In the International structure Life volumes showed a growth of 13.8% on equivalent terms, driven by the performance recorded in Asia that showed a 28.2% growth recorded in most countries and in China in particular for savings and pure risk and protection policies.

LIFE NET INFLOWS

The net inflows were amongst the highest levels in the market, reaching € 11,369 million. The 5.2% growth, equal to € 492 million, reflected the trend of France (+ € 612 million), which benefited from the rising premiums and lower surrenders compared to 2017, to which were added those of Asia (+ € 487 million), which received a further boost from the drop in surrenders in the quarter, and Germany (+ € 231 million) thanks to both the improvement in premiums and lower surrenders. Italy (- € 934 million) was affected by higher payments deriving from surrenders.

(€ million)	Net cash inflows	
	31/12/2018	31/12/2017
Italy	4,769	5,703
France	1,571	959
Germany	3,197	2,966
Austria, CEE & Russia	312	327
International	1,519	922
Spain	-86	-232
Switzerland	397	457
Americas and Southern Europe	162	151
Asia	981	494
Europ Assistance	0	0
Other	66	52
Group Holding and other companies	1	0
Total	11,369	10,877

2017 comparative data for Net Inflows differ from those published last year, since they are restated in application of IFRS 5, thus excluding data related to discontinued operations.

LIFE NEW BUSINESS DEVELOPMENT

The new business in terms of present value of new business premiums (PVNBP) amounted to € 43,202 million, showing a decline of 1.8%. With reference to the business lines, the protection business increased by 2.1% in all the Group's areas of operations, with the exception of Germany. Unit-linked business decreased (-1.5%, due to the performance in Italy and Germany) as did that of savings products (-3.7%), in line with the Group's strategy aimed at reducing the guaranteed business.

The profitability of new business (margin on PVNBP) improved by 0.26 pps, to 4.35% (4.01% at 31 December 2017), following the increase in profitability of both protection products (+0.51 pps), mainly thanks to the improvement in France and Spain, and savings products (+0.29 pps), positively influenced by the continued reduction of financial guarantees and the improvement of the economic environment.

As a result of the actions described above, the value of new business (NBV) increased by 4.3% and stood at € 1,877 million (€ 1,820 million at 31 December 2017).

A.3. INVESTMENT PERFORMANCE

INVESTMENT PERFORMANCE

Generali Group aims at maximising investment returns for a given risk appetite and to achieve the Strategic Plan objectives through portfolio diversification and an accurate liability-driven investment strategy. Over the last few years, financial market conditions have not been very favourable. The crisis that started in 2008 led to a very low interest rate environment that has been still persisting within the Eurozone. Macroeconomic factors, monetary policy actions and the race for yield have impacted the level of interest rates on government bonds and other key market segments such as corporate bonds.

Considering the very low yield environment, in order to sustain investment performance also for the benefit of Life policyholders, the pursued strategy consisted in an increase of asset and geographical diversification, in particular of exposures towards private market, alternative debt and private equity investments, offering attractive risk-adjusted return also under the Solvency II framework.

This chapter will give an overview of the invested Assets of the Generali Group, with a break-down of asset classes and return on investments.

ASSET CLASS ANALYSIS

At 31 December 2018, total investments amounted to € 415,994 million, a slight decrease compared to the previous year (-0.8%). Group investments amounted to € 350,205 million (-0.3%) and linked investments amounted to € 65,789 million (-2.9%).

Asset allocation (€ million)	Total		Life		Property&Casualty	
	31/12/2018	31/12/2017	31/12/2018	31/12/2017	31/12/2018	31/12/2017
	Fixed income investments	299,736	304,055	266,502	268,895	26,751
Government bonds	159,431	158,216	142,144	139,846	11,625	12,441
Corporate bonds	112,017	117,207	100,758	105,780	11,949	12,420
Other fixed income	28,288	28,631	23,599	23,569	3,177	2,825
Equity instruments	19,807	17,697	12,820	11,980	2,279	2,254
Real estate investments	15,258	13,616	8,827	8,752	4,012	3,828
Cash & cash like	11,114	11,635	6,180	8,083	2,729	2,502
Other investments	4,290	4,395	6,673	5,476	2,034	1,774
Total investments - General account	350,205	351,398	301,002	303,186	37,805	38,044
Investment back to unit and index-linked policies	65,789	67,741	65,789	67,741	0	0
Total investments	415,994	419,139	366,791	370,927	37,805	38,044

In terms of weight of the main investment categories, the relative exposure of the fixed income instruments was down to 85.6% (86.5% at 31 December 2017), while that of equity instruments increased, up to 5.7% (5.0% at 31 December 2017). The weight of investment properties and that of other investments also showed a slight increase, standing at 4.4% (3.9% at 31 December 2017) and 1.1% (1.0% at 31 December 2017), respectively. Other investments mainly include receivables from banks and customers, investments in subsidiaries, associated companies and joint ventures, and derivatives. Finally, the weight of liquidity went from 3.3% to 3.2%.

With reference to the bond portfolio, government bonds, which represented 53.2% (52.0% at 31 December 2017), were up, standing at € 159,431 million (€ 158,216 million at 31 December 2017). The change during the period was mainly attributable to the net purchasing position of the Group with respect to these types of assets. The exposure to individual government bonds was mainly allocated to the respective countries of operation, in line with the Group's ALM policy.

The corporate component decreased in absolute terms to € 112,017 million (€ 117,207 million at 31 December 2017), equal to 37.4% of the bond portfolio (38.5% at 31 December 2017), due to the orientation of the reinvestment strategy toward the government bond component. On the other hand, taking into account the new composition of the current portfolio, there is a substantial decrease in securities exposed to the financial sector, partially offset by an increase in exposure to the telecommunications sector.

The Group's corporate portfolio confirmed its improvement in terms of creditworthiness, with over 93% of the securities classified as Investment Grade (91% at the end of the previous year). Non-Investment Grade securities declined by € 2.9 billion compared to 31 December 2017.

RETURN ON INVESTMENT

Investment yields

%	Total		Life		Property&Casualty	
	31/12/2018	31/12/2017	31/12/2018	31/12/2017	31/12/2018	31/12/2017
Fixed Income						
Current return	2.9%	3.1%	3.0%	3.1%	2.7%	2.7%
Total P&L return	3.0%	3.3%	3.0%	3.4%	2.5%	3.0%
Comprehensive return	-0.1%	2.5%	-0.2%	2.4%	0.6%	3.1%
Equity & Equity-like						
Current return	4.4%	3.7%	4.3%	3.5%	4.8%	4.7%
Total P&L return	2.1%	6.8%	0.1%	7.3%	5.8%	8.1%
Comprehensive return	-3.8%	9.8%	-10.2%	9.8%	-3.9%	9.9%
Real Estate						
Current return	5.2%	5.5%	5.6%	5.7%	5.5%	5.9%
Total P&L return	4.0%	4.9%	4.7%	5.2%	4.0%	5.8%
Comprehensive return	3.9%	5.0%	4.8%	5.3%	3.9%	5.8%
TOTAL						
Current return	3.0%	3.1%	3.1%	3.2%	3.1%	3.0%
Total P&L return	2.8%	3.3%	2.8%	3.3%	2.6%	3.2%
Comprehensive return	-0.2%	2.7%	-0.5%	2.6%	0.7%	3.4%

The current return on investments fell slightly, reaching 3.0% (3.1% at 31 December 2017). The performance of this indicator is attributable, on the one hand, to the increase in average investments and, on the other, to a fall in the absolute value of current income, which amounted to € 10,668 million (€ 10,847 million at 31 December 2017), due to the low interest rates obtainable as part of the reinvestment activity.

The contribution to the result of the period deriving from net realized gains, net impairment losses and net unrealized gains (harvesting rate)⁶ showed a decrease, reaching -0.1% (0.6% at 31 December 2017), following both a greater impact of the impairment losses, particularly significant compared to those posted in the previous period, and a lower impact of the net realized gains.

INFORMATION ABOUT INVESTMENTS IN SECURITISATION

The Group investments in securitisation represents less than 0.8% of Group Total Fixed income. Securitisations are subject to internal limits defined at single legal entity level and are monitored on a monthly basis across the Group.

A.4. PERFORMANCE OF OTHER ACTIVITIES

PERFORMANCE OF OTHER ACTIVITIES

Asset management segment

The Asset Management segment includes the activities exercised by asset management companies operating within the Group.

This segment operates as a provider of products and services both to the insurance companies of the Generali Group and to third-party clients. The products include equity and fixed-income funds, as well as alternative products. The aim pursued by Asset Management is to identify investment opportunities and sources of growth for all of its clients, while managing risks.

The segment includes companies specialised in institutional and retail clients, rather than in Group insurance companies or third-party clients, or in products such as real assets, high conviction strategies or more traditional investments.

Its scope includes, for example, companies in the Generali Investments group, Generali Real Estate, Generali Investments CEE and Fortuna Investments, to which are added the other companies linked to the multi-boutique strategy and some companies operating in Asia.

(€ million)	31/12/2018	31/12/2017	Change
Asset under Management (€ billion)	456	463	-2%
Operating result	335	261	28%
Net result	235	189	24%
Cost/Income ratio	46%	54%	-8 p.p.

The operating result of Asset Management increased from € 261 million in 2017 to € 335 million in 2018 (+28.2%). This increase was mainly due to the increase in the operating result of the Generali Investments group, made possible following the renegotiation of commissions on the insurance mandates of Group companies and the larger volumes on real assets, which also resulted in the increase in non-recurring commissions.

Holding and other businesses segment

The Holding and other businesses segment includes the activities of the Group companies in the banking and asset management sectors, the costs incurred for the direction, coordination and financing activities, as well as all other operations that the Group considers to be ancillary to the core insurance business.

The operating result of the aforementioned business sectors are summarized in the table below:

Holding and other businesses operating result by sector

(in € million)	31/12/2018	31/12/2017	Variation
Holding and other businesses operating result	-70	-163	-57.1%
Financial and other businesses	397	291	36.3%
Holding operating expenses	-467	-454	2.9%

The operating result of the Holding and other businesses segment came to € -70 million, an improvement compared to € -163 million at 31 December 2017.

In particular, the operating result of the financial and other businesses posted an increase, to € 397 million (€ 291 million at 31 December 2017). The 36.3% increase reflected mainly the performance, particularly in the last quarter, recorded in Lion River and Planvital. The result of Banca Generali was slightly lower at € 233 million (-3.6%).

Net operating holding expenses amounted to € -467 million (€ -454 million at 31 December 2017), reflecting higher costs for the disposal in Germany and the execution of the new asset management strategy, as well as lower revenues from brand fees.

AGREEMENTS RESULTING FROM LEASING OPERATIONS

In the course of ordinary business, the Group companies normally enter into leasing agreements as lessees. Mentioned agreements are nearly exclusively related to operating leases for use of real estate properties used for business, company cars and office furniture and equipment.

In some cases Group companies acts also as lessor, mainly related to real estate rentals through operating lease, involving part of Generali's real estate portfolio.

A.5. ANY OTHER INFORMATION

A.5.1. SIGNIFICANT OPERATIONS AND TRANSACTIONS WITHIN THE GROUP

There are many different intragroup arrangements in the Group, spanning from assets management services, real-estate management services and banc-assurance agreements to internal reinsurance and risk pooling arrangements, intragroup financing and centralised liquidity management, as well as claims management and similar services. In addition, there are also specific financing arrangements, servicing both operational liquidity and capital needs.

The Parent Company acts as holding company and ultimate Group reinsurer, and together with local holding companies supports different local unit needs, among which capital solidity and soundness.

Consequently there are numerous transactions within the Group, of which the most material can be grouped as follows:

- intragroup dividends and capital movements;
- intragroup financing servicing both operational financing needs and capital needs (representing local legal entity basic own funds);
- intragroup liquidity management and cash-pooling arrangements;
- intragroup reinsurance;
- guarantees and similar arrangements;
- shared services;
- other transactions.

Considering the size and the structure of the Group, there are numerous dividend payments/transactions and capital transfers, mainly towards specific Group companies specialised in investment and asset management.

Intragroup financing was approximately €17.1 billion, contributing to both local legal entities operational financing needs and also as additional capital buffer to Group insurance companies. The latter was of approximately €4.0 billion.

Intragroup liquidity management and cash-pooling arrangements were created to service operational liquidity needs and to optimise liquidity management and liquidity buffer at Group level.

Intragroup reinsurance activities aim to optimise single company and single country risk retention and also to optimise overall group risk retention and reinsurance activity. Local reinsurers or local holding usually act as first risk pooling, later on passed to the Parent Company, which defines the external reinsurance structure. Of approximately €65.2 billion of gross written premiums collected, €4.7 billion are ceded in intragroup reinsurance.

Within the Group, guarantees and similar arrangements are put in place, mainly to facilitate specific activities such as real-estate construction and similar projects, to facilitate specific operations and also to optimise capital structure.

Shared services and similar arrangements consist mainly of investment management, banc-assurance, IT and claims management.

Operations in derivatives as well as material intragroup asset sales were observed to a very limited extent.

“Other Transactions” includes investment commitments in Group companies. These are mainly commitments associated with alternative investments (private equity), predominantly towards a specialised Group company managing this type of investments, and are funding commitments the same company has towards third parties. Some commitments were also made for other investment opportunities, in particular to real estate investment funds.

There are also two intragroup commitments between Assicurazioni Generali and Generali Vie, the Group's most important French life insurance operation, put in place at the end of December 2016 in order to optimise its capital structure. These arrangements are considered ancillary own funds strengthening Generali Vie's capital position. Details are as follows:

- Assicurazioni Generali subscribed an “equity commitment letter” by which it commits to subscribe, at fair market value, a capital increase up to €250 million. This arrangement, approved by the French regulator, qualifies as Tier 2 Ancillary Own Funds of Generali Vie. In the event the commitment is called and subsequently paid, it will be classified as Unrestricted Tier 1 Basic Own Funds;
- Assicurazioni Generali subscribed a “Commitment letter to pay and subscribe in a full T2 item” by which it commits to subscribe at fair market value a Tier 2 subordinated bond issued by Generali Vie for an amount up to €250 million. This arrangement, approved by the French regulator, qualifies as Tier 3 Ancillary Own Funds of Generali Vie. In the event the commitment is called and subsequently paid, it will be classified as Tier 2 Basic Own Funds.

In addition there is a similar commitment between Generali Deutschland Holding and Generali Lebensversicherung Aktiengesellschaft, two subsidiaries of the German sub-group. Generali Deutschland Holding is committed to paying a capital increase of the latter, up to € 297 million. This arrangement has been approved by the German Regulator as Tier 2 Ancillary Own Funds of Generali Lebensversicherung Aktiengesellschaft.

B. System of Governance

B.1. GENERAL INFORMATION ON THE SYSTEM OF GOVERNANCE

THE CORPORATE GOVERNANCE SYSTEM OF THE GROUP

Assicurazioni Generali S.p.A. (AG), in its capacity as parent company of the Generali Group, has issued internal provisions applicable to all the most relevant Group companies (insurance, reinsurance, asset management, banking and other significant entities) that have to be followed in the definition of the corporate governance system, with a view of ensuring an adequate level of consistency among the Group.

This paragraph details the main contents of the abovementioned internal provisions while any detail on the corporate governance system of AG is included under the SFCR solo, available on the website at www.generali.com.

RULES ON AMSB COMPOSITION

As a general rule, the Administrative, Management or Supervisory Body (the AMSB) of each Group company must have a number of members proportional to the dimension and complexity of the relevant Group company and their composition must follow specific functional perspective criteria. Candidates for nomination to AMSB, including executive roles, must not hold other positions, including within the Group, which might generate a conflict of role or a conflict of interest.

In addition, each Group company must ensure that candidates for non-executive roles are normally selected among employees of the Group, with the exception of listed subsidiaries. Executive roles must not be attributed to the chairmen of AMSB. AMSB's member, and the AMSB as a whole, must fulfil the fit & proper requirements defined by the Group Fit & Proper Policy and detailed in Section B.2.

AMSB GENERAL COMPETENCES

The AMSB holds the ultimate responsibility for compliance with applicable laws, regulations and administrative provisions, including those adopted pursuant the Solvency II Directive for insurance and reinsurance Group companies.

Specific rules concern "reserved matters", meaning matters that all Group companies' AMSB must reserve to their exclusive competence. In this respect, the reserved matters must be on top of those provided for by the local laws and regulations and, in the implementation of those matters, each Group company must also take into account the scope, nature and complexity of the risks and business it carries out.

In particular, the reserved matters include the followings:

- approval of the organisational structure and set-up of possible internal committees within the AMSB;
- definition and approval of the internal control system and of the risk management framework;
- grant, amend and revoke delegated powers to AMSB member(s);
- approval of the remuneration policies in favour of employees and corporate bodies members (including remuneration plans based on financial instruments);
- appointment and revocation of the lines reporting to the CEO as well as the heads of key functions and approval of the relevant remuneration;
- approval of the asset allocation strategy;
- approval of outsourcing of critical or important functions/activities, including the general terms and conditions of the outsourcing agreement;
- approval of infra-group transactions, when performed at conditions other than market standards (not arm's length);
- approval of the draft financial statements to be submitted for approval to the competent corporate body, proposal upon allocation of profits, distribution of any interim dividends;
- approval of any shareholders' agreement of particular strategic importance as well as any agreement setting forth and/or amending terms and conditions of the investment and/or divestment in any participated company and the relevant rights and obligations as shareholder (e.g.: put and call options);
- opening and closing of secondary offices or branches;
- investments related matters not performed under asset management agreements, merger and demerger, provision of goods and services, cooperation agreements, issuance of financial instruments, granting loans, execution (as borrower) of loan agreements

and guarantees (not pertaining the insurance activity), or similar transactions and settlement agreements, provided that specific requirements and thresholds are respectively met.

AMSB COMPETENCES IN CONNECTION WITH THE INTERNAL CONTROL AND RISK MANAGEMENT SYSTEM

Furthermore, Group companies must comply with specific internal provisions regarding the role of the AMSB in connection with internal control and risk management system. In particular, AMSB of Group companies must ensure that the abovementioned system as well as the other elements of the system of governance are at all times consistent with a number of relevant Group policies. To this end, the AMSB reassesses the consistency periodically and at least once a year.

In particular, the AMSB competences in connection with the internal control and risk management system include the followings:

- establish the key functions ("key functions" according to Solvency II framework), defining their mandate and reporting lines as well as, where appropriate, any support committee. The establishment of support committees does not relieve the AMSB from its own responsibilities;
- adopt the relevant Group policies and define the means by which the Senior Management (comprising the CEO, the General Manager, the Financial Reporting Officer and the Heads of those functions that carry out management supervision duties) implements the internal control system and keeps it suitable and effective;
- determine the scope and the frequency of the internal review of the system of governance taking into account the nature, scale and complexity of the business as well as the structure of the Group, ensuring in any case that such internal review is made on a regular basis;
- ensure that adequate decision-making processes are adopted and formalised and that functions are appropriately separated;
- approve the system of delegated powers and responsibilities, making sure that it remains adequate over time; taking care in avoiding excessive concentration of powers on one person and set up instruments for assessing the exercise of delegated powers, with the consequent possibility of providing adequate contingency arrangements if it decides to reserve the delegated powers for itself;
- approve the Own Risk and Solvency Assessment (ORSA) Report and, based on its results, set the Group company's risk appetite and overall risk tolerance limits;
- approve the main risk management strategies and policies;
- check that Senior Management correctly implements the system of internal controls and risk management in accordance with its issued directives and assesses its functionality and adequacy;
- require to be periodically informed about the effectiveness and adequacy of the system of internal control and risk management and that the most significant critical situations are promptly brought to its attention, whether they are detected by Senior Management, internal audit, risk management, actuarial and compliance functions or personnel, promptly issuing the directives for the adoption of corrective measures, whose effectiveness it subsequently assesses;
- identify certain events or circumstances that require prompt intervention by Senior Management;
- ensure that there is appropriate interaction between all the committees established within the AMSB, the Senior Management and risk management, actuarial, compliance and internal audit functions, also proactively, to ensure its effectiveness;
- carry out, at least once a year, an assessment of the size, composition and functioning of the AMSB as a whole and of its committees, advising on the experts whose presence in the administrative body is considered appropriate and proposing possible corrective actions.

The decisions taken by the AMSB must be appropriately documented. Evidence must be given on how the information from the risk management system has been taken into account.

AMSB COMMITTEES

The AMSB must evaluate whether to establish an internal control committee, composed by non-executive directors, or designate one of its members to oversee the internal control and risk management system.

The internal control committee or the designated AMSB member assists the AMSB by providing advice and making proposals, in determining policy and guidelines in relation to the system of internal controls, periodical checks on its adequacy and its effective functioning, the identification and management of main corporate risks.

The AMSB must also evaluate whether to establish a remuneration committee composed by non-executive directors to perform a competent and independent judgment on the remuneration policy and its oversight.

This evaluation must consider various factors, including the size, nature and scope of the business, the internal organisation and resulting complexity of the remuneration policy, as well as its link with the Group company's risk profile.

If a remuneration committee is not established, the AMSB must assume the tasks that would otherwise have been assigned to the remuneration committee, in a way that avoids conflicts of interest.

The tasks of the remuneration committee include: a) supporting the AMSB on the design of the Group company's overall remuneration policy; b) preparing decisions regarding remuneration; c) reviewing the policy regularly to ensure it remains appropriate even in case of changes to the Group company's operations or business environment; d) identifying potential conflicts of interest and the steps to be taken to address them; and e) providing adequate information to the AMSB regarding the performance of the remuneration policy.

The remuneration committee or the person designated to assume its tasks needs to have access to all the data and information necessary to advise on the design and maintenance of an effective remuneration policy. To secure proper governance, the committee ensures proper involvement of the persons responsible for the Key Functions.

SENIOR MANAGEMENT AND MANAGEMENT COMMITTEES

The AMSB appoints a CEO and defines its mandate and responsibilities.

For branches of Group companies, the branch manager, regardless of the title, plays the role of the CEO, as described here below.

The CEO is responsible for the implementation, maintenance and monitoring of the system of internal controls and risk management, including risks arising from non-compliance with regulations, in accordance with the directives of the AMSB. The Senior Management supports the CEO in the performance of its mandate.

In particular, the CEO:

- defines in detail the organisational set-up of the Group company, the tasks and responsibilities of the operational units and their staff, as well as the decision-making processes in line with the directives issued by the AMSB; within this sphere it implements the appropriate separation of tasks between individuals and functions so as to avoid, as far as possible, conflicts of interest;
- implements the policies relating to the assessment, even on a forward-looking basis, and management of risks as established by the AMSB, ensuring the definition of operational limits and prompt checks on those limits, as well as the monitoring of exposures to risks and compliance with the levels of tolerance;
- implements, taking into account the strategic objectives and consistently with the risk management policy, the underwriting, reserving, reinsurance and other risk mitigation techniques as well as of operational risk management policies;
- oversees the maintenance of the functionality and overall adequacy of the organisational set-up, the internal control and risk management system, including risks arising from non-compliance with regulations;
- checks that the AMSB is informed about the effectiveness and adequacy of the internal control and risk management system periodically and, in any event, promptly every time significant critical situations occur;
- implements the instructions given by the AMSB on the measures to be adopted in order to correct faults that have come to light and make improvements;
- proposes to the AMSB initiatives aimed at adjusting and reinforcing the system of internal controls and risk management.

On the basis of the applicable system of delegated powers, each Group company (including the branches) must establish a managerial risk committee, or equivalent, to support the CEO in the implementation, maintenance and monitoring of the internal controls and risk management system. The key functions must participate in the committee meetings providing their evaluation of the adequacy of the internal control system.

The risk committee: a) identifies, evaluates and addresses the actions to mitigate the significant risks; b) monitors the adequacy of the main policies, procedures and processes to mitigate risks; c) monitors the effective implementation of the Group risk policies; d) challenges and evaluates the results of the risk assessments.

THE KEY FUNCTIONS

The Group internal control and risk management system is founded on the establishment of the three lines of defence:

- the operating functions (the risk owners), which represent the first line of defence and have ultimate responsibility for risks relating to their area of expertise;
- actuarial (for insurance and reinsurance entities only), compliance and risk management functions, which represent the second line of defence;
- internal audit, which represents the third line of defence.

Actuarial, compliance, risk management and internal audit functions are the key functions. These functions must be independent from the operational functions and, as a consequence, they must: (i) retain the responsibility for taking the decisions necessary for the proper

performance of their duties without interference from others and (ii) be able to report their results and any concerns and suggestions to the AMSB without restrictions as to their scope or content from anybody else.

ACTUARIAL FUNCTION

According to Solvency II provisions, the actuarial function has the responsibility to:

- coordinate the calculation of technical provisions;
- ensure the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of technical provisions;
- assess the sufficiency and quality of the data used in the calculation of technical provisions;
- compare best estimates against experience;
- inform the AMSB on the reliability and adequacy of the calculation of technical provisions;
- oversee the calculation of technical provisions in the cases where there are insufficient data or appropriate quality to apply a reliable actuarial method;
- express an opinion on the overall underwriting policy;
- express an opinion on the adequacy of reinsurance arrangements; and
- contribute to the effective implementation of the risk management system.

The Head of the actuarial function hierarchically reports to the CFO but, as a Key Function, reports also to the AMSB.

COMPLIANCE FUNCTION

The compliance function has the responsibility to advise the AMSB on compliance with laws, regulations and administrative provisions, including those adopted pursuant to the Solvency II Directive for insurance and reinsurance Group companies.

The compliance function also advises on other laws, regulations and administrative provisions, including the Group Code of Conduct and Group policies.

Moreover, the compliance function has the responsibility to assess the possible impact of any changes in the legal environment on the operation of the relevant Group company and to identify and assess the compliance risks, including the adequacy of the measures adopted to prevent non-compliance.

While the compliance function established at entity level is responsible for the identification and assessment of the compliance risks embedded in the operations of the Group company concerned, the Group Compliance Function, established at parent company level, is also responsible to ensure that adequate resources, methodologies and tools are in place and used across the Group to manage the compliance activities and an adequate consolidated reporting is provided to the Board of Directors of AG.

The compliance officer reports to the AMSB.

RISK MANAGEMENT FUNCTION

The risk management function guarantees the accurate implementation of the risk management system in accordance with the Solvency II Directive, the other applicable legal and regulatory provisions, the directions given by the AMSB and the provisions of the Group policies.

This function supports the AMSB and Senior Management in defining the risk management strategies and tools for identifying, monitoring, managing and measuring risks. It also provides the information needed to evaluate the adequacy of the risk management system as a whole, through an adequate reporting system.

The risk management function is responsible to report to the AMSB on risks that have been identified as potentially material. The risk management function should also report on other specific areas of risks both on its own initiative and following requests from the AMSB.

The risk management function has the responsibility to:

- assist the AMSB and other functions in the effective operation of the risk management system;
- monitor the risk management system and the implementation of the risk management policy;
- monitor the general risk profile of the Group company and provide the reporting defined in the Group Risk Appetite Framework, including the reporting in case of tolerances breaches;

- coordinate a detailed reporting on risks and, in particular, coordinate ORSA Report preparation;
- advise AMSB on risk management matters, including in relation to strategic affairs such as corporate strategy, mergers and acquisitions and major projects and investments and, in general, foster risk management embedding with business decision making processes;
- as part of the broader risk identification process, identify and assess emerging risks.

The chief risk officer reports to the AMSB.

INTERNAL AUDIT FUNCTION

Within the Generali Group, the internal audit activities are performed by Group Audit, consisting of the totality of the Internal Audit Functions across the Generali Group, as per the organizational rules defined in the Group Audit Policy, approved by the Board of Directors of Assicurazioni Generali S.p.A.

The internal audit function is responsible for the evaluation of the adequacy and effectiveness of the internal control system as well as of other elements of the system of governance of the Group Company.

The internal audit function has the responsibility to:

- establish, implement and maintain an audit plan setting out the audit work to be undertaken in the upcoming years, taking into account all activities and the complete system of governance of the Group company;
- take a risk-based approach in deciding its priorities;
- issue audit reports with actions to mitigate the identified risks, based on the result of the audit work;
- submit a report to the AMSB at least on a semi-annual basis on activities and significant issues during the period and a proposal of action plan: the AMSB determines the actions to be taken with respect to each of the issues presented in the report to the AMSB and ensures that those actions are carried out;
- monitor closely the significant issues reported in the audits in order to ensure a proper implementation of the defined actions and test them to verify their effectiveness. The results of the monitoring activity, as well as the outstanding issues, are reported to the AMSB at least annually.

The head of internal audit function reports to the AMSB.

INTERACTIONS AMONG THE KEY FUNCTIONS

An effective interaction and coordination among key functions increases the efficacy of their role in supporting the Senior Management and the AMSB in maintaining a clear and integrated view on the Group company's risk exposure.

In this context, the key functions act according to a clear interaction framework, based on the following pillars:

- the key functions plan their activities in a coordinated manner in order to ensure consistency and avoid duplications in their initiatives;
- the key functions meet regularly and share any outcome, finding or information that can be useful to better perform their respective activities (e.g. audit findings related to risks falling under the scope of activity of the other key functions; outcomes of the monitoring activities performed by risk management and compliance functions, outcomes of the risk assessments, scenario analysis and testing activities performed by risk management and compliance functions);
- the risk management and the compliance functions provide the organisation with common risk assessment methodologies, processes and tools in order to obtain a comprehensive evaluation and representation of the operational and compliance risks. The compliance function contributes to the drafting of the ORSA Report and the risk appetite framework and participate in the scenario analysis as far as the compliance risk is concerned;
- the actuarial and risk management functions define a common governance to effectively manage, from a methodological and technical standpoint, processes and tools supporting the calculation of both the technical provisions and solvency capital requirement;
- the internal audit, acting as independent third line of defence, performs an independent overall evaluation of the second level key functions' operating model, methodologies, tools and procedures;
- any disagreement among the local key functions on the above subjects will be submitted to the relevant Group key functions. Any disagreement among the Group Key Functions will be submitted to the Board of Directors of AG;
- any disagreement among the local key functions that can affect the calculation of the technical provisions or solvency capital requirement will be submitted to the relevant local AMSB. Any disagreement among the Group Key Functions that can affect the calculation of the Group technical provisions or Group solvency capital requirement will be submitted to the Board of Directors of AG.

MATERIAL CHANGES TO THE SYSTEM OF GOVERNANCE OF THE GROUP OCCURRED IN 2018

No material changes to the Group system of governance occurred in 2018.

REMUNERATION POLICY GENERAL PRINCIPLES

As a general principle, according to the Group Directives on the internal control and risk management system, the remuneration awards recognised by Group companies must not threaten their ability to maintain an adequate capital base.

Remuneration practices must be established, implemented and maintained in line with the business carried out and the risk management strategy, the risk profile, objectives, risk management practices and the long-term interests and performance of the Group Legal Entity and shall incorporate measures aimed at avoiding conflicts of interest.

The Remuneration Policy adopted by the Board of Directors of Assicurazioni Generali S.p.A. sets out the principles and requirements that Group companies must comply with, within the requirements set out by the local regulatory framework, including special requirements provided for banking and financial business, with a view to ensuring consistency among the Group.

The general principles which the abovementioned remuneration policy is based on are the followings:

- equity and consistency of remuneration in relation to the assigned responsibilities and capabilities demonstrated;
- alignment with corporate strategy and goals defined;
- competitiveness with respect to market trends and practices;
- value merit and performance, in terms of results, behaviours and values;
- clear governance and compliance with the regulatory framework.

Beside this, with reference to the values established in the remuneration policy, particular importance is given to:

- the meritocratic alignment of the remuneration systems with sustainable long-term business results, in constant compliance to corporate values that represent the main pillars of remuneration systems and of a prudent risk management;
- the alignment with the overall business strategy based, among others, on a significant international integration of the Group, so that the principles and policies are applied in a coherent manner to all Group's key executives, thus favouring the overall alignment to the Group's goals.

The remuneration package consists of a fixed component, a variable component and benefits, structured in a balanced way. Such remuneration must be consistent with each role, the responsibilities assigned and the skills and abilities demonstrated and must also be aligned to the reference market. This applies both for the Group executive roles as well as for other employees, and complies with the requirements of current national and company labour contracts.

The fixed component of the remuneration rewards the role held and the responsibilities assigned, also taking into account the expertise and the competences of the relevant person as well as the quality of the contribution in terms of achieving business results. The variable component is defined on the basis of short and long term incentive plans aimed at motivating the management to achieve business targets by creating a direct link between incentives and quantitative and qualitative targets set at Group, Region, Country, Business/Function and individual level. A relevance impact is assigned to the variable component of the remuneration linked to the long term incentive plan. Caps to the maximum amount of both the overall and the individual variable remuneration are always set, linked to the effective achievement of the performance conditions and the target set.

Benefits include, in particular, supplementary pensions and health care for employees and their families, as well as a company car and other benefits, including those related to internal and international mobility in line with market practices.

The remuneration package structure is analysed in order to ensure that the fixed remuneration is balanced with respect to the short and long-term variable remuneration and benefits, in order to encourage managers to commit fully to achieving sustainable results. In particular the fixed remuneration is determined as an amount that does not incentivise the undertaking of inappropriate risks by the manager and that allows the effective enforceability, in the theoretical event the relevant conditions are met, of specific ex post correctional mechanisms (malus and clawback) on variable compensation. The weighting and structure of the variable remuneration component are balanced so as to incentivise the achievement of sustainable results over time, while taking due consideration of the Group's risk framework and discourage conduct that would lead to excessive exposure.

REMUNERATION OF GROUP COMPANIES' AMSB MEMBERS

Group companies have to take into consideration and implement local rules on remuneration for the members of their AMSB consistent with those set out under the remuneration policy of the parent company. The latter remuneration policy provides, for all non-executive directors (independent or not independent), that remuneration shall consist of a fixed component and of an attendance fee which will be issued for each attended meeting of the Board of Directors, in addition to the reimbursement of expenses incurred for attendance and, in general terms, for the discharge of their tasks. This role shall also entail the assignment of certain non-monetary benefits, such as insurance coverage against professional liability. Consistently with the best international market practice, no variable component nor any supplementary pensions are provided for such non-executive directors.

Directors who are also members of board committees (but not at the same time managers of the Generali Group) are rewarded, on top of the remuneration they receive as members of the Board of Directors, with an additional emolument related to the competences assigned to the relevant committees and to the effort and time required for attending such committees, in terms of the number of meetings and preparation required.

REMUNERATION POLICY FOR THE CHIEF EXECUTIVE DIRECTOR AND THE OTHER MANAGERS WITH STRATEGIC RESPONSIBILITIES

The chief executive director and the other managers with strategic responsibilities receive a total remuneration package consisting of a fixed component, a variable component (short and long term) and benefits.

In terms of total target remuneration, the Group's intention is to align the remuneration at a competitive level, between the median and the upper quartile of the reference market, with an individual positioning linked to the assessment of performance, of the potential and the strategic relevance of the person considered according to a segmented approach.

In particular, the variable component of the remuneration includes a short term and a long term variable component and may be respectively achieved on the basis of the criteria provided for the Short Term Incentive (STI) plan and the Long Term Incentive (LTI) plan. Such components reward the achievement of qualitative and quantitative performance objectives.

The Short Term Incentive (STI) plan provides for the assignment of an annual cash bonus, comprised between 0% and 200% of the individual target baseline and is defined on the basis of:

- the Group funding, related to the results achieved in terms of operating results and net profit adjusted of the Group;
- the achievement of a minimum level of Regulatory Solvency Ratio equal to 120% consistently with the hard limit of the Risk Appetite Framework approved by the Board of Directors of Assicurazioni Generali;
- the achievement of individual goals, defined in terms of value creation, risk adjusted profitability, efficiency, business transformation & strategy acceleration and people empowerment. The final assessment of the level of achievement of such goals is also based on an individual assessment concerning the consistency with compliance value and control culture as well as compliance with code of conduct rules and governance processes; such assessment may also be used as a malus/clawback clause, if necessary.

The Long Term Incentive (LTI) plan provides for the assignment of shares of Assicurazioni Generali S.p.A. and presents the following characteristics:

- it is based on a total time frame of 6 years;
- is linked to specific performance objectives (Return on Equity and Relative Total Shareholder Return);
- is conditioned upon the achievement of a minimum level of Regulatory Solvency Ratio equal to 120%;
- provides a three-year performance cycle and further lock-up periods of the assigned shares up to two years (so called minimum holding period).

All the objectives the incentive system makes reference to are defined on an ex ante basis, with a view of ensuring that the annual performance indicators are consistent with those used as reference for the long term incentive plans.

No incentive is paid in the event of wilful misconduct or gross negligence, or a significant deterioration of the Generali's capital and financial situation. Any amount disbursed will be subject to clawback if the performance on which the incentive was awarded is later found to be unsustainable or was achieved as a result of wilful misconduct or gross negligence.

More specifically, thresholds and malus mechanisms are envisaged for both the variable remuneration components - annual and deferred. These mechanisms set out limits below which a reduction/zeroing of any incentive is made, subject to the evaluation of the Board of Directors.

With regard to the annual variable component, the final assessment of the extent to which the goals have been achieved also includes an individual assessment of conformity with respect to compliance / audit / code of conduct and governance processes, to be carried out and used also within the calibration process and as malus/ clawback mechanism as necessary.

In line with the European regulatory framework (Solvency II), the Company requires the incentive policies' beneficiaries not to use any personal coverage or insurance strategies (known as "hedging") that could alter or undermine the risk alignment effects embedded in variable remuneration mechanisms.

REMUNERATION POLICY FOR THE HEADS OF THE KEY FUNCTIONS AND THE MANAGERS DIRECTLY REPORTING TO THEM

The overall remuneration package for the heads of the key functions and their first reporting line managers consists of a fixed and a variable component plus additional benefits. The fixed component is established according to the level of the responsibilities and duties assigned to such persons and is designed to guarantee the independence and autonomy required for such roles. The variable component is linked to the participation in a specific deferred monetary incentive system that has multi-year time goals which relate exclusively to the effectiveness and quality of controls, with the exclusion of any form of financial indicators and financial instruments which may give rise as a conflict of interest source.

It is provided that the supplementary pension schemes are governed by individual contracts, applicable collective bargaining agreements and the additional regulations of the Generali Group.

MATERIAL TRANSACTIONS EXECUTED IN 2018

No material transactions have been executed during the reporting period by any of the Group companies with shareholders, persons who exercise a significant influence on Assicurazioni Generali S.p.A. or with the members of Assicurazioni Generali S.p.A. Board of Directors.

B.2. FIT AND PROPER REQUIREMENTS

Assicurazioni Generali, in its capacity as parent company of the Generali Group, has adopted the "Group Fit & Proper Policy", according to which Group companies must evaluate the fitness and propriety of the "Relevant personnel", composed by:

- members of the AMSB;
- members of the Board of Statutory Auditors, if any (meaning the board of persons with a control and auditing role, whose appointment is required by applicable legislation or by-laws, excluding external auditing firms);
- key managers (meaning the persons effectively running the business, responsible for high level decision making and for the implementation of the strategies devised and the policies approved by the AMSB);
- personnel of the key functions,
- personnel exerting control over certain outsourced activities (meaning at least the persons exerting control over the outsourced activities in case such activities are internal audit, risk management, compliance, actuarial function or anti-money laundering).

FITNESS REQUIREMENTS

The AMSB of Group insurance and reinsurance companies must collectively possess appropriate experience and knowledge about at least:

- the market in which the company operates, meaning an awareness and understanding of the broader relevant business, economic and market environment and an awareness of the level of knowledge and needs of customers;
- business strategy and business model, meaning a detailed understanding of the company's business strategy and model;
- system of governance, meaning awareness and understanding of the risks that the company is facing and the capability to manage them as well as the ability to assess the effectiveness of the company's arrangements to deliver effective governance, oversight and controls in the business and, if necessary, oversee changes in these areas;
- actuarial and financial analysis, meaning the ability to assess the company's actuarial and financial information, identify and assess key issues and take any necessary measures (including appropriate controls) based on this information;

- regulatory framework and requirements, meaning awareness and understanding of the regulatory framework in which the company operates, in terms of both regulatory requirements and expectations and ability to adapt to changes in the regulatory framework without delay.

The AMSB of the Group companies other than insurance and reinsurance companies must collectively possess appropriate experience and knowledge on the above fields depending on the specific business sector in which they operate.

The members of the Board of Statutory Auditors (if any) must comply with the fitness requirements provided by the applicable local legislation.

Each Key Manager as well as the personnel of the key functions must possess the professional qualifications, knowledge and experience which are appropriate and adequate to hold all the roles he/she is in charge for.

The personnel exerting control over outsourced activities must possess sufficient professional qualifications, knowledge and expertise to discharge such control activity. In particular, at a minimum level, the person who has overall responsibility for the outsourced activities must possess enough knowledge and experience regarding the outsourced function to be able to challenge the performance and the results of the service provider.

PROPER REQUIREMENTS

In addition to the professional requirements, Group companies must evaluate if the Relevant personnel is suitable to perform the role and responsibilities assigned to them based on local legislation, and is reliable with a good reputation.

The professional integrity of the Relevant personnel is assessed on the basis of evidence regarding the following:

- criminal convictions;
- negative assessments by competent supervisory authorities stating the inadequacy of the person to hold the relevant office;
- serious disciplinary or administrative measures applied as a consequence of wilful misconduct or gross negligence, also related to relevant breaches of the Group Code of Conduct and the implementing provisions.

Criminal convictions and disciplinary measures should be assessed in relation to laws governing banking, financial, securities or insurance activity, or concerning securities markets or securities or payment instruments, including, but not limited to, laws on money laundering, market manipulation, or insider dealing and usury, as well as any offences of dishonesty such as fraud or financial crime. They also include any other serious criminal offences under legislation relating to companies, bankruptcy, insolvency or consumer protection.

The following situations will automatically preclude Relevant personnel from being appointed or continuing in their current role:

- a definitive conviction in relation to the above mentioned laws, or
- a definitive conviction providing for a detention period of at least two years for any offence with criminal intent, or
- the existence of any of the other situations under b) and c) mentioned above.

Negative information other than that listed above, including non-definitive criminal convictions, will not automatically preclude Relevant personnel from being appointed or continuing in their current role. Unless otherwise provided by the applicable legislation, previous infringements do not automatically result in the person not being assessed as proper for the duties he/she has to perform. While criminal, disciplinary or administrative convictions or past misconduct are significant factors, the assessment of the proper requirements is to be done on a case by case basis. Hence, consideration needs to be given to the type of misconduct or conviction, the level of appeal (definitive vs. non-definitive convictions), the lapse of time since the misconduct or conviction, and its severity, as well as the person's subsequent conduct.

Subject to local laws, the content of the labour contracts of the Relevant personnel must ensure the enforcement of the Group Policy provisions mentioned above and compel Relevant personnel to notify their Group company if any of the above situations have arisen.

EVALUATION OF FIT AND PROPER REQUIREMENTS

The evaluation of the AMSB members must be executed by the AMSB itself in one of the first meetings after their appointment, at least once a year (as a general rule, when approving the annual financial statements) and whenever a change in the composition of the AMSB occurs (e.g. in the event of replacement of one of the members of the corporate body, following the revocation or withdrawal of such member). When a sole director is appointed, the evaluation is performed by the subject (within the Group) who has the power to appoint him/her (in most cases the shareholders).

The evaluation of Key Managers must be executed by the subject or the collective body in charge of their appointment according to the applicable corporate governance rules.

The evaluation of the Heads of the key functions must be executed by the AMSB of each Group company when appointing the Heads of the relevant key functions and on an ongoing basis (at least annually). The evaluation of the personnel must be executed by the Head of the key function.

The evaluation of the personnel exerting control over outsourced activities must be executed by the person in charge of appointing such personnel.

Moreover, the HR Department of the relevant Group company must request to Key Managers, all personnel of the key functions and all personnel exerting control over outsourced activities a written self-declaration, at least on an annual basis, confirming the adherence of such persons to the current fit & proper standards.

The Relevant personnel must promptly communicate any fact and/or circumstance that leads to the loss of their fit &/or proper requirements to the person or body in charge of the evaluation of their fit and proper requirements.

B.3. RISK MANAGEMENT SYSTEM INCLUDING THE OWN RISK AND SOLVENCY ASSESSMENT

B.3.1. RISK MANAGEMENT SYSTEM

Group Risk Management Policy

The principles defining the Group risk management system, including strategies, processes and reporting procedures, are provided in the Group Risk Management Policy, which is the cornerstone of all risk-related policies and guidelines. The Group Risk Management Policy covers all risks on a current and forward-looking basis and is implemented in a consistent manner across the Group.

Generali Group's risk management process is defined in the following phases:



1. Risk identification

The purpose of risk identification is to ensure that all material risks to which the Group is exposed are properly identified. To this end, the Risk Management Function interacts with the main business functions in order to identify the main risks, assess their importance and ensure that adequate measures are taken to mitigate them according to a sound governance process. Within this process also emerging risks²¹ related to new risks and developing trends, characterised by uncertain evolution and often of systemic nature, are considered.

The Group main risks identification process is based on the results of the local risk identification processes.

2. Risk measurement

Identified risks can be measured through their contribution to the Solvency Capital Requirement (SCR), complemented by other modelling techniques deemed appropriate and proportionate to better reflect the Group risk profile. Using the same metric for measuring the risks and the capital requirements ensures that each quantifiable risk is covered by an adequate amount of capital that could absorb the loss incurred if the risk materialises. For SCR calculation purposes 1 in 200 years events are considered.

The SCR is calculated by means of the Group's Partial Internal Model (PIM²²) for financial, credit, life and non-life underwriting risks. Operational risks are measured by means of standard formula, complemented by qualitative risk assessments. The PIM provides an accurate representation of the main risks the Group is exposed to, measuring not only the impact of each risk taken individually but also their combined impact on the Group's own funds.

²¹ Major details on emerging risk definition are provided in section C.6.

²² In the document the terms "Model", "Internal Model", "Partial Internal Model" and "PIM" are equivalent.

For the scope of the Group PIM in terms of legal entities, please refer to section E.4. Insurance and re-insurance entities not included in the PIM scope calculate the capital requirement based on standard formula, while other financial services (e.g. banking or pension funds) calculate the capital requirement based on their own specific sectoral regimes.

Other risks, for which no SCR is calculated, such as liquidity, reputational, strategic, contagion, emerging and additional Group specific risks (i.e. risks from intragroup transactions, risk concentrations), are evaluated on the basis of quantitative and qualitative techniques, models and additional stress testing or scenario analysis.

3. Risk management and control

The risks which the Group is exposed to are managed on the basis of the Group Risk Appetite Framework (RAF), defined by the Board of Directors of Assicurazioni Generali S.p.A. (BoD). The Group RAF defines the level of risk the Group is willing to accept in conducting business and thus provides the overall framework for embedding risk management into business processes. In particular, the RAF includes the statement of risk appetite, the risk preferences, the risk metrics, the tolerance and the target levels.

The purpose of the Group RAF is to set the desired level of risk exposure on the basis of the Group strategy. The Group RAF statement is complemented by qualitative assertions (risk preferences) supporting the decision-making processes as well as by risk tolerances providing quantitative boundaries to limit excessive risk-taking, as well as by a target operating range to provide indications on the solvency level at which the Group aims to operate. Tolerance and target levels are referred to capital and liquidity metrics.

The Group RAF governance provides a framework for embedding risk management into day-to-day and extraordinary business operations and control mechanisms as well as the escalation and reporting to be applied in case of risk tolerance breaches. Should an indicator approach or breach the defined tolerance levels, escalation mechanisms are activated.

Further details on underwriting, investment, liquidity and operational risks' management are provided in sections C.1., C.2., C.3., C.4. and C.5., respectively Underwriting Risk, Market Risk, Credit Risk, Liquidity Risk and Operational Risk.

4. Risk reporting

The purpose of risk reporting is to keep business functions, Senior Management, AMSB and Supervisory Authority aware and informed on the development of the risk profile, the trends of single risks and the breaches of risk tolerances on an ongoing basis.

The Own Risk and Solvency Assessment (ORSA) Report, including current and forward-looking risk assessment, is prepared on annual basis.

The main risk reporting tool, being the ORSA Report, is further described in section B.3.3..

Risk Management Function

The Risk Management Function supports the AMSB and Senior Management in ensuring the effectiveness of the risk management system and provides advice and support to the main business decision-making processes (in particular for the strategic planning process, the strategic asset allocation, the product development process, as well as for extraordinary operations management).

In terms of risk governance, a description of how the above Risk Management Function is implemented and integrated into the organisational structure and decision-taking processes is provided in the section B.1. General Information on System of Governance.

B.3.2. INTERNAL MODEL FRAMEWORK: GOVERNANCE AND VALIDATION

INTERNAL MODEL GOVERNANCE

As anticipated, underwriting, financial and credit risks are measured by means of the PIM, which has been approved by the Supervisory Authority for the calculation of the SCR.

The Group PIM is structured around a Risk Map, which contains all quantifiable risks that Generali Group has identified as relevant to its business, allowing for the calculation of the SCR at single risk level and at higher aggregation levels.

Governance and processes regarding the Group PIM are defined in the Group Internal Model Governance Policy, ensuring that:

- models and components are appropriate for their purpose;
- procedures are in place to design, implement, use and validate new models and model changes;
- the appropriateness of models on an ongoing basis is verified.

To rule the activities related to the Internal Model developments necessary to ensure its appropriateness over time and, more in general, to support the Internal Model change process, the Group Internal Model Change Policy has been also defined with the aim to specify roles and responsibilities in the implementation of major and minor changes.

A dedicated committee, the Internal Model Committee, has been established to review Group PIM calibrations, to support the Group Chief Risk Officer (GCRO) in the decision-making process on Group PIM developments or model changes and to control the full model lifecycle, assuring proper compliance with the Group Internal Model Governance Policy. This Committee is chaired by the Model Design Authority, in the person of the Head of Group Enterprise Risk Management, responsible for ensuring the overall consistency and reliability of the Group PIM. The members of the Internal Model Committee are all the Model Owners and the Model Design Authority and possibly further participants required by the Model Design Authority.

The Internal Model Committee is in charge of providing proposals/advice on the Internal Model matters before the submission to GCRO and ensures the escalation process from Model Owner to the Board of Directors of Assicurazioni Generali S.p.A., if there are not resolved issues.

The GCRO defines the processes and controls to ensure the ongoing appropriateness of the design and operations of the Group PIM, so that it continues to appropriately reflect the Group risk profile. The GCRO is also responsible for defining the methodology of each model component, on the basis of the Internal Model Committee's proposals, as well as for the results production and ultimately for submitting the relevant Internal Model supporting documentation to the Board of Directors of Assicurazioni Generali S.p.A..

The GCEO reviews, with the support of the Balance Sheet Committee, the relevant Internal Model supporting documentation before the submission to the Board of Directors of Assicurazioni Generali S.p.A. by the GCRO. The Board of Directors, assisted by the Risk and Control Committee, ensures the ongoing appropriateness of the design and operations, the ongoing compliance of the Group PIM and also that the Group PIM continues to appropriately reflect the risk profile of the Group.

These roles are generally mirrored within the organisational structure of each Group legal entity within the PIM scope.

No material changes have occurred during the period with reference to the PIM governance.

INTERNAL MODEL VALIDATION

The Group PIM is subject to independent validation, which aims to gain independent assurance of the completeness, robustness and reliability of the processes and results of the Group PIM as well as their compliance with the Solvency II regulatory requirements.

The validation process follows the principles and procedures defined within the Group Internal Model Validation Policy and related guidelines.

In particular, the validation outputs are designed to support Senior Management and Board of Directors in understanding the appropriateness of the Group PIM, including areas of weaknesses and limitations, especially with regard to its use.

To ensure an adequate level of independence, the resources performing the validation activities are not involved in the development and operation of the Group PIM.

Within the validation process, results obtained during previous validation cycles are also taken into account, as well as developments within internal and external business environment, financial market trends and Group PIM changes. The Internal Model validation process excludes those aspects covered by the assurance work of the Group Actuarial Function (i.e. technical provisions and related IT systems, actuarial platforms and their governance).

Furthermore, the validation process also serves as an incentive mechanism to ensure timely and accurate incorporation of modelling refinements.

In order to warrant the appropriateness of the array of elements contained within the Group PIM, the validation covers both the quantitative and qualitative aspects of the Internal Model, and is therefore not limited to the calculation engine and methodology. Other important items such as data quality, documentation and uses of the Internal Model are validated accordingly.

The validation process is carried out on regular annual basis and when requested by the Board of Directors or Senior Management (e.g. in case of PIM changes).

B.3.3. ORSA PROCESS

The purpose of the Own Risk and Solvency Assessment (ORSA) process is to provide the assessment and reporting of all risks and of the overall solvency needs on a current and forward-looking basis.

The ORSA process includes the assessment of all risks, quantifiable and not in terms of capital requirements (e.g. liquidity risk). Within the ORSA process, stress tests and sensitivity analyses are also performed to assess the resilience of the solvency position and risk profile to changed market conditions or specific risk factors.

Generali Group applies a Group-wide process, which implies that each Group legal entity is responsible for the preparation of its own ORSA Report and the Parent Company coordinates the Group ORSA reporting process.

At Group level, the process is coordinated by the Risk Management Function, supported by other functions for what concerns own funds, technical provisions and other risks. The Group ORSA Report, documenting main results of this process, is produced on an annual basis. A non-regular ORSA Report can also be produced in case of significant changes of the risk profile. The Group Compliance review of the Report is also foreseen. The Group ORSA Report is reviewed by the Senior Management and after the discussion and approval by the Board of Directors of Assicurazioni Generali S.p.A., assisted by the Risk and Control Committee, it is submitted to the Supervisory Authority.

The ORSA process ensures an ongoing assessment of the solvency position based on the Strategic Plan and the Group Capital Management Plan. In particular, during the strategic plan finalisation phase, the forward-looking risk assessment is also updated in line with the Group Capital Management Plan.

Risk and capital management are closely integrated processes. This integration is deemed essential in order to align capital and business management processes.

The ORSA relies on the Capital Management Plan and assesses the adequacy and quality of own funds to cover the overall solvency needs during the planning period.

To grant risk and business strategy alignment on an ongoing basis, the Risk Management Function actively supports the strategic planning and the plan definition processes.

B.4. INTERNAL CONTROL SYSTEM

As already stated in paragraph B.1, Assicurazioni Generali S.p.A., in its capacity as parent company of the Generali Group, has adopted the "Group Directives on Internal Control and Risk Management System", with a view of ensuring that the internal control system of each relevant Group company is based on the same key elements, roles and responsibilities.

According to the aforementioned policy, the internal control system of Group companies must be founded on the set-up of the following three lines of defence:

- operating functions (risk owners), which represent the first line of defence and have ultimate responsibility for risks related to their area of expertise;
- actuarial, compliance and risk management functions, which represent the second line of defence;
- internal audit, which represents the third line of defence.

The internal control system must be effective and well integrated into the organisational structure and in the decision-making processes, thereby ensuring compliance with applicable laws, regulations and administrative provisions as well as operational effectiveness and efficiency of Group companies.

Controls are an integral part of every business process. Therefore, the heads of operational departments (i.e. the risk owners) have direct responsibility to take charge for risks falling under their respective competence, manage them and implement appropriate control measures. To this end, they must provide the Senior Management with the information needed to define the policies, methods and tools for the management and control of the risks for which they are responsible, oversee their implementation and ensure their adequacy over time. They also ensure that the operational departments under their responsibility comply with their objectives and policies, implement corrective actions within the scope of their autonomy, while on a higher hierarchical level, they submit specific recommendations or proposals to the Senior Management.

In addition, Group companies must establish actuarial, compliance and risk management functions as second line of defence and the internal audit function as third line of defence according to the provisions of the relevant Group policies.

Key functions must be independent from operational functions and, as a consequence, they must: (i) retain the responsibility for taking the decisions necessary for the proper performance of their duties without interference from others and (ii) be able to report their results and any concerns and suggestions to the AMSB without restrictions as to their scope or content.

COMPLIANCE OPERATING MODEL

Assicurazioni Generali S.p.A., in its capacity as parent company of the Generali Group, has adopted the “Group Compliance Management System Policy” which includes the fundamental rules on how compliance must be embedded in the daily operations and how the compliance function must be implemented. In this respect, the above-mentioned policy defines the operating model of the global compliance function across the Group.

In particular, the core processes included under the compliance operating model are the following:

- risk identification;
- risk evaluation;
- risk mitigation;
- risk monitoring;
- reporting and planning.

The risk identification process is aimed at ensuring that the requirements arising in connection with both the internal and the external regulations are identified and allocated under the responsibility of the relevant operational functions.

The risk evaluation process is aimed at assessing, also under a forward-looking perspective, the risks which each Group company is exposed to and the level of adequacy of the internal control system to achieve its goals. The compliance function, together with the risk management function, performs and supports risk owners in risk assessment activities and ensures that Group methodologies are applied.

The risk mitigation process aims at ensuring the adoption of all actions necessary for the correct implementation of the requirements set out by the internal and external regulations. In particular, the compliance function ensures that appropriate training programs for all employees are delivered on a regular basis, internal regulations and procedures are defined and minimum standard for controls identified, in cooperation with the operational functions.

The risk monitoring process aims at achieving an updated picture on the ability of the Group company to manage compliance risks. Such process consists in the collection and periodical analysis of specific data and indicators that ensure the effective deployment of such risk monitoring.

The reporting process aims at ensuring that appropriate information flows towards Senior Management and the AMSB of each Group company are in place in such a way as to allow these parties to make decisions that take into account the level of exposure of the Group company to compliance risks and to assess the adequacy and effectiveness of their internal control systems to manage such risks.

B.5. INTERNAL AUDIT FUNCTION

Within the Generali Group, the internal audit activities are performed by Group Audit, consisting of the totality of the Internal Audit Functions in all companies belonging to the Generali Group, as per the organizational rules defined in the Group Audit Policy, approved by the Board of Directors of Assicurazioni Generali S.p.A.

In particular, as provided by the Policy, each Group company shall be subject to an audit activity guaranteed by a function set up in accordance with the principles stated in the above Policy. The Internal Audit Function is generally located within the company responsible for the development of the business in the country. Additional Internal Audit Functions are set up in the same country only when audit activities need to be carried out in sectors that are not related to the insurance sector.

The Head of Group Audit reports to the Assicurazioni Generali S.p.A. Board of Directors and a managerial solid-line reporting model is established between the Heads of the Local Internal Audit Functions, the Heads of Business Unit Audit and the Head of Group Audit. In line with this model, the Head of the Local Internal Audit Function reports to the AMSB and ultimately, to the Head of Group Audit, through the Head of Business Unit Audit.

The implemented reporting structure ensures autonomy to act and independence from operational management as well as more effective communication flows. The solid reporting line covers the methodologies to be used, the organizational structure to be adopted, the objectives setting and the year-end appraisal, the reporting methods, as well as the proposed audit activities to be included in the local internal audit plan to be submitted to the local AMSB for approval.

In addition to the audit activities carried out by the local Internal Audit Functions, at any moment Group Audit can carry out specific audits on Group companies independently in agreement with local AMSB or working alongside the local Internal Audit Functions.

Each local Internal Audit Function is an independent and objective function established by the local AMSB to examine and evaluate the adequacy, effectiveness and efficiency of the internal control system and of other elements of the system of governance.

The local Internal Audit Function has full, free, unrestricted and timely access to any and all of the organization's records, physical properties and personnel pertinent to carry out any audit activity, with strict accountability for confidentiality and safeguarding records and information. The Head of the local Internal Audit Function has free and unrestricted access to the local AMSB.

Group Audit governs itself by adherence to the Institute of Internal Auditors' mandatory guidance including the Core Principles for the Professional Practice of Internal Auditing, the Definition of Internal Auditing, the Code of Ethics and the International Standards for the Professional Practice of Internal Auditing. The Head of the Internal Audit Function should have an open, constructive and cooperative relationship with regulators, which supports sharing of information relevant to carry out their respective responsibilities.

The activity of the local Internal Audit Function remains free from interference by any element in the organization, including matters of audit selection, scope, procedures, frequency, timing, or report content in order to ensure the necessary independent and objective mental attitude.

Internal Auditors do not have direct operational responsibility or authority over any of the activities audited. Accordingly, they are not involved in operational organization of the undertaking or in developing, introducing or implementing organizational or internal control measures. However, the need of impartiality does not exclude the possibility to request the Internal Audit Function for an opinion on specific matters related to the internal control principles to be complied with.

At least annually, the Head of each local Internal Audit Function proposes to the local Risk and Control Committee an internal audit plan before submitting it for approval to the local AMSB.

The internal audit plan is developed based on a prioritization of the audit universe using a risk-based methodology, taking into account all activities, the system of governance, the expected developments of activities and innovations, the organization's strategies, the key business objectives and inputs from the local top management and the AMSB. The planning takes into account the deficiencies found during audits already performed and any new risk detected.

Each internal audit plan includes at least the audit engagements, the criteria on the basis of which they have been selected, their timing, budget and human resource requirements for the following calendar year and any further relevant information. The Head of the local Internal Audit Function communicates the impact of any resource limitations and significant changes occurred during the year to the AMSB.

The internal audit plan is reviewed and updated at least every six months in response to changes occurred in the organization's business, risks, operations, programs, systems, controls and audit findings. Where necessary, the local Internal Audit Function may carry out audits not included in the approved audit plan or advisory activities for the benefit of the AMSB, the Top Management and other stakeholders.

All audit activities are carried out following a consistent methodology common at Group Level. The scope of auditing encompasses, but is not limited to, the examination and evaluation of the adequacy and effectiveness of the organization's governance, risk management, and internal control processes in relation to the organization's defined goals and objectives.

Following the conclusion of each audit activity, a written audit report is prepared and issued to the auditee and the auditee's hierarchy. This report indicates the significance of the issues found and covers at least any issues regarding the effectiveness, efficiency and suitability of the internal control system, as well as major shortcomings regarding compliance with internal policies, procedures, processes and company objectives. It includes the proposal of the corrective actions taken or to be taken concerning the issues identified and the proposed deadlines for their implementation.

The Head of the local Internal Audit Function, at least every six months, provides the local AMSB with a report on activities performed and significant issues found during the period and a proposal of an action plan. The local AMSB determines what actions are to be taken with respect to each issue and ensures that these actions are carried out. However, in the event of any particularly serious situations, the Head of the local Internal Audit Function will immediately inform the local Risk and Control Committee and the AMSB.

Each Internal Audit Function is responsible for monitoring appropriate follow-up on issues raised and agreed actions.

Group Audit maintains a quality assurance and improvement program that covers all aspects of audit activities and involves local Internal Audit Functions. The program includes an evaluation of the audit activity's conformance with the Standards for the Professional Practice of Internal Auditing, the Audit Policy, the Group Audit Manual, and an evaluation of whether internal auditors apply the Code of Ethics. The program also assesses the efficiency and effectiveness of the audit activity and identifies opportunities for improvement.

B.6. ACTUARIAL FUNCTION

The Generali Group's actuarial function, called Group Actuarial Function, was created in 2015 to comply with the Solvency II regulation.

The main responsibilities of the function are the following:

- coordinate the calculation of Group technical provisions;
- ensure the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of Group technical provisions;
- assess the sufficiency and quality of the data used in the calculation of Group technical provisions;
- compare best estimates against experience;
- inform the Board of Directors of the reliability and adequacy of the calculation of Group technical provisions;
- express an opinion on the overall Group underwriting policy;
- express an opinion on the adequacy of Group reinsurance arrangements; and
- contribute to the effective implementation of the risk-management system.

In addition, the Group Actuarial Function also defines the common reference framework to be followed by the local actuarial functions of the Generali Group companies, with reference to the calculation and the assessment of the adequacy of the technical provisions (in terms of methodology, process, monitoring and reporting procedure) and in forming and expressing the opinion on the local underwriting policy and reinsurance arrangements. The local actuarial functions apply the common reference framework to fulfil the above listed responsibilities with reference to the technical provisions, underwriting policy and reinsurance arrangements at local level.

The Group Actuarial Function is located under the Chief Financial Officer area to ensure an effective coordination for the calculation of technical provisions. To preserve the independence in carrying out his/her activities, the head of the actuarial function reports also to the Board of Directors, to which he/she has independent and direct access. Moreover, his/her performance management, which does not include business objectives, is evaluated by the Board of Directors.

Within this framework and as required by the Solvency II regulation, the head of the actuarial function produces a written report to be submitted to the Board of Directors at least annually. This report provides with the opinions on the reliability and adequacy of the calculation of Group technical provisions, on the overall Group underwriting policy and on the adequacy of Group reinsurance arrangements and documents all tasks that have been undertaken by the actuarial function and their results, reports possible remarks and suggested remediation actions.

The function is provided with a number of resources proportionate to the nature, scale and complexity of the assigned tasks. The personnel hold appropriate actuarial qualifications (with a degree in actuarial sciences, statistics or mathematics, or other finance/insurance-specific post-graduate qualifications) and with the knowledge and skills necessary to the proper exercise of the relevant responsibilities.

B.7. OUTSOURCING

The Group Outsourcing Policy is intended to set consistent minimum mandatory outsourcing standards at Group level, assign main outsourcing responsibilities and ensure that appropriate controls and governance structures are established within any outsourcing initiative.

The Policy applies to all Group legal entities, outlining the main principles to be followed when implementing outsourcing.

The Policy introduces a risk-based approach, adopting a proportionality principle to apply requirements according to the risk profile (distinguishing between critical and not critical outsourcing), the materiality of each outsourcing agreement and the extent which the Generali Group controls service providers.

The Group Outsourcing Policy implemented in the Generali Group defined a set of qualitative and quantitative criteria to be adopted in each Group Legal Entity in order to identify critical or important operational functions or activities outsourced. The Policy criteria are:

Qualitative criteria

- Regulatory criteria: functions / activities without which the Group legal entity's ability to maintain its business authorization would be compromised shall be considered critical;
- Internal control system criteria: control functions, i.e. internal audit, compliance, risk management and actuarial functions, shall be considered critical;

- Business criteria: functions / activities that are essential to the operation of the business shall be considered critical (i.e. the Group legal entity, without the function, would be unable to deliver its services to customers, achieve its business strategy and objectives, or would face serious reputation issues);
- Data Protection Officer: outsourcing of the Data Protection Officer activities shall be considered critical.

Quantitative criteria (if applied)

- Materiality criteria: are to be defined giving consideration to the size of the agreement, the volume and / or value of functions / activities to be outsourced and the potential financial impacts generated if those functions / activities were performed unsatisfactorily or not performed.

Each Legal Entity adopted the criteria and classified its outsourcing contract portfolio as well as defined new processes in order to capture and classify new outsourcing initiatives.

The Policy requires for each outsourcing agreement the appointment of a specific business referent. The business referent is responsible for the overall execution of the outsourcing lifecycle, from risk assessment to the final management of the agreement and subsequent monitoring activities of Service Level Agreements defined in each contract. Moreover, in order to ensure that appropriate oversight and safeguards are in place, the Policy requires that the outsourcing agreement clearly allocates the respective rights and obligations of the outsourcing Group legal entity and the service provider. It provides a sound legal base for the outsourcing relationship.

The outsourcing of critical or important operational functions or activities is implemented mainly through an "in-country" model, in which the supplier is resident in the same country as the Group company client.

Main outsourced critical or important functions or activities are listed in the table below (based on the number of active contracts) and they are outsourced mainly to Intra Group companies.

Main outsourced critical or important functions or activities

- IT Infrastructure and Software Management
- Claims and Reservation
- Underwriting and Portfolio Management
- Investments
- Control Functions
- Accounting and Balance Sheet Management

B.8. ANY OTHER INFORMATION

ASSESSMENT ON THE ADEQUACY OF THE SYSTEM OF GOVERNANCE

The Risk and Control Committee supports the Board of Directors of Assicurazioni Generali S.p.A. in the assessment of the adequacy and effectiveness of the internal control and risk management system across the Group, based on the relevant Group policies. In the course of 2018, such assessment was completed in March and July.

Afterwards, in March 2018, the Board of Directors of Assicurazioni Generali S.p.A., based on the opinions of the Risk and Control Committee, the Group CEO (in his capacity as Director in charge of the internal control and risk management system) and the Group heads of the control functions, expressed its positive opinion as to the overall adequacy and effectiveness of the internal control and risk management system across the Group.

OTHER MATERIAL INFORMATION ON THE SYSTEM OF GOVERNANCE OF THE GROUP

No other material information on the system of governance of the Group have to be reported.

C. Risk Profile

C.1. UNDERWRITING RISK

C.1.1. LIFE UNDERWRITING RISK

Risk exposure

Life and health underwriting risks derive from the Group's core insurance business in the life and health segment. The major part of the business and the related risks derive from direct portfolio underwritten by the Group. Health business represents a minor component of the portfolio.

The life portfolio is given by traditional business, which mainly includes insurance with profit participation, and unit linked products. The prevailing component of traditional business includes products with insurance coverage linked to the policyholders' life and health. It also includes pure risk covers, with related mortality risk, and some annuity portfolios, with the presence of longevity risk. The vast majority of the insurance coverages include legal or contractual policyholder rights to fully or partly terminate, surrender, decrease, restrict or suspend the insurance cover or permit the insurance policy to lapse, or to fully or partially establish, renew, increase, extend or resume the insurance or reinsurance cover. For these reasons, the products are subject to lapse risk.

Life and health underwriting risks can be distinguished in biometric and operating risks embedded in the life and health insurance policies. Biometric risks derive from the uncertainty in the assumptions regarding mortality, longevity, health, morbidity and disability rates taken into account in the insurance liability valuations. Operating risks derive from the uncertainty regarding the amount of expenses and the adverse exercise of contractual options by policyholders. Policy lapse is the main contractual option held by the policyholders, together with the possibility to reduce, suspend or partially surrender the insurance coverage.

Life and health underwriting risks are:

- mortality risk, defined as the risk of loss, or of adverse change in the value of insurance liabilities, resulting from changes in mortality rates, where an increase in mortality rates leads to an increase in the value of insurance liabilities. Mortality risk also includes mortality catastrophe risk, resulting from the significant uncertainty of pricing and provisioning assumptions related to extreme or irregular events;
- longevity risk that, similarly to mortality, is defined as the risk resulting from changes in mortality rates, where a decrease in mortality rates leads to an increase in the value of insurance liabilities;
- disability and morbidity risks derive from changes in the disability, sickness, morbidity and recovery rates;
- lapse risk is linked to the loss or adverse change in liabilities due to a change in the expected exercise rates of policyholder options. The relevant options are all legal or contractual policyholder rights to fully or partly terminate, surrender, decrease, restrict or suspend insurance cover or permit the insurance policy to lapse. Mass lapse events are also considered;
- expense risk results from changes in the expenses incurred in servicing insurance or reinsurance contracts;
- health risk results from changes in health claims and also includes health catastrophe risk (for PIM entities).

In addition to the risks above, the Group Risk Map includes also the going concern reserve risk, a German business specific risk that refers to mis-estimation of new business assumptions.

Risk measurement

The approach underlying the life underwriting risk measurement is based on the calculation of the loss resulting from unexpected changes in biometric and/or operating assumptions. Capital requirements for life underwriting risks are calculated on the basis of the difference between the insurance liabilities before and after the application of the stress.

Life underwriting risks are measured by means of the Group PIM²³, in line with the measurement adopted last year²⁴.

The SCR for life underwriting risk at YE2018 amounts to €3,404 million before diversification, equal to 10.8% of total SCR before diversification (€3,484 at YE2017) and €986 million after the diversification with other risks, equal to 4.0% of total SCR after diversification (€1,134 at YE2017). In terms of contribution to the risk profile, it is to be noted that life underwriting risks are well diversified with other risk categories. The overall contribution to the risk profile therefore remains limited.

²³ For the scope of the Group PIM please refer to section E.4.. Entities not included in the PIM scope calculate the capital requirement based on standard formula.

²⁴ The overall SCR results for YE2018 are impacted by the PIM scope extension to cover also Austrian and Swiss operations, as described in section E.2..

There are no substantial changes to be reported over the reporting period.

Risk management and mitigation

Life underwriting processes represent the key drivers for an effective underwriting risk management. These are mainly based on:

- product development and accurate pricing;
- ex-ante selection of risks through underwriting;
- setting and monitoring of operative underwriting limits;
- portfolio management and monitoring.

Product pricing consists in setting product features and assumptions regarding expenses, financial, biometric and policyholders' behaviour to allow the Group legal entities to withstand any adverse development in the realisation of these assumptions.

Pricing should be based on robust technical data to allow a long-term sustainable valuation of the risks affecting life business. For business with a biometric component, it is achieved by setting prudent assumptions, while for savings business this is mainly achieved through profit testing.

For insurance portfolios with a biometric risk component, the pricing process shall take into account the latest available demographic information, including trends. A particular emphasis is placed on the underwriting of new contracts with reference to medical, financial and moral hazard risks. The risk selection process is coordinated by the Group through the definition of specific underwriting guidelines for biometric risks and the setting of clear underwriting standards through manuals, forms, medical and financial underwriting requirements. For insurance riders, which are most exposed to moral hazard, maximum insurability levels are also set, lower than those applied for death covers. In order to mitigate these risks, policy exclusions are also defined.

Financial and credit risks, related to products with a savings component and with financial guarantees, are accurately evaluated during the pricing phase together with the associated costs. In this case financial risks related to the minimum interest rate guarantee and any potential mismatch between the liabilities and the corresponding assets are considered in the valuation.

In addition, the impact of risks linked to voluntary early exit from the contract (lapse risk) and with respect to expenses (expense risk) is accurately taken into account besides main featuring product risks.

As part of the underwriting process, Generali Group adopts underwriting guidelines, and the Risk Management Function reviews implications of new lines of business/products on the Group risk profile.

A framework to maintain life risk exposure within the stated risk profile is provided by underwriting guidelines, through the definition of underwriting operative limits. Regular risk exposure monitoring and adherence to the operative limits, reporting and escalation processes are also in place, allowing for potential remedial actions to be undertaken.

Reinsurance is taken into account within the underlying processes, in particular as key risk mitigation technique aimed at balancing the underlying resulting life portfolio in terms of biometric and operating risks. The Parent Company acts as a core reinsurer for the Group legal entities and cedes part of the business to external reinsurers.

The Group reinsurance strategy is developed consistently with the risk appetite and with the risk preferences defined in the Group Risk Appetite Framework (RAF), and with the reinsurance market cycle. The definition of a reinsurance arrangement is based on the process managed by Reinsurance Function in constant interaction with Risk Management and Actuarial Functions.

No transfers of life underwriting risks to special purpose vehicles are reported at YE2018.

Risk concentrations

No significant risk concentrations within life underwriting risks are to be reported.

C.1.2. NON-LIFE UNDERWRITING RISK

Risk exposure

Non-life underwriting risks arise from the Group's insurance business in the P&C²⁵ segment. Non-life underwriting risks include the risk of underestimating the frequency and/or severity of the claims in defining pricing and reserves (respectively pricing risk and reserving risk), the risk of losses arising from extreme or exceptional events (catastrophe risk) and the risk of policyholder lapses from P&C insurance contracts (lapse risk). In particular:

²⁵ The terms "P&C" and "non-life" are considered as equivalent within this Report.

- pricing and catastrophe risks derive from the possibility that premiums are not sufficient to cover future claims, also in connection with extremely volatile events and contract expenses;
- reserving risk relates to the uncertainty of the claims reserves (in a one-year time horizon);
- lapse risk arises from the uncertainty of the underwriting profits recognised in the premium provisions.

Risk measurement

Non-life underwriting risks are measured by means of the Group PIM²⁶, in line with the measurement adopted last year²⁷. For the majority of risks assessed through the PIM, the assessments are based on in-house developed models and external models that are primarily used to assess the catastrophic events, for which broad market experience is considered beneficial.

The SCR for non-life underwriting risks at YE2018 amounts to €4,059 million before diversification, equal to 12.9% of total SCR before diversification (€5,145 at YE2017) and €2,537 million after the diversification with other risks, equal to 10.3% of total SCR after diversification (€3,270 at YE2017).

There are no substantial changes to be reported over the reporting period.

Moreover, the Group uses additional indicators for risk concentrations. This is specifically the case for catastrophe risks and commercial risks, which are both coordinated at central level as they generally represent a key source of concentration.

Risk management and mitigation

Based on the Group RAF, P&C risk selection starts with an overall proposal in terms of underwriting strategy and corresponding business selection criteria. During the strategic planning process, targets are established and translated into underwriting limits to ensure business is underwritten according to the plan. Underwriting limits define the maximum size of risks and classes of business that Group legal entities shall be allowed to write without seeking any additional or prior approval. The limits may be set based on value, risk type, product exposure or class of occupancy. The purpose of these limits is to attain a coherent and profitable book of business founded on the expertise of each legal entity.

Additional indicators such as relevant exposures, risk concentration and risk capital figures are used for the purpose of P&C underwriting risk monitoring. The indicators are calculated on a quarterly basis to ensure alignment with the Group RAF.

Reinsurance is the key mitigating technique for balancing the P&C portfolio. It aims at optimising the use of risk capital by ceding part of the underwriting risk to selected counterparties, whilst simultaneously minimising the credit risk associated with such operations.

The P&C Group reinsurance strategy is developed consistently with the risk appetite and the risk preferences defined in the Group RAF, on one side, and taking into account the reinsurance market on the other.

The Group has historically preferred traditional reinsurance as a tool for mitigating catastrophe risk resulting from its P&C portfolio, adopting a centralised approach where the placement of reinsurance towards the market is managed through a central Group Reinsurance Function.

The Group aims at diversifying its cessions to reinsurers to avoid excessive concentrations, to optimize its reinsurance purchases, including from a pricing perspective, and to continuously develop know-how in the most innovative risk transfer techniques. For this reason, part of the Italian earthquake, European flood and European windstorm exposures were carved out from the traditional catastrophe reinsurance program and placed in the Insurance Linked Securities (ILS) market. This innovative issuance was completed successfully and at competitive terms.

Alternative risk transfer solutions are continuously analysed and implemented. As an example, in addition to traditional reinsurance, a protection is in place to reduce the impact of an unexpectedly high loss ratio for the Group Motor liability portfolio. Such transfer represents a partial transfer of pricing risk to the special purpose vehicle named Horse.

The process described and the regular assessment performed enable to confirm the adequacy of the risk mitigation techniques. These are carried out by the Risk Management Function which is responsible for the validation of the limits proposed by the Insurance and Reinsurance Function and for the measurement, monitoring and reporting of the Group underwriting risk profile.

Risk concentrations

In terms of CAT risk, the Group's largest exposures are earthquakes in Italy, European floods and European windstorms. Less material catastrophe risks are also taken into account and assessed by means of additional scenario analysis.

²⁶ For the scope of the Group PIM please refer to section E.4.. Entities not included in the PIM scope calculate the capital requirement based on standard formula.

²⁷ The overall SCR results for YE2018 are impacted by the PIM scope extension to cover also Austrian and Swiss operations, as described in section E.2..

The management of risk concentrations referred to CAT events (man-made events and natural disasters) follows the principles defined in the Group Risk Concentrations Management Policy – Reinsurance and Underwriting Exposures, further described in section C.6.2..

C.2. MARKET RISK²⁸

Risk exposure

The Group is exposed to the market risks due to its investments in financial assets and is driven by asset prices volatility.

Moreover, there are the risks that either:

- invested assets not performing as expected because of falling or volatile market prices;
- reinvested proceeds of existing assets being exposed to unfavourable market conditions, such as lower interest rates.

Generali Group traditional life savings business is long-term in nature; therefore the Group holds mostly long-term investments which have the ability to withstand short-term decreases and fluctuations in the market value of assets.

Nonetheless, the Group manages its investments in a prudent way according to the so-called Prudent Person Principle²⁹, and strives to optimise the return of its assets while minimising the negative impact of short-term market fluctuations on its solvency position.

Under Solvency II, the Group is also required to hold a capital buffer, with the purpose of maintaining a sound solvency position even in the circumstances of adverse market movements.

Within the life business, the Group assumes a considerable financial risk when it guarantees policyholders with a minimum return on the accumulated capital over a, potentially, long period. Should the yields generated by the financial investments be lower than the guaranteed return during this period, then the Group shall compensate the shortfall for those contractual guarantees. In addition, independently on the achieved asset returns, the Group has to secure that the value of the financial investments backing the insurance contracts remains sufficient to meet the value of its obligations.

Unit-linked business typically does not represent a source of financial risk for insurers (except when there are guarantees embedded in the contracts), although market fluctuations typically have profitability implications.

Regarding P&C business, the Group has to ensure that the benefits can be paid on a timely basis when claims occur.

The description of the assets portfolio is provided in section A.3.. In respect to off-balance sheet items, it has to be noted that in the Internal Model the value of collaterals held to hedge the counterparty risk produced by contracts with third parties, is subject to a haircut accounting for the potential losses that might be originated from market and credit risks.

In more detail, the Group is exposed to the following generic financial risk types:

- equity risk deriving from the risk of adverse changes in the market value of the assets or in the value of liabilities due to changes in the level of equity market prices which can lead to financial losses;
- equity volatility risk deriving from changes in the volatility of equity markets. Exposure to equity volatility is typically related to equity option contracts or to insurance products sold with embedded guarantees whose market consistent value is sensitive to the level of equity volatility;
- interest rate risk, defined as the risk of adverse changes in the market value of the assets or in the value of liabilities due to changes in the level of interest rates in the market. The Group is mostly exposed to downward changes in interest rates as lower interest rates increase the present value of the promises made to policyholders more than the value of the assets backing those promises. As a result, it may become increasingly costly for the Group to maintain its promises, thereby leading to financial losses. Linked to that, interest rate volatility risk derives from changes in the level of interest rate implied volatilities. This comes, for example, from insurance products sold with embedded minimum interest rate guarantees whose market consistent value is sensitive to the level of interest rates volatility;
- property risk deriving from changes in the level of property market prices. Exposure to property risk arises from property asset positions;
- currency risk deriving from adverse changes in exchange rates;
- concentration risk deriving from asset portfolio concentration to a small number of counterparties.

²⁸ This section focuses on financial risks which better represent the taxonomy of the Generali Group.

²⁹ The "Prudent Person Principle" set out in Article 132 of Directive 2009/138/EC requires the legal entity to only invest in assets and instruments whose risks can be identified, measured, monitored, controlled and reported as well as taken into account in the legal entity overall solvency needs. The adoption of this principle is ruled in the Group Investment Governance Policy (GIGP).

Risk measurement

Financial risks are measured by means of the Group PIM³⁰, in line with the measurement adopted last year³¹. In particular, losses are modelled as follows:

- equity risk is modelled by associating each equity exposure to a market index representative of its industrial sector and/or geography. Potential changes in market value of the equities are then estimated based on past shocks observed for the selected indices;
- equity volatility risk models the impact that changes in the equity implied volatility can have on the market values of derivatives;
- interest rate risk models the changes in the term structure of the interest rates for various currencies and the impact of these changes on any interest rate sensitive asset and also on the value of future liability cash-flows alike;
- interest rate volatility risk models the impact that the variability in interest rate curves can have on both the market value of derivatives and on the value of liabilities sensitive to interest rate volatility assumptions (such as minimum pension guarantees);
- property risk models the returns on a selection of published property investment indices and the associated impact on the value of the Group's property assets. These are mapped to various indices based on property location and type of use;
- for currency risk the plausible movements in exchange rate of the reporting currency of the Group in respect to foreign currencies are modelled, as well as the consequent impact on the value of asset holdings not denominated in the domestic currency;
- for concentration risk the extent of additional risk borne by the Group due to insufficient diversification in its equity, property and bond portfolios is assessed.

The SCR for financial risks at YE2018 amounts to €13,469 million before diversification, equal to 42.8% of total SCR before diversification (€13,156 at YE2017) and €12,072 million after the diversification with other risks, equal to 49.0% of total SCR after diversification (€11,522 at YE2017).

The most material market risk for the Group is equity risk, followed by interest rate, property and currency risks. With respect to the previous year, equity risk has slightly increased exposures. Interest rate risk has also increased as a consequence of the interest rate curve movement.

Risk management and mitigation (Prudent Person Principle)

As anticipated, assets are invested, and more generally the investment activity is performed in a sound and prudent manner in accordance with the Prudent Person Principle, following the provisions set in the Group Investment Governance Policy (GIGP).

To ensure a comprehensive management of the impact of financial and credit risks on assets and liabilities, the Group strategic asset allocation (SAA) process needs to be liability-driven and strongly interdependent with insurance-specific targets and constraints. For this reason the Group has integrated the strategic asset allocation and the asset liability management (SAA&ALM) within the same process.

The aim of the SAA&ALM process is to define the most efficient combination of asset classes which, according to the Prudent Person Principle, maximises the investment contribution to value creation, taking into account solvency, actuarial and accounting indicators. The aim is not just to mitigate risks, but also to define an optimal risk-return profile that satisfies both the return target and the risk appetite of the Group over the business planning period.

The asset portfolio is then invested and rebalanced according to the asset class and duration weights. The main risk mitigation techniques used by the Group are liability-driven management of the assets and the regular use of rebalancing.

The liability driven investment helps granting a comprehensive management of assets whilst taking into account the liability structure; while, at the same time, the regular rebalancing redefines target weights for the different asset classes and durations, alongside the related tolerance ranges defined as investment limits. This technique contributes to an appropriate mitigation of financial risks.

SAA&ALM activities aim at ensuring that the Group holds sufficient and adequate assets in order to reach defined targets and meet liability obligations. For this purpose, analyses of the asset-liability relationship under a range of market scenarios and expected/stressed investment conditions are undertaken.

The Group works to ensure a close interaction between the Group Investments, Asset & Wealth Management, GCFO (incl. Treasury), Group Actuarial and Group Risk Management Functions to secure that the SAA&ALM process remains consistent with the Group RAF, the strategic planning and the capital allocation mechanisms.

The annual SAA proposal:

- defines target exposure and limits for each relevant asset class, in terms of target exposure and upper/lower boundaries;
- embeds the asset and liabilities duration mismatches permitted and potential mitigation actions that can be enabled on the investment side.

³⁰ For the scope of the Group PIM please refer to section E.4.. Entities not included in the PIM scope calculate the capital requirement based on standard formula.

³¹ The overall SCR results for YE2018 are impacted by the PIM scope extension to cover also Austrian and Swiss operations, as described in section E.2..

Regarding specific asset classes, such as (i) private equity, (ii) private debt, (iii) hedge funds, (iv) derivatives and structured products, the Group has mainly centralised their management and monitoring.

These kinds of investments are subject to accurate due diligence in order to assess their quality, the level of risk related to the investment and its consistency with the approved liability-driven SAA.

The Group also uses derivatives with the aim of mitigating the risk present in the asset and/or liability portfolios. The derivatives help the Group to improve the quality, liquidity and profitability of the portfolio, according to the business planning targets. Operations in derivatives are likewise subject to a regular monitoring and reporting process.

No transfer of market risk to special purpose vehicles is reported at YE2018.

Risk concentrations

Concentration risk by geographical area, industry sector and currency is managed at Group level by means of the Group Risk Concentrations Management Policy – Investment Exposures, whose limits and thresholds are monitored on a quarterly basis. The results of the monitoring activity are reported to the Board of Directors at least on yearly basis. These limits are complemented by requirements and thresholds defined in the Group Investments Risk Guidelines and specifically designed for private debt, private equity and hedge funds exposures. In addition, these Guidelines set also a maximum limit on currency exposure applied at each portfolio level.

Due to the good diversification of the investment portfolio, the Group is not exposed to significant concentrations by industry sector, geographical area and currency.

The management of risk concentrations referred to investment exposures follows the principles defined in the Group Risk Concentrations Management Policy – Investment Exposures, further described in section C.6.2..

Sensitivity analysis

Sensitivity analyses have been conducted on the main risk drivers to which the Group is exposed, which include increases and reductions of the interest rates (+/- 50bps), changes in the long-term interest rates (for Euro Ultimate Forward Rate -15bps) and equity shocks of 25%. Under these stressed conditions, the Group solvency position showed the following variations:

- +4 percentage points in case of increase of interest rates by 50bps;
- -7 percentage points in case of decrease of interest rates by 50bps;
- -1 percentage point in case of the 2019 planned review of Ultimate Forward Rate (UFR) by EIOPA (for Euro, the UFR will be decreased by 15bps);
- +4 percentage points in case of increase of equity price by 25%;
- -4 percentage points in case of decrease of equity price by 25%.

Details on the impact of such analyses are provided in section C.7..

C.3. CREDIT RISK

Risk exposure

The Group is exposed to credit risks related to invested assets and those arising from other counterparties (e.g. cash, reinsurance).

Credit risks include the following two categories:

- spread widening risk, defined as the risk of adverse changes in the market value of debt security assets. Spread widening can be linked either to the market's assessment of the creditworthiness of the specific obligor (often implying also a decrease in rating) or to a market-wide systemic reduction in the price of credit assets;
- default risk, defined as the risk of incurring in losses because of the inability of a counterparty to honour its financial obligations.

An overview on assets portfolio is provided in section A.3.. In respect to off-balance sheet items, it has to be noted that in the Internal Model the value of collaterals held to hedge the counterparty risk produced by contracts with third parties, is subject to a haircut accounting for the potential losses that might be originated from market and credit risks.

The Prudent Person Principle is also applied in the optimisation of the portfolio allocation with respect to credit risks, following the process already described in the section C.2. Market risk.

Risk measurement

Credit risks are measured by means of the Group PIM³², in line with the measurement adopted last year³³. In particular:

- credit spread risk models the possible movement of the credit spread levels for bond exposures of different rating, industrial sector and geography based on the historical analysis of a set of representative bond indices. Spread-sensitive assets held by the Group are associated with specific indices based on the characteristics of their issuer and currency;
- default risk models the impact of default of bond issuers or counterparties to derivatives, reinsurance and other transactions on the value of the Group's assets. Distinct modelling approaches have been implemented to model default risk for the bond portfolio (i.e. credit default risk) and the risk arising from the default of counterparties in cash deposits, risk mitigation contracts (such as reinsurance), and other types of exposures (e.g. counterparty default risk).

The Group PIM's credit risk model evaluates spread risk and default risk also for sovereign bond exposures. This approach is more prudent than the standard formula, which treats bonds issued by EU Central Governments and denominated in domestic currency as exempt from credit risk.

The SCR for credit risks at YE2018 amounts to €8,044 million before diversification, equal to 25.5% of total SCR before diversification (€9,196 at YE2017) and €6,737 million after the diversification with other risks, equal to 27.3% of total SCR after diversification (€7,965 at YE2017).

The most material credit risk for the Group is spread widening risk, followed by default risk in the bond portfolio. With respect to the previous year, the risk has been slightly reduced thanks to the positive market trend resulting in slightly lower default probabilities and spread shocks.

The credit risk assessment is based on the credit rating assigned to counterparties and financial instruments. To limit the reliance on external rating assessments provided by rating agencies, an internal credit rating assignment framework has been set within the Group Risk Management Policy.

Within this framework additional rating assessments can be performed at counterparty and/or financial instrument level and ratings need to be renewed at least annually. This process applies even where an external rating is available. Moreover, additional assessments shall be performed each time the parties involved in the process possess any information, coming from reliable sources, that may affect the creditworthiness of the issuer/issues.

The internal credit rating assignment system at counterparty level is based on the evaluation of quantitative metrics and qualitative elements. The risk elements that are considered, among others, are referred to the assessment of the riskiness of the sector to which they belong, of the country in which the activities are carried out and of the controlling group, where present. At financial instrument level, instead, the risk of its issuer is one of the main elements considered, including the peculiarities of the instrument itself.

Risk management and mitigation

The most important strategy for the managing of credit risk used by the Group is the application of a liability-driven SAA, which can limit the impact of the market spread volatility. In addition, the Group is actively mitigating counterparty default risk by using, where feasible like e.g. for derivative transactions, the collateralisation strategy that strongly alleviates the losses that the Group might suffer as a result of the default of one or more of its counterparties.

No credit risk mitigation strategy based on derivatives and no transfer of credit risk to special purpose vehicles are reported at YE2018.

Risk concentrations

Concentration risk by ultimate is managed at Group level by means of the Group Risk Concentrations Management Policy – Investment Exposures whose limits and thresholds are monitored on a quarterly basis. The results of the monitoring activity are reported to the Board of Directors at least on yearly basis. These limits are complemented by a specific set of concentration limits by ultimate and credit rating classes provided by the Group Investments Risk Guidelines, which are applied at legal entity level and monitored on monthly basis.

In terms of credit risk concentration, the largest exposures are towards sovereign and supranational counterparties, among which the most significant are Italy, France and Spain.

The management of risk concentrations referred to reinsurance counterparty default risk stemming from ceded reinsurance follows the principles defined in the Group Risk Concentrations Management Policy – Investment Exposures, further described in section C.6.2..

³² For the scope of the Group PIM please refer to section E.4.. Entities not included in the PIM scope calculate the capital requirement based on standard formula.

³³ The overall SCR results for YE2018 are impacted by the PIM scope extension to cover also Austrian and Swiss operations, as described in section E.2..

Sensitivity analysis

Sensitivity analyses have been conducted on the main risk drivers to which the Group is exposed, which include the increase of Italian government bonds spread (in the amount of 100bps) and corporate spreads (in the amount of 50bps). Under these stressed conditions, the Group solvency position showed the following variations:

- -7 percentage points in case of spread widening on Italian government bonds (BTP) by 100bps (please notice that as at 31st December 2018, an increase of the Italian government bonds by 100bps, such as under the sensitivity analysis here considered, would trigger the “Country IT” component of the volatility adjustment);
- -4 percentage points in case of spread widening on corporate bonds by 50bps.

Details on the impact of such analyses are provided in section C.7..

C.4. LIQUIDITY RISK

Risk exposure

Liquidity risk is defined as the uncertainty, emanating from business operations, investment or financing activities, over the ability of the Group and its legal entities to meet payment obligations in a full and timely manner, in a current or stressed environment.

The Group is exposed to liquidity risk from its insurance and reinsurance operating activity, due to the potential mismatches between the cash inflows and the cash outflows deriving from the business.

Liquidity risk can also stem from investing activity, due to potential liquidity gaps deriving from the management of the asset portfolio as well as from a potentially insufficient level of liquidity in case of disposals (e.g. capacity to sell adequate amounts at a fair price and within a reasonable timeframe).

Liquidity risk from financing activity is related to the potential difficulties in accessing the primary market of debt or in paying excessive financing costs.

The Group can be also exposed to liquidity outflows related to issued guarantees, commitments, derivative contract margin calls, or regulatory constraints.

Risk measurement

The Group liquidity risk management framework relies on projecting cash obligations and available cash resources over defined time horizons, to monitor that available liquid resources are at all times sufficient to cover cash obligations that will become due in the same horizons.

A set of liquidity risk metrics (liquidity indicators) has been defined to monitor the liquidity situation of each Group insurance legal entity on a regular basis. All such metrics are forward-looking, i.e. they are calculated at a future date based on projections of cash flows, assets and liabilities and on the assessment of the level of liquidity of the asset portfolio.

The metrics are calculated under both the so-called “base scenario”, in which the values of cash flows, assets and liabilities correspond to those projected according to each legal entity’s Strategic Plan scenario, and a set of so-called “stress scenarios”, in which the projected cash inflows and outflows, the market price of assets and the amount of technical provisions are calculated to take into account unlikely but plausible circumstances that would adversely impact the liquidity of each legal entity.

Liquidity risk limits have been defined in terms of value of the above-mentioned liquidity indicators. The limit framework is designed to ensure that each Group legal entity holds a “buffer” of liquidity in excess of the amount required to withstand the adverse circumstances described in the stress scenarios.

The Group has defined a set of metrics to measure liquidity risk at Group level, based on the liquidity metrics calculated at legal entity level. The Group manages expected cash inflows and outflows in order to maintain a sufficient available level of liquid resources to meet its medium-term needs. The Group metrics are forward-looking and are calculated under both the base and stress scenarios.

The annual assessment shows a solid liquidity profile for the Group, without substantial changes compared to the previous year.

Risk management and mitigation

The Group has established clear governance for liquidity risk management, including specific limit setting, as mentioned above, and the escalation process in case of limit breaches or other liquidity issues.

The principles for liquidity risk management designed at Group level are fully embedded in strategic and business processes, including investments and product development.

Since the Group explicitly identifies liquidity risk as one of the main risks connected with investments, indicators as cash flow duration mismatch are embedded in the strategic asset allocation process. Investment limits are set to ensure that the share of illiquid assets remains within the level that does not impair the Group's asset liquidity.

The Group has defined in its Life and P&C Underwriting Policies the principles to be applied to mitigate the impact on liquidity from surrenders in life business and claims in non-life business.

Risk concentrations

The Group has set investment limits to which legal entities shall adhere as to limit risk concentrations by taking into consideration a number of dimensions, such as asset class, counterparty, credit rating and geography. In fact, material liquidity risk concentrations could arise from large exposures to individual counterparties and/or groups. In case of default or other liquidity issue of a counterparty towards which a significant risk concentration exists, this may negatively affect the value or the liquidity of the Group's investment portfolio and hence its ability to promptly raise cash by selling assets in the market in case of need.

C.4.1. EXPECTED PROFIT INCLUDED IN FUTURE PREMIUMS

The Expected Profit Included in Future Premiums (EPIFP) represents the expected present value of future cash-flows which result from the inclusion in technical provisions of premiums relating to existing insurance and reinsurance contracts, that are expected to be received in the future, but that may not be received for any reason, other than the insured event having occurred, regardless of the legal or contractual rights of the policyholder to discontinue the policy.

The amount of EPIFP for the life business written by the Group has been calculated in accordance with article 260(2) of the Delegated Acts and amounts to €14,199 million (gross of reinsurance) at YE2018 (€12,897 at YE2017). The yearly variation of life EPIFP is explained by the inclusion in the evaluation perimeter of some non-EEA entities in Asia, by the positive variance observed in some countries and other reporting refinements.

The amount of EPIFP for the non-life business written by the Group has been calculated in accordance with article 260(2) of the Delegated Acts and amounts to €1,256 million (gross of reinsurance) at YE2018 (€1,167 at YE2017). The yearly variation of non-life EPIFP is explained by refinements both in the calculation approach and in the reporting perimeter.

The total amount of EPIFP is equal to €15,455 million (gross of reinsurance) at YE2018 (€14,063 at YE2017).

C.5. OPERATIONAL RISK

Risk exposure

Operational risk is the risk of loss arising from inadequate or failed internal processes, personnel or systems, or from external events. The definition includes the compliance risk and financial reporting risk and excludes the strategic and reputational risks.

Risk measurement

Operational risks are measured following the standard formula approach, in line with the measurement adopted last year.

The SCR for operational risks at YE2018 amounts to €2,206 million, equal to 7.0% of total SCR before diversification and 9.0% of total SCR after diversification (€2,261 at YE2017).

There are no substantial changes to be reported over the reporting period.

Risk management and mitigation

Although ultimate responsibility for managing the risk sits in the first line, the so-called risk owners, the Risk Management Function with its methodologies and processes ensures an early identification of the most severe threats across the Group. In doing so, it provides management at all levels with a holistic view of the broad operational risk spectrum that is essential for prioritising actions and allocating resources in most risk related critical areas.

The target is achieved by adopting methodologies and tools in line with industry best practices and by establishing a strong dialogue with the first line of defence.

Furthermore, since 2015, the Group has been exchanging operational risk data, properly anonymized, through the “Operational Risk data eXchange Association (ORX)”, a global association of operational risk practitioners where main industry players also participate. The aim is to use the data to improve the risk management and to anticipate emerging trends. In addition, since losses are collected by the first line, the process contributes to create awareness among the risk owners upon risks that actually impact the Group. In this sense, a primary role is played by Group-wide forward-looking assessments that aim to estimate the evolution of the operational risk exposure in a given time horizon, supporting in the anticipation of potential threats, in the efficient allocation of resources and related initiatives.

Based on the last assessments, the most relevant scenarios at Group level are related to cyber-attacks, customer data privacy, product flaws, distribution and international sanctions. The assessments of these risks remain relatively stable as compared to last year.

To further strengthen the risk management system and in addition to the usual risk owners' responsibilities, the Group established specialised units within the first line of defence with the scope of dealing with specific threats (e.g. cyber risk, fraud, financial reporting risk) and that act as a key partner for the Risk Management Function.

Another benefit from this cooperation is constituted by a series of risk mitigating measures triggered across the Group as a result of control testing, assessments, and the collection of operational risk events.

An example is the creation of a dedicated unit for the management and coordination of the Group-wide IT Security that steers the evolution of the IT security strategy and operating model, ensuring a timely detection and fixing of the vulnerabilities that may affect the business. This initiative helps the Group to better cope with the growing threat represented by cyber risk.

C.6. OTHER MATERIAL RISKS

C.6.1. REPUTATIONAL AND EMERGING RISKS

Although not included in the calculation of SCR, as part of the Group risk identification process, reputational and emerging risks are also taken into account.

Reputational risk refers to potential losses arising from a deterioration or a negative perception of the Group's image in respect to its customers (i.e. due to increasing conflicts with policyholders, poor services, and inadequate selling and liquidation practices) as well as to its reputation in respect to other counterparties (i.e. shareholders and Supervisory Authority).

Emerging risks arise from new trends or evolving risks, which are difficult to perceive and quantify, although typically systemic. These typically refer to environmental trends (climate change), technological changes (big data), and geopolitical developments. For the identification and the assessment of these risks and to raise the awareness on the implications of the main observed trends, Group Risk Management Function engages with a dedicated network, including specialists from business functions (Life & Health Insurance; P&C, Claims and Reinsurance; Investments, Asset & Wealth Management; Sustainability & Social Responsibility, given the relevant interrelation with ESG³⁴ factors; Marketing; Strategy, etc.). The Group also participates to the Emerging Risk Initiative (ERI), a dedicated working group of the CRO Forum, which involves the CROs of the main European groups. Within ERI, emerging risks common to the insurance industry are discussed and specific studies are conducted on single risks.

C.6.2. RISK CONCENTRATIONS

Concentration risk is the risk stemming from all risk exposures with a potential loss which is large enough to threaten the solvency or the financial position. Risk concentrations are significant when they can threaten the solvency or the liquidity position of the Group, thus substantially impacting the Group risk profile. Significant risk concentrations, in the case of financial conglomerates, can only arise from risk exposures towards counterparties which are not part of the financial conglomerate. Such exposures may cause concentrations of counterparty risk/credit risk, investment risk, insurance risk, market risk, other risks or a combination or interaction of these risks.

The Group identifies three categories of exposures in terms of main sources of concentration risk for the Group:

- investment exposure stemming from investment activity;
- exposure to reinsurance counterparty default risk stemming from ceded reinsurance;
- non-life underwriting exposure, specifically natural disasters or man-made catastrophes.

As a financial conglomerate, the Group is subject to supplementary supervision. In this context, the Group is required to report on a regular basis and at least annually any significant risk concentration at financial conglomerate level.

³⁴ ESG stands for Environmental, Social and Governance.

The annual assessment has outlined no significant risk concentrations at YE2018 that could undermine the solvency or liquidity situation of the Group.

C.7. ANY OTHER INFORMATION

C.7.1. SENSITIVITY ANALYSES

In addition to the calculation of the Solvency Capital Requirement, the Group regularly performs sensitivity analyses of the variability of its Solvency Ratio to changes in specific risk factors. The aim of these analyses is to assess the resilience of the Group capital position to the main risk drivers and evaluate the impact of a wide range of shocks.

For this purpose, several sensitivity analyses have been performed as at 31st December 2018, in particular:

- increase and decrease of interest rates by 50bps;
- increase of Italian government bonds spread (*Buoni del Tesoro Poliennali* - BTP) by 100bps;
- increase of corporate bonds spread by 50bps;
- increase and decrease of equity values by 25%.

Related impacts are reported as follows:

Sensitivity analysis on main financial risk drivers

(€ million)	Base at YE2018	Interest rates +50bps	Interest rates -50bps	BTP spread +100bps	Corporate spread +50bps	Equity +25%	Equity -25%
Group own funds	44,191	44,697	43,470	44,263	43,794	47,006	41,461
Solvency Capital Requirement	20,407	20,231	20,710	21,151	20,649	21,286	19,531
Solvency Ratio	217%	221%	210%	209%	212%	221%	212%
Delta on Group own funds		506	-722	71	-397	2,814	-2,731
Delta on Solvency Capital Requirement		-176	303	744	242	880	-876
Delta on Solvency Ratio		+4p.p.	-7p.p.	-7p.p.	-4p.p.	+4p.p.	-4p.p.

During 2019, following EIOPA's review of the Solvency II risk free rates term structure, the UFR (Ultimate Forward Rate) will be further modified (for Euro, the UFR will be decreased by 15bps): the anticipated impact of such change as at 31st December 2018 solvency ratio amounts to -1 percentage points.

The analyses here reported show how the Group results are affected by changes in the above mentioned financial risk factors.

Even in case of unfavourable market conditions (decrease in interest rates or equity values, increase in spreads), the Group would still show a solid position, mainly due to a business profile characterised by a limited duration gap, a good loss absorption capacity of technical provisions and an average minimum guarantee steadily lower than the average portfolio return.

D. Valuation for Solvency Purposes

SCOPE AND GENERAL VALUATION PRINCIPLES

This section provides a detailed description of the methods applied for the valuation of assets and liabilities within the Solvency II balance sheet, including consolidation techniques.

As foreseen by the Solvency II directive, for the definition of the Group Solvency II balance sheet:

- all Group insurance and reinsurance undertakings, insurance holding companies, mixed financial holding companies and ancillary services undertakings, which are subsidiaries of Assicurazioni Generali S.p.A., are fully consolidated, according to “method 1” defined in Article 230 of the Solvency II directive;
- Group financial sector undertakings³⁵ contribute with their quota share of the own funds calculated according to the relevant sectoral rules, according to “method 2 - deduction and aggregation” defined in Article 233 of the Solvency II directive;
- investment vehicles associated to insurance activities are consolidated in the parent company, according to their quota share of participation;
- remaining Group entities are valued within the parent undertakings according to their quota share of participation.

As set out in Article 75 of Solvency II directive, the Solvency II regulatory framework requires an economic, market-consistent approach to the valuation of assets and liabilities adopting assumptions that market participants would use in valuing the same assets and liabilities. In order to define the Solvency II figures, all assets and liabilities in the balance sheet must be valued at fair value.

The mostly adopted valuation techniques for the fair value measurement are:

- market approach: it uses prices and other relevant information generated by market transactions involving identical or comparable assets or liabilities;
- income approach: it converts future imports to a single current (i.e. discounted) amount using discounted cash flow analysis, option pricing models and other present value techniques;
- cost approach: it reflects the amount that would be required currently to replace the service capacity of an asset.
- balance sheet item specific valuation techniques (e.g., net asset value for equities and net realisable value for property inventories).

The IFRS13 fair value hierarchy classifies these valuation techniques in the following three levels:

- **Level 1 - Quoted market price in active markets for the same assets / liabilities:** use of quoted market prices in active markets for the same assets and liabilities;
- **Level 2 - Quoted market price in active markets for similar assets / liabilities:** if quoted market prices for the same assets or liabilities are not available, different approaches are adopted, such as:
 - the use of quoted market prices in active markets for similar assets or liabilities with adjustments to reflect differences;
 - quoted prices for identical or similar assets or liabilities in markets that are not active;
 - using valuation techniques based on inputs that are observable in the market;
- **Level 3 - Alternative valuation methods:** if there are no quoted market prices in active markets nor market input available, a mark-to-model technique is used. This alternative valuation technique is benchmarked, extrapolated or otherwise calculated as far as possible from a market input; in case of unobservable inputs, the best information available are used, including possible own data and taking into account all information about market participant assumptions that are reasonably available.

Compared to the previous year-end valuation, the Solvency II balance sheet have not been significantly impacted by changes in the valuation approach of assets and liabilities.

In the following table, a comparison between year-end 2018 and year-end 2017 Solvency II balance sheet is provided³⁶. From year-end 2017 to the year-end 2018 the excess of asset over liabilities decreases by € -1,181 million, from € 39,520 million to 38,339 million: this change is mainly attributable to the payment of the 2017 dividend made during 2018.

³⁵ Credit institutions, investment firms and financial institutions, alternative investment fund managers, UCITS management companies, institutions for occupational retirement provision, non-regulated undertakings carrying out financial activities.

³⁶ According to current regulatory framework, IFRS 5 is not applicable for SII purposes. For this reason, Solvency II balance sheet figures at year-end 2017 are the official ones reported for regulatory and disclosure purposes without any adjustment related to IFRS discontinued operation in-force at year-end 2018.

SII balance sheet

(€ million)	31/12/2018	31/12/2017
Goodwill, DAC and intangible assets	0	0
Deferred tax assets	1,233	1,317
Property, plant & equipment held for own use	3,304	3,443
Investments (other than assets held for index-linked and unit-linked contracts)	380,083	387,645
Assets held for index-linked and unit-linked contracts	72,433	86,978
Loans and mortgages	7,678	6,697
Reinsurance recoverables	3,152	3,617
Deposits to cedants	1,264	1,271
Receivables	14,238	14,810
Own shares	3	3
Cash and cash equivalents	5,653	6,289
Any other assets, not elsewhere shown	1,678	1,791
Total assets	490,719	513,860
(€ million)	31/12/2018	31/12/2017
Technical provisions	408,929	428,710
Contingent liabilities	3	8
Provisions other than technical provisions	1,497	1,603
Pension benefit obligations	3,774	4,134
Deposits from reinsurers	852	702
Deferred tax liabilities	8,716	9,296
Liabilities derivatives	1,299	1,444
Financial liabilities	6,340	6,385
Payables	10,803	11,615
Subordinated liabilities	8,625	8,931
Any other liabilities, not elsewhere shown	1,541	1,512
Total liabilities	452,380	474,340
(€ million)	31/12/2018	31/12/2017
Excess of assets over liabilities	38,339	39,520

In the following paragraphs, comparisons with the IFRS financial statement in terms of valuation approaches and amounts are reported. Solvency II refers broadly to IFRS accounting principles to evaluate assets and liabilities, with the main adjustments related to:

- holdings in related undertakings, due to differences in the consolidation method of some Group entities in IFRS financial statements and Solvency II balance sheet;
- the elimination of intangible assets including deferred acquisition costs and goodwill;
- the assets that have to be measured at fair value in the Solvency II balance sheet;
- the financial liabilities that have to be measured at Solvency II value (without taking into account the change in own credit standing);
- the technical provisions that have to be measured at fair value in the Solvency II balance sheet;
- French pension assets and technical provisions that, in accordance with the measures allowed for the application of the IORP transitional regime, are valued according to French accounting standards on a historical basis;
- impacts of above adjustments on deferred taxes.

D.1. ASSETS

This chapter outlines Solvency II valuation methods for the main classes of assets, reporting the following information:

- description of the basis, methods and main assumptions used for valuation for Solvency II purposes;
- quantitative and qualitative explanation of any material differences between the basis, methods and main assumptions used by the undertaking for the valuation for Solvency II purposes and those used for their valuation in IFRS financial statements.

The table below reports, for each assets class, the difference between IFRS financial statements and Solvency II valuation. The column "IFRS carrying amount" reports the official amounts according to IFRS financial statements. The column "Reclassification" reports the adjustments necessary to move from IFRS perspective to Solvency II balance sheet taxonomy of IFRS assets and liabilities (e.g., the treatment of Financial & Credit, Pension entities³⁷, the mapping of the financial liabilities related to investment contracts as technical provisions, other perimeter adjustments such as the not applicability of the IFRS 5 principles³⁸). The column "IFRS homogeneous perimeter" is given by the sum of the previous columns, showing the IFRS figures in accordance with the Solvency II line item structure. The column "Change to Solvency II value" is the difference between Solvency II balance sheet and IFRS values. The column "Solvency II value" reports the official Solvency II balance sheet values.

Total assets at 31/12/2018

(€ million)	IFRS carrying amount (a)	IFRS reclass. (b)	IFRS homogen. perimeter (c = a+b)	Change to SII value (d-c)	SII value (d)
Goodwill, DAC and intangible assets	10,888	-176	10,712	-10,712	0
Deferred tax assets	2,345	-19	2,326	-1,093	1,233
Property, plant & equipment held for own use	2,878	-407	2,470	834	3,304
Investments (other than assets held for index-linked and unit-linked contracts)	332,102	39,870	371,973	8,110	380,083
Property (other than for own use)	13,650	2,201	15,850	7,707	23,557
Holdings in related undertakings	1,320	2,091	3,411	405	3,817
Equities	10,962	151	11,114	-10	11,104
Government bonds	159,431	17,287	176,718	-310	176,408
Corporate bonds, structured notes and collateralized securities	112,017	15,889	127,906	714	128,620
Collective investments undertakings	31,676	1,944	33,620	-46	33,574
Assets derivatives	1,625	-14	1,610	-351	1,260
Deposits other than cash equivalents	914	322	1,236	0	1,237
Other investments	508	-1	506	0	506
Assets held for index-linked and unit-linked contracts	65,789	6,640	72,429	4	72,433
Loans and mortgages	13,603	-6,181	7,423	255	7,678
Reinsurance recoverables	4,009	55	4,064	-912	3,152
Non-life business	2,764	-75	2,689	-621	2,068
Life business	1,245	130	1,375	-291	1,084
Deposits to cedants	734	530	1,264	0	1,264
Receivables	14,148	-132	14,016	222	14,238
Own shares	0	0	0	3	3
Cash and cash equivalents	6,697	-1,036	5,661	-8	5,653
Any other assets, not elsewhere shown	62,620	-60,830	1,789	-112	1,678
Total assets	515,812	-21,687	494,126	-3,407	490,719

³⁷ Reported in Solvency II balance sheet as investments in "Holding in related undertakings".

³⁸ At year-end 2018, Generali Leben and Guernsey and Belgium entities are classified as discontinued operations for IFRS purposes.

GOODWILL, DEFERRED ACQUISITION COSTS AND INTANGIBLE ASSETS

Goodwill, deferred acquisition costs and intangibles assets are valued at zero in the Solvency II balance sheet of Generali Group:

- goodwill, that is an intangible asset arising as a result of a business combination, is not recognisable in the Solvency II balance sheet, while it is identifiable within IFRS financial statement;
- deferred acquisition costs, that are costs directly related to the acquisition and renewal of insurance contracts and investment contracts with discretionary participation features and likely to be recovered, are included in the valuation of the technical provisions, therefore not recognised separately in the assets side of the Solvency II balance sheet;
- intangible assets, other than goodwill, that are non-monetary assets without physical substance, are only recognized in the Solvency II balance sheet when are separable and there is evidence of exchange transactions for the same or similar assets.

DEFERRED TAX ASSETS

Deferred taxes assets are commented in paragraph D.3, where the net position between deferred tax assets and deferred tax liabilities is reported.

PROPERTY, PLANT AND EQUIPMENT HELD FOR OWN USE

Property, plant and equipment held for own use includes tangible assets which are intended for permanent use and property held by the Group for own use and are measured at fair value under Solvency II.

Properties are mainly valued on the basis of inputs of similar assets in active markets or of discounted cash flows of future income and expenses of the rental considered as part of the higher and best use by a market participant. In particular, the valuation takes into consideration not only the discounted net future income but also the peculiarities of the properties such as intended use and location as well as the entity of the vacancy rate.

In addition:

- for residential properties, the best evidence of fair value is normally given by current prices on an active market for similar property in the same location and condition and subject to similar lease and other contracts, with adjustments to reflect differences;
- for properties used by the tenant for production or administrative purposes (commercial office), the best evidence of fair value is normally given by discounted cash flow projections based on reliable estimates of future cash flows, supported by the terms or any existing lease and other contracts and (where possible) by external evidence such as current market rents for similar properties in the same location and condition, and using discount rates that reflect current market assessments of the flows;
- for property inventories, net realisable value is a consistent option that is amended in case of material costs of completion and selling.

The difference between IFRS and Solvency II values is due to the different measurement basis: properties, plant and equipment held for own use are recognised at amortised cost under IFRS, while are measured at fair value in the Solvency II balance sheet.

INVESTMENTS

Investments (other than assets held for index-linked and unit-linked contracts) are measured at fair value for Solvency II purposes. In the following table, the investments are reported according to the valuation level of the fair value hierarchy:

Investments fair value hierarchy

	Level 1	Level 2	Level 3	Total
Total investments	76.0%	13.6%	10.4%	100.0%

Investments – Property (other than for own use)

Property (other than for own use) includes property used as investment and is measured at fair value under Solvency II. Valuation method applied and considerations on the difference with IFRS financial statements are consistent to the ones reported above for the real estates included in the asset class of property, plant and equipment.

Investments – holdings in related undertakings

Holdings in related undertakings, including participations, are defined as the ownership, direct or by way of control, of 20% or more of the voting rights or capital of an undertaking.

The hierarchy used by the Generali Group to value holdings in related undertakings for Solvency purposes is the following:

- in case of active market: quoted market price
- in case of no active market:
 - Adjusted equity method (for insurance and other Group entities included in the Solvency II balance sheet perimeter)
 - IFRS equity method (for non-insurance and other Group entities not included in the Solvency II balance sheet perimeter)
 - Alternative techniques (for associates and/or joint controlled entities)

Moving from IFRS to Solvency II valuation, the change in value of holdings in related undertakings is mainly due to the different treatment of financial sector entities (financial and credit institutions, IORP and UCITS) and other residual subsidiaries performing not homogeneous business. Specifically, applying Solvency II rules, financial sector entities are not consolidated line by line but classified as participations; whereas, for IFRS purposes, these are consolidated line by line.

Investments – Equities, collective investments undertakings and asset derivatives

The Solvency II valuation at fair value for equities, collective investments undertakings and asset derivatives is aligned with IFRS measurements. The fair value is determined considering market prices, when available. Otherwise, the net asset value, the income approach or the cost approach are applied.

No material differences arise between IFRS financial statements and Solvency II values. Some minor differences are attributable to the treatment of the assets linked to the French IORP business.

Investments – Deposits other than cash equivalents and other investments

Deposits other than cash equivalents and others investments are valued at fair value within Solvency II balance sheet, mainly according to the income approach. In IFRS financial statements they are measured at fair value or at amortised cost, depending on the IFRS class. No material differences arise between IFRS financial statements and Solvency II values.

Investments – Bonds

Bonds include government bonds, corporate bonds, structured notes and collateralised securities and are valued at fair value under Solvency II mainly using the market approach. In case a quoted market price is not available, quoted market price in active markets for similar assets are adopted for the fair value evaluation.

The difference between Solvency II and IFRS figures depends on the bonds classified as “loans” or as “held to maturity”, that are recognised at amortised cost in IFRS.

ASSETS HELD FOR INDEX-LINKED AND UNIT-LINKED CONTRACTS

Assets held for index-linked and unit-linked contracts, that are defined as assets held for insurance or investment products where the policyholder bears the investment risk, are valued at fair value both in Solvency II and in IFRS, mainly determined by market prices. No material differences arise between IFRS financial statements and Solvency II values.

LOANS AND MORTGAGES

Loans and mortgages include loans on policies, loans and mortgages to individual and other loans and mortgages, are valued at fair value within Solvency II usually according to the income approach using deterministic discounted cash flow models. In IFRS financial statements they are recognised at amortised cost. This difference determines the change in values.

REINSURANCE RECOVERABLES

Reinsurance recoverables are commented in paragraph D.2, where the net technical provisions are reported.

DEPOSITS TO CEDANTS

Deposits to cedants, that are deposits relating to accepted reinsurance, under Solvency II are measured at fair value, mostly determined using the income approach. In IFRS financial statements, they are recognised at amortised cost. Depending on the reinsurance agreement (for example, in case of variable risk free return) the amortised cost adopted in IFRS financial statements could represent an acceptable proxy of the fair value of the cash deposits also within Solvency II; in some cases more enhanced models are used, based on cash flows related to the deposit and regulated by the reinsurance agreement itself.

OWN SHARES

Own shares, that are defined as the shares issued by Assicurazioni Generali and owned by the Group entities, are valued in Solvency II balance sheet at fair value according to their quoted market price at valuation date. In IFRS financial statements they are directly deducted from the shareholders' equity.

RECEIVABLES, CASH AND CASH EQUIVALENTS AND ANY OTHER ASSETS, NOT ELSEWHERE SHOWN

Receivables (including reinsurance receivables, insurance and intermediaries receivables and receivables trade – not insurance), cash and cash equivalents and any other assets, not elsewhere shown (including prepaid interest, deferrals, other accrued income and pension benefit surplus), are not significantly adjusted moving from IFRS financial statements to fair value for the Solvency II balance sheet because of their specific nature, usually characterized by the short duration and maturity, the absence of expected interest cash-flows, etc.

D.2. TECHNICAL PROVISIONS

The Solvency II Group technical provisions at 31 December 2018 have been calculated according to the Solvency II regulation, as the sum of the best estimate of liabilities (BEL) and the risk margin (RM).

The BEL corresponds to the probability weighted average of the present values of future cash flows related to insurance and reinsurance obligations in force at the valuation date; therefore, it includes both a probabilistic assessment of their occurrence and an appropriate assessment of the time value of money, obtained for each relevant currency on the basis of the risk-free interest rate term structure at 31 December 2018, observed in the market and officially provided by EIOPA. The basic risk-free interest rate curves are derived, for the main currencies, from interbank swap rates and include an adjustment to consider the residual default risk of these instruments, the so-called credit risk adjustment. For Euro-denominated liabilities, representing 93% of the Generali Group's life technical provisions and 88% of the non-life technical provisions, the credit risk adjustment at 31 December 2018 is -10bps. Moreover, the valuation curve used for the BEL calculation can be further adjusted by means of the so-called volatility adjustment, to consider the additional return that can be achieved in a risk-free manner by the assets backing insurance liabilities. The currency specific volatility adjustment is provided by EIOPA (for Euro currency equal to +24bps at 31 December 2018) and is used for the valuation of most of the Group's portfolios. At 31 December 2018 the conditions defined in the EIOPA's formula for the application of the Country specific volatility adjustment have not been met, therefore the BEL has been calculated with the currency specific volatility adjustment, where relevant.

The method used to derive the **BEL** is based on the projection and discounting of all expected future cash flows for the entire contract duration, in line with the contract boundaries defined by the regulation. In particular, the projections consider all cash in-flows related to future premiums and cash out-flows due to the occurrence of insured events (e.g. benefits and claims), the possible exercise of contractual options (e.g. surrender or paid-up options) and the expenses incurred in servicing insurance and reinsurance obligations.

In further detail, in calculating the life technical provisions, the expected future cash flows are valued either in a unique scenario (i.e. certainty equivalent – methodology used for the valuation of contracts without any financial asymmetry) or as the mean value of a set of stochastic projections, to allow the calculation of the cost of financial guarantees and contractual options. The actuarial platforms also include specific assumptions on future management actions (e.g. management of asset allocation, of unrealised gains and losses, and of

profit sharing funds) and on the dynamic policyholder behaviour (i.e. the variation of the policyholders' propensity to the exercise of contractual options at predefined terms depending on the different economic conditions).

In calculating the non-life technical provisions, a distinction is made for the outstanding claims, whether reported or not, occurred before the valuation date whose costs and related expenses have not been completely paid by that date (claims provisions) and the future claims of contracts that are either in force at the valuation date or for which a legal obligation exists to provide coverage (premium provisions). The BEL calculation of the claims provisions is based on actuarial methods commonly used in international practice, among which the most common are the Link Ratio, the Bornhuetter-Ferguson and the Average Cost per Claim methods. The BEL for premium provisions is calculated taking into account the cash in-flows related to future premiums and the cash out-flows related to future claims and expenses applying, for the part related to unearned portion of contracts whose total amount of premiums has already been written at the valuation date, appropriate loss ratio and expense ratio (calculated according to a best estimate view) to the IFRS premiums reserves.

The Generali Group's BEL gross of reinsurance is determined on the basis of consolidated data, i.e. it is the sum of the BEL gross of reinsurance of the individual entities after the elimination of any intra-group reinsurance transaction, and no other consolidation or top-up adjustment is applied.

The **risk margin** is the part of technical provisions that ensures that the overall value of the technical provisions is equivalent to the amount a third party would theoretically require to take over and meet the insurance liabilities, taking into account the cost of capital required to support those liabilities over their remaining future lifetime and regarding non-hedgeable risks, i.e. underwriting risks, credit risks related to reinsurance contracts and operational risks.

In line with the regulation, the risk margin is calculated on a net of reinsurance basis separately for each entity of the Group and then aggregated to obtain the risk margin at Group level (i.e. no diversification benefit between entities and between life and non-life segment is considered). In detail, for each entity of the Group, the capital requirement needed to cover the non-hedgeable risks is determined using the internal model for the entities where it is approved and using the standard formula for all other entities of the Group. In both cases, as required by the regulation, risk capitals are calculated without the use of the volatility adjustment and considering the diversification benefits among different risks affecting the business of each entity. The projection of risk capitals and their allocation by line of business is performed using risk drivers specific to each risk. The yearly rate used to determine the cost of capital is 6%. The cost of capital of each projection year is discounted at the valuation date using the interest rate term structure at 31 December 2018 provided by EIOPA, without the volatility adjustment, for each relevant currency.

The technical provisions associated with a residual part of the portfolio (relating to non-material third country business) are valued via a simplified method. The adopted approach is considered proportionate to the nature, scale and complexity of the underlying risks.

Since the Group technical provisions are the result of the full consolidation of the technical provisions of the individual entities after the elimination of any intragroup reinsurance transaction and without any other consolidation or top-up adjustment, the bases, methods and assumptions used at Group level are the same as those used by the individual entities.

The consolidated **reinsurance recoverables**, i.e. the amounts expected to be recovered from reinsurance contracts, are obtained as the sum of the reinsurance recoverables associated with the extra-group reinsurance arrangements of each Group entity. They are valued either by means of precise projections of cash flows expected from extra-group reinsurance contracts or using a simplified method. The adopted approach is considered proportionate to the nature, scale and complexity of the underlying risks. In addition, as required by the Solvency II regulation, all reinsurance recoverables are reduced by the counterparty default adjustment to reflect the reinsurer's default risk.

LIFE TECHNICAL PROVISIONS

SII Group life technical provisions: overview and details by component

The following table shows the amount of Solvency II Group life technical provisions at 31 December 2018 and at 31 December 2017, broken down by main components: best estimate of liabilities, risk margin and reinsurance recoverables net of the counterparty default adjustment.

SII life technical provisions

(€ million)	31/12/2018	31/12/2017
Best estimate of liabilities - gross of reinsurance	379,370	397,907
Risk margin	4,575	4,640
Technical provisions - gross of reinsurance	383,945	402,547
Reinsurance recoverables	1,084	1,130
Technical provisions - net of reinsurance	382,861	401,417

The life technical provisions decrease from 31 December 2017 to 31 December 2018 (-4.6%) is mostly explained by the changes in scope occurred during 2018 (mainly the disposal of the entities in Ireland and in the Netherlands) and the negative economic variances linked to the unfavourable financial markets' development (especially due to the widening of spreads and the worsening of equity performance).

SII Group life technical provisions: details by line of business

The following table reports the amount of Solvency II Group life technical provisions (and of its main components) at 31 December 2018 with breakdown by main lines of business.

SII life technical provisions at 31/12/2018

(€ million)	BEL gross of reins.	Risk margin	SII TP gross of reins.
Life insurance other than index and unit linked	285,056	2,755	287,812
Index and unit linked	77,326	796	78,122
Health insurance similar to life	16,988	1,023	18,011
Total	379,370	4,575	383,945

With reference to technical provisions gross of reinsurance, the Group's portfolio is composed as follows:

- 75% of the portfolio is made up of traditional insurance, of which 97% is business with profit participation, mainly deriving from business underwritten in Italy, France, and Germany, whereas the remaining 3% is made up of business without profit participation;
- about 20% of the business refers to unit-linked contracts, mainly deriving from business underwritten in Italy, France, Germany and Switzerland;
- the remaining business (less than 5%) is made up of health similar to life products, mainly deriving from business underwritten in Germany.

SII Group life technical provisions: comparison with IFRS reserves

The following table compares IFRS Group life reserves (inclusive of DPL, i.e. the liability for future profit sharing on unrealised capital gains/losses at valuation date) with Solvency II Group life technical provisions at 31 December 2018.

Life IFRS reserves and SII technical provisions at 31/12/2018

(€ million)	IFRS reserves gross of reins.	SII TP gross of reins.
Life insurance other than index and unit linked	297,677	287,812
Index and unit linked	85,549	78,122
Health insurance similar to life	20,413	18,011
Total	403,639	383,945

The difference between IFRS life reserves and Solvency II life technical provisions is due to the substantial methodological differences between their respective valuation approaches. The valuation of the IFRS reserves is based on technical provisions calculated in accordance with local accounting principles and thus generally uses demographic pricing assumptions, discounts the contractual flows at the technical interest rate defined at the issue of the contract and considers, via the DPL, only the financial profit sharing on unrealised gains/losses existing at the valuation date. The Solvency II valuation, instead, is based on the projection of future cash flows performed

using best estimate operating assumptions, considering future profit sharing (both technical and financial), including the cost of contractual options and financial guarantees, and discounting using the current interest rate term structure. Moreover, under the Solvency II framework, the valuation of technical provisions includes the risk margin, whilst this component is not included in the valuation of IFRS reserves.

SII Group life technical provisions: source of uncertainty

In addition to methods, models and data used, the valuation of Solvency II life technical provisions depends on the assumptions made on a number of operating and economic factors whose future realisation might differ from the expectations at the valuation date, regardless of how accurate these might be.

The main operating assumptions affecting the Generali Group business are longevity, mortality, morbidity, lapses and expenses. Among these operating factors, expenses and surrenders are the most significant; in particular, a 10% increase in projected expenses produces a technical provisions variation of about 0.3% and a 10% increase in the surrender assumptions leads to a technical provisions increase of about 0.2%. For the other operating factors, a 10% variation with respect to the best estimate assumptions lead to impacts on technical provisions of about 0.1%.

Compared to the previous year-end valuation, the Solvency II Group life technical provisions have not been significantly impacted by the updates of the best estimate operating assumptions.

NON-LIFE TECHNICAL PROVISIONS

SII Group non-life technical provisions: overview and details by component

The following table shows the amount of Solvency II Group non-life technical provisions at 31 December 2018 and at 31 December 2017, broken down by main components: best estimate of liabilities, risk margin and reinsurance recoverables net of the counterparty default adjustment, separately for claims provisions and premium provisions.

SII non-life technical provisions - Claims provisions

(€ million)	31/12/2018	31/12/2017
Best estimate of liabilities - gross of reinsurance	20,553	21,422
Risk margin	875	891
Technical provisions - gross of reinsurance	21,428	22,313
Reinsurance recoverables	1,961	2,377
Technical provisions - net of reinsurance	19,467	19,937

SII non-life technical provisions - Premium provisions

(€ million)	31/12/2018	31/12/2017
Best estimate of liabilities - gross of reinsurance	3,208	3,262
Risk margin	349	587
Technical provisions - gross of reinsurance	3,557	3,849
Reinsurance recoverables	107	110
Technical provisions - net of reinsurance	3,450	3,740

The decrease in non-life technical provisions from 31 December 2017 to 31 December 2018 (-3.2%) is mainly due to changes in scope occurred during 2018 (mainly the disposal of the entities in the Netherlands and in Colombia), the decrease of risk margin due to the entrance of Austria and Switzerland in the Internal Model scope, the decrease of IFRS reserves in Italy mainly due to the increase of settlement speed (change in legislative framework), and the depreciation of pesos on euro in Argentina.

SII Group non-life technical provisions: details by line of business

The following table reports the amount of Solvency II Group non-life technical provisions (and of its main components) at 31 December 2018 with breakdown by main lines of business.

SII non-life technical provisions - Claims provisions at 31/12/2018

(€ million)	BEL gross of reins.	Risk margin	SII TP gross of reins.
Direct and accepted proportional	19,709	828	20,536
Medical expense insurance	493	7	500
Income protection insurance	1,101	15	1,116
Workers compensation insurance	163	13	175
Motor vehicle liability insurance	7,481	398	7,879
Other motor insurance	530	14	544
Marine, aviation and transport insurance	704	22	726
Fire and other damage to property insurance	3,474	109	3,583
General liability insurance	4,652	203	4,854
Credit and suretyship insurance	219	19	238
Legal expenses insurance	608	17	625
Assistance	122	7	129
Miscellaneous financial loss	162	5	168
Accepted non-proportional	844	47	891
Non-proportional health reinsurance	19	0	19
Non-proportional casualty reinsurance	458	38	496
Non-proportional marine, aviation and transport reinsurance	61	1	62
Non-proportional property reinsurance	306	7	314
Total	20,553	875	21,428

SII non-life technical provisions - Premium provisions at 31/12/2018

(€ million)	BEL gross of reins.	Risk margin	SII TP gross of reins.
Direct and accepted proportional	3,172	344	3,515
Medical expense insurance	241	6	246
Income protection insurance	-27	15	-12
Workers compensation insurance	2	1	2
Motor vehicle liability insurance	994	61	1,055
Other motor insurance	368	22	390
Marine, aviation and transport insurance	78	7	84
Fire and other damage to property insurance	1,098	165	1,262
General liability insurance	227	53	280
Credit and suretyship insurance	33	3	36
Legal expenses insurance	-56	7	-48
Assistance	120	3	122
Miscellaneous financial loss	95	2	97
Accepted non-proportional	36	6	41
Non-proportional health reinsurance	0	0	0
Non-proportional casualty reinsurance	1	3	4
Non-proportional marine, aviation and transport reinsurance	13	0	13
Non-proportional property reinsurance	22	3	24
Total	3,208	349	3,557

SII Group non-life technical provisions: comparison with IFRS reserves

The following table compares IFRS Group non-life reserves with Solvency II Group non-life technical provisions at 31 December 2018.

Non-life IFRS reserves and SII TP - Claims and premium provisions at 31/12/2018

(€ million)	IFRS reserves gross of reins.	SII TP gross of reins.
Non-life (excluding health)	27,240	22,938
Health (similar to non-life)	2,997	2,047
Total	30,237	24,984

The difference between IFRS non-life reserves and Solvency II non-life technical provisions is due to the substantial methodological differences between their respective valuation approaches. The valuation of IFRS reserves is based on technical provisions calculated in accordance with local accounting principles as ultimate cost without discounting the future cash-flows. The Solvency II valuation is instead based on the projection of future cash flows performed using best estimate assumptions, considering contract boundaries and discounting using the current interest rate term structure. Moreover, under the Solvency II framework, the valuation of technical provisions includes the risk margin, whilst, this component is not included in the valuation of IFRS reserves.

SII Group non-life technical provisions: source of uncertainty

The evaluation of the non-life technical provisions of Generali Group depends on the assumptions made on a number of operating and economic factors whose future realisations might differ from the expectations at the valuation date, regardless of how accurate these might be. These uncertainties are managed according to the standard international approaches and in particular in the projection of future claims and expenses related to very volatile portfolios discussing expected trends with claims, loss adjusters and underwriting experts.

Compared to the previous year-end valuation, the Solvency II Group non-life technical provisions have not been significantly impacted by the updates of the best estimate assumptions.

USE OF LONG-TERM GUARANTEE MEASURES

97% of the Solvency II Group life technical provisions and 93% of the Group non-life total portfolio are calculated using the volatility adjustment. A change to zero of the volatility adjustment for each currency would correspond to an increase of € 3,331 million in the life technical provisions net of reinsurance and an increase of € 206 million in the non-life technical provisions net of reinsurance.

The impacts due to the change to zero of the volatility adjustment on technical provisions, own funds and Solvency capital requirement are reported below.

Impacts of a change to zero of the volatility adjustment - at 31/12/2018

(€ million)	Amount with volatility adjustment	Impact of change to zero of the volatility adjustment
Technical provisions - net of reinsurance	405,777	3,537
Basic own funds after deduction	42,939	-2,116
Group own funds to meet the SCR	44,191	-2,116
Solvency capital requirement (SCR)	20,407	7,505
Group own funds to meet the MCR	40,656	-2,025
Minimum capital requirement (MCR)	15,639	574

The change to zero of the volatility adjustment on the own funds is due to the negative impact on technical provisions, partially compensated by the impact of deferred taxes (€ 1,008 million) and regulatory filters (€ 413 million).

For the Generali Group, the application of the volatility adjustment has limited impacts and does not result in non-compliance with the Solvency capital requirement.

The matching adjustment is not used for the calculation of Solvency II Group life and non-life technical provisions.

The transitional measure on the risk-free interest rate-term structure and the transitional measure on technical provisions are not used in the calculation of Solvency II Group life and non-life technical provisions.

D.3. OTHER LIABILITIES

This chapter outlines Solvency II valuation methods for the main classes of liabilities other than technical provisions, reporting the following information:

- description of the basis, methods and main assumptions used for valuation for Solvency II purposes;
- quantitative and qualitative explanation of any material differences between the basis, methods and main assumptions used by the undertaking for the valuation for Solvency II purposes and those used for their valuation in IFRS financial statements.

The table below reports, for each liabilities class, the difference between IFRS financial statements and Solvency II valuation. The column "IFRS carrying amount" reports the official amounts according to IFRS financial statements. The column "Reclassification" reports the adjustments necessary to move from IFRS perspective to Solvency II balance sheet taxonomy of IFRS assets and liabilities (e.g., the treatment of Financial & Credit, Pension entities³⁹, the mapping of the financial liabilities related to investment contracts as technical provisions, other perimeter adjustments such as the not applicability of the IFRS 5 principles⁴⁰). The column "IFRS homogeneous perimeter" is given by the sum of the previous columns, showing the IFRS figures in accordance with the Solvency II line item structure.

³⁹ Reported in Solvency II balance sheet as investments in "Holding in related undertakings".

⁴⁰ At year-end 2018, Generali Leben and Guernsey and Belgium entities are classified as discontinued operation for IFRS purposes.

The column “Change to Solvency II value” is the difference between Solvency II balance sheet and IFRS values. The column “Solvency II value” reports the official Solvency II balance sheet values.

Total Liabilities at 31/12/2018

(€ million)	IFRS carrying amount (a)	IFRS reclass. (b)	IFRS homogen. perimeter (c = a+b)	Change to SII value (d-c)	SII value (d)
Technical provisions	377,828	56,047	433,875	-24,946	408,929
Non-life business	31,457	-1,220	30,237	-5,253	24,984
Life business	346,371	57,267	403,639	-19,694	383,945
Contingent liabilities	0	0	0	3	3
Provisions other than technical provisions	1,816	-319	1,497	0	1,497
Pension benefit obligations	3,722	52	3,774	0	3,774
Deposits from reinsurers	747	62	809	43	852
Deferred tax liabilities	1,789	156	1,945	6,771	8,716
Liabilities derivatives	1,216	102	1,318	-19	1,299
Financial liabilities	28,539	-22,594	5,945	395	6,340
Payables	10,919	-56	10,863	-59	10,803
Subordinated liabilities	8,124	0	8,124	501	8,625
Subordinated liabilities not in basic own funds	0	0	0	0	0
Subordinated liabilities in basic own funds	8,124	0	8,124	501	8,625
Any other liabilities, not elsewhere shown	56,471	-55,136	1,334	206	1,541
Total liabilities	491,170	-21,687	469,483	-17,103	452,380

CONTINGENT LIABILITIES

Both for IFRS and Solvency II purposes, contingent liabilities valuation criteria are defined by IAS 37, with different reporting rules: while for IFRS they are only disclosed but not reported, for Solvency II they are recognised in the balance sheet if material⁴¹ and if the possibility of outflow is not remote.

IAS 37 defines that the value of contingent liabilities is equal to the expected present value of future cash flows required to settle the contingent liability over the lifetime, using the basic risk-free interest rate term structure. Moreover, when valuing liabilities, no adjustment for the own credit standings of the insurance or reinsurance undertaking is taken into account.

With reference to the main outstanding litigation proceedings, it should be noted that during 2016 Generali received from Banco BTG Pactual S.A. requests for damages, by means of a notice arbitration, as provided by the Share and Purchase Agreement of BSI S.A.. In this regard, the following main developments occurred during the year are summarized.

On 5 October 2018, Banco BTG Pactual SA filed a further brief in which it reiterated its claims for damages arising, according to the counterparty, on the alleged violation of the representations, warranties and covenants assumed by the seller in the context of the sale of BSI S.A.. Within the deadline set by the Arbitral Tribunal, Generali then filed further briefs in which it reiterated the firm objection, both in fact and in law, of the opposing claims, reiterating the preliminary exceptions raised. Taking into account the status of the arbitration proceeding and the legal opinions acquired in this regard, it is considered that the conditions of probability and ability to make a reliable estimate related to the abovementioned request for damages to be recognized in the provisions other than technical provisions or in the contingent liabilities are not met.

⁴¹ contingent liabilities are material if their current or potential size or nature may influence the decision-making or judgment of the intended user of that information.

PROVISIONS OTHER THAN TECHNICAL PROVISIONS

The provisions other than technical refer to liabilities of uncertain timing and amount different from insurance, reinsurance and pension benefit obligations. This class of liabilities is valued both in Solvency II balance sheet and IFRS financial statements according to a best estimate approach. Therefore there are no material differences between the two values. In calculating the best estimate, the following elements are considered:

- uncertainties and risks surrounding the events related to the obligation;
- discount rates reflecting market conditions of the time value of money.

PENSION BENEFIT OBLIGATIONS

Pension benefit obligations relate the employee pension schemes, both in the form of defined benefits plans and in the form of defined contribution plans. The valuation method described in IAS 19 is considered appropriate also for Solvency II balance sheet: therefore, IFRS and Solvency II values do not present any significant difference.

Within the Group, the main defined benefit plans are present in Germany and Austria.

DEPOSITS FROM REINSURERS

Deposits from reinsurers, that are deposits relating to ceded reinsurance, under Solvency II are measured at fair value, mostly determined using the income approach. In IFRS financial statements, they are recognised at their amortised cost. Depending on the reinsurance agreement (for example, in case of variable risk free return) the amortised cost adopted in IFRS financial statements could represent an acceptable proxy of the fair value of the cash deposits also within Solvency II; in some cases more enhanced models are used, based on cash flows related to the deposit and regulated by the reinsurance agreement itself.

DEFERRED TAX LIABILITIES

According to the Solvency II framework, deferred taxes are based on the temporary difference between the Solvency II value of assets and liabilities and the value for tax purposes on an item by item basis, using the expected tax rate to be applied when assets (liabilities) are realised (settled) and considering any potential impact of any announcement of amendment to tax rate. Unlike any deferred tax liability, the recognition of a deferred tax asset is subject to a recoverability test, which aims at showing that sufficient taxable income will be available in the future to absorb the tax credit, taking into account the existence of tax groups and any legal or regulatory requirements on the limits (in terms of amounts or timing) related to the carry forward of unused tax losses or the carry forward of unused tax credits.

The deferred tax calculation takes into account the tax regulations specific to particular assets and liabilities in the applicable tax regime. The tax rates used in the calculation are the applicable national tax rates. Deferred tax assets and liabilities are not discounted.

Deferred tax assets and liabilities can be offset at fiscal entity (or tax group if any) level⁴², if they relate to income taxes levied by the same taxation authority on the same taxable entity with same maturity, and if a legally enforceable right exists to set off income tax assets against tax liabilities.

Within the Solvency II balance sheet of Generali Group, the deferred tax liabilities exceed the amount of deferred tax assets: the net position amounts to € 7,483 million at year end 2018.

The following table reports the net deferred taxes by relevant asset and liabilities class, including the expiry date for each item. The main contributors to the net deferred taxes are financial instruments and properties, on the assets side, and technical provisions and reinsurance deposits, on the liabilities side.

The difference between Solvency II and IFRS values for deferred tax is due to differences in underlying valuation principles for assets and liabilities.

⁴² Generali group performs the netting between DTA and DTL according to IAS 12 § 74 and in consideration of IVASS regulation n. 34/2017 (cfr. art.20). In addition, for the determination of Solvency II Own Funds, the Delegated Acts 2015/35 art.76 (a) states that only the net position of Deferred Taxes can be classified as Tier 3.

Net deferred taxes by expiry date at 31/12/2018

	Total	Expiry Date			
		Up to 1 year	Between 2 and 5 years	More than 5 years	Unlimited
DAC & intangible assets	939	212	379	266	82
Investments (including Real Estate self used)	-4,863	-61	-329	-1,376	-3,097
Land and buildings (investment properties, self-used, property inventories and held for sale), plant & equipment held for own use	-1,506	10	-1	-125	-1,390
Investments in subsidiaries, associated companies, joint ventures and investment vehicles	-745	0	0	0	-745
Equities	-129	16	45	155	-345
Other investments, loans and mortgages, assets held for index-linked and unit-linked funds	-2,483	-87	-373	-1,406	-617
Technical provisions (net of reinsurance) and reinsurance deposits	-4,783	-165	-185	-1,363	-3,070
Financial liabilities	258	17	54	99	88
Other items	966	-79	2	35	1,008
Net deferred taxes	-7,483	-75	-79	-2,339	-4,990

LIABILITIES DERIVATIVES

The Solvency II valuation at fair value for liabilities derivatives is aligned with IFRS measurements. The fair value is determined by means of the income approach, using deterministic discounted cash flow models.

FINANCIAL AND SUBORDINATED LIABILITIES

Within Solvency II balance sheet, financial and subordinated liabilities are measured at Solvency II value determined mainly according to the market approach, using quoted market prices, and income approach, using deterministic discounted cash flow models, adjusted to avoid subsequent changes to own credit standing (that is, considering the credit standing of the borrower at issue).

The difference between Solvency II and IFRS values is due to the valuation approach: in IFRS the financial and subordinated liabilities are measured at amortized cost.

During 2018, the Group repaid part of the subordinated debt eligible in basic own funds for a nominal amount of € 250 million.

In the following table, the details on main senior issuances in the market are reported:

Main financial liabilities at 31/12/2018

Company	SII valuation	Currency	Issue date	Maturity	Coupon
Assicurazioni Generali	2,081	EUR	16/09/2009	16/09/2024	5.12%
Assicurazioni Generali	1,271	EUR	14/01/2014	14/01/2020	2.88%

In the following table, the details on main subordinated liabilities issuances in the market are reported:

Main subordinated liabilities at 31/12/2018

Company	SII valuation (in €)	Currency	Issue date	Call date	Maturity	Coupon	Tiering	Transitional
Assicurazioni Generali	1,395	EUR	21/11/2014	11/21/2025	PERP	4.60%	TIER1	Y
Assicurazioni Generali	1,318	EUR	12/12/2012	12/12/2022	12/12/2042	7.75%	TIER2	Y
Assicurazioni Generali	1,297	EUR	27/10/2015	27/10/2027	27/10/2047	5.50%	TIER2	N
Assicurazioni Generali	1,092	EUR	02/05/2014	na	04/05/2026	4.13%	TIER2	Y
Assicurazioni Generali	848	EUR	08/06/2016	08/06/2028	08/06/2048	5.00%	TIER2	N
Assicurazioni Generali	793	EUR	10/07/2012	10/07/2022	10/07/2042	10.13%	TIER2	Y
Assicurazioni Generali	617	GBP	08/02/2007	08/02/2022	PERP	6.42%	TIER1	Y
Assicurazioni Generali	482	GBP	16/06/2006	16/06/2026	PERP	6.27%	TIER1	Y
Assicurazioni Generali	352	EUR	04/03/2009	04/03/2019	PERP	7.24%	TIER1	Y
Assicurazioni Generali	352	EUR	06/03/2009	06/03/2019	PERP	8.50%	TIER1	Y
Assicurazioni Generali	51	EUR	15/07/2009	15/07/2019	PERP	9.00%	TIER1	Y

PAYABLES AND ANY OTHER LIABILITIES, NOT ELSEWHERE SHOWN

Payables (including payables to insurance and intermediaries, reinsurance payables and payables trade - not insurance) and any other liabilities, not elsewhere shown (including mainly accruals and deferrals), are not significantly adjusted moving from IFRS financial statements to fair value for the Solvency II balance sheet because of their specific nature, usually characterized by the short duration and maturity, the absence of expected interest cash-flows, etc.

D.4. ALTERNATIVE METHODS FOR VALUATION

For information on alternative methods used for valuation of assets and liabilities other than technical provisions, please refer to the subchapter Scope and general valuation principles for assets and liabilities not quoted in an active market at the beginning of chapter D.

D.5. ANY OTHER INFORMATION

No additional information to be reported in this section.

E. Capital Management

E.1. OWN FUNDS

The solvency ratio for the Generali Group stands at 216.6% at 31 December 2018. Compared to 31 December 2017⁴³, the solvency ratio increased by +9.8 p.p.

Solvency ratio

(€ million)	31/12/2018	31/12/2017
Group own funds (GOF) to meet the SCR	44,191	45,880
Solvency capital requirement (SCR)	20,407	22,191
Excess over the SCR	23,784	23,689
Solvency ratio	216.6%	206.8%

The strengthening of the solvency position of the Group is mainly attributable to the significant contribution of the normalised capital generation and to the extension of the partial internal model, that exceed the negative economic variance deriving from financial markets and the foreseeable dividend of the year.

MCR coverage

(€ million)	31/12/2018	31/12/2017
Group own funds to meet the MCR	40,656	42,862
Minimum capital requirement (MCR)	15,639	17,318
Excess over the MCR	25,016	25,545
Ratio of GOF to MCR	260.0%	247.5%

The coverage of the minimum capital requirement (MCR) shows an increase of 12.5 p.p., moving from 247.5% at 31 December 2017 to 260.0% at 31 December 2018.

The following table presents the development of the Group own funds from 2017 to 2018, on a net of tax basis.

Group own funds analysis of movement

(€ million)	
2017 Group own funds	45,880
Regulatory model changes and opening adjustments	412
Normalised own funds generation	3,312
Life	2,902
Non-life	1,017
Holdings & sectorals	-607
Operating variances	406
Economic variances	-3,306
Other variances	-849

⁴³ According to current regulatory framework, IFRS 5 is not applicable for SII purposes. For this reason, Group own funds and solvency capital requirements figures at year-end 2017 are the official ones reported for regulatory and disclosure purposes without any adjustment related to IFRS discontinued operations in-force at year-end 2018.

Model refinements	-98
Non recurring expenses, taxes & other	-751
Total own funds generation	-26
Foreseeable dividend	-1,413
Redemption of subordinated debt eligible in GOF	-250
2018 Group own funds	44,191

2018 Regulatory model changes and opening adjustments (€ 412 million) mainly refer to the extension of Generali's risk capital partial internal model to Austria (excluding health business) and Switzerland, approved by the Regulators during 2018,

and the impact on GOF (substantially neutral) stemming from the M&A operations concluded during 2018 (mainly the sale of the operations in Ireland and in the Netherlands).

2018 Normalised own funds generation (€ 3,312 million) is driven by the solid performance of life and non-life segments, partially offset by the contribution of the holding & sectorals segment, which is affected by the interest costs on subordinated debt. More in detail:

- **Life normalised own funds generation** (€ 2,902 million) mainly comes from the Solvency II value of new production, from the release of the prudency (risk margin) included in the Solvency II valuation and from the higher (compared to Solvency II) expected investment returns.
- **Non-Life normalised own funds generation** (€ 1,017 million) mainly stems from the technical result based on best estimate assumptions
- **Holdings and sectoral normalised own funds generation** (€ -607 million) mainly relates to the payment of the interest on the subordinated debt and to recurring holding costs, partially offset by the net result of the financial segment.

2018 Operating variances positively contribute to the GOF movement (€ 406 million) and mainly come from the life segment, in view of the positive experience variance of the year.

2018 Economic variances have an impact of € -3,306 million, mainly attributable to:

- the negative impact of the significant credit spreads widening on both corporate bonds and the Italian government bonds, which has not been adequately offset by the increase of the volatility adjustment (+20 bps on Euro area). This was essentially driven by the missed application of the country-specific VA in Italy, which would have counter-balanced on the liability side the impact suffered from the assets side.
- the lower interest rates on Euro area;
- the negative performance of Equities;
- the review of the assumptions adopted by EIOPA for the determination of the ultimate forward rate used in the definition of the long-term tail of the risk-free curves (for Euro, the UFR has been reduced from 4.20% to 4.05%);
- Other economic variances (€ -191 million), due to residual or cross-effects among above quoted factors.

2018 Other variances (€ -849 million) reflect the impact of minor refinements applied on the actuarial projection models, the impact of non-recurring holding expenses and the impact of the further haircut prescribed by the French regulator on the amount of unrealised gains on IORP pension business, which is recognised as an eligible item for GOF⁴⁴.

The movement of GOF from 2017 to 2018 is completed with the impacts related to the **2018 foreseeable dividend** paid in 2019 (€ -1,413 million) and to the early repayment of part (€ -250 million) of the Group's subordinated debt eligible in the GOF.

CAPITAL MANAGEMENT POLICIES

The Group and Local Capital Management Policy define principles for Capital Management activities to which the Assicurazioni Generali S.p.A. and the Group Legal Entities within the scope must adhere.

Capital management activities refer to Own Funds management and control and in particular to procedures to:

- classify and periodically review Own Funds in order to guarantee that Own Funds items meet the requirements of the applicable capital regime both at issuance and subsequently;

⁴⁴ These additional own funds are authorised by the Supervisory Authority for the years between 2016 to 2022, a period during which the proportion of the eligible unrealised capital gains will decrease gradually. In fact, starting from YE2016 ACPR (l'Autorité de contrôle prudentiel et de résolution) established a haircut on unrealised gains/losses (UGL) on IORP assets to be considered for Solvency II own funds; precisely at YE2018, 50% of UGL is to be recognised, while, for the future, a decreasing percentage of relevant UGL will be considered.

- regulate issuances of Own Funds according to the medium-term Capital Management Plan and the three years Strategic Plan also to guarantee
 - that Own Funds are not encumbered,
 - that all actions required or permitted related to the governance of Own Funds are timely completed,
 - that ancillary Own Funds are timely called,
 - that terms and conditions are clear and unambiguous, including instances in which distributions on an Own Funds item are expected to be deferred or cancelled;
- ensure that any policy or statement in respect of ordinary share dividends is taken into account when analysing the capital position;
- establish driving principles and common standards to carry out these activities efficiently, in compliance with the relevant regulatory requirements and legislative frameworks at Group and Local level, and in line with the stated risk appetite and strategy of the Generali Group.

The Capital Management Group Policy, which was approved by the Board of Directors of Assicurazioni Generali S.p.A. has to be approved by the relevant body at entity level.

The Capital Management Plan represents a part of the overall three-year Strategic Plan and this ensures the consistency of the CMP with three-year Strategic Plan assumptions.

The Capital Management Plan includes a detailed description of the development of Own Funds and Regulatory Solvency Ratio from the latest available actual figures to the last plan's year figures.

Local CFOs are responsible for producing Local CMP and Local CEOs are responsible submitting them to the relevant AMSB. Furthermore Local Entities include the Capital Management Plan in the information package to be delivered to the Group CFO function in the planning process. The main elements of the Capital Management Plan are discussed and challenged in specific meetings (Deep Dives on Capital) and within the regular business review process.

If extraordinary operations (i.e. M&A, Own Funds issuance) are foreseen in the plan period, their impact is explicitly included in Own Funds and Regulatory Solvency Ratio development and further details are included in the relevant documentation. Own Funds issuances are explicitly included in the CMP with a detailed description of the rationale.

The description of the development of Own Funds explicitly includes the issuance, redemption or repayment (earlier or at maturity) of Own Funds items and their impacts on the limits on tiers. Any variation in the valuation of Own Funds items is also indicated, with additional qualitative details in terms of limits on tiers when needed.

The CMP is defined taking into account limits and tolerances set in the Risk Appetite Framework.

In the CMP any transitional measure has to be reported in terms of impact on the solvency position current and at the end of the transitional period (both at Group and Local level), duration and general features including their absorption capacity in times of stress.

No material changes occurred during the reference period.

GROUP OWN FUNDS RESULTS BY COMPONENT

In compliance with the Solvency II regulatory requirements, Group own funds are defined as the sum of consolidated basic own funds related to insurance entities, holding and ancillary undertakings attributable to insurance activity and the own funds attributable to non-insurance entities, defined according to their sectoral regulatory regimes.

Basic own funds, in turn, can be further analysed as the sum of the following components:

- the excess of assets over liabilities as defined in accordance to art. 75 of Directive 2009/138/EC;
- plus subordinated debt eligible in basic own funds;
- less foreseeable dividends;
- plus additional own funds related to unrealised capital gains from French pension activities arising from the application of the IORP transitory regime;
- less deductions for participations in other sectoral entities;
- less deductions for regulatory filters applied to non-available items at Group level, restricted own fund items⁴⁵ and shares of the parent company.

No ancillary own funds items are included in the Group own funds.

⁴⁵ e.g. restrictions due to ring fenced funds deriving from deposit administration funds in Guernsey, restrictions due to surplus funds not available at Group level deriving from German life business and fiscal impact on Solvency II valuation of subordinated liabilities eligible as basic own fund items.

The contribution to the Group own funds of each element listed above is detailed in the following table.

Group own funds components

(€ million)	31/12/2018	31/12/2017
Excess of assets over liabilities	38,339	39,520
Subordinated liabilities eligible in basic own funds	8,625	8,931
Foreseeable dividend	-1,413	-1,330
Unrealised gains on French IORP business	933	1,703
Deduction for participations in sectoral entities	-2,089	-2,535
Impact of filter for non availability & minorities and other deductions	-1,457	-1,483
Basic own funds after deductions	42,939	44,806
Contribution of sectoral entities	1,253	1,074
Group own funds	44,191	45,880

Commenting on the items contributing to the GOF, it can be noted that:

- the decrease of the excess of assets over liabilities (€ -1,181 million) is mainly attributable to the payment of the 2017 dividend made during 2018;
- the change in the amount of subordinated debt eligible in basic own funds is due to its € 250 million early redemption occurred during 2018;
- the foreseeable dividend increases to € 1,413 million;
- the reduced contribution of the unrealised gains on IORP business stems from their progressive yearly haircut required by the French Regulator;
- the lower impact of other deductions (related to participations in sectoral entities and to filters for minorities and non-available items) mainly comes from the lower value (quoted market price) of the participation in Banca Generali;
- the increased contribution of sectoral entities reflects the higher capital held by Group entities operating within the financial segment.

RECONCILIATION BETWEEN IFRS EQUITY AND SOLVENCY II EXCESS OF ASSETS OVER LIABILITIES

Under the Solvency II regime, Solvency II excess of assets over liabilities is valued starting from IFRS shareholders' equity and by adjusting at fair value consolidated assets and liabilities in accordance with Article 75 and Section 2 of the Solvency II Directive.

More precisely, these adjustments consist of:

- eliminating intangible assets (e.g. goodwill);
- revaluating investments not accounted at fair value, such as loans, held to maturity investments and real estate;
- accounting for the technical provisions according to Solvency II rules as a sum of best estimate of liabilities and risk margin;
- including the Solvency II evaluation of financial liabilities and recognising material contingent liabilities;
- recalculating the impact of net deferred taxes on the above adjustments.

The following table presents the reconciliation between IFRS shareholders' equity and Solvency II excess of assets over liabilities at year-end 2018 and, for comparative purposes, at year-end 2017.

Reconciliation of IFRS equity to Group own funds

(€ million)	31/12/2018	31/12/2017
IFRS equity (gross of minorities)	24,643	26,177
Intangibles	-10,712	-10,790
Goodwill	-6,663	-6,662

DAC	-2,143	-2,141
Other intangibles	-1,906	-1,987
Mark to market of assets	9,310	9,867
Bonds	404	1,370
Real estates	8,541	7,499
Loans	255	357
Participations	405	964
Other Assets	-296	-322
Mark to market of Liabilities	22,962	21,669
Net technical provisions	24,034	22,467
Financial liabilities	-395	-439
Subordinated liabilities	-501	-552
Other liabilities	-175	193
Impact net deferred taxes	-7,864	-7,404
Excess of assets over liabilities	38,339	39,520

The main elements of reconciliation from the IFRS shareholders' equity (€ 24,643 million) to the Solvency II excess of assets over liabilities (€ 38,339 million) are the following:

- Intangibles (€ -10,712 million), not recognised under Solvency II,
- Mark to market of assets: this adjustment (€ 9,310 million) is primarily due to the fair valuation of real estate,
- Mark to market of liabilities: this adjustment (€ 22,962 million) is primarily due to net technical provisions (€ 24,034 million deriving from the difference between IFRS and Solvency II valuation),
- Impact of net deferred taxes (€ -7,864 million) is a consequence of the change to fair value of the items reported above.

GROUP OWN FUNDS TIERING

According to Solvency II regulation, Group own funds items are classified into three tiers representing different level of quality, depending on the ability to absorb losses due to adverse business fluctuations on a going-concern basis and in the case of winding-up.

The Group's tiering is described below.

- tier 1 unrestricted own funds includes the following items:
 - ordinary share capital and the related share premium account,
 - surplus funds (from German and Austrian business),
 - reconciliation reserve,
 - additional own funds from French pension activities,
- tier 1 restricted is composed of undated subordinated debt;
- tier 2 includes the remaining part of subordinated debt which is classified as dated;
- tier 3 is composed by net deferred tax assets, which are characterised by lower capital quality being not immediately available to absorb losses.

The sum of tier 2 and tier 3 should not exceed 50% of the SCR. In Generali Group, no eligibility filters are triggered thanks to the high-quality of the capital-tiering.

The GOF at year end 2018 split by tiers is reported in the following table, including a comparison with correspondent figures at year-end 2017.

Group own funds by tiering

(€ million)	Total	Tier 1 – unrestr.	Tier 1 - restricted	Tier 2	Tier 3
Group own funds to meet the SCR - 31/12/2018	44,191	35,505	3,276	5,349	61
Group own funds to meet the SCR - 31/12/2017	45,880	36,870	3,603	5,328	79
Change	-3.7%	-3.7%	-9.1%	0.4%	-22.4%

2018 Group own funds are mainly composed by high-quality capital. Tier 1 counts for about 87.8% of the total (88.2% in 2017), tier 2 represents 12.1% (11.6% in 2017) and tier 3 only 0.1% of the total (0.2% in 2017).

More details of GOF tiering are introduced in the following table.

Group own funds by tiering at 31/12/2018

(€ million)	Total	Tier 1 - unrestr.	Tier 1 - restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	1,565	1,565	0	0	0
Share premium account related to ordinary share capital	3,568	3,568	0	0	0
Surplus funds	2,392	2,392	0	0	0
Reconciliation reserve	29,283	29,283	0	0	0
Subordinated liabilities	8,625	0	3,276	5,349	0
An amount equal to the value of net deferred tax assets	61	0	0	0	61
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	-91	-91	0	0	0
Unrealised capital gains from French pension activities benefitting from IORP transitory regime, authorised by the Supervisory Authority	933	933	0	0	0
Impact of Minorities and other filters	-1,309	-1,309	0	0	0
Deductions for participations in financial and credit institutions	-2,089	-2,089	0	0	0
Contribution of sectoral entities	1,253	1,253	0	0	0
Group own funds	44,191	35,505	3,276	5,349	61

In particular, the Solvency II subordinated liabilities eligible in basic own funds amount to € 8,625 million and are entirely available to cover Group SCR. According to art. 308 b) paragraphs 9 and 10 of Omnibus II Directive, the subordinated liabilities in GOF are subject to the following tiering classification:

- tier 1 restricted basic own funds subordinated liabilities amount to € 3,276 million and benefit from grandfathering considering that these items were issued before the entry into force of the Solvency II Directive, covering the Solvency margin up to 50% according to Solvency I regime;
- tier 2 basic own funds subordinated liabilities amount to € 5,349 million, of which € 3,204 million benefit from grandfathering considering that these items were issued before the entry into force of the Solvency II Directive, covering the Solvency margin up to 25% according to Solvency I regime.

The subordinated liabilities that benefit from grandfathering have loss absorption capacity in line with grandfathering provisions; the remaining part of subordinated liabilities are fully compliant with Solvency II (in particular, art. 73 of Delegated Acts).

To define MCR coverage, stricter own funds eligibility rules are applied compared to the ones used for the SCR. The eligible amount of tier 1 items shall be at least 80% of the MCR and tier 2 items shall not exceed 20% of the MCR. No tier 3 items are allowed to cover the MCR and no capital from sectoral entities is considered.

The following table reports the split by tiering of GOF to meet the MCR.

Group own funds to meet the MCR by tiering

(€ million)	Total	Tier 1 - unrestr.	Tier 1 - restricted	Tier 2
Group own funds to meet the MCR - 31/12/2018	40,656	34,252	3,276	3,128
Group own funds to meet the MCR - 31/12/2017	42,862	35,796	3,603	3,464
Change	-5.2%	-4.3%	-9.1%	-9.7%

Tier 1 counts for 92.3% of the total own funds to meet the MCR (+0.4 p.p. vs. year end 2017) while tier 2 counts for 7.7% (-0.4 p.p. vs year end 2017, reflecting the decrease of the subordinated liabilities).

RECONCILIATION RESERVE

In the Generali Group, the reconciliation reserve at year end 2018 amounts to €29,283 million.

Reconciliation reserve is obtained as the sum of the following components:

- the excess of assets over liabilities as defined in accordance to art. 75 of Directive 2009/138/EC;
- less own shares;
- less foreseeable dividends;
- less other basic own funds items (the sum of ordinary share capital and related share premium account, surplus funds and net deferred tax assets);
- less restricted own funds items due to ring fencing;
- less other non available own funds.

The contribution to the reconciliation reserve of each element listed above is detailed in the following table.

Reconciliation reserve

(€ million)	31/12/2018	31/12/2017
Excess of assets over liabilities	38,339	39,520
(-) Own shares	-3	-3
(-) Foreseeable dividends	-1,413	-1,330
(-) Other basic own fund items	-7,587	-7,794
(-) Restricted own fund items due to ring fencing	-3	-2
(-) Other non available own funds	-51	0
Reconciliation reserve	29,283	30,391

E.2. SOLVENCY CAPITAL REQUIREMENT AND MINIMUM CAPITAL REQUIREMENT

E.2.1. SCR AND MCR VALUES

This section presents the Solvency Capital Requirement (SCR) and the Minimum Capital Requirement (MCR) of the Generali Group.

The SCR is calculated as the Value at Risk (VaR) of own funds subject to a confidence level of 99.5% over a one-year period.

The SCR is calculated with the Partial Internal Model (PIM)⁴⁶ of the Generali Group which covers financial, credit, life and non-life underwriting risks of the entities that had received the approval from the Supervisory Authority, as well as with the standard formula for the other (re-)insurance entities and applying other regulatory regimes (i.e. banking as well as pension business).

Operational risks are measured following a standard formula for all insurance entities of the Group.

The PIM provides an accurate representation of the main risks, measuring both the impact of each risk individually and their combined impact on the Group's own funds, as described in greater detail in section E.4..

The Group does not use simplified calculations for the definition of SCR.

Undertaking Specific Parameters (USP) are used for the calculation of the SCR of Europ Assistance entities and Italian entity DAS (*Difesa Automobilistica Sinistri*). The use of these USP has been approved by the Supervisory Authority⁴⁷.

Details on the volatility adjustment are provided in section D. Matching adjustments are not applied.

Group SCR amounts to €20,407 million (€22,191 million as at YE2017)⁴⁸. The significant decrease is mostly explained by the Internal Model Approval Process (IMAP) for the PIM scope extension of the main Swiss and Austrian insurance operations. This affects the risk profile and diversification benefits of the Group leading to the reduction of the Group SCR.

The following template provides the SCR by segment⁴⁹.

SCR by segment

(€ million)	Life		Non-life		Other		Total	
	Total	Impact (%)	Total	Impact (%)	Total	Impact (%)	Total	Impact (%)
YE2018	12,414	60.8%	6,881	33.7%	1,111	5.4%	20,407	100.0%

SCR by segment

(€ million)	Life		Non-life		Other		Total	
	Total	Impact (%)	Total	Impact (%)	Total	Impact (%)	Total	Impact (%)
YE2017	12,921	58.2%	8,126	36.6%	1,144	5.2%	22,191	100.0%

The following template provides the total SCR as a sum of the capital requirements for the below categories of entities, among which no diversification is calculated:

- entities authorised to use the PIM for SCR calculation based on the Internal Model, distinguished between EEA (European Economic Area) and non-EEA entities;
- entities based on standard formula calculation distinguished between EEA and non-EEA and other minor holding entities;
- credit and other financial services, based on sectorial rules;
- IORP pension funds, based on Solvency I.

⁴⁶ Solvency II allows the use of internal models, subject to Supervisory Authority approval, to calculate capital requirements to better reflect the risk profile.

⁴⁷ For the legal entity EA Spain the authorization process is under discussion with local supervisors.

⁴⁸ 2017 data for new production, Group own funds and SCR correspond to the values reported in the documents last year: in coherence with the applicable regulation, the figures have not been restated ex IFRS5.

⁴⁹ Model Adjustments indicated in the following templates are allocated by segment.

Total SCR by scope

(€ million)	YE2018	
	Total	Impact (%)
Partial Internal Model	15,291	74.9%
Total EEA entities	14,336	70.3%
Total non-EEA entities	955	4.7%
Standard formula	4,539	22.2%
Total EEA entities	2,133	10.4%
Total non-EEA entities and other minor holdings	2,406	11.8%
Other Regimes	577	2.8%
Credit and other financial services	485	2.4%
Pension funds (IORPs)	92	0.5%
Total SCR	20,407	100.0%

Total SCR by scope

(€ million)	YE2017	
	Total	Impact (%)
Partial Internal Model	14,321	64.5%
Total EEA entities	14,321	64.5%
Total non-EEA entities	0	0.0%
Standard formula	7,247	32.7%
Total EEA entities	3,662	16.5%
Total non-EEA entities and other minor holdings	3,585	16.2%
Other Regimes	623	2.8%
Credit and other financial services	535	2.4%
Pension funds (IORPs)	88	0.4%
Total SCR	22,191	100.0%

For the purpose of Group consolidated minimum SCR⁵⁰, the calculation is based on the MCR of Group legal entities, following the indications provided by EIOPA. The results are reported in the following tables.

MCR Value

(€ million)	Total
YE2018	15,639

⁵⁰ Under Solvency II, the MCR calculation is required to determine the minimum level of capital, under which the Group would be exposed to an unacceptable level of risk when allowed to continue its operations. For the purpose of the MCR calculation, premiums and reserves (net of reinsurance) are used for non-life while only reserves are used for life entities.

MCR Value

(€ million)	Total
YE2017	17,318

The reduction of MCR from €17,318 million at YE2017 to €15,639 million at YE2018 is mostly driven by a refinement of the calculation of Group MCR as well as by the reduction of the SCR movements of the legal entities⁵¹.

E.2.2. SCR BREAKDOWN

The SCR breakdown is provided as follows, highlighting also the contribution of the risks to the total SCR and the impact of the diversification among risks:

Total SCR YE2018 split by risks before and after diversification among risks (*)

(€ million)	Before diversification		After diversification	
	Total	Impact (%)	Total	Impact (%)
SCR as a sum (before diversification)	31,504	100.0%		
Financial risks	13,469	42.8%	12,072	49.0%
Credit risks	8,044	25.5%	6,737	27.3%
Life underwriting risks	3,404	10.8%	986	4.0%
Health underwriting risks	322	1.0%	112	0.5%
Non-life underwriting risks	4,059	12.9%	2,537	10.3%
Intangible risk	0	0.0%	0	0.0%
Operational risk	2,206	7.0%	2,206	9.0%
Diversification benefit	-	6,854		
Non linearity adjustments	-	14	-	14
SCR after diversification	24,635		24,635	100.0%
Unmodelled		7		
Adjustment due to RFF/MAP nSCR aggregation		5		
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC (IORP)		534		
Sectorial rules & Equivalent Regime		577		
SCR before taxes	25,759			
Tax absorption	-	5,607		
SCR before Model Adjustment	20,152			
Model Adjustment		255		
Total SCR	20,407			

(*) For what concerns risk modules, differently from the official QRT template S.25.02, the table shows amounts "before tax absorption effects". This representation better reflects the risk profile breakdown currently used within the business, in line with internal risk reporting procedures.

⁵¹ SCR values are used for MCR calculation in order to derive the corridor limits, nonetheless MCR values can also move not linearly to SCR values given their dependencies on volumes of premiums and reserves.

Total SCR YE2017 split by risks before and after diversification among risks (*)

(€ million)	Before diversification		After diversification	
	Total	Impact (%)	Total	Impact (%)
SCR as a sum (before diversification)	33,877	100.0%		
Financial risks	13,156	38.8%	11,522	43.4%
Credit risks	9,196	27.1%	7,965	30.0%
Life underwriting risks	3,484	10.3%	1,134	4.3%
Health underwriting risks	635	1.9%	215	0.8%
Non-life underwriting risks	5,145	15.2%	3,270	12.3%
Intangible risk	0	0.0%	0	0.0%
Operational risk	2,261	6.7%	2,261	8.5%
Diversification benefit	-7,510			
Non linearity adjustments	168		168	0.6%
SCR after diversification	26,535		26,535	100.0%
Unmodelled	7			
Adjustment due to RFF/MAP nSCR aggregation	5			
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC (IORP)	522			
Sectorial rules & Equivalent Regime	623			
SCR before taxes	27,692			
Tax absorption	-5,908			
SCR before Model Adjustment	21,784			
Model Adjustment	407			
Total SCR	22,191			

(*) For what concerns risk modules, differently from the official QRT template S.25.02, the table shows amounts "before tax absorption effects". This representation better reflects the risk profile breakdown currently used within the business, in line with internal risk reporting procedures.

The most relevant risks are financial/market risks that count for 42.8% (38.8% as at YE2017) of the total SCR before diversification and credit/counterparty risks that count for 25.5% (27.1% as at YE2017), while life/health and non-life underwriting count respectively for 11.8% (12.2% as at YE2017) and for 12.9% (15.2% as at YE2017). The operational risk counts for 7.0% (6.7% as at YE2017).

In terms of incidence, financial and credit risk weights on SCR after diversification further increase to 49.0% (43.4% as at YE2017) and to 27.3% (30.0% as at YE2017), respectively. The life/health risks count for 4.5% (5.1% as at YE2017) and non-life risks count for 10.3% (12.3% as at YE2017). There is no diversification benefit with the other risks for the operational risk which counts for 9.0% (8.5% as at YE2017).

The Model Adjustment represents an additional voluntary margin allocated for planned modelling improvements in a medium time horizon.

The row Adjustment due to RFF (ring-fenced funds)/MAP (matching adjustment portfolio) notional SCR aggregation represents the adjustment to correct the bias on SCR calculation due to aggregation of ring fenced funds, while the Group does not apply the matching adjustment.

E.3. USE OF THE DURATION-BASED EQUITY RISK SUB-MODULE IN THE CALCULATION OF THE SOLVENCY CAPITAL REQUIREMENT

This section is not applicable, since the duration-based equity risk sub-module set out in Article 304 of Solvency II Directive is not applicable to the Generali Group.

E.4. DIFFERENCES BETWEEN THE STANDARD FORMULA AND ANY INTERNAL MODEL USED

This section provides an overview of the PIM in terms of

- purpose;
- scope;
- methods used for the main risk categories with focus on the key differences between standard formula and Partial Internal Model.

E.4.1. INTERNAL MODEL PURPOSE

For the purpose of SCR calculation, the PIM is used to better capture the Group's risk profile. The PIM allows a more precise connection between the effective exposures and the capital requirements correlated to the specific business and activities of the Group legal entities within the scope.

The PIM allows to better capture the effective risk profile in terms of granularity, calibration and correlation of the various risk factors.

The PIM is developed based on the Group's specific portfolios and considers the experience gained in relation to each of them. Based on the observed interdependencies, the correlations matrices among risks are also defined.

E.4.2. INTERNAL MODEL SCOPE

The legal entities included in the PIM scope which have received the authorisation for PIM use for SCR calculations are the Italian, German, French entities, Czech legal entity (Ceska Pojistovna a.s.), as well as Austrian legal entities (Generali Versicherung AG and BAWAG P.S.K. Versicherung AG)⁵². These entities have been authorised to use the PIM for the calculation of the SCR. In addition, the Swiss entities have received the authorization for PIM use for SCR calculation in Group contribution only. The Swiss legal entities (Generali Assurances Générales SA and Generali Personenversicherungen S.A.) have been approved for consolidation purposes only, while at local level they continue to use Swiss Solvency Test capital requirement.

All the remaining insurance entities contribute to the Group SCR by means of the standard formula. Other financially regulated entities (i.e. banks, pension funds, etc.) contribute to the Group SCR by means of their local sectorial capital requirements.

The Group PIM is structured around a Risk Map, which contains all quantifiable risks that Generali has identified as relevant to its business, allowing for the calculation of the SCR at single risk level and at higher aggregation levels. The PIM scope includes credit and financial risks, life underwriting risks and non-life underwriting risks.

In terms of risks, the contribution of operational risks to the SCR is measured by means of the standard formula.

⁵² The Group applied for the use of its own Partial Internal Model (PIM) to calculate the SCR under Solvency II. The PIM scope as at YE2018 includes the following entities: Assicurazioni Generali S.p.A., Generali Italia S.p.A., Alleanza S.p.A., Genertel S.p.A., Genertellife S.p.A., Dialog Lebensversicherungs AG, Generali Deutschland Holding AG, AachenMünchener Lebensversicherung AG, AachenMünchener Versicherung AG, Generali Lebensversicherung AG, Generali Versicherung AG, AdvoCard Rechtsschutzversicherung AG, Cosmos Versicherung AG, Cosmos Lebensversicherungs AG, Central Krankenversicherung AG, Generali Beteiligungs-GmbH, Generali Vie S.A., Generali IARD S.A., Equité S.A. Cie d'Assurances et Réass. contre les risques de toute nature, GFA Caraïbes, Prudence Creole, Generali France S.A., Ceska Pojistovna a.s., Generali Versicherung AG, Bawag PSK Versicherung AG, Generali Assurances Générales S.A. and Generali Personenversicherungen S.A.. For the purpose of better capturing the Group's risk profile, the PIM scope is planned to be extended to Spanish insurance entities.

E.4.3. METHODS USED IN THE INTERNAL MODEL

Probability Distribution Forecast

In implementing the Partial Internal Model, the Group has adopted the so called Monte-Carlo approach with “proxy functions” to determine the Probability Distribution Forecasts (PDF) of the changes in the basic own funds over a 1-year horizon.

The own funds probability distribution allows to determine the potential losses at any percentile for risks in scope and, in particular, the SCR corresponding to the 99.5th percentile. The risk measure applied is the VaR (Value at Risk). Monte-Carlo methods are used in the industry to obtain sound numerical results using the embedded characteristics of repeated random sampling to simulate the more complex real-world events. Proxy functions are mathematical functions that mimic the interaction between risk drivers and insurance portfolios to obtain the most reliable results.

The calibration procedure involves quantitative and qualitative aspects. The aggregation process uses advanced mathematical techniques following market best practices. Dependencies among risks are defined through the use of a so called ‘Copula approach’ that simulates the interaction between several risk drivers (elements that mimic the underlying sources of risk) throughout the simulations generated by the Monte-Carlo stochastic method.

Data used in the PIM

For the purpose of SCR calculation, the PIM relies on market data (mostly for what concerns asset features), accounting data as well as statistical portfolios data, such to jointly consider both market evidence and business drivers. This information provides a comprehensive data set for the PIM stochastic modelling of the Group own funds.

The quality of data used in the PIM is granted on the basis of the process defined in the Group Data Quality Policy. Within this policy, the Group defines the data in scope based on proportionality and materiality principles, assesses the quality of data through controls aimed at verifying accuracy, completeness and appropriateness.

The Partial Internal Model (PIM) SCR calculation is subject to the independent validation process, on the basis of the principles defined in the Group Internal Model Validation Policy (see also section B.).

Diversification benefits

For what concerns the underlying implicit diversification generated by the assumptions of the correlation matrix and the relevant marginal distributions, this can be originated by:

- different market indexes (e.g. equity market holds a degree of diversification between sectorial and geographical indexes);
- different segments (diversification generates from the joint presence of life business, with medium to long-term cash flows and relevant interactions between market realisations and policyholders behaviour, and non-life business, with short-term exposures and generally speaking opposite effects deriving from interest rates movements);
- different geographies (non-life and life businesses sold in different regions with limited propagation/interaction effects);
- different business models (for example, the level of profit sharing with policyholders and the relevant management actions of the portfolios);
- different risks (e.g. the probability of occurrence of different risks is not the same and consequently the joint events have a correlation lower than 100%: as an example, natural CAT events are independent from financial market events, while the opposite is not true).

All of these elements contribute to the Group SCR in a consistent manner generating relevant diversification benefits.

Finally, the Group Partial Internal Model makes use of the “two world” approach for assessing the interaction between Internal Model scope and standard formula scope. This approach, as defined by the regulation does not allow for any diversification benefit between the “two worlds” granting a layer of prudency (for example, where the interest rate SCR of Internal Model scope and standard formula scope are generated by opposite economic scenarios).

In terms of quantitative results, based on the information provided in section E.2., the following table summarises the diversification benefits occurring across the main risk categories, taking into account that the diversification among geographies, segments, business models and granular risk modules is already embedded in the SCR risk categories:

Diversification benefits YE2018 split by risk

(%)	Diversification across risks
Financial risks	-10.4%
Credit risks	-16.3%
Life underwriting risks	-71.0%
Health underwriting risks	-65.2%
Non-life underwriting risks	-37.5%
Intangible risk	0.0%
Operational risk	0.0%
Overall diversification benefit	-21.8%

In general terms it is evident that financial and credit events are strongly correlated among each other, providing a limited diversification (i.e. the probability that financial and credit stressed events occur at the same time is high). Life and health underwriting risks are weakly correlated with the other risk categories, considering they are mostly driven by biometric events. Non-life underwriting risks are materially correlated with financial events (e.g. yield curve movements, inflation, credit worthiness of counterparties), this explaining the diversification benefit shown. Finally, operational risk is not diversified with any other risk category in line with the mentioned "two world" approach chosen by the Group. The final overall diversification benefit is the result of having the majority of the exposures subject to financial and credit risks more than to underwriting risks.

Different approaches applied for the calculation of the SCR at legal entity level

The use of Group PIM has been authorised both for the calculation of the SCR at Group level and of the SCR of the entities within the PIM scope, excluding Swiss legal entities Generali Assurances Générales SA and Generali Personenversicherungen SA which at local level continue to use Swiss Solvency Test capital requirement. To this end, the Local Suitability Assessment grants that the modelling and calibrations remain adequate also for the entities in scope. In terms of local specific calibrations, it is to be noted that for Italian entities, differently than for the calculation at Group level and other PIM entities, stress is neither applied to Italian government bonds nor to the Stochastic Volatility Adjustments.

Main differences between standard formula and the PIM for each risk category

Main differences between standard formula and the PIM for each risk category are the following:

1. With reference to life underwriting risks:

- the PIM life underwriting stress calibration is based on historical portfolio data, rather than on stress levels defined by the regulation as required by the standard formula approach. In particular, the calculation is based on the impact on technical provisions, of the potential deviations in the underlying calculation assumptions, arising from adverse events, defined through:
 - a combination of market data and exposures for the calibration of catastrophe risks (mortality and health);
 - single legal entity historical portfolio data for all other life risks.

2. With reference to non-life underwriting risks:

- a bottom-up calibration approach on the underwritten business for pricing and reserving risks within PIM, while the standard formula approach is based on standard deviation;
- regarding catastrophe (CAT) risks, standard formula calibration uses predefined EIOPA ratios based on the geography of exposures, while the PIM uses advanced methods based on market best practices;
- for what concerns reinsurance, the standard formula adopts simplified approaches, while PIM considers a specific modelling for forward looking reinsurance treaties with residual simplifications on past treaties and facultative reinsurance.

3. With reference to financial and credit risks:

- for market risk, the standard formula approach is based either on the application of standardised stress levels applied directly on assets or, in case of interest rate risk, on the application of a standardised and simplified stress on the curves used to discount the future cash flows;
- the PIM adopts more sophisticated modelling techniques, based on a more granular risk map (for example, the interest and equity volatility risks are considered in the PIM, while they are not considered in standard formula, and the calculation of the default risk is extended also to the bond portfolio);

- the PIM aims at a more accurate representation of the risk profile, also within the same risk module. The PIM approach calibrates specific stress distributions related to the peculiarities of each financial instrument, instead of applying the same stress coefficients on large asset classes. Calibrations are reviewed on yearly basis;
- it is worth noting that credit spread widening risk is classified within credit risk module under the PIM, differently from the standard formula.

E.5. NON-COMPLIANCE WITH THE MINIMUM CAPITAL REQUIREMENT AND NON-COMPLIANCE WITH THE SOLVENCY CAPITAL REQUIREMENT

This section is not applicable.

E.6. ANY OTHER INFORMATION

No additional information to be reported in this section.

Annex

Annex

Glossary

Basic own funds: According to art. 88 of Solvency II Directive 2009/138/CE, Basic Own Funds are defined as the sum of the excess of assets over liabilities measured on market consistent principles in accordance with art. 75 of Solvency II Directive 2009/138/CE and reduced by the amount of own shares held by the insurance or reinsurance undertaking, and subordinated liabilities.

Best estimate liability: The best estimate liability represents the expected present value of future cash-flows related to insurance and reinsurance obligations in force at valuation date. The best estimate liability is calculated on a gross of reinsurance basis, i.e. without any deduction of the amounts recoverable from reinsurance contracts and special purpose vehicles.

Best estimate operating assumptions: The assumptions on all those non-financial factors which can have an impact on future cash-flows, including not only the most common operating factors (i.e. mortality/longevity, disability/morbidity, lapses, expenses), but also those contractual policyholders' options that can be exercised by policyholders at pre-determined conditions (e.g. annuity take-up rates, voluntary premium increases, maturity extensions...).

Cash and cash equivalents: the item includes cash and highly-liquid short-term financial investments (readily convertible in specific amounts of cash which are subject to an irrelevant risk of change in value). Furthermore this asset class includes also short term deposits and money-market investment funds, which are included in the Group liquidity management.

Combined Ratio (COR): It is a technical performance indicator of the P&C segment, calculated as the weight of the loss ratio and the acquisition and general expenses (expense ratio) on the earned premiums.

Contract boundaries: This is the limit beyond which relevant cash flows are excluded from the calculation of technical provisions. It is defined in line with Article 18 of the Delegated Acts, and refers to future dates where the insurance undertaking has a unilateral right either to terminate the contract, or to reject payable premiums or to amend the payable premiums or the benefits in such a way that the premiums fully reflect the risks.

Counterparty default risk adjustment: The counterparty default adjustment is the amount of reinsurance recoverables that the Company expects not to be able to recover as a consequence of the possible default of the reinsurance counterparty at any point in time in the future.

Equivalent consolidation area: Refers to equivalent consolidation scope.

Equity investments: direct investments in quoted and unquoted equity instruments. Moreover, this asset class includes also investments funds mainly exposed to investments or risks similar to direct investments presented within this asset class, including also private equity and hedge funds.

Equivalent terms: Refers to equivalent exchange rates and equivalent consolidation scope.

Expected Profit Included in Future Premiums (EPIFP): it is the expected present value of future cash flows, if positive, which results from the inclusion in technical provisions of premiums relating to existing insurance and reinsurance contracts that are expected to be received in the future, but that may not be received for any reason, other than because the insured event has occurred, regardless of the legal or contractual rights of the policyholder to discontinue the policy.

Fixed income instruments: direct investments in government and corporate bonds, loans, term deposits other than those presented as cash and cash equivalents, and reinsurance deposits. Moreover, this asset class includes also investments funds mainly exposed to investments or risks similar to direct investments presented within this asset class.

Gross written premiums: Equal to gross written premiums of direct business and accepted by third parties.

Gross direct premiums: Equal to gross written premiums of direct business.

(Partial) Internal Model: The Internal Model refers to the Generali Group's Partial Internal Model approved by the Supervisory Authority for the calculation of the Solvency Capital Requirement under Solvency II. This model has been developed to better capture the risk profile of the Group and of the companies in scope. It covers all risk categories except operational risks.

Insurance contracts: a contract under which one party (the insurer) accepts significant insurance risk from another party (the policyholder) by agreeing to compensate the policyholder or other beneficiary if a specified uncertain future event (the insured event) adversely affects the policyholder or other beneficiary [Appendix A, IFRS4].

Investments back to unit and index-linked policies: includes various types of investments backing insurance liabilities related to unit and index-linked policies.

Investment contracts: investment contracts that have the legal form of insurance contracts but as they substantially expose the insurer to significant insurance risk (such as the mortality risk or similar insurance risks) cannot be classified as insurance contracts. In accordance with the definitions of FRS 4 and IAS 39 these contracts are recognized as financial liabilities. Investment contracts that have the legal form of an insurance contract but as they substantially expose the insurer to significant insurance risk (such as the mortality risk or similar insurance risks) cannot be classified as such. In line with the definitions of FRS 4 and IAS 39 these contracts are recognized as financial liabilities.

Investments properties: direct investments in real-estates. Moreover, this asset class includes also investments funds mainly exposed to real-estate investments.

Long term guarantee adjustments and transitional measures: This expression refers to the matching adjustment (as set out in article 77b of Solvency II Directive 2009/138/CE), the volatility adjustment (as set out in article 77d of Solvency II Directive 2009/138/CE), the transitional measure on the risk-free interest rates (as set out in article 308c of Solvency II Directive 2009/138/CE) and the transitional measure on technical provisions (as set out in article 308d of Solvency II Directive 2009/138/CE).

Minimum Capital Requirement (MCR): The Minimum Capital Requirement corresponds to an amount of eligible basic own funds below which policyholders and beneficiaries are exposed to an unacceptable level of risk were insurance and reinsurance undertakings allowed to continue their operations. It corresponds to the Value-at-Risk of the basic own funds subject to a confidence level of 85% over a one-year period (Solvency II Directive 2009/138/CE, Art. 129).

Net cash inflows: it is an indicator of cash flows generation of the life segment. It is equal to the amount of premiums collected net of benefits paid.

Other investments: includes participations in non-consolidated Group companies, derivative investments and receivables from banks and customers, the latter mainly related to Group banking operations.

Outstanding Claims Reserves: The Outstanding Claims Reserves (or Claims Provisions) are reserves for the outstanding claims, whether reported or not, occurred before the evaluation date whose costs and related expenses have not been completely paid by that date.

Own funds: According to art. 87 of Solvency II Directive 2009/138/CE, Own Funds are defined as the sum of basic own funds and ancillary own funds.

Premiums Reserves: The Premiums Reserves (or Premium Provisions) are reserves for contracts that are either in force at the valuation date or for which a legal obligation exists to provide coverage.

Reinsurance recoverables: Reinsurance recoverables represent the amount of best estimate liability expected to be recovered via reinsurance treaties or special purpose reinsurance vehicles and correspond to the expected present value of the future cash flows referring to the in force reinsurance agreements.

Return on investments: The indicators for the return on investments are presented, obtained as the ratio:

- a) Current return: between interest and other income, including income from financial instruments at fair value through profit and loss (excluding income from financial instruments related to linked contracts) net of depreciation on real estate investments and the average investments calculated on IAS book value);
- b) The profit and loss return is equal to the current return plus the harvesting rate (net realized gains, net impairment losses and realized and unrealized gains and losses from financial instruments at fair value through profit and loss (excluding those from financial instruments related to linked contracts) net of investment management expenses and foreign exchange impact recorded within the consolidated profit or loss and the average investments calculated on IAS book value);
- c) The comprehensive return is equal to the profit and loss return plus fair value and other movement recorder within OCI on available for sale financial assets and the average investments calculated on IAS book value).

The average investments (calculated on IAS book value) included land and buildings (investment properties), investments in subsidiaries, associated companies and joint ventures, loans and receivables, available for sale financial assets, financial assets at fair value through profit or loss less financial assets and liabilities related to linked contracts, derivatives classified as financial liabilities at fair value through profit or loss and cash and cash equivalents. Total investments are adjusted for derivative instruments classified as financial liabilities at fair value through profit or loss and REPOs classified as other financial liabilities. The average is calculated on the average asset base of each quarter of the reporting period.

Risk Adjusted Capital (RAC): The Risk Adjusted Capital is defined as the one-year change in basic own funds calculated at various percentiles (e.g. 1-in-10, 1-in-200). It is derived by reading the points from the full Probability Distribution Forecast (PDF) of the one-year changes in own funds, generated by the Partial Internal Model.

Risk Appetite Framework (RAF): The Risk Appetite Framework sets the overall risk strategy in terms of aggregate level of risk that the Generali Group is willing to accept or avoid in order to achieve its business objectives.

Risk Margin: The risk margin is the part of technical provisions that should ensure that the overall value of the technical provisions is equivalent to the amount a third party would theoretically require in order to take over and meet the insurance liabilities, taking into account the cost of capital required to support those liabilities over their remaining future lifetime and regarding non-hedgeable risks such as underwriting and operational risks.

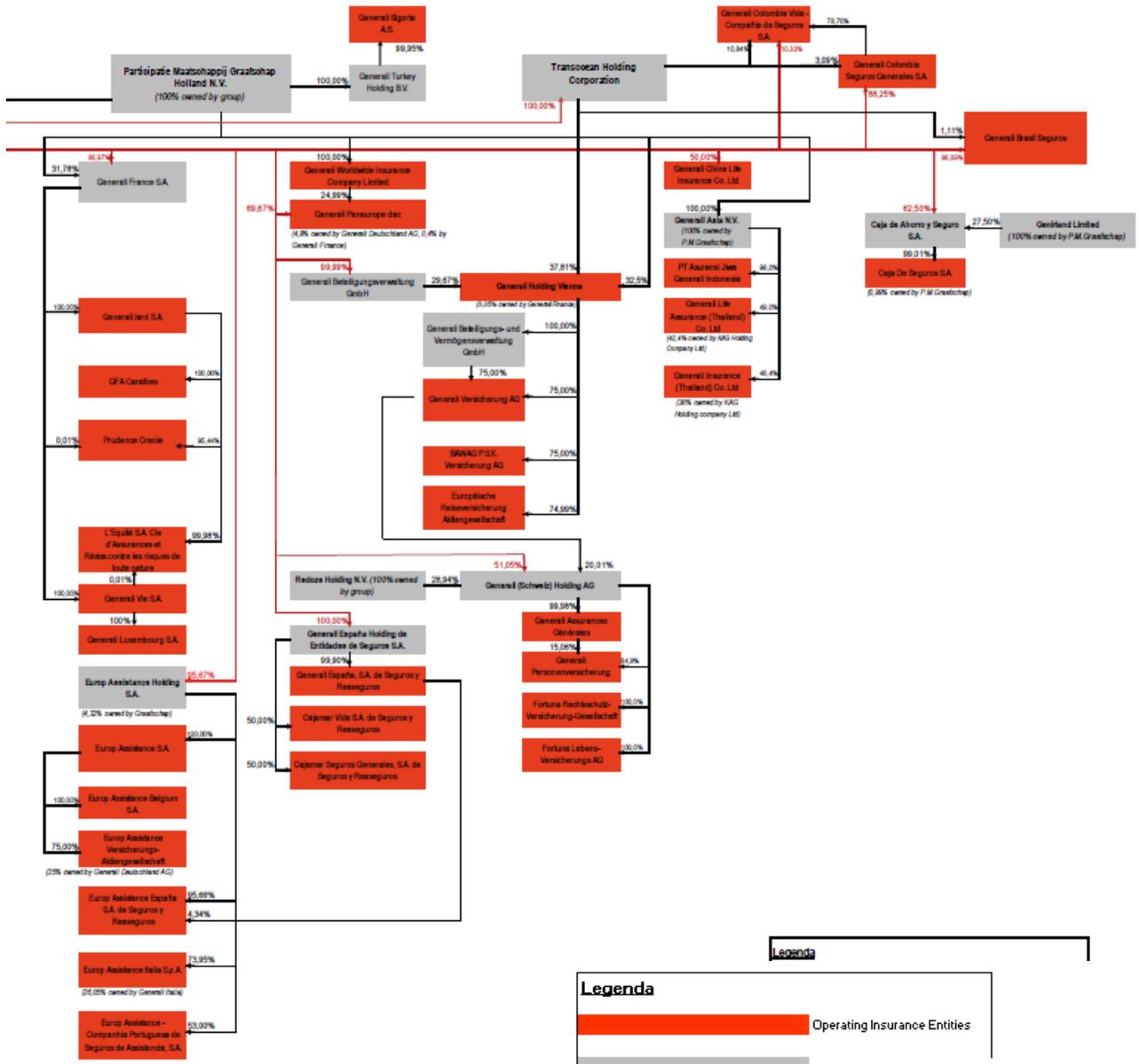
Solvency II ratio: defined as the ratio between the Eligible Own Funds and the Group Solvency Capital requirement, both calculated according to the definitions of the Solvency II regime. Own funds are determined net of proposed dividend.

Solvency Capital Requirement (SCR): The Solvency Capital Requirement is determined as the economic capital to be held by insurance and reinsurance undertakings in order to ensure that ruin occurs no more often than once in every 200 cases or, alternatively, that those undertakings will still be in a position, with a probability of at least 99.5%, to meet their obligations to policyholders and beneficiaries over the following 12 months (Solvency II Directive 2009/138/CE, Introduction, c. 64).

Standard formula: The standard formula is a standard method defined by Solvency II Directive for the calculation of the Solvency Capital Requirement. The standard formula covers the following risks: non-life underwriting risk, life underwriting risk, health underwriting risk, market risk, counterparty default risk and operational risk.

Technical provisions: The technical provisions correspond to the sum of the best estimate liability and risk margin. In case technical provisions are considered on a net of reinsurance basis, the amount of reinsurance recoverables net of the counterparty default adjustment is deducted from the technical provisions.

Volatility Adjustment (VA): Volatility Adjustment (VA) allows insurance and reinsurance undertakings to adjust the relevant risk-free interest rate term structure used for the calculation of the best estimate of technical provisions to mitigate the effect of bond spreads widening. The VA is calculated by EIOPA and amounts to 65% of the risk-corrected spread between the interest rate that could be earned from bonds included in a reference portfolio and the basic risk-free interest rates. The VA is derived for each relevant currency (based on currency specific reference portfolios) and, where relevant, for national insurance markets (based on country specific reference portfolios).



Legenda

Legenda

- Operating Insurance Entities
- Non Operating Entities (holding)
- Financial Entities

Entity	Shareholders	Shareholding %
Quotia Asset Management Company	Assicurazioni Generali spa	30,0%
Generali China Assets Management Company Co., Ltd	Generali China Life Insurance Co. Ltd	60,0%
Deutsche Bausparkasse Bodens Aktiengesellschaft	Generali Deutschland AG	100,0%
Banca Generali S.p.A.	Generali Italia spa Generali Vie SA Generallife spa Allianza Assicurazioni spa Generel spa	33,2% 3,6% 4,8% 2,4% 0,4%
Generali Investments Holding S.p.A.	Assicurazioni Generali spa Generali France SA Generali Deutschland AG	31,7% 34,0% 28,3%
Generali Investimento Europe S.p.A. Società di Gestione Risparmio	GI Holding spa Allianza Assicurazioni spa	82,3% 17,1%

Undertakings in the scope of the Group

Company	Country	Group Equity Ratio
Assicurazioni Generali S.p.A.	Italy	100,00
Genertel S.p.A.	Italy	100,00
UMS - Immobiliare Genova S.p.A.	Italy	99,90
Europ Assistance Italia S.p.A.	Italy	100,00
Europ Assistance Trade S.p.A.	Italy	100,00
Europ Assistance VAI S.p.A.	Italy	100,00
Generali Investments Partners S.p.A. Società di Gestione Risparmio	Italy	99,55
Generali Welion S.c.a.r.l.	Italy	100,00
Generali Properties S.p.A.	Italy	100,00
Alleanza Assicurazioni S.p.A.	Italy	100,00
Genagricola - Generali Agricoltura S.p.A.	Italy	100,00
Agricola San Giorgio S.p.A.	Italy	100,00
GenerFid S.p.A.	Italy	50,45
Banca Generali S.p.A.	Italy	50,45
Fondo Scarlatti - Fondo Immobiliare chiuso	Italy	67,28
Generali Real Estate S.p.A.	Italy	100,00
Fondo Immobiliare Mascagni	Italy	100,00
Fondo Immobiliare Toscanini	Italy	99,98
GSS - Generali Shared Services S.c.a.r.l.	Italy	99,84
Generali Business Solutions S.c.p.A.	Italy	99,71
CityLife S.p.A.	Italy	100,00
Residenze CYL S.p.A.	Italy	66,67
D.A.S. Difesa Automobilistica Sinistri - S.p.A. di Assicurazione	Italy	50,01
D.A.S. Legal Services S.r.l.	Italy	50,01
Alfuturo Servizi Assicurativi s.r.l.	Italy	100,00
Fondo Canaletto	Italy	98,90
Generali Real Estate S.p.A. SGR	Italy	100,00
Generali Investments Holding S.p.A.	Italy	99,55
Fondo Donizetti	Italy	100,00
Fondo Immobiliare Mantegna	Italy	100,00
Fondo Immobiliare Tiepolo	Italy	99,37
Fondo Immobiliare Schubert - comparto 1	Italy	100,00
Fondo Immobiliare Schubert - comparto 2	Italy	100,00
Fondo Immobiliare Schubert - comparto 3	Italy	100,00
Fondo Immobiliare Segantini	Italy	100,00
Genertellife S.p.A.	Italy	100,00
Generali Italia S.p.A.	Italy	100,00
Generali Insurance Asset Management S.p.A. Società di Gestione del Risparmio	Italy	99,63
Generali CyberSecurTech S.r.l.	Italy	100,00
Risparmio Assicurazioni S.p.A. in liquidazione	Italy	100,00
Initium S.r.l. in liquidazione	Italy	49,00
Sementi Dom Dotto S.p.A.	Italy	100,00
Finagen S.p.A. Società in liquidazione	Italy	100,00
Investimenti Marittimi S.p.A.	Italy	30,00
Servizi Tecnologici Avanzati S.p.A.	Italy	25,00
GRA S.p.A.	Italy	50,77
Tiberina S.r.l. Unipersonale	Italy	100,00
Telco S.p.A.	Italy	19,30
CityLife Sviluppo 2 S.r.l.	Italy	100,00
CityLife Sviluppo 3 S.r.l.	Italy	100,00
CityLife Sviluppo 4 S.r.l.	Italy	100,00
CityLife Sviluppo 5 S.r.l.	Italy	100,00
CityLife Sviluppo 6 S.r.l.	Italy	100,00
Fondo Yielding	Italy	44,50
Solaris S.r.l. in liquidazione	Italy	50,00
Fondo Sammartini	Italy	48,00
Generali Jeniot S.p.A.	Italy	100,00

Company	Country	Group Equity Ratio
Donatello Intermediazione S.r.l.	Italy	100,00
Dialog Lebensversicherungs-Aktiengesellschaft	Germany	100,00
GDPK-FI1 GmbH & Co. offene Investment KG	Germany	100,00
Generali Health Solutions GmbH	Germany	100,00
Generali Deutschland AG	Germany	100,00
AachenMünchener Lebensversicherung AG	Germany	100,00
AachenMünchener Versicherung AG	Germany	100,00
Generali Lebensversicherung Aktiengesellschaft	Germany	100,00
Generali Versicherung Aktiengesellschaft	Germany	100,00
Central Krankenversicherung Aktiengesellschaft	Germany	100,00
Europ Assistance Versicherungs-AG	Germany	100,00
Europ Assistance Services GmbH	Germany	100,00
Cosmos Lebensversicherungs Aktiengesellschaft	Germany	100,00
Cosmos Versicherung Aktiengesellschaft	Germany	100,00
ENVIVAS Krankenversicherung Aktiengesellschaft	Germany	100,00
ADVOCARD Rechtsschutzversicherung AG	Germany	100,00
Generali Deutschland Pensionskasse AG	Germany	100,00
Generali Beteiligungs-GmbH	Germany	100,00
Generali Deutschland Finanzierungs-GmbH	Germany	100,00
Generali 3. Immobilien AG & Co. KG	Germany	100,00
VVS Vertriebsservice für Vermögensberatung GmbH	Germany	74,00
GLL GmbH & Co. Retail KG i.L.	Germany	52,49
Generali Pensionsfonds AG	Germany	100,00
Generali European Real Estate Income Investments GmbH & Co. Geschlossene Investment KG	Germany	99,99
Generali Northern America Real Estate Investments GmbH & Co. KG	Germany	99,94
AM Erste Immobilien AG & Co. KG	Germany	100,00
CENTRAL Erste Immobilien AG & Co. KG	Germany	100,00
CENTRAL Zweite Immobilien AG & Co. KG	Germany	100,00
Deutsche Bausparkasse Badenia Aktiengesellschaft	Germany	100,00
Volksfürsorge 1.Immobilien AG & Co. KG	Germany	100,00
Thuringia Generali 1.Immobilien AG & Co. KG	Germany	100,00
Thuringia Generali 2.Immobilien AG & Co. KG	Germany	100,00
AM Vers Erste Immobilien AG & Co. KG	Germany	100,00
Generali Finanz Service GmbH	Germany	100,00
AM Sechste Immobilien AG & Co. KG	Germany	100,00
DBB Vermögensverwaltung GmbH & Co. KG	Germany	100,00
Generali Deutschland Services GmbH	Germany	100,00
Generali Deutschland Schadenmanagement GmbH	Germany	100,00
Generali Deutschland Informatik Services GmbH	Germany	100,00
ATLAS Dienstleistungen für Vermögensberatung GmbH	Germany	74,00
AM Gesellschaft für betriebliche Altersversorgung mbH	Germany	100,00
Cosmos Finanzservice GmbH	Germany	100,00
Generali Vitality GmbH	Germany	100,00
FPS GmbH	Germany	98,90
FLI GmbH	Germany	98,90
FFDTV GmbH	Germany	98,90
Generali Pensions- und SicherungsManagement GmbH	Germany	100,00
Volksfürsorge 5.Immobilien AG & Co. KG	Germany	100,00
Grundstücksgesellschaft Einkaufszentrum Marienplatz-Galerie Schwerin mbH & Co. KG	Germany	100,00
Grundstücksgesellschaft Einkaufszentrum Louisen-Center Bad Homburg mbH & Co. KG	Germany	100,00
GID Fonds AAREC	Germany	100,00
GID Fonds ALAOT	Germany	100,00
GID Fonds CLAOT	Germany	100,00
GID Fonds AVAOT	Germany	100,00
GID Fonds CEAOT	Germany	100,00
GID Fonds VLAOT	Germany	100,00
GID Fonds GLLAE	Germany	100,00

Company	Country	Group Equity Ratio
GID Fonds GDRET	Germany	100,00
GID Fonds AMLRET	Germany	100,00
GID Fonds GVMET	Germany	100,00
GID Fonds GLMET	Germany	100,00
GID Fonds GLRET 3	Germany	100,00
GID Fonds GLRET 2	Germany	100,00
GID Fonds GLRET 4	Germany	100,00
Vofü Fonds I Hamburgische Grundbesitz und Anlage GmbH & Co.KG	Germany	54,19
GID-Fonds GPRET	Germany	91,70
GLL AMB Generali Properties Fund I GmbH & Co. KG	Germany	99,90
GLL AMB Generali Properties Fund II GmbH & Co. KG	Germany	100,00
GLL Properties Fund I LP	United States	99,89
GLL Properties Fund II LP	United States	100,00
GLL Properties 444 Noth Michig. LP	United States	100,00
GLL AMB Generali 200 State Street	Germany	99,50
GID Fonds AVAOT II	Germany	100,00
GID Fonds AVAOT III	Germany	100,00
GID Fonds ALRET	Germany	100,00
GID Fonds CERET	Germany	100,00
GID-Fonds CLRET	Germany	100,00
GID Fonds GLRET	Germany	100,00
GID Fonds DLRET	Germany	100,00
GID Fonds GDPRET	Germany	100,00
GID Fonds GVRET	Germany	100,00
Gentum Nr. 1	Germany	100,00
GID Fonds AVRET	Germany	100,00
GID Fonds GLAKOR	Germany	100,00
GID-Fonds GLRET 5	Germany	100,00
GID Fonds DLAET	Germany	100,00
GID-Fonds AAINF	Germany	100,00
GID-Fonds CLRET 2	Germany	100,00
GID-Fonds ALAET	Germany	100,00
GID-Fonds CLTGP	Germany	100,00
GID-Fonds ALAET II	Germany	100,00
GIE-Fonds AADMSE	Germany	100,00
GIE-Fonds AASBWA	Germany	100,00
GIE-Fonds AADMGI	Germany	100,00
Generali Deutschland Alternative Investments Verwaltungs GmbH	Germany	100,00
vSPS Management GmbH i. L.	Germany	100,00
BBG Beteiligungsgesellschaft m.b.H.	Germany	100,00
Alstercampus Verwaltungsgesellschaft mbH	Germany	50,00
Generali Partner GmbH	Germany	100,00
Generali Deutschland Immobilien Verwaltungs GmbH	Germany	100,00
BA1 Alstercampus Grundstücksgesellschaft mbH & Co. KG	Germany	50,00
Zweite AM RE Verwaltungs GmbH	Germany	100,00
Generali Akademie GmbH	Germany	100,00
Versicherungs-Planer-Vermittlungs-GmbH	Germany	100,00
MLV Beteiligungsverwaltungsgesellschaft mbH	Germany	100,00
Deutsche Vermögensberatung Aktiengesellschaft DVAG	Germany	40,00
MPC Real Value Fund GmbH & Co. KG	Germany	100,00
Generali SicherungsTreuhand GmbH	Germany	100,00
Volksfürsorge Fixed Assets GmbH	Germany	100,00
Central Fixed Assets GmbH	Germany	100,00
AVW Versicherungsmakler GmbH	Germany	26,00
AM RE Verwaltungs GmbH	Germany	100,00
Generali Deutschland Versicherungsvermittlung GmbH	Germany	100,00
ver.di Service GmbH	Germany	50,00
Dein Plus GmbH	Germany	60,00

Company	Country	Group Equity Ratio
GEL Management GmbH	Germany	100,00
VOV GmbH	Germany	43,00
Louisen-Center Bad Homburg Verwaltungsgesellschaft mbH	Germany	94,90
Verwaltungsgesellschaft Marienplatz-Galerie Schwerin mbH	Germany	100,00
Blitz 17-628 AG	Germany	100,00
Generali IARD S.A.	France	98,67
Generali Vie S.A.	France	98,67
L'Equité S.A. Cie d'Assurances et Réass.contre les risques de toute nature	France	98,67
GFA Caraïbes	Martinique	98,67
Prudence Creole	Reunion Island	94,36
SAS Lonthènes	France	98,67
Europ Assistance France S.A.	France	100,00
Europ Assistance Océanie S.A.S.	French Polynesia	100,00
Ocealis S.A.S.	France	75,00
Generali France S.A.	France	98,67
Europ Assistance Holding S.A.S.	France	100,00
Cofifo S.A.S.	France	98,67
Suresnes Immobilier S.A.S.	France	98,67
SCI Terra Nova V Montreuil	France	98,67
GEII Rivoli Holding SAS	France	98,90
Immobiliere Commerciale des Indes Orientales IMMOCIO	France	98,67
SAS IMMOCIO CBI	France	98,67
Europ Assistance S.A.	France	100,00
Europ Assistance Brokerage Solutions S.a.r.l.	France	100,00
Europ Téléassistance S.A.S.	France	100,00
SCI Generali Reaumur	France	98,67
Gconcierges S.A.S.	France	100,00
GEIH France OPCI	France	98,90
SCI GRE PAN-EU 74 Rivoli	France	98,90
SCI GRE PAN-EU 146 Haussmann	France	98,90
SCI du 68 Pierre Charron	France	98,90
OPPCI K Archives	France	98,90
OPPCI K Charlot	France	98,90
GRE PANEU Cœur Marais SCI	France	98,90
GRE PANEU Fhive SCI	France	98,90
SAS Retail One	France	98,90
Retail One Fund OPPCI	France	98,82
SCI Retail One	France	98,82
SCI du 54 Avenue Hoche	France	98,67
SCI 42 Notre Dame Des Victoires	France	98,67
SCI Generali Wagram	France	98,67
SCI du Coq	France	98,67
SCI Espace Seine-Generali	France	98,58
SCI GF Pierre	France	98,67
SCI Landy-Novatis	France	98,67
SCI Cogipar	France	98,66
SC Commerce Paris	France	98,67
SCI Landy-Wilo	France	98,67
SCI Generali Carnot	France	98,67
SCI Generali Commerce 1	France	98,67
SCI Generali Commerce 2	France	98,67
SCI Generali le Moncey	France	98,67
SC Generali Logistique	France	98,67
SCI Parcolog Lille Hénin Beaumont 2	France	98,67
SCI Iris La Défense	France	98,67
OPCI Parcolog Invest	France	98,67
SCI Parc Logistique Maisonneuve 1	France	98,67

Company	Country	Group Equity Ratio
SCI Parc Logistique Maisonneuve 2	France	98,67
SCI Parc Logistique Maisonneuve 3	France	98,67
SCI Parc Logistique Maisonneuve 4	France	98,67
SCI Parcolog Isle D'Abeau 1	France	98,67
SCI Parcolog Isle D'Abeau 2	France	98,67
SCI Parcolog Isle D'Abeau 3	France	98,67
SCI Parcolog Combs La Ville 1	France	98,67
SCI Parcolog Bordeaux Cestas	France	98,67
SCI Parcolog Marly	France	98,67
SCI Parcolog Messageries	France	98,67
SCI Commerces Regions	France	98,67
SCI Thiers Lyon	France	98,67
SCI Iliade Massy	France	98,67
SAS Parcolog Lille Henin Beaumont 1	France	98,67
OPCI Generali Bureaux	France	98,67
OPCI Generali Residentiel	France	98,67
OPCI GB1	France	98,67
OPCI GR1	France	98,67
SCI 18-20 Paix	France	98,67
SCI Berges de Seine	France	98,67
SCI 6 MESSINE	France	98,67
SCI 204 Pereire	France	98,67
SCI du 33 avenue Montaigne	France	98,67
SCI 5/7 MONCEY	France	98,67
SCI 28 Cours Albert 1er	France	98,67
SC Novatis	France	98,67
SCI Bureaux Paris	France	98,67
Sarl Breton	France	98,67
SCI Luxury Real Estate	France	98,58
Association pour La Location du Moncey	France	98,67
Equi#Generali S.A.S.	France	98,67
Cabinet Berat et Fils S.A.S.	France	98,67
ASSERCAR SAS	France	29,34
COSEV@D Société par actions simplifiée	France	98,67
Trieste Courtage S.A.	France	98,66
Generali 7 S.A.	France	98,57
PMC Treize Montluçon S.A.S.	France	98,67
Generali 10 S.A.S.	France	98,67
EAP France SAS	France	50,10
Bien Être Assistance S.A.S.	France	50,10
Risque et Sérénité S.A.	France	60,35
MAPREG	France	24,93
GF Sante S.A.S.	France	98,67
ABT SAS	France	24,67
Metropole Assurances S.à r.l.	France	98,67
Reunion Aerienne & Spatiale SAS	France	32,89
SAP BEA	France	50,10
Generali Global Infrastructure S.A.S.	France	50,75
Generali 11 S.A.S.	France	98,67
Generali 12 S.A.S.	France	98,67
Generali 13 S.A.S.	France	98,67
Generali 14 S.A.S.	France	98,67
Generali 15 S.A.S.	France	98,67
Generali 16 S.A.S.	France	98,67
Generali 17 S.A.S.	France	98,67
SAS 100 CE	France	49,45
SCI Les 3 Collines Le Ferandou	France	47,66
SCI Font Romeu Neige et Soleil	France	98,67
Sarl Parcolog Lyon Isle d'Abeau Gestion	France	98,67

Company	Country	Group Equity Ratio
SCE Château La Pointe	France	98,67
Bois Colombes Europe Avenue SCI	France	49,34
SCI 11/15 Pasquier	France	49,34
SCI 9 Messine	France	49,34
SCI Daumesnil	France	49,34
SCI Malesherbes	France	49,34
SCI 15 Scribe	France	49,34
SCI CIC	Martinique	98,67
SCI GFA Caraibes	Martinique	98,67
Generali Holding Vienna AG	Austria	100,00
Europäische Reiseversicherung Aktiengesellschaft	Austria	74,99
HSR Verpachtung GmbH	Austria	85,00
Generali Versicherung AG	Austria	100,00
BAWAG P.S.K. Versicherung AG	Austria	75,00
Europ Assistance Gesellschaft mbH	Austria	100,00
Car Care Consult Versicherungsvermittlung GmbH	Austria	100,00
Generali Beteiligungs- und Vermögensverwaltung GmbH	Austria	100,00
Allgemeine Immobilien-Verwaltungs GmbH & Co. KG	Austria	100,00
Generali Immobilien GmbH	Austria	100,00
Generali Beteiligungsverwaltung GmbH	Austria	100,00
SW 13	Austria	98,90
Generali Bank AG	Austria	100,00
Generali Leasing GmbH	Austria	100,00
Care Consult Versicherungsmakler GmbH	Austria	74,99
3 Banken-Generali-GLStock	Austria	100,00
3 Banken Generali GLBond Spezialfonds	Austria	100,00
3 Banken-Generali-GSBond	Austria	100,00
3 Banken-Generali - GEN4A Spezialfonds	Austria	100,00
BAWAG PSK Spezial 6	Austria	75,00
3 Banken-Generali - GNLStock	Austria	100,00
3 Banken-Generali-GHStock	Austria	100,00
Lead Equities II. Auslandsbeteiligungs AG	Austria	21,59
Lead Equities II. Private Equity Mittelstandsfinanzierungs AG	Austria	21,59
SK Versicherung AG	Austria	39,66
Drei Banken Versicherungsagentur GmbH	Austria	20,00
Bonus Pensionskassen AG	Austria	50,00
Generali 3 Banken Holding AG	Austria	49,30
M.O.F. Immobilien AG	Austria	20,00
3 Banken-Generali Investment-Gesellschaft m.b.H.	Austria	48,57
Risk-Aktiv Versicherungsservice GmbH	Austria	100,00
BONUS Vorsorgekasse AG	Austria	50,00
Generali Betriebsrestaurants-GmbH	Austria	100,00
TTC - Training Center Unternehmensberatung GmbH	Austria	74,99
Generali European Retail Investments Holdings S.A.	Luxembourg	99,44
Generali Luxembourg S.A.	Luxembourg	98,67
Generali Investments Luxembourg S.A.	Luxembourg	99,55
Generali Real Estate Multi-Manager	Luxembourg	100,00
Generali North American Holding 1 S.A.	Luxembourg	98,67
Generali North American Holding 2 S.A.	Luxembourg	99,94
Generali North American Holding S.A.	Luxembourg	100,00
Generali Europe Income Holding S.A.	Luxembourg	98,90
GRE PAN-EU Munich 1 S.à r.l.	Luxembourg	98,90
GRE PAN-EU Hamburg 1 S.à r.l.	Luxembourg	98,90
GRE PAN-EU Hamburg 2 S.à r.l.	Luxembourg	98,90
GRE PAN-EU Frankfurt 1 S.à r.l.	Luxembourg	98,90
Cologne 1 S.à.r.l.	Luxembourg	99,37
GRE PAN-EU Frankfurt 2 S.à r.l.	Luxembourg	98,90
Retail One Fund	Luxembourg	98,90

Company	Country	Group Equity Ratio
Generali European Real Estate Investments S.A.	Luxembourg	99,44
Frescobaldi S.à.r.l.	Luxembourg	99,44
GLL AMB Generali Cross-Border Property Fund FCP	Luxembourg	100,00
BG Fund Management Luxembourg S.A.	Luxembourg	50,45
GLL AMB Generali City22 S.à.r.l.	Luxembourg	100,00
Corelli S.à.r.l.	Luxembourg	99,44
Torelli S.à.r.l.	Luxembourg	99,44
GLL AMB Generali Bankcenter S.à.r.l.	Luxembourg	100,00
Generali Real Estate Asset Repositioning S.A.	Luxembourg	99,37
Generali Financial Holding FCP-FIS - Sub-Fund 2	Luxembourg	99,87
Point Partners GP Holdco S.à r.l.	Luxembourg	24,86
Point Partners Special Limited Partnership	Luxembourg	24,86
Holding Klege S.à.r.l.	Luxembourg	49,72
GARBE Logistic European Strategic Fund II	Luxembourg	39,73
Generali España, S.A. de Seguros y Reaseguros	Spain	99,90
Cajamar Vida S.A. de Seguros y Reaseguros	Spain	50,00
Cajamar Seguros Generales, S.A. de Seguros y Reaseguros	Spain	50,00
Europ Assistance España S.A. de Seguros y Reaseguros	Spain	100,00
Europ Assistance Servicios Integrales de Gestion, S.A.	Spain	100,00
Generali España Holding de Entidades de Seguros S.A.	Spain	100,00
Hermes Sociedad Limitada de Servicios Inmobiliarios y Generales	Spain	99,90
Vitalicio Torre Cerdà S.l.	Spain	99,90
Grupo Generali España, A.I.E.	Spain	99,90
Preciados 9 Desarrollos Urbanos SL	Spain	98,90
GRE PAN-EU MADRID 2 SL	Spain	98,90
GLL City22 S.L.	Spain	100,00
Europ Assistance Travel S.A.	Spain	100,00
Generali Cliente, Agencia de Seguros Exclusiva, SL	Spain	99,90
Generali Vida Companhia de Seguros S.A.	Portugal	99,99
Generali Companhia de Seguros, S.A.	Portugal	100,00
Europ Assistance - Companhia Portuguesa de Seguros, S.A.	Portugal	100,00
Europ Assistance - Serviços de Assistência Personalizados S.A.	Portugal	99,98
Ponte Alta, SGPS, Unipessoal, Lda.	Portugal	100,00
Keviana – Empreendimentos Imobiliários, S.A.	Portugal	98,67
Generali Belgium S.A.	Belgium	99,99
Generali Real Estate Investments B.V.	Netherlands	99,99
Europ Assistance Belgium S.A.	Belgium	100,00
Europ Assistance Services S.A.	Belgium	100,00
GRE PAN-EU Brussels 1 s.p.r.l.	Belgium	98,90
GRE PAN-EU Brussels 2 s.p.r.l.	Belgium	98,90
Dedale S.A.	Belgium	99,98
B&C Assurance S.A.	Belgium	99,99
Webbroker S.A.	Belgium	99,99
Verzekeringskantoor Soenen N.V.	Belgium	99,79
Groupe Vervietois d'Assureurs S.A.	Belgium	99,94
Participatie Maatschappij Graafschap Holland N.V.	Netherlands	100,00
Redoze Holding N.V.	Netherlands	100,00
Generali Asia N.V.	Netherlands	100,00
Generali Turkey Holding B.V.	Netherlands	100,00
Saxon Land B.V.	Netherlands	99,60
Lion River I N.V.	Netherlands	99,61
Generali Horizon B.V.	Netherlands	100,00
Lion River II N.V.	Netherlands	99,97
Generali CEE Holding B.V.	Czech Republic	100,00
CZI Holdings N.V.	Czech Republic	100,00
CP Strategic Investments N.V.	Netherlands	100,00
GW Beta B.V.	Netherlands	99,93
Amulio Governance B.V.	Netherlands	49,99

Company	Country	Group Equity Ratio
Sigma Real Estate B.V.	Netherlands	22,21
MyDrive Solutions Limited	United Kingdom	100,00
Generali Saxon Land Development Company Ltd	United Kingdom	99,60
La Reunion Aerienne London Limited	United Kingdom	32,89
loca Entertainment Limited	United Kingdom	17,66
CM Investment Solutions Limited	United Kingdom	99,55
Generali Worldwide Insurance Company Limited	Guernsey	100,00
Generali Portfolio Management (CI) Ltd	Guernsey	100,00
Genirland Limited	Ireland	100,00
Generali Link Limited	Ireland	100,00
Købmagergade 39 ApS	Denmark	98,90
Europ Assistance A/S	Denmark	100,00
Citadel Insurance plc	Malta	20,16
Generali Hellas Insurance Company S.A.	Greece	100,00
Generali Biztosító Zrt.	Hungary	100,00
Európai Utazási Biztosító Zrt.	Hungary	70,75
Europ Assistance Magyarország Kft	Hungary	100,00
Váci utca Center Uzletközpont Kft	Hungary	100,00
Generali-Ingatlan Vagyonkezelő és Szolgáltató Kft.	Hungary	100,00
Generali Alapkezelő Zártkörűen Működő Részvénytársaság	Hungary	100,00
Genertel Biztosító Zrt.	Hungary	100,00
Roar Biztosítási És Pénzügyi Közvetítő Korlátolt Felelősségű Társaság	Hungary	100,00
GP Consulting Pénzügyi Tanácsadó Kft.	Hungary	100,00
AUTOTÁL Biztosítási Szolgáltató Kft	Hungary	100,00
Top Torony Zrt.	Hungary	50,00
Generali Pojišťovna a.s.	Czech Republic	100,00
Europ Assistance s.r.o.	Czech Republic	100,00
Generali Velký Špalíček s.r.o.	Czech Republic	100,00
CP Distribuce a.s	Czech Republic	100,00
GRE PAN-EU Prague 1 s.r.o.	Czech Republic	98,90
PCS Praha Center Spol.s.r.o.	Czech Republic	100,00
Direct Care s.r.o.	Czech Republic	100,00
Parížská 26, s.r.o.	Czech Republic	100,00
Palac Krizik a.s.	Czech Republic	100,00
IDEE s.r.o.	Czech Republic	100,00
Small GREF a.s.	Czech Republic	100,00
Náměstí Republiky 3a, s.r.o.	Czech Republic	100,00
Mustek Properties, s.r.o.	Czech Republic	100,00
Office Center Purkynova, a.s.	Czech Republic	100,00
Ceská pojišťovna a.s.	Czech Republic	100,00
Penzijní společnost České Pojišťovny, a.s.	Czech Republic	100,00
Ceská pojišťovna ZDRAVÍ a.s.	Czech Republic	100,00
Generali Investments CEE, Investiční Společnost, a.s.	Czech Republic	100,00
Generali Distribuce a.s.	Czech Republic	100,00
Acredité s.r.o.	Czech Republic	100,00
Generali Real Estate Fund CEE a.s., investiční fond	Czech Republic	100,00
City Empiria a.s.	Czech Republic	100,00
Solitaire Real Estate, a.s.	Czech Republic	100,00
Transformovaný fond Penzijní společnosti České Pojišťovny, a.s.	Czech Republic	100,00
BRISTIH CORNER s.r.o.	Czech Republic	100,00
OVOČNÝ TRH 2 s.r.o.	Czech Republic	100,00
VARENSKÁ 1 s.r.o.	Czech Republic	100,00
REVOLUČNÍ 2 s.r.o.	Czech Republic	100,00
Nadace GCP	Czech Republic	100,00
Generali Poistovna, a. s.	Slovakia	100,00
Green Point Offices a.s.	Slovakia	100,00
VUB Generali dôchodková správcovská spoločnosť, a.s.	Slovakia	50,00
Generali IT S.r.o.	Slovakia	100,00

Company	Country	Group Equity Ratio
GSL Services s.r.o.	Slovakia	100,00
Generali Towarzystwo Ubezpieczen Spólka Akcyjna	Poland	100,00
Generali Zycie Towarzystwo Ubezpieczen Spólka Akcyjna	Poland	100,00
Wielkopolskie Towarzystwo Ubezpieczen Zyciowych i Rentowych Concordia Capital SA	Poland	96,30
Concordia Polska Towarzystwo Ubezpieczen Wzajemnych	Poland	98,76
Europ Assistance Polska Sp.zo.o.	Poland	100,00
PLAC M GP SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ	Poland	98,90
PLAC M LP SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ	Poland	98,90
BILIKI Plac M	Poland	98,90
Generali Finance spółka z ograniczona odpowiedzialnoscia	Poland	100,00
Generali Powszechne Towarzystwo Emerytalne S.A.	Poland	100,00
PL Investment Jerozolimskie I Spółka Ograniczona Odpowiedzialnoscia	Poland	100,00
Cleha Invest Sp. z o.o.	Poland	100,00
SIBSEN Invest sp. z o.o.	Poland	100,00
Concordia Innowacje Sp. Z o.o.	Poland	98,76
Bankowy Ośrodek Doradztwa i Edukacji Sp. Z o.o.	Poland	25,63
Bezpieczny.pl Sp z.o.o.	Poland	51,00
Generali zavarovalnica d.d. Ljubljana	Slovenia	100,00
LEV Registracija, registracija vozil, d.o.o.	Slovenia	100,00
Generali Societate de Administrare a Fondurilor de Pensii Private S.A.	Romania	100,00
S.C. Generali Romania Asigurare Reasigurare S.A.	Romania	99,97
FATA Asigurari S.A.	Romania	100,00
S.C. Genagricola Romania S.r.l.	Romania	100,00
S.C. Vignadoro S.r.l.	Romania	100,00
Genagricola Foreste S.r.l.	Romania	100,00
Generali Insurance AD	Bulgaria	99,78
Generali Zakrila Medical and Dental Centre EOOD	Bulgaria	99,78
GP Reinsurance EAD	Bulgaria	100,00
Generali Osiguranje d.d.	Croatia	100,00
Generali Assurances Générales SA	Switzerland	99,98
Generali Personenversicherungen AG	Switzerland	100,00
Fortuna Rechtsschutz-Versicherung-Gesellschaft AG	Switzerland	100,00
Europ Assistance (Suisse) S.A.	Switzerland	70,00
Europ Assistance (Suisse) Assurances S.A.	Switzerland	70,00
Europ Assistance (Suisse) Holding S.A.	Switzerland	70,00
Generali (Schweiz) Holding AG	Switzerland	100,00
Fortuna Investment AG	Switzerland	100,00
Generali Group Partner AG	Switzerland	100,00
Fortuna Lebens-Versicherungs AG	Liechtenstein	100,00
Generali Sigorta A.S.	Turkey	99,96
Europ Assistance Yardim ve Destek Hizmetleri Ticaret Anonim Sirketi	Turkey	100,00
Akcionarsko društvo za osiguranje Generali Osiguranje Montenegro	Montenegro	100,00
Europ Assistance CEI OOO	Russian Federation	100,00
Generali Russia	Russian Federation	99,93
Generali Insurance Brokers – Russia and CIS Limited Liability Company	Russian Federation	99,93
Akcionarsko društvo za osiguranje Generali Osiguranje Srbija, Beograd	Serbia	100,00
Akcionarsko društvo za reosiguranje Generali Reosiguranje Srbija, Beograd	Serbia	100,00
Akcionarsko društvo za upravljanje dobrovoljnim penzijskim fondom Generali	Serbia	100,00
Generali Development d.o.o. Beograd	Serbia	100,00
Generali Realities Ltd	Israel	100,00
Generali Global Assistance Inc.	United States	100,00
Europ Assistance North America, Inc.	United States	100,00
Customized Services Administrators Inc.	United States	100,00
GMMI, Inc.	United States	100,00
CareLinx Inc.	United States	80,00
Transocean Holding Corporation	United States	100,00
General Securities Corporation of North America	United States	99,51
GNAREH 1 Farragut LLC	United States	99,51

Company	Country	Group Equity Ratio
GNAREI 1 Farragut LLC	United States	99,51
Genamerica Management Corporation	United States	100,00
Generali Consulting Solutions LLC	United States	100,00
Generali Claims Solutions LLC	United States	100,00
Aperture Investors LLC	United States	69,68
Montcalm Wine Importers Ltd	United States	100,00
GLL 200 State Street L.P.	United States	49,74
Generali Alpha Corp.	United States	99,55
CMN Global Inc.	Canada	100,00
Europ Assistance (Bahamas) Ltd	Bahamas	99,99
Generali Pacifique NC	New Caledonia	98,67
Caja de Seguros S.A.	Argentina	90,09
Europ Assistance Argentina S.A.	Argentina	95,65
Caja de Ahorro y Seguro S.A.	Argentina	90,00
Ritenere S.A.	Argentina	90,00
Generali Brasil Seguros S.A.	Brasile	100,00
AG SE&A Prestação de Serviços e Participações Ltda.	Brasile	99,99
Europ Assistance Brasil Serviços de Assistência S.A.	Brasile	50,00
EABS Serviços de Assistência e Participações S.A.	Brasile	50,00
CEABS Serviços S.A.	Brasile	50,00
Asesoría e Inversiones Los Olmos SA	Chile	44,57
AFP Planvital S.A.	Chile	38,38
Europ Servicios S.p.A.	Chile	50,96
Europ Assistance SA	Chile	50,96
Generali Ecuador Compañía de Seguros S.A.	Ecuador	52,45
Atacama Investments Ltd	Virgin Islands (British)	44,06
Europ Assistance Pacifique	New Caledonia	75,00
PT Asuransi Jiwa Generali Indonesia	Indonesia	98,00
PT Generali Services Indonesia	Indonesia	98,67
Generali Life Assurance Philippines, Inc.	Philippines	100,00
Generali Life Assurance (Thailand) Public Co. Ltd	Thailand	90,89
Generali Insurance (Thailand) Public Co. Ltd	Thailand	84,51
IWF Holding Company Ltd	Thailand	94,67
KAG Holding Company Ltd	Thailand	94,97
FTW Company Limited	Thailand	90,57
MGD Company Limited	Thailand	90,57
DWP Partnership	Thailand	90,57
Generali Vietnam Life Insurance Limited Liability Company	Vietnam	100,00
Europ Assistance India Private Ltd	India	100,00
Future Generali India Life Insurance Company Ltd	India	49,00
Future Generali India Insurance Company Ltd	India	49,00
Sprint Advisory Services Private Limited	India	47,96
Shendra Advisory Services Private Limited	India	47,96
FG&G DISTRIBUTION PRIVATE LIMITED	India	49,00
Generali China Life Insurance Co. Ltd	China	50,00
Europ Assistance Travel Assistance Services (Beijing) Co Ltd	China	100,00
Generali China Assets Management Company Co. Ltd	China	40,00
Generali Insurance Agency Company Limited	China	100,00
Generali China Insurance Co. Ltd	China	49,00
Guotai Asset Management Company	China	30,00
Zhonghe Sihai Insurance Agency Company Limited	China	24,99
Shanghai Sinodrink Trading Company, Ltd	China	45,00
Generali Services Pte. Ltd.	Singapore	100,00
Europ Assistance Worldwide Services Pte Ltd	Singapore	100,00
ONB Technologies Pte. Ltd.	Singapore	18,50
Generali Financial Asia Limited	Hong Kong	100,00
Generali Life (Hong Kong) Limited	Hong Kong	100,00
Generali Investments Asia Limited	Hong Kong	99,55
NKFE Insurance Agency Company Limited	Hong Kong	100,00

Company	Country	Group Equity Ratio
Europ Assistance Worldwide Services (South Africa) (Pty) Ltd	South Africa, Republic	87,50
EASA Training Academy (Pty) Ltd	South Africa, Republic	87,50
MPI Generali Insurans Berhad	Malaysia	49,00
Europ Assistance (Macau) - Serviços De Assistência Personalizados, Lda.	Macao	70,00

QUANTITATIVE REPORTING TEMPLATE

The following public QRTs are provided in excel format and are available on the Generali Group website:

S.02.01 Balance Sheet

S.05.01 Premiums, claims and expenses by line of business

S.05.02 Premiums, claims and expenses by country

S.22.01 Impact of long term guarantees and transitionals measures

S.23.01 Own funds

S.25.02 Solvency Capital Requirement – for groups using the standard formula and partial internal model

S.32.01 Undertakings in the scope of the group

Generali

Solvency and Financial condition report - Public QRTs - as of December 31, 2018



Basic Information

Undertaking name	Assicurazioni Generali S.p.A. - Generali Group
Undertaking identification code	549300X5UKJVE386ZB61
Type of code of undertaking	1 - LEI
Language of reporting	EN
Currency used for reporting	EUR
Figures reported in	thousand
Accounting standards	1 - The group is using IFRS
Method of Calculation of the SCR	2 - Partial internal model

EUR thousand
S.02.01.02
Balance Sheet

		Solvency II value
		C0010
Assets		
Intangible assets	R0030	0
Deferred tax assets	R0040	1.233.186
Pension benefit surplus	R0050	3.809
Property, plant & equipment held for own use	R0060	3.304.399
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	380.083.005
Property (other than for own use)	R0080	23.557.300
Holdings in related undertakings, including participations	R0090	3.816.583
<i>Equities</i>	R0100	<i>11.103.895</i>
Equities - listed	R0110	8.728.823
Equities - unlisted	R0120	2.375.071
<i>Bonds</i>	R0130	<i>305.028.199</i>
Government Bonds	R0140	176.407.750
Corporate Bonds	R0150	116.921.136
Structured notes	R0160	9.059.234
Collateralised securities	R0170	2.640.079
Collective Investments Undertakings	R0180	33.574.486
Derivatives	R0190	1.259.619
Deposits other than cash equivalents	R0200	1.236.496
Other investments	R0210	506.427
Assets held for index-linked and unit-linked contracts	R0220	72.433.067
Loans and mortgages	R0230	7.677.896
Loans on policies	R0240	2.163.377
Loans and mortgages to individuals	R0250	2.105.620
Other loans and mortgages	R0260	3.408.899
Reinsurance recoverables from:	R0270	3.151.762
Non-life and health similar to non-life	R0280	2.067.800
Non-life excluding health	R0290	1.984.587
Health similar to non-life	R0300	83.213
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	1.111.747
Health similar to life	R0320	447.501
Life excluding health and index-linked and unit-linked	R0330	664.246
Life index-linked and unit-linked	R0340	-27.784
Deposits to cedants	R0350	1.264.131
Insurance and intermediaries receivables	R0360	7.911.645
Reinsurance receivables	R0370	638.603
Receivables (trade, not insurance)	R0380	5.687.799
Own shares (held directly)	R0390	2.638
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	5.653.167
Any other assets, not elsewhere shown	R0420	1.673.857
Total assets	R0500	490.718.965

Liabilities		
Technical provisions - non-life	R0510	24.984.271
Technical provisions - non-life (excluding health)	R0520	22.937.523
TP calculated as a whole	R0530	0
Best estimate	R0540	21.769.257
Risk margin	R0550	1.168.266
Technical provisions - health (similar to non-life)	R0560	2.046.748
TP calculated as a whole	R0570	0
Best estimate	R0580	1.991.402
Risk margin	R0590	55.346
Technical provisions - life (excluding index-linked and unit-linked)	R0600	305.822.885
Technical provisions - health (similar to life)	R0610	18.011.373
TP calculated as a whole	R0620	0
Best estimate	R0630	16.987.936
Risk margin	R0640	1.023.437
Technical provisions - life (excluding health and index-linked and unit-linked)	R0650	287.811.512
TP calculated as a whole	R0660	0
Best estimate	R0670	285.056.110
Risk margin	R0680	2.755.402
Technical provisions - index-linked and unit-linked	R0690	78.122.069
TP calculated as a whole	R0700	0
Best estimate	R0710	77.325.674
Risk margin	R0720	796.395
Contingent liabilities	R0740	3.240
Provisions other than technical provisions	R0750	1.496.669
Pension benefit obligations	R0760	3.773.945
Deposits from reinsurers	R0770	852.262
Deferred tax liabilities	R0780	8.716.182
Derivatives	R0790	1.299.160
Debts owed to credit institutions	R0800	2.540.378
Financial liabilities other than debts owed to credit institutions	R0810	3.799.827
Insurance & intermediaries payables	R0820	3.739.575
Reinsurance payables	R0830	544.385
Payables (trade, not insurance)	R0840	6.519.477
Subordinated liabilities	R0850	8.625.020
Subordinated liabilities not in BOF	R0860	0
Subordinated liabilities in BOF	R0870	8.625.020
Any other liabilities, not elsewhere shown	R0880	1.540.755
Total liabilities	R0900	452.380.101
Excess of assets over liabilities	R1000	38.338.864

EUR thousand

S.22.01.22

Impact of long term guarantees and transitional measures

		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	408.929.225	0	0	3.560.272	0
Basic own funds	R0020	42.938.563	0	0	-2.116.056	0
Eligible own funds to meet Solvency Capital Requirement	R0050	44.191.384	0	0	-2.116.056	0
Solvency Capital Requirement	R0090	20.406.950	0	0	7.504.730	0

EUR thousand

S.23.01.22

Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector						
Ordinary share capital (gross of own shares)	R0010	1.565.165	1.565.165			
Non-available called but not paid in ordinary share capital at group level	R0020					
Share premium account related to ordinary share capital	R0030	3.568.250	3.568.250			
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	2.392.187	2.392.187			
Non-available surplus funds at group level	R0080	874.329	874.329			
Preference shares	R0090					
Non-available preference shares at group level	R0100					
Share premium account related to preference shares	R0110					
Non-available share premium account related to preference shares at group level	R0120					
Reconciliation reserve	R0130	29.282.923	29.282.923			
Subordinated liabilities	R0140	8.625.020		3.275.602	5.349.418	
Non-available subordinated liabilities at group level	R0150					
An amount equal to the value of net deferred tax assets	R0160	61.311				61.311
The amount equal to the value of net deferred tax assets not available at the group level	R0170	14				14
Other items approved by supervisory authority as basic own funds not specified above	R0180					
Non available own funds related to other own funds items approved by supervisory authority	R0190					
Minority interests (if not reported as part of a specific own fund item)	R0200					
Non-available minority interests at group level	R0210	435.157	435.157			
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220	91.312				
Unrealised gains on French pension business under IORP transitional measures, authorised by Supervisor		933.288	933.288			
Deductions						
Deductions for participations in other financial undertakings, including non-regulated undertakings carrying out financial activities	R0230	2.088.770	2.088.770			
whereof deducted according to art 228 of the Directive 2009/138/EC	R0240					
Deductions for participations where there is non-availability of information (Article 229)	R0250					
Deduction for participations included by using D&A when a combination of methods is used	R0260					
Total of non-available own fund items	R0270	1.309.500	1.309.486			14
Total deductions	R0280	3.398.270	3.398.256			14
Total basic own funds after deductions	R0290	42.938.563	34.252.246	3.275.602	5.349.418	61.297
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300				0	
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Non available ancillary own funds at group level	R0380					
Other ancillary own funds	R0390					
Total ancillary own funds	R0400					
Own funds of other financial sectors						
Credit institutions, investment firms, financial institutions, alternative investment fund managers, UCITS management companies	R0410	806.123	806.123			
Institutions for occupational retirement provision	R0420	118.038	118.038			
Non regulated entities carrying out financial activities	R0430	328.659	328.659			
Total own funds of other financial sectors	R0440	1.252.821	1.252.821			
Own funds when using the D&A, exclusively or in combination of method 1						
Own funds aggregated when using the D&A and combination of method	R0450					
Own funds aggregated when using the D&A and a combination of method net of IGT	R0460					
Total available own funds to meet the consolidated group SCR (excluding own funds from other financial sector and from the undertakings included via D&A)	R0520	42.938.563	34.252.246	3.275.602	5.349.418	61.297
Total available own funds to meet the minimum consolidated group SCR	R0530	42.877.266	34.252.246	3.275.602	5.349.418	
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	42.938.563	34.252.246	3.275.602	5.349.418	61.297
Total eligible own funds to meet the minimum consolidated group SCR	R0570	40.655.690	34.252.246	3.275.602	3.127.842	
Minimum consolidated group SCR	R0610	15.639.207				
Ratio of Eligible own funds to Minimum Consolidated Group SCR	R0650	260,0%				
Total eligible own funds to meet the group SCR (including own funds from other financial sector and from the undertakings included via D&A)	R0660	44.191.384	35.505.067	3.275.602	5.349.418	61.297
Group SCR	R0680	20.406.950				
Ratio of Eligible own funds to group SCR including other financial sectors and the undertakings included via D&A	R0690	216,6%				
		C0060				
Reconciliation reserve						
Excess of assets over liabilities	R0700	38.338.864				
Own shares (held directly and indirectly)	R0710	2.638				
Foreseeable dividends, distributions and charges	R0720	1.412.641				
Other basic own fund items	R0730	7.586.913				
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	2.648				
Other non available own funds	R0750	51.101				
Reconciliation reserve before deduction for participations in other financial sector	R0760	29.282.923				
Expected profits						
Expected profits included in future premiums (EPIFP) - Life business	R0770	14.199.293				
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	1.255.577				
Total Expected profits included in future premiums (EPIFP)	R0790	15.454.870				

EUR thousand

S.25.02.22

Solvency Capital Requirement - for groups using the standard formula and partial internal model

Unique number of component	Components description	Calculation of the Solvency Capital Requirement	Amount modelled	USP	Simplifications
C0010	C0020	C0030	C0070	C0080	C0090
FIN01	Financial Risk	10,517,938	7,252,207		
CRD01	Credit Risk	5,945,984	5,518,359		
LUW01	Life underwriting risk	2,668,147	1,511,088		
HLT01	Health underwriting risk	297,663			
NUW01	Non-life underwriting risk	3,114,843	2,117,264 - Standard deviation for non-life premium risk		
OPE01	Operational risk	1,674,659			
TAX01	Tax Cap Effect	207,102	207,102		
MOD01	Model adjustment	255,010	255,010		
INT01	Intangible risk				
Calculation of Solvency Capital Requirement		C0100			
Total undiversified components		R0110	24,681,346		
Diversification		R0060	-5,391,231		
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC		R0160	534,173		
Solvency capital requirement excluding capital add-on		R0200	19,829,278		
Capital add-ons already set		R0210	0		
Solvency capital requirement for undertakings under consolidated method		R0220	20,406,950		
Other information on SCR					
Amount/estimate of the overall loss-absorbing capacity of technical provisions		R0300	-425,121		
Amount/estimate of the overall loss-absorbing capacity of deferred taxes		R0310	-5,607,463		
Capital requirement for duration-based equity risk sub-module		R0400	0		
Total amount of Notional Solvency Capital Requirements for remaining part		R0410	19,820,759		
Total amount of Notional Solvency Capital Requirements for ring fenced funds (other than those related to business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional))		R0420	8,969		
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios		R0430	0		
Diversification effects due to RFF nSCR aggregation for article 304		R0440	-5,440		
Minimum consolidated group solvency capital requirement		R0470	15,639,207		
Information on other entities					
Capital requirement for other financial sectors (Non-insurance capital requirements)		R0500	577,222		
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	485,419		
Capital requirement for other financial sectors (Non-insurance capital requirements) - Institutions for occupational retirement provisions		R0520	91,803		
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		
Overall SCR					
SCR for undertakings included via D and A		R0560	0		
Solvency capital requirement		R0570	20,406,950		

EUR thousand
S.32.01.22
Undertakings in the scope of the group

Country	Identification code of the undertaking	Type of code of the EU of the undertaking	Legal name of the undertaking	Type of undertaking	Legal form	Category (multihold 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 art. 214 is applied	Method used and under method 1, treatment of the undertaking			
CU010	CU020	CU030	CU040	CU050	CU060	CU070	CU080	CU090	CU100	CU110	CU120	CU130	CU140	CU150	CU160	CU170	CU180	CU190	CU200
AR	449300L50VCF3WZ37	1-LEI	Caja de Seguros S.A.	4- Composite undertaking	Sociedad Anónima	2- Non-Mutual	SSN - Superintendencia de Seguros de la Nación (Insurance Authority)	80%	100%	100%	90%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
AR	449300XJAVE3B28E1UARA440	2- Specific Code	Euro Assistance Argentina S.A.	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sociedad Anónima	2- Non-Mutual		96%	100%	100%	96%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
AR	449300YVW9Q77H0292	1-LEI	Caja de Ahorro y Seguro S.A.	5- Insurance holding company as defined in Article 2(1)(f) of Directive 2009/138/EC	Sociedad Anónima	2- Non-Mutual		90%	100%	100%	90%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
AR	449300Z7P1Q21V0L526	1-LEI	Rilensse S.A.	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sociedad Anónima	2- Non-Mutual		90%	100%	100%	90%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
AT	429997R09MFR9R9470	2- Specific Code	Generali Holding Vienna AG	5- Insurance holding company as defined in Article 2(1)(f) of Directive 2009/138/EC	Altengesellschaft	2- Non-Mutual		100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
AT	429997N6M3M3CFE010	1-LEI	Europäische Reimversicherungs Aktiengesellschaft	2- Non life insurance undertaking	Altengesellschaft	2- Non-Mutual	Finanzmarktaufsicht Lichtenstein	75%	100%	100%	75%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
AT	449300XJAVE3B28E1UAT0355	2- Specific Code	HSR Investholding GmbH	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Gesellschaft mit beschränkter Haftung	2- Non-Mutual		80%	100%	100%	80%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
AT	429996SL3E7E00LBA4	1-LEI	Generali Versicherung AG	4- Composite undertaking	Altengesellschaft	2- Non-Mutual	Finanzmarktaufsicht Lichtenstein	100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
AT	429996M10Y6R014K20	1-LEI	BWAAG P.S.K. Versicherung AG	1- Life insurance undertaking	Altengesellschaft	2- Non-Mutual	Finanzmarktaufsicht Lichtenstein	75%	100%	100%	75%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
AT	449300XJAVE3B28E1UATA434	2- Specific Code	Euro Assistance Gesellschaft reit	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Gesellschaft mit beschränkter Haftung	2- Non-Mutual		100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
AT	449300XJAVE3B28E1UATA643	2- Specific Code	Car Casual Versicherungsgewerkschaft GmbH	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Gesellschaft mit beschränkter Haftung	2- Non-Mutual		100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
AT	449300XJAVE3B28E1UATA1707	2- Specific Code	Generali Beteiligungs- und Vermögensverwaltung GmbH	5- Insurance holding company as defined in Article 2(1)(f) of Directive 2009/138/EC	Gesellschaft mit beschränkter Haftung	2- Non-Mutual		100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
AT	449300XJAVE3B28E1UATA346	2- Specific Code	Allgemeine Immobilien-Verwaltungs GmbH & Co. KG	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Kommunalgesellschaft	2- Non-Mutual		100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
AT	449300XJAVE3B28E1UATAF12	2- Specific Code	Generali Immobilien GmbH	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Gesellschaft mit beschränkter Haftung	2- Non-Mutual		100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
AT	449300XJAVE3B28E1UATA2719	2- Specific Code	Generali Beteiligungsverwaltung GmbH	5- Insurance holding company as defined in Article 2(1)(f) of Directive 2009/138/EC	Gesellschaft mit beschränkter Haftung	2- Non-Mutual		100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
AT	449300XJAVE3B28E1UATA7219	2- Specific Code	BSF 13	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Gesellschaft mit beschränkter Haftung	2- Non-Mutual		99%	100%	100%	99%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
AT	429997M70TMSG81	1-LEI	Generali Bank AG	4- Credit institution, investment firm and financial institution	Altengesellschaft	2- Non-Mutual	Finanzmarktaufsicht Lichtenstein	100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	4-	Method 1: Sectoral rules	
AT	449300XJAVE3B28E1UATAA21	2- Specific Code	Generali Leasing GmbH	8- Credit institution, investment firm and financial institution	Gesellschaft mit beschränkter Haftung	2- Non-Mutual	Finanzmarktaufsicht Lichtenstein	100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	4-	Method 1: Sectoral rules	
AT	449300XJAVE3B28E1UATAA38	2- Specific Code	Car Casual Versicherungsmakler GmbH	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Gesellschaft mit beschränkter Haftung	2- Non-Mutual		75%	100%	100%	75%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
AT	429997S1P9VZ0ZV10	1-LEI	3 Banken-Generali GL-Stock	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Spezialfonds gemäß § 163 InvM § 68ff InvFG 2011	2- Non-Mutual		100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
AT	429997B0E1UJ3ZM07U13	1-LEI	3 Banken-Generali GL-Bond Spezialfonds	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Spezialfonds gemäß § 163 InvM § 68ff InvFG 2011	2- Non-Mutual		100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
AT	429997Q4K1H4J0T153	1-LEI	3 Banken-Generali GIB-Bond	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Spezialfonds gemäß § 163 InvM § 68ff InvFG 2011	2- Non-Mutual		100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
AT	429997W0WYMT7TCSA37	1-LEI	3 Banken-Generali - GENIA Spezialfonds	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Spezialfonds gemäß § 163 InvM § 68ff InvFG 2011	2- Non-Mutual		100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
AT	449300XJAVE3B28E1UATA1529	2- Specific Code	BWAAG PSM Special 6	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Spezialfonds gemäß § 163 InvM § 68ff InvFG 2011	2- Non-Mutual		75%	100%	100%	75%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
AT	429997D7P7E399334	1-LEI	3 Banken-Generali - GIN-Stock	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Spezialfonds gemäß § 163 InvM § 68ff InvFG 2011	2- Non-Mutual		100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
AT	449300XJAVE3B28E1UATA7239	2- Specific Code	3 Banken-Generali GIN-Bond	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Spezialfonds gemäß § 163 InvM § 68ff InvFG 2011	2- Non-Mutual		100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
BE	449300P2D737747E459	2- Specific Code	Generali Belgium S.A.	4- Composite undertaking	Société Anonyme	2- Non-Mutual	Nationale Bank van België	100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
NL	449300XJAVE3B28E1BEA2713	2- Specific Code	Generali Real Estate Investments B.V.	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Baasden Vennootschap	2- Non-Mutual		100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
BE	449300GJANW0LE7L281	1-LEI	Euro Assistance Belgium S.A.	2- Non life insurance undertaking	Société anonyme	2- Non-Mutual	Commission bancaire française et des assurances	100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
BE	449300XJAVE3B28E1BEA3A30	2- Specific Code	Euro Assistance Services S.A.	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société anonyme	2- Non-Mutual		100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
BE	449300XJAVE3B28E1BEA4720	2- Specific Code	GRE PAN-EU Bruxelles 1 s.p.r.l.	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société à responsabilité limitée	2- Non-Mutual		99%	100%	100%	99%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
BE	449300XJAVE3B28E1BEA4780	2- Specific Code	GRE PAN-EU Bruxelles 2 s.p.r.l.	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société anonyme	2- Non-Mutual		99%	100%	100%	99%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
BG	449300S1ZD0F0L832	1-LEI	Generali Insurance AD	2- Non life insurance undertaking	Акционерно дружество	2- Non-Mutual	Косовски за Ревенюс Хазап	100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
BG	449300XJAVE3B28E1BG0A7268	2- Specific Code	Generali Zdravje Medic and Dental Centre EOOD	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Единично дружество с ограничена отговорност	2- Non-Mutual		100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
BE	3157093000000030356	1-LEI	GP Reinsurance EAD	2- Non life insurance undertaking	Единично акционерно дружество	2- Non-Mutual	Косовски за Ревенюс Хазап	100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
BR	449300P3P1EJCZ9F023	1-LEI	Generali Brazil Seguros S.A.	4- Composite undertaking	Sociedade anônima	2- Non-Mutual	Superintendencia de Seguros Privados	100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
BR	449300XJAVE3B28E1BR048275	2- Specific Code	AG SERA Previdência de Serviços e Participações Ltda	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Unipessoal limitada	2- Non-Mutual		100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
CA	449300XJAVE3B28E1CA1A7345	2- Specific Code	Generali Assurances Genesee S.A.	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Incorporation	2- Non-Mutual		100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
CH	449300Y7E25ANM1DM37	1-LEI	Generali Assurances Genesee S.A.	4- Composite undertaking	Joint-stock company (Altengesellschaft)	2- Non-Mutual	Swiss Financial Market Supervisory Authority	100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
CH	449300L1Q3G8MRT3M16	1-LEI	Generali Personensicherungen AG	1- Life insurance undertaking	Joint-stock company (Altengesellschaft)	2- Non-Mutual	Swiss Financial Market Supervisory Authority	100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
CH	449300Q149SS2BZ0D11	1-LEI	Fortuna Rechtsschutz-Versicherung Gesellschaft AG	2- Non life insurance undertaking	Joint-stock company (Altengesellschaft)	2- Non-Mutual	Swiss Financial Market Supervisory Authority	100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
CH	449300XJAVE3B28E1CHA4A04	2- Specific Code	Euro Assistance (Suisse) S.A.	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société anonyme	2- Non-Mutual		70%	100%	100%	70%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
CH	449300XJAVE3B28E1CHA4A745	2- Specific Code	Euro Assistance (Suisse) Assurances S.A.	2- Non life insurance undertaking	Société anonyme	2- Non-Mutual	Swiss Financial Market Supervisory Authority	70%	100%	100%	70%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
CH	449300XJAVE3B28E1CHA4A36	2- Specific Code	Euro Assistance (Suisse) Holding S.A.	5- Insurance holding company as defined in Article 2(1)(f) of Directive 2009/138/EC	Société anonyme	2- Non-Mutual		70%	100%	100%	70%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
CH	449300L3L9XV7WRN11	1-LEI	Generali (Schweiz) Holding AG	5- Insurance holding company as defined in Article 2(1)(f) of Directive 2009/138/EC	Joint-stock company (Altengesellschaft)	2- Non-Mutual		100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
CH	449300735G2P9L4R636	1-LEI	Fortuna Investment AG	8- Credit institution, investment firm and financial institution	Joint-stock company (Altengesellschaft)	2- Non-Mutual	Swiss Financial Market Supervisory Authority	100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	4-	Method 1: Sectoral rules	
CL	449300XJAVE3B28E1CLA2096	2- Specific Code	Asesora e Inversores Los Olivos SA	7- Mixed financial holding company as defined in Article 2(1)(g) of Directive 2009/138/EC	Sociedad Anónima	2- Non-Mutual		49%	100%	100%	49%	1-	Dominate	40%	1-	Included in the scope	4-	Method 1: Sectoral rules	
CL	449300XJAVE3B28E1CLA2087	2- Specific Code	APP Generali S.A.	99- Other	Sociedad Anónima	2- Non-Mutual		38%	100%	100%	38%	1-	Dominate	38%	1-	Included in the scope	4-	Method 1: Sectoral rules	
CL	449300XJAVE3B28E1CLA2059	2- Specific Code	Euro Services S.p.A.	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sociedad anónima cerrada	2- Non-Mutual		91%	100%	100%	91%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
CL	449300XJAVE3B28E1CLA1037	2- Specific Code	Euro Assistance S.A.	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sociedad anónima cerrada	2- Non-Mutual		91%	100%	100%	91%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
CN	449300XJAVE3B28E1CNA4A38	2- Specific Code	Generali China Life Insurance Co. Ltd	1- Life insurance undertaking	有限责任公司	2- Non-Mutual	China Insurance Regulatory Commission	50%	100%	100%	50%	1-	Dominate	100%	1-	Included in the scope	1-	Method 1: Full consolidation	
CN	449300XJAVE3B28E1CNA1177	2- Specific Code	Euro Assistance Travel Assistance Services (Beijing) Co Ltd	99- Other	有限责任公司	2- Non-Mutual		100%	100%	100%	100%	1-	Dominate	100%	1-	Included in the scope	3-	Method 1: Adjusted equity method	
CN	449300XJAVE3B28E1CNA2586	2- Specific Code	Generali China Assets Management Company Co. Ltd	8- Credit institution, investment firm and financial institution	有限责任公司	2- Non-Mutual	China Insurance Regulatory Commission	40%	100%	100%	40%	1-	Dominate	40%	1-	Included in the scope	4-	Method 1: Sectoral rules	
CN	449300XJAVE3B28E1CNA2707	2- Specific Code	Generali Insurance Agency Company Limited	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	中外合資保險代理有限公司	2- Non-Mutual		100%	100%	100%	100%	1-	Dominate	100%					

Country	Identification code of the undertaking	Type of code of the undertaking	Legal name of the undertaking	Type of undertaking	Legal form	Category (inclusion/exclusion)	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 art. 214 is applied
CZ	3157001000005480	1 - LEI	Česká spořitelna ZÜRÄV a.s.	2 - Non life insurance undertaking	Akciová společnost	2 - Non-Mutual	Česka Narodni Banka	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
CZ	3157001000005480	1 - LEI	General Investments CEE, Investment Spolokov, a.s.	8 - Credit institution, investment firm and financial institution	Akciová společnost	2 - Non-Mutual	Česka Narodni Banka	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	4 - Method 1: Sectoral rules
CZ	549300XKJVE38281ICZA1928	2 - Specific Code	General Distribuce a.s.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	Akciová společnost	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
CZ	549300XKJVE38281ICZA1929	2 - Specific Code	Andreis s.r.o.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	Společnost s r.o.činí omezením	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
CZ	3157001000005480	1 - LEI	General Real Estate Fund CEE a.s. - investiční fond	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	Akciová společnost	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
CZ	3157001000005480	1 - LEI	City Empira a.s.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	Akciová společnost	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
CZ	3157001000005480	1 - LEI	Solimar Real Estate a.s.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	Akciová společnost	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
CZ	3157001000005480	1 - LEI	Transformový fond Petržijka spolokov Česka Pojistovna, a.s.	99 - Other	Akciová společnost	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	3 - Method 1: Adjusted equity method
DE	449300XKJVE38281ICZA1927	2 - Specific Code	Dialog Lebensversicherungs-Aktiengesellschaft	1 - Life insurance undertaking	Aktiengesellschaft	2 - Non-Mutual	BaFin - Bundesanstalt für Finanzdienstleistungsaufsicht	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	449300XKJVE38281ICZA1928	2 - Specific Code	DPK-FH GmbH & Co. office Investment KG	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	als persönlich haftender Gesellschafter (Special APF)	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	3 - Method 1: Adjusted equity method
DE	449300XKJVE38281ICZA1929	2 - Specific Code	General Health Solutions GmbH	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	Gesellschaft mit beschränkter Haftung	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	449300XKJVE38281ICZA1930	2 - Specific Code	General Deutscher AG	3 - Reinsurance undertaking	Aktiengesellschaft	2 - Non-Mutual	BaFin - Bundesanstalt für Finanzdienstleistungsaufsicht	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	449300XKJVE38281ICZA1931	2 - Specific Code	AachenMünchener Lebensversicherung AG	1 - Life insurance undertaking	Aktiengesellschaft	2 - Non-Mutual	BaFin - Bundesanstalt für Finanzdienstleistungsaufsicht	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	449300XKJVE38281ICZA1932	2 - Specific Code	AachenMünchener Versicherung AG	4 - Composite undertaking	Aktiengesellschaft	2 - Non-Mutual	BaFin - Bundesanstalt für Finanzdienstleistungsaufsicht	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	449300XKJVE38281ICZA1933	2 - Specific Code	General Lebensversicherung Aktiengesellschaft	1 - Life insurance undertaking	Aktiengesellschaft	2 - Non-Mutual	BaFin - Bundesanstalt für Finanzdienstleistungsaufsicht	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	449300XKJVE38281ICZA1934	2 - Specific Code	General Versicherung Aktiengesellschaft	4 - Composite undertaking	Aktiengesellschaft	2 - Non-Mutual	BaFin - Bundesanstalt für Finanzdienstleistungsaufsicht	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	449300XKJVE38281ICZA1935	2 - Specific Code	Central Krankenversicherung Aktiengesellschaft	4 - Composite undertaking	Aktiengesellschaft	2 - Non-Mutual	BaFin - Bundesanstalt für Finanzdienstleistungsaufsicht	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	38120000000000000000	1 - LEI	Euro Assistance Versicherungs-AG	2 - Non life insurance undertaking	Aktiengesellschaft	2 - Non-Mutual	BaFin - Bundesanstalt für Finanzdienstleistungsaufsicht	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	449300XKJVE38281ICZA1936	2 - Specific Code	Euro Assistance Services GmbH	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	Gesellschaft mit beschränkter Haftung	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	449300XKJVE38281ICZA1937	2 - Specific Code	Cosmos Lebensversicherungs Aktiengesellschaft	1 - Life insurance undertaking	Aktiengesellschaft	2 - Non-Mutual	BaFin - Bundesanstalt für Finanzdienstleistungsaufsicht	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	449300XKJVE38281ICZA1938	2 - Specific Code	Cosmos Versicherung Aktiengesellschaft	2 - Non life insurance undertaking	Aktiengesellschaft	2 - Non-Mutual	BaFin - Bundesanstalt für Finanzdienstleistungsaufsicht	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	449300XKJVE38281ICZA1939	2 - Specific Code	ENVIAS Krankenversicherung Aktiengesellschaft	4 - Composite undertaking	Aktiengesellschaft	2 - Non-Mutual	BaFin - Bundesanstalt für Finanzdienstleistungsaufsicht	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	449300XKJVE38281ICZA1940	2 - Specific Code	ADVOCARD Rechtsschutzversicherung AG	2 - Non life insurance undertaking	Aktiengesellschaft	2 - Non-Mutual	BaFin - Bundesanstalt für Finanzdienstleistungsaufsicht	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	449300XKJVE38281ICZA1941	2 - Specific Code	General Deutscher Pensionskasse AG	9 - Institution for occupational retirement provision	Aktiengesellschaft	2 - Non-Mutual	BaFin - Bundesanstalt für Finanzdienstleistungsaufsicht	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	4 - Method 1: Sectoral rules
DE	5299003YNEAABC750	1 - LEI	General Beteiligungs GmbH	5 - Insurance holding company as defined in Article 2(11) (f) of Directive 2009/138/EC	Gesellschaft mit beschränkter Haftung	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	5299003YNEAABC751	1 - LEI	General Deutscher Finanzierungs GmbH	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	Gesellschaft mit beschränkter Haftung	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	5299003YNEAABC752	1 - LEI	General 3 Immobilien AG & Co. KG	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	haftenden Gesellschafter	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	5299003YNEAABC753	1 - LEI	WIS Vermögensverwalter für Vermögensberatung GmbH	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	haftenden Gesellschafter	2 - Non-Mutual		74%	100%	74%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	449300XKJVE38281ICZA1942	2 - Specific Code	GLI GmbH & Co. Real Estate KG	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	haftenden Gesellschafter	2 - Non-Mutual		52%	100%	52%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	449300XKJVE38281ICZA1943	2 - Specific Code	General Personalfonds AG	9 - Institution for occupational retirement provision	Aktiengesellschaft	2 - Non-Mutual	BaFin - Bundesanstalt für Finanzdienstleistungsaufsicht	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	4 - Method 1: Sectoral rules
DE	449300XKJVE38281ICZA1944	2 - Specific Code	General European Real Estate Income Investments GmbH & Co. Gesellschaften Investment KG	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	haftenden Gesellschafter	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	5299003YNEAABC754	1 - LEI	General Northern America Real Estate Investments GmbH & Co. KG	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	haftenden Gesellschafter	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	5299003YNEAABC755	1 - LEI	AM Erste Immobilien AG & Co. KG	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	haftenden Gesellschafter	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	5299003YNEAABC756	1 - LEI	CENTRAL Erste Immobilien AG & Co. KG	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	haftenden Gesellschafter	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	5299003YNEAABC757	1 - LEI	CENTRAL Zweite Immobilien AG & Co. KG	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	haftenden Gesellschafter	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	38120000000000000000	1 - LEI	Deutsche Baupostkasse Badener Aktiengesellschaft	8 - Credit institution, investment firm and financial institution	Aktiengesellschaft	2 - Non-Mutual	BaFin - Bundesanstalt für Finanzdienstleistungsaufsicht	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	4 - Method 1: Sectoral rules
DE	5299003YNEAABC758	1 - LEI	Volkstreuerei 3 Immobilien AG & Co. KG	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	haftenden Gesellschafter	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	5299003YNEAABC759	1 - LEI	Thuring General 1 Immobilien AG & Co. KG	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	haftenden Gesellschafter	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	5299003YNEAABC760	1 - LEI	Thuring General 2 Immobilien AG & Co. KG	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	haftenden Gesellschafter	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	5299003YNEAABC761	1 - LEI	AM West Estate Immobilien AG & Co. KG	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	haftenden Gesellschafter	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	449300XKJVE38281ICZA1945	2 - Specific Code	General Finanz Service GmbH	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	Gesellschaft mit beschränkter Haftung in Liquidation	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	5299003YNEAABC762	1 - LEI	AM Sachels Immobilien AG & Co. KG	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	haftenden Gesellschafter	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	5299003YNEAABC763	1 - LEI	DBB Vermögensverwaltung GmbH & Co. KG	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	haftenden Gesellschafter	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	3 - Method 1: Adjusted equity method
DE	5299003YNEAABC764	1 - LEI	General Deutscher Services GmbH	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	Gesellschaft mit beschränkter Haftung	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	5299003YNEAABC765	1 - LEI	General Deutscher Schadenmanagement GmbH	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	Gesellschaft mit beschränkter Haftung	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	5299003YNEAABC766	1 - LEI	General Deutscher Informatik Services GmbH	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	Gesellschaft mit beschränkter Haftung	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	5299003YNEAABC767	1 - LEI	ATLAS Dienstleistungen für Vermögensberatung GmbH	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	Gesellschaft mit beschränkter Haftung	2 - Non-Mutual		74%	100%	74%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	5299003YNEAABC768	1 - LEI	AM Gesellschaft für betriebliche Altersversorgung mbH	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	Gesellschaft mit beschränkter Haftung	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	5299003YNEAABC769	1 - LEI	Cosmos Finanzservice GmbH	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	Gesellschaft mit beschränkter Haftung	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	449300XKJVE38281ICZA1946	2 - Specific Code	General Varsity GmbH	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	Gesellschaft mit beschränkter Haftung	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	449300XKJVE38281ICZA1947	2 - Specific Code	PPS GmbH	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	Gesellschaft mit beschränkter Haftung	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	449300XKJVE38281ICZA1948	2 - Specific Code	FLI GmbH	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	Gesellschaft mit beschränkter Haftung	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	449300XKJVE38281ICZA1949	2 - Specific Code	FDI GmbH	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	Gesellschaft mit beschränkter Haftung	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	5299003YNEAABC770	1 - LEI	General Partners and Sicherungsmanagement GmbH	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	Gesellschaft mit beschränkter Haftung	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	5299003YNEAABC771	1 - LEI	Volkstreuerei 5 Immobilien AG & Co. KG	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	haftenden Gesellschafter	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	449300XKJVE38281ICZA1950	2 - Specific Code	Grundstücksgesellschaft Einkaufszentrum Marienplatz-Galerie Scheuven mbH & Co. KG	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	haftenden Gesellschafter	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	5299003YNEAABC772	1 - LEI	Grundstücksgesellschaft Einkaufszentrum Lousen-Center Bad Homburg mbH & Co. KG	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	haftenden Gesellschafter	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	5299003YNEAABC773	1 - LEI	GD Fonds AAREC	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	Sondervermögen	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	5299003YNEAABC774	1 - LEI	GD Fonds AACT	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	Sondervermögen	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
DE	5299003YNEAABC775	1 - LEI	GD Fonds AADT	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/2035	Sondervermögen	2 - Non-Mutual									

Country	Identification code of the undertaking	Type of code of the undertaking	Legal name of the undertaking	Type of undertaking	Legal form	Category (institution 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 art. 214 is applied
DE	529600A0Q21EPP0489	1-LEI	GED Fonds AVANT II	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sondervermögen	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
DE	529600K3107VU3V3733	1-LEI	GED Fonds AVANT III	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sondervermögen	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
DE	529600300KL8BMR030	1-LEI	GED Fonds ALET	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sondervermögen	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
DE	529600BURVU79K7Y43	1-LEI	GED Fonds CRET	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sondervermögen	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
DE	529600BZ6VH05H447205	1-LEI	GED Fonds CLRET	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sondervermögen	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
DE	529600W88P8V298K948	1-LEI	GED Fonds CLRET	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sondervermögen	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
DE	5296005263K81422703	1-LEI	GED Fonds CLRET	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sondervermögen	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
DE	529600HQ87C73737550	1-LEI	GED Fonds CDPRET	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sondervermögen	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	3- Method 1: Adjusted equity method
DE	529600L488R7LUV9494	1-LEI	GED Fonds CVRET	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sondervermögen	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
DE	5296000K8LAVCN0R28	1-LEI	Gertum Nr. 1	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sondervermögen	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
DE	52960069P92K6E32F54	1-LEI	GED Fonds AVRET	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sondervermögen	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
DE	5296001G2L4H48F351	1-LEI	GED Fonds GLAKOR	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sondervermögen	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
DE	529600V7L8L6F0N4009	1-LEI	GED Fonds GRET 5	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sondervermögen	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
DE	5296001H8FMS69M005	1-LEI	GED Fonds DLRET	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sondervermögen	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
DE	549300XUKAVE38Z881DEA2937	2- Specific Code	GED-Fonds AANF	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sondervermögen	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
DE	549300XUKAVE38Z881DEA2958	2- Specific Code	GED-Fonds CLRET 2	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sondervermögen	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
DE	549300XUKAVE38Z881DEA2968	2- Specific Code	GED-Fonds ALCT	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sondervermögen	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
DE	549300XUKAVE38Z881DEA2728	2- Specific Code	GED-Fonds CLTOP	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sondervermögen	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
DE	549300XUKAVE38Z881DEA2753	2- Specific Code	GED-Fonds ALALET II	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sondervermögen	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
DE	549300XUKAVE38Z881DEA2789	2- Specific Code	GED-Fonds ANDMSE	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sondervermögen	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
DE	549300XUKAVE38Z881DEA2777	2- Specific Code	GED-Fonds ASBIVA	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sondervermögen	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
DE	549300XUKAVE38Z881DEA2779	2- Specific Code	GED-Fonds ADMGI	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sondervermögen	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
DK	549300XUKAVE38Z881DKA2786	2- Specific Code	Københavnsgade 39 A/S	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Ansættelskab	2- Non-Mutual		95%	100%	99%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
EC	549300QPNF428B89887	1-LEI	General Ecuador Compañía de Seguros S.A.	4- Composite undertaking	Sociedad Anónima	2- Non-Mutual	Superintendencia de Compañías, Valores y Seguros	92%	100%	92%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
ES	5493001MSLCC8272070	1-LEI	General España S.A. de Seguros y Reaseguros	4- Composite undertaking	Sociedad Anónima	2- Non-Mutual	Dirección General de Seguros y Fondos de Pensiones	100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
ES	549300FLM78GRSUDX77	1-LEI	Cajamar Vida S.A. de Seguros y Reaseguros	1- Life insurance undertaking	Sociedad Anónima	2- Non-Mutual	Dirección General de Seguros y Fondos de Pensiones	90%	100%	90%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
ES	569900ZJ2P8F8C12026	1-LEI	Cajamar Seguros Generales S.A. de Seguros y Reaseguros	2- Non life insurance undertaking	Sociedad Anónima	2- Non-Mutual	Dirección General de Seguros y Fondos de Pensiones	90%	100%	90%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
ES	569900159AK82C43377	1-LEI	Emp. Asistencia España S.A. de Seguros y Reaseguros	2- Non life insurance undertaking	Sociedad Anónima	2- Non-Mutual	Dirección General de Seguros	100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
ES	549300XUKAVE38Z881ESA1021	2- Specific Code	Emp. Asistencia Servicios Integrados de Gestión S.A.	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sociedad Anónima	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
ES	569900E7L6XK8B50480	1-LEI	General España Holding de Entidades de Seguros S.A.	5- Insurance holding company as defined in Article 2(21) (f) of Directive 2009/138/EC	Sociedad Anónima	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
ES	569900EY9V8T4U2228	1-LEI	Hermes Sociedad Limitada de Servicios Inmobiliarios y Generales	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sociedad Limitada	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
ES	569900B5V24K908L20	1-LEI	Valitos Tomé Cardé S.L.	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sociedad Anónima	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
ES	569900397F91M84S486	1-LEI	Guppi General España, A.I.E.	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sociedad de Interés Económico	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
ES	549300XUKAVE38Z881ESA2770	2- Specific Code	Previdas 9 Desarrollos Urbanos SL	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sociedad de responsabilidad limitada	2- Non-Mutual		99%	100%	99%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
ES	549300XUKAVE38Z881ESA2818	2- Specific Code	GRE PANEU MAORR 2 SL	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sociedad Limitada	2- Non-Mutual		99%	100%	99%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
ES	529600EY6C1N008M4E48	1-LEI	GLI Cay27 S.L.	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Sociedad de responsabilidad limitada	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
FR	549300B8E4K1K9C3P275	1-LEI	General IARD S.A.	2- Non life insurance undertaking	Société Anonyme	2- Non-Mutual	Autorité de Contrôle Prudentiel et de Résolution	99%	100%	99%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
FR	549300W7M5V81C2521	1-LEI	General Viea S.A.	1- Life insurance undertaking	Société Anonyme	2- Non-Mutual	Autorité de Contrôle Prudentiel et de Résolution	99%	100%	99%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
FR	549300K1G4D1202020	1-LEI	General España S.A. de Asesoramiento y Nécess contrôle aux reques de toute nature	2- Non life insurance undertaking	Société Anonyme	2- Non-Mutual	Autorité de Contrôle Prudentiel et de Résolution	99%	100%	99%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
FR	5493007A4E1242428	1-LEI	CS4 Cashback	2- Non life insurance undertaking	Société Anonyme	2- Non-Mutual	Autorité de Contrôle Prudentiel et de Résolution	99%	100%	99%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
FR	569900S4GFW8V8V83823	1-LEI	Prudencia Capital	2- Non life insurance undertaking	Société Anonyme	2- Non-Mutual	Autorité de Contrôle Prudentiel et de Résolution	94%	100%	94%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
FR	5699001S1NFP9F8W342	1-LEI	SAS Lathéras	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société par actions simplifiée	2- Non-Mutual		99%	100%	99%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
FR	549300XUKAVE38Z881FRA0A477	2- Specific Code	Emp. Asistencia France S.A.S.	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société Anonyme	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
FR	549300XUKAVE38Z881FRA0A500	2- Specific Code	Emp. Asistencia Océania S.A.S.	99- Other	Société par actions simplifiée	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	3- Method 1: Adjusted equity method
FR	549300XUKAVE38Z881FRA0A337	2- Specific Code	Coaleis S.A.S.	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société par actions simplifiée	2- Non-Mutual		75%	100%	75%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
FR	549300Q24730P7W0541	1-LEI	General France S.A.	5- Insurance holding company as defined in Article 2(21) (f) of Directive 2009/138/EC	Société Anonyme	2- Non-Mutual		99%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
FR	549300XUKAVE38Z881FRA0A476	2- Specific Code	Emp. Asistencia Holding S.A.S.	5- Insurance holding company as defined in Article 2(21) (f) of Directive 2009/138/EC	Société Anonyme	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
FR	569900K4V8FGL8M943	1-LEI	Colfo S.A.S.	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société par actions simplifiée	2- Non-Mutual		99%	100%	99%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
FR	569900K4V8FGL8M943	1-LEI	Suzanne Immobilier S.A.S.	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société Anonyme	2- Non-Mutual		99%	100%	99%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
FR	549300XUKAVE38Z881FRA0A276	2- Specific Code	SC1 Tomé Tomé Y Mores Mall	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société commerciale immobilière	2- Non-Mutual		99%	100%	99%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
FR	549300Z0VJ8V20204	1-LEI	GES Rival Holding SAS	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société par actions simplifiée	2- Non-Mutual		99%	100%	99%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
FR	569900C07088C0X030	1-LEI	Immobilier Commercial des Indes Orientales MIMCOO	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Capital Variable	2- Non-Mutual		99%	100%	99%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
FR	569900S4J2S2LQ4L7887	1-LEI	SAS MIMCOO CB1	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société par actions simplifiée	2- Non-Mutual		99%	100%	99%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
FR	569900E626R45A776	1-LEI	Emp. Asistencia S.A.	2- Non life insurance undertaking	Société Anonyme	2- Non-Mutual	Autorité de Contrôle Prudentiel et de Résolution	100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
FR	549300XUKAVE38Z881FRA0A740	2- Specific Code	Emp. Asistencia Brokerage Solutions S.A.r.l.	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société à Responsabilité Limitée	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
FR	549300XUKAVE38Z881FRA0A887	2- Specific Code	Emp. Téléassistance S.A.S.	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société par actions simplifiée	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
FR	549300XUKAVE38Z881FRA0A1127	2- Specific Code	SC1 General Reasur	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2- Non-Mutual		99%	100%	99%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
FR	549300XUKAVE38Z881FRA0A205	2- Specific Code	Cooperations S.A.S.	99- Other	Société par actions simplifiée	2- Non-Mutual		100%	100%	100%		1- Dominant	100%	1- Included in the scope	3- Method 1: Adjusted equity method
FR	549300XUKAVE38Z881FRA0A274	2- Specific Code	GEH France CPC1	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Fonds d'investissement	2- Non-Mutual		99%	100%	99%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
FR	549300XUKAVE38Z881FRA0A275	2- Specific Code	GRE PANEU 18 Rival	10- Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2- Non-Mutual		99%	100%	99%		1- Dominant	100%	1- Included in the scope	1- Method 1: Full consolidation
FR	549300XUKAVE38Z881FRA0A278	2- Specific Code	SC1 GRE PANEU 18H Reasurants	10- Ancillary services undertaking as defined in Article 1 (

Country	Identification code of the undertaking	Type of code of the undertaking	Legal name of the undertaking	Type of undertaking	Legal form	Category (inclusion/exclusion)	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 art. 214 is applied
FR	549300XKJVE382861FRA0A889	2 - Specific Code	SCI General Carrot	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A1178	2 - Specific Code	SCI General Commerce 1	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A1179	2 - Specific Code	SCI General Commerce 2	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A1188	2 - Specific Code	SCI General Monaco	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	96950200YHVF0191463	1 - LEI	SC General Logisbase	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A220	2 - Specific Code	SCI Parozing Life Henri Beaumont 2	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société à Responsabilité Limitée	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	96950200YHVF0204792	1 - LEI	SC 196 La Défense	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	96950200YHVF020481017	1 - LEI	CPCI Fincoy Invest	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Capital Variable	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A218	2 - Specific Code	SCI Parc Logisbase Maternouze 1	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A219	2 - Specific Code	SCI Parc Logisbase Maternouze 2	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A220	2 - Specific Code	SCI Parc Logisbase Maternouze 3	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A221	2 - Specific Code	SCI Parc Logisbase Maternouze 4	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A222	2 - Specific Code	SCI Parozing Iles D'Abau 1	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A223	2 - Specific Code	SCI Parozing Iles D'Abau 2	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A224	2 - Specific Code	SCI Parozing Iles D'Abau 3	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A227	2 - Specific Code	SCI Parozing Combs La Ville 1	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A229	2 - Specific Code	SCI Parozing Bordeaux Costas	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A230	2 - Specific Code	SCI Parozing Mare	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A231	2 - Specific Code	SCI Parozing Messanges	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A234	2 - Specific Code	SCI Comarcas Regions	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A236	2 - Specific Code	SCI Thiers Lyon	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A237	2 - Specific Code	SCI Basse Maye	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	96950200YHVF0198103	1 - LEI	SAS Parozing Life Henri Beaumont 1	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société par actions simplifiée	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	96950200YHVF0198105	1 - LEI	CPCI General Bureaux	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Capital Variable	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	96950200YHVF0198106	1 - LEI	CPCI General Residential	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Capital Variable	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	96950200YHVF0198109	1 - LEI	CPCI 081	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Capital Variable	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	96950200YHVF0198112	1 - LEI	CPCI 081	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Capital Variable	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A213	2 - Specific Code	SCI 181 208 Paris	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A214	2 - Specific Code	SCI 181 208 Paris	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A244	2 - Specific Code	SCI 4 MESSINE	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A246	2 - Specific Code	SCI 204 Parnes	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A248	2 - Specific Code	SCI 40 33 avenue Montagne	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A247	2 - Specific Code	SCI 57 MONCEY	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A248	2 - Specific Code	SCI 28 Cours Albert 1er	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A249	2 - Specific Code	SCI 28 Cours Albert 1er	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A260	2 - Specific Code	SCI Bureaux Paris	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A270	2 - Specific Code	SCI Bartheon	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société à Responsabilité Limitée	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A271	2 - Specific Code	SCI Luxury Real Estate	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société civile immobilière	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
FR	549300XKJVE382861FRA0A273	2 - Specific Code	SCI General Solutions Limited	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Limited	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
GB	549300XKJVE382861GB0A4449	2 - Specific Code	General Saxon Land Development Company Ltd	8 - Credit institution, investment firm and financial institution	Limited Liability Company	2 - Non-Mutual	Financial Services Authority	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	4 - Method 1: Sectoral rules
GB	213800Y25C707990997	1 - LEI	General Worldwide Insurance Company Limited	4 - Composite undertaking	Limited Liability Company	2 - Non-Mutual	Germany Financial Services Commission	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
GG	549300XKJVE382861GG0A1074	2 - Specific Code	General Portfolio Management (CI) Ltd	8 - Credit institution, investment firm and financial institution	Limited Liability Company	2 - Non-Mutual	Germany Financial Services Commission	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	4 - Method 1: Sectoral rules
GR	213800Y21F0R090336	1 - LEI	General Hellen Insurance Company S.A.	4 - Composite undertaking	Ανώνυμη Επιχείρηση	2 - Non-Mutual	Bank of Greece - Department of Private Insurance Supervision	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
HK	549300XKJVE382861HK0A2038	1 - LEI	General Financial Asia Limited	6 - Mixed activity insurance holding company as defined in Article 2(1)(g) of Directive 2009/138/EC	有限公司	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
HK	549300XKJVE382861HK0A2708	2 - Specific Code	General Life (Hong Kong) Limited	1 - Life insurance undertaking	Limited company	2 - Non-Mutual	Insurance Authority	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
HK	549300XKJVE382861HK0A2844	1 - LEI	General Investments Asia Limited	99 - Other	有限公司	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	4 - Method 1: Sectoral rules
HK	549300XKJVE382861HK0A2919	2 - Specific Code	NPEF Insurance Agency Company Limited	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	有限公司	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
HR	529950020X0A00V0284	1 - LEI	General Osiguranje d.d.	4 - Composite undertaking	Dioničko društvo	2 - Non-Mutual	Croatian Financial Services Supervisory Agency	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
HU	529950020X0A00V0285	1 - LEI	General Biztosító Zrt.	4 - Composite undertaking	Zárkötött működésű részvénytársaság	2 - Non-Mutual	Magyar Nemzeti Bank	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
HU	529950020X0A00V0286	1 - LEI	General Biztosító Zrt.	2 - Non life insurance undertaking	Zárkötött működésű részvénytársaság	2 - Non-Mutual	Magyar Nemzeti Bank	71%	100%	71%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
HU	549300XKJVE382861HU0A0428	2 - Specific Code	Empo Assistance Magyarország Kft	99 - Other	Korlátolt felelősségű társaság	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	3 - Method 1: Adjusted equity method
HU	549300XKJVE382861HU0A1687	2 - Specific Code	Videx Asia Center Lifebiztosító Kft.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Korlátolt felelősségű társaság	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
HU	529950020X0A00V0287	1 - LEI	General Ingatlan Végrehajtás és Szolgáltató Kft.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Korlátolt felelősségű társaság	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
HU	529950020X0A00V0288	1 - LEI	General Alapkezelő Zárkötött Működésű Részvénytársaság	8 - Credit institution, investment firm and financial institution	Zárkötött működésű részvénytársaság	2 - Non-Mutual	Magyar Nemzeti Bank	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	4 - Method 1: Sectoral rules
HU	529950020X0A00V0289	1 - LEI	General Biztosító Zrt.	2 - Non life insurance undertaking	Zárkötött működésű részvénytársaság	2 - Non-Mutual	Magyar Nemzeti Bank	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
ID	549300XKJVE382861ID0A11637	1 - LEI	PT Asuransi Jwa General Indonesia	1 - Life insurance undertaking	Perusahaan Terbatas (PT)	2 - Non-Mutual	Ministry of Finance	96%	100%	96%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
ID	549300XKJVE382861ID0A2061	2 - Specific Code	PT General Services Indonesia	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Perusahaan Terbatas (PT)	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
IN	549300XKJVE382861IN0A1024	2 - Specific Code	General India	5 - Insurance holding company as defined in Article 2(1)(f) of Directive 2009/138/EC	Limited	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
IN	549300XKJVE382861IN0A1552	2 - Specific Code	Empo Assistance India Private Ltd	99 - Other	Limited	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	3 - Method 1: Adjusted equity method
IT	549300XKJVE382861IT0A0273	2 - Specific Code	General Investimenti S.p.A.	4 - Composite undertaking	Società per azioni	2 - Non-Mutual	Istituto per la Vigilanza sulle assicurazioni	9%	0%	0%		1 - Dominant	0%	1 - Included in the scope	1 - Method 1: Full consolidation
IT	549300XKJ														

Country	Identification code of the undertaking	Type of code of the EU of the undertaking	Legal name of the undertaking	Type of undertaking	Legal form	Category (multi/mon 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 art. 214 is applied
IT	549300XKJVE18028611TA0600	2 - Specific Code	CityLife S.p.A.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Società per azioni	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
IT	549300XKJVE18028611TA02476	2 - Specific Code	Residenza CVL S.p.A.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Società per azioni	2 - Non-Mutual		67%	100%	67%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
IT	519600EA1E4E2F8A47	1 - LEI	D.A.S. Dilexa Automobiliata Simint - S.p.A. di Assicurazione	2 - Non life insurance undertaking	Società per azioni	2 - Non-Mutual	Istituto per la Vigilanza sulle assicurazioni	50%	100%	50%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
IT	519600DE0882C02645	1 - LEI	D.A.S. Legal Services S.r.l.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Società a responsabilità limitata	2 - Non-Mutual		50%	100%	50%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
IT	519600DF1479FD0171	1 - LEI	Altitude Service Assicuratori s.r.l.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Società a responsabilità limitata	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
IT	549300XKJVE18028611TA02728	2 - Specific Code	Fondo Capitalia	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Chiuso	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
IT	519600DQ1A889B8C492	1 - LEI	General Real Estate S.A. SGR	8 - Credit institution, investment firm and financial institution	Società per azioni	2 - Non-Mutual	Banca d'Italia	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	4 - Method 1: Sectoral rules
IT	549300XKJVE18028611TA02128	2 - Specific Code	General Investments Holding S.p.A.	8 - Credit institution, investment firm and financial institution	Società per azioni	2 - Non-Mutual	Banca d'Italia	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	4 - Method 1: Sectoral rules
IT	519600E6A1E4289338	1 - LEI	Fondo Donatelli	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Chiuso	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
IT	549300XKJVE18028611TA02760	2 - Specific Code	Fondo Immobiliare Mantegna	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Chiuso	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
IT	549300XKJVE18028611TA02767	2 - Specific Code	Fondo Immobiliare Teppico	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Chiuso	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
IT	549300XKJVE18028611TA02784	2 - Specific Code	Fondo Immobiliare Schiaiet - comparto 1	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Chiuso	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
IT	549300XKJVE18028611TA02786	2 - Specific Code	Fondo Immobiliare Schiaiet - comparto 2	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Chiuso	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
IT	549300XKJVE18028611TA02793	2 - Specific Code	Fondo Immobiliare Schiaiet - comparto 3	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Chiuso	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
IT	549300XKJVE18028611TA02794	2 - Specific Code	Fondo Immobiliare Segarini	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Chiuso	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
IT	54930087A2D0PFLQ2405	1 - LEI	Generelle S.p.A.	1 - Life insurance undertaking	Società per azioni	2 - Non-Mutual	Istituto per la Vigilanza sulle assicurazioni	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
IT	5493007FNKZQ20M4908	1 - LEI	General Italia S.p.A.	4 - Composite undertaking	Società per azioni	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
IT	549300ACJLQD92D9025	1 - LEI	General Insurance Asset Management S.p.A. Società di Gestione del Risparmio	8 - Credit institution, investment firm and financial institution	Società per azioni	2 - Non-Mutual	Banca d'Italia	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	4 - Method 1: Sectoral rules
LU	529905Y6BWT1LZ2865	1 - LEI	Fortuna Lebens-Versicherung AG	1 - Life insurance undertaking	Joint-stock company (Aktienengesellschaft)	2 - Non-Mutual	Finanzstaatsrat	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
LU	5493000M94HZVY9F88	1 - LEI	General European Retail Investments Holding S.A.	8 - Credit institution, investment firm and financial institution	Société anonyme	2 - Non-Mutual	Commission de Surveillance du Secteur Financier	99%	100%	99%		1 - Dominant	99%	1 - Included in the scope	3 - Method 1: Adjusted equity method
LU	22109F60R5D2BPY21	1 - LEI	General Luxembourg S.A.	1 - Life insurance undertaking	Société Anonyme	2 - Non-Mutual	Commissariat aux Assurances	99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
LU	22109F30454.BK.82	1 - LEI	General Investments Luxembourg S.A.	14 - UCITS management companies as defined in Article 1 (54) of Delegated Regulation (EU) 2019/35	Société Anonyme	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	4 - Method 1: Sectoral rules
LU	5493003430EULJDN85	1 - LEI	General Real Estate Multi-Manager	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société à responsabilité limitée	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
LU	549300700DQAQZ7117	1 - LEI	General North American Holding 1 S.A.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société anonyme	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
LU	5493001QNT80D00294	1 - LEI	General North American Holding 2 S.A.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société anonyme	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
LU	5493007F9T18EY2K47	1 - LEI	General North American Holding 3 S.A.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société anonyme	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
LU	5493009P3D5EHW0256	1 - LEI	General Europe Income Holding S.A.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société anonyme	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
LU	549300XKJVE18028611UA02711	2 - Specific Code	GRE PAN EU Member 1 S.A.r.l.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société à responsabilité limitée	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
LU	549300XKJVE18028611UA02715	2 - Specific Code	GRE PAN EU Hamburg 1 S.A. r.l.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société à responsabilité limitée	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
LU	549300XKJVE18028611UA02716	2 - Specific Code	GRE PAN EU Hamburg 2 S.A. r.l.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société à responsabilité limitée	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
LU	549300XKJVE18028611UA02718	2 - Specific Code	GRE PAN EU Frankfurt 1 S.A. r.l.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société à responsabilité limitée	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
LU	549300XKJVE18028611UA0281	2 - Specific Code	Colony 1 S.A.r.l.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société à responsabilité limitée	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
LU	549300XKJVE18028611UA0282	2 - Specific Code	GRE PAN EU Frankfurt 2 S.A. r.l.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société à responsabilité limitée	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
LU	549300XKJVE18028611UA0283	2 - Specific Code	Retail One Fund	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	d'Investissement Spéciale	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
LU	549300K4K4EMWFPJ04	1 - LEI	General European Real Estate Investments S.A.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société anonyme - Fond d'Investissement Spécialisé	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
LU	5493004E1RVJLZ1V005	1 - LEI	Friscoad S.A.r.l.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société à responsabilité limitée	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
LU	529905P8F8M9W5C987	1 - LEI	GLI A&B General Cross-Border Property Fund FCP	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	d'Investissement Spéciale	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
LU	549300XKJVE18028611UA01960	2 - Specific Code	BE Fund Management Luxembourg S.A.	8 - Credit institution, investment firm and financial institution	Société anonyme	2 - Non-Mutual	Commission de Surveillance du Secteur Financier	50%	100%	50%		1 - Dominant	50%	1 - Included in the scope	3 - Method 1: Adjusted equity method
LU	529905F42J8P252878	1 - LEI	GLI A&B General City S.A.r.l.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société à responsabilité limitée	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
LU	5493006V192H78E105	1 - LEI	Swell S.A.r.l.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société à responsabilité limitée	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
LU	549300Y29D39F9H482	1 - LEI	Toski S.r.l.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société à responsabilité limitée	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
LU	529905N64078YF5E40	1 - LEI	GLI A&B General Bankcenter S.A.r.l.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société à responsabilité limitée	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
LU	549300XKJVE18028611UA02778	2 - Specific Code	General Real Estate Asset Repositioning S.A.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Société anonyme	2 - Non-Mutual		99%	100%	99%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
LU	549300XKJVE18028611UA02616	2 - Specific Code	General Financial Holding FCP-FIS - Sub-Fund 2	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	d'Investissement Spéciale	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	3 - Method 1: Adjusted equity method
ME	549300B0M282LUN67	1 - LEI	Akcionarsko društvo za osiguranje Generali Osiguranje Montenegro	2 - Non life insurance undertaking	Akcionarsko društvo	2 - Non-Mutual	Agencija za nadzor osiguranja	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
MG	549300XKJVE18028611NG02715	2 - Specific Code	Genp Assistance Pacifica	99 - Other	Société par actions simplifiée	2 - Non-Mutual		75%	100%	75%		1 - Dominant	75%	1 - Included in the scope	3 - Method 1: Adjusted equity method
NL	549300070060JZ22496	1 - LEI	Particulate Matchappac Graafschap Holland N.V.	5 - Insurance holding company as defined in Article 2(121) (f) of Directive 2009/138/EC	Naamloze Vennootschap	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
NL	724000M8M9M9M9W093	1 - LEI	Redox Holding N.V.	6 - Mixed-activity insurance holding company as defined in Article 2(121)(g) of Directive 2009/138/EC	Naamloze Vennootschap	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
NL	724000T0921T013F4989	1 - LEI	General Asia N.V.	5 - Insurance holding company as defined in Article 2(121) (f) of Directive 2009/138/EC	Naamloze Vennootschap	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
NL	549300XKJVE18028611UA04620	2 - Specific Code	General Turkey Holding B.V.	5 - Insurance holding company as defined in Article 2(121) (f) of Directive 2009/138/EC	Naamloze Vennootschap	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
NL	724000J9C14E2Z22488	1 - LEI	Saxon Lead B.V.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Naamloze Vennootschap	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
NL	724000M38ZVYV0778	1 - LEI	Lin River I N.V.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Naamloze Vennootschap	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
NL	724000A18E9H9V8J272	1 - LEI	General Horizon B.V.	6 - Mixed-activity insurance holding company as defined in Article 2(121)(g) of Directive 2009/138/EC	Naamloze Vennootschap	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
NL	724000PUB07DQ0A136	1 - LEI	Lin River II N.V.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Naamloze Vennootschap	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
CZ	315700100000041120	1 - LEI	General CEE Holding B.V.	5 - Insurance holding company as defined in Article 2(121) (f) of Directive 2009/138/EC	Naamloze Vennootschap	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
NL	3157003000000002029	1 - LEI	CZ Holdings N.V.	5 - Insurance holding company as defined in Article 2(121) (f) of Directive 2009/138/EC	Naamloze Vennootschap	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
NL	724000CKP81260J812	1 - LEI	CP Strategic Investments N.V.	10 - Ancillary services undertaking as defined in Article 1 (3) of Delegated Regulation (EU) 2019/35	Naamloze Vennootschap	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
NL	549300XKJVE18028611NA02801	2 - Specific Code	OH Bank B.V.	5 - Insurance holding company as defined in Article 2(121) (f) of Directive 2009/138/EC	Naamloze Vennootschap	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
PH	5493003E178AC6262509	1 - LEI	General Life Assurance Philippines, Inc.	1 - Life insurance undertaking	Share	2 - Non-Mutual	Insurance Commission	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
PL	259400A21L8P260488	1 - LEI	General Towarzystwo Ubezpieczeń Spółka Akcyjna	2 - Non life insurance undertaking	Spółka akcyjna	2 - Non-Mutual	Komisja Nadzoru Finansowego	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation

Country	Identification code of the undertaking	Type of code of the EU of the undertaking	Legal name of the undertaking	Type of undertaking	Legal form	Category (institution 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. 2(14) is applied
RU	549300XKJVE382881RUJAA770	2 - Specific Code	Euro Assistance CEI OOO	99 - Other	Общество с ограниченной ответственностью	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	3 - Method 1: Adjusted equity method
SG	549300XKJVE382881SGA2684	2 - Specific Code	General Services Pte. Ltd	10 - Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Limited Private Company	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
SI	485100008.BCPCZKZ91	1 - LEI	Generalni zavarovalnica d.d. Ljubljana	4 - Composite undertaking	Delniška družba	2 - Non-Mutual	Agencija za Zavarovalni Nadzor	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
SK	315100000000001826	1 - LEI	General Postovna, a. s.	4 - Composite undertaking	Akciovna spoločnosť	2 - Non-Mutual	Narodna Banka Slovenska	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
SK	9279008FD1000023943	1 - LEI	Green Point Offices a.s.	10 - Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Akciovna spoločnosť	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
TH	549300XKJVE382881THJ2722	1 - LEI	General Life Assurance (Thailand) Public Co. Ltd	1 - Life insurance undertaking	บริษัทประกันชีวิต	2 - Non-Mutual	Office of Insurance Commission	91%	100%	91%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
TH	549300XKJVE382881THJ272974	1 - LEI	General Insurance (Thailand) Public Co. Ltd	2 - Non life insurance undertaking	บริษัทประกันชีวิต	2 - Non-Mutual	Office of Insurance Commission	95%	100%	95%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
TH	549300XKJVE382881THJ27988	1 - LEI	HFV Holding Company Ltd.	5 - Insurance holding company as defined in Article 2(121) (f) of Directive 2009/138/EC	บริษัทโฮลดิ้ง	2 - Non-Mutual		95%	100%	95%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
TH	549300444RV9WY7Y1B24	1 - LEI	KAG Holding Company Ltd	5 - Insurance holding company as defined in Article 2(121) (f) of Directive 2009/138/EC	บริษัทโฮลดิ้ง	2 - Non-Mutual		95%	100%	95%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
TH	549300730TD6PAQNY767	1 - LEI	FTW Company Limited	5 - Insurance holding company as defined in Article 2(121) (f) of Directive 2009/138/EC	บริษัทโฮลดิ้ง	2 - Non-Mutual		91%	100%	91%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
TH	549300XKJVE382881THJ298403	1 - LEI	MED Company Limited	5 - Insurance holding company as defined in Article 2(121) (f) of Directive 2009/138/EC	บริษัทโฮลดิ้ง	2 - Non-Mutual		91%	100%	91%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
TH	5493003184H0J2EJ5P44	1 - LEI	DWP Partnership	5 - Insurance holding company as defined in Article 2(121) (f) of Directive 2009/138/EC	พาร์ทเนอร์ชิพ	2 - Non-Mutual		91%	100%	91%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
TR	549300XKJVE382881TRAA150	2 - Specific Code	General Sigorta A.S.	2 - Non life insurance undertaking	Anonim Şirket	2 - Non-Mutual	Republic of Turkey Prime Ministry Undersecretariat of Treasury	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
TR	549300XKJVE382881TRAA282	2 - Specific Code	Euro Assistance Yardi ve Destek Hizmetleri Ticaret Anonim Şirketi	99 - Other	Anonim Şirket	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	3 - Method 1: Adjusted equity method
US	549300XKJVE382881USAA439	2 - Specific Code	General Global Assistance Inc	99 - Other	Incorporation	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	3 - Method 1: Adjusted equity method
US	549300XKJVE382881USAA2027	2 - Specific Code	Euro Assistance North America, Inc.	99 - Other	Incorporation	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	3 - Method 1: Adjusted equity method
US	549300XKJVE382881USAA2028	2 - Specific Code	Customized Services Administrators Inc.	99 - Other	Incorporation	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	3 - Method 1: Adjusted equity method
US	549300XKJVE382881USAA2029	2 - Specific Code	GMK, Inc.	99 - Other	Incorporation	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	3 - Method 1: Adjusted equity method
US	549300XKJVE382881USAA2757	2 - Specific Code	Casela, Inc.	99 - Other	Incorporation	2 - Non-Mutual		80%	100%	80%		1 - Dominant	75%	1 - Included in the scope	3 - Method 1: Adjusted equity method
US	549300XKJVE382881USAA152	2 - Specific Code	Transocean Holding Corporation	6 - Mixed-activity insurance holding company as defined in Article 2(121)(g) of Directive 2009/138/EC	Corporation	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
US	549300398022R6400	1 - LEI	General Securities Corporation of North America	10 - Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Corporation	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
US	549300344HUTTE1P31	1 - LEI	GNAREH 1 Farmgut LLC	10 - Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Limited liability company	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
US	549300344HUTTE1P31	1 - LEI	GNAREH 1 Farmgut LLC	10 - Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Limited liability company	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
US	549300XKJVE382881USAA444	2 - Specific Code	Generamerica Management Corporation	10 - Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Corporation	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
US	549300XKJVE382881USAA1089	2 - Specific Code	General Consulting Solutions LLC	10 - Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Legal Liability Company	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
US	549300XKJVE382881USAA808	2 - Specific Code	General Claims Solutions LLC	10 - Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Legal Liability Company	2 - Non-Mutual		100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
VG	549300XKJVE382881VGAA1765	2 - Specific Code	Asacama Investments Ltd	7 - Mixed financial holding company as defined in Article 2(121)(b) of Directive 2009/138/EC	Limited	2 - Non-Mutual		44%	100%	100%		1 - Dominant	44%	1 - Included in the scope	3 - Method 1: Adjusted equity method
VN	549300344HUTTE1P31	1 - LEI	General Vietnam Life Insurance Limited Liability Company	1 - Life insurance undertaking	CÔNG TY TNHH	2 - Non-Mutual	Vietnam Ministry of Finance	100%	100%	100%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
ZA	549300XKJVE382881ZAA4476	2 - Specific Code	Euro Assistance Worldwide Services (South Africa) (Pty) Ltd	10 - Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Proprietary Limited	2 - Non-Mutual		88%	100%	88%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation
ZA	549300XKJVE382881ZAA4273	2 - Specific Code	EASA Training Academy (Pty) Ltd	10 - Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Proprietary Limited	2 - Non-Mutual		88%	100%	88%		1 - Dominant	100%	1 - Included in the scope	1 - Method 1: Full consolidation

Independent Auditor's Report

Independent auditor's report pursuant to article 47-septies, comma 7 of Legislative Decree n. 209, dated 7 September 2005, and article 5, comma 1, letters a) and b) of IVASS Regulation n. 42, dated 2 August 2018

(Translation from the original Italian text)

To the Board of Directors of
Assicurazioni Generali S.p.A.

Opinion

We have audited the following elements of the Solvency and Financial Condition Report (the "SFCR") of Generali Group as at December 31, 2018, prepared pursuant to article 47-septies of Legislative Decree n. 209, dated 7 September 2005:

- reporting templates "S.02.01.02 Balance Sheet" and "S.23.01.22 Own funds" (the "reporting templates");
- sections "D. Valuation for solvency purposes" and "E.1. Own funds" (the "disclosures").

Our procedures do not extend to:

- the components of technical provisions related to Risk Margin (items R0550, R0590, R0640, R0680 and R0720) of the reporting template "S.02.01.02 Balance Sheet";
- the Group Solvency Capital Requirement (item R0680) and to the Minimum Consolidated Group Capital Requirement (item R0610) of the reporting template "S.23.01.22 Own funds";

consequently, they are excluded from our opinion.

The reporting templates and the disclosures, with the exclusions abovementioned, constitute "the MVBS and OF reporting templates and related disclosures" as a whole.

In our opinion, the MBVS and OF reporting templates and related disclosures included in the SFCR of Generali Group as at December 31, 2018 have been prepared, in all material respects, in accordance with the applicable European Union regulations and the national sectoral regulation.

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the MVBS and OF reporting templates and related disclosures* section of our report.

We are independent of Assicurazioni Generali S.p.A. (the "Parent Company" or the "Company") in accordance with the regulations and standards on ethics and independence of the Code of Ethics for Professional Accountants (IESBA Code) issued by the International Ethics Standards Board for Accountants applicable to the audit of reporting templates and related disclosures.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Emphasis of Matter – Basis of preparation, purpose and restriction on use

We draw attention to section “D. Valuation for solvency purposes” which describes the basis of preparation. The MVBS and OF reporting templates and related disclosures have been prepared for solvency supervision purposes in accordance with the applicable European Union regulations and the national sectoral regulation, which results in a special purpose framework. As a result, they may not be suitable for other purposes. Our opinion is not modified in respect of this matter.

Other matters

The Company has prepared the consolidated financial statements as at December 31, 2018 in accordance with International Financial Reporting Standards as adopted by the European Union and the Regulation issued to implement article 90 of Legislative Decree n. 209, dated 7 September 2005, on which we issued our independent auditor’s report to the shareholders of the Company dated April 3, 2019.

The Company has prepared the reporting template “S.25.02.22 Solvency Capital Requirement – for groups using the standard formula and partial internal model” and the related disclosure presented in section “E.2. Solvency Capital Requirement and Minimum Capital Requirement” included in the SFCR in accordance with the applicable European Union regulations, the national sectoral regulation and the Partial Internal Model of Generali Group, which are subject to limited review pursuant to article 5, comma 1, letter c) of IVASS Regulation n. 42, dated 2 August 2018, following which we issued on the same date a limited review report attached to the SFCR.

Other Information included in the SFCR

The Directors are responsible for the preparation of the other information included in the SFCR in accordance with the applicable laws and regulations governing the basis of preparation.

The other information included in the SFCR are:

- reporting templates “S.05.01.02 Premiums, claims and expenses by line of business”, “S.05.02.01 Premiums, claims and expenses by country”, “S.12.01.02 Life and Health SLT Technical Provisions”, “S.17.01.02 Non-life technical provisions”, “S.19.01.21 Non-life insurance claims”, “S.22.01.22 Impact of long term guarantees and transitional measures”, “S.25.02.22 Solvency Capital Requirement – for groups using the standard formula and partial internal model”;
- sections “A. Business and performance”, “B. System of governance”, “C. Risk profile”, “E.2. Solvency Capital Requirement and Minimum Capital Requirement”, “E.3. Use of the duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement”, “E.4. Differences between the standard formula and any internal model used”, “E.5. Non-compliance with the Minimum Capital Requirement and non-compliance with the Solvency Capital Requirement” e “E.6. Any other information”.

Our opinion on the MVBS and OF reporting templates and related disclosures does not cover the other information.

In connection with our audit of the MBVS and OF reporting templates and related disclosures, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the MVBS and OF reporting templates and related disclosures or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify possible inconsistencies or material misstatement, we are required to determine if there is a material misstatement in the MVBS and OF reporting templates and related disclosures or in the other information. If, based on the work performed, we conclude that there is a material misstatement, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of Directors and Those Charged with Governance for the MVBS and OF reporting templates and related disclosures

The Directors are responsible for the preparation and presentation of the MVBS and OF reporting templates and related disclosures in accordance with the applicable laws and regulations governing the basis of preparation, and, within the terms provided by the law, for such internal control as they determine is necessary to enable the preparation of MVBS and OF reporting templates and related disclosures that are free from material misstatement, whether due to fraud or error.

The Directors are responsible for assessing the Group's ability to continue as a going concern and, in preparing the MVBS and OF reporting templates and related disclosures, for the appropriateness of the use of the going concern and for disclosing related matters.

The Directors use the going concern basis of accounting in the preparation of MVBS and OF reporting templates and related disclosures unless they either intend to liquidate the Parent Company or to cease operations, or has no realistic alternative but to do so.

The statutory audit committee ("Collegio Sindacale") is responsible, within the terms provided by the law, for overseeing the Group's financial reporting process.

Auditor's Responsibilities for the Audit of the MVBS and OF reporting templates and related disclosures

Our objectives are to obtain reasonable assurance about whether the MVBS and OF reporting templates and related disclosures as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with International Standards on Auditing (ISAs) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the MVBS and OF reporting templates and related disclosures.

As part of an audit in accordance with International Standards on Auditing (ISAs), we have exercised professional judgment and maintained professional skepticism throughout the audit. In addition:

- we have identified and assessed the risks of material misstatement of the MBVS and OF reporting templates and related disclosures, whether due to fraud or error; have designed and performed audit procedures responsive to those risks, and obtained audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;
- we have obtained an understanding of internal control relevant to the audit of the MVBS and OF reporting templates and related disclosures in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control;
- we have evaluated the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Directors;
- we have concluded on the appropriateness of Directors' use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the SFCR or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Group to cease to continue as a going concern.

We have communicated with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We have provided those charged with governance with a statement that we have complied with regulations and standards on ethics and independence of the Code of Ethics for Professional Accountants (IESBA Code) issued by the International Ethics Standards Board for Accountants, and we have communicated with them all matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

Trieste, 31 May 2019

EY S.p.A.

Signed by: Matteo Brusatori, Partner

This report has been translated into the English language solely for the convenience of international readers.

Independent auditor's review report pursuant to article 47-septies, comma 7 of Legislative Decree n. 209, dated 7 September 2005, and article 5, comma 1, letter c) of IVASS Regulation n. 42, dated 2 August 2018

(Translation from the original Italian text)

To the Board of Directors of
Assicurazioni Generali S.p.A.

Introduction

We have reviewed the accompanying reporting template "S.25.02.22 Solvency Capital Requirement – for groups using the standard formula and partial internal model" (the "SCR and MCR reporting template") and the related disclosures presented in section "E.2. Solvency Capital Requirement and Minimum Capital Requirement" (the "disclosures" or the "related disclosures") included in the Solvency and Financial Condition Report (the "SFCR") of Generali Group (the "Group") as at December 31, 2018, pursuant to article 47-septies of Legislative Decree n. 209, dated 7 September 2005. The SCR and MCR reporting template and related disclosures have been prepared by the Management in accordance with the applicable European Union regulations, the national sectoral regulation and the Partial Internal Model of the Group, as described in the disclosures included in the SFCR and as approved by IVASS.

Management's Responsibility

Management is responsible for the preparation of the SCR and MCR reporting template and related disclosures in accordance with the applicable European Union regulations, the national sectoral regulation and the Partial Internal Model of the Group, as described in the disclosures included in the SFCR and as approved by IVASS, and, within the terms provided by the law, for such internal control as they determine is necessary to enable the preparation of SCR and MCR reporting template and related disclosures that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express a conclusion on SCR and MCR reporting template and related disclosures. We conducted our review in accordance with International Standard on Review Engagements (*ISRE*) n. 2400 (*Revised*), *Engagements to review Historical Financial Statements. ISRE 2400 (Revised)* requires us to conclude whether anything has come to our attention that causes us to believe that the SCR and MCR reporting template and related disclosures are not prepared, in all material respects, in accordance with the applicable European Union regulations, the national sectoral regulation and the Partial Internal Model of the Group, as described in the disclosures included in the SFCR and as approved by IVASS. This Standard also requires us to comply with relevant ethical requirements.

The review of SCR and MCR reporting template and related disclosures in accordance with *ISRE 2400 (Revised)* is a limited assurance engagement. The auditor performs procedures, primarily consisting of making inquiries of management and others within the entity, as appropriate, and applying analytical procedures, and evaluates the evidence obtained. Furthermore, as required by article 14 of IVASS Regulation n. 42 dated 2 August 2018, with regard to information relating to non-regulated entities

or entities from other financial sector or having their registered office in a third country included in the group perimeter, our audit activities have been limited to verifying their inclusion on the basis of the values determined pursuant to Legislative Decree n. 209, dated 7 September 2005, to the relevant implementing regulation and to applicable European Union provisions.

The procedures performed in a review are substantially less than those performed in an audit conducted in accordance with International Standards on Auditing (ISA). Accordingly, we do not express an audit opinion on SCR and MCR reporting template and related disclosures.

Conclusion

Based on our review, nothing has come to our attention that causes us to believe that SCR and MCR reporting template and related disclosures included in the SFCR of Generali Group, as at December 31, 2018 are not prepared, in all material respects, in accordance with the applicable European Union regulations, the national sectoral regulation and the Partial Internal Model of the Group as described in the disclosures included in the SFCR and as approved by IVASS.

Basis of preparation, purpose and restriction on use

Without modifying our conclusion, we draw attention to section "E.2. Solvency Capital Requirement and Minimum Capital Requirement" included in the SFCR, which describes the basis of preparation of SCR and MCR reporting template.

The SCR and MCR reporting template and the related disclosures are prepared, for solvency supervision purposes, in accordance with the applicable European Union regulations, the national sectoral regulation and the Partial Internal Model of the Group, as described in the disclosures included in the SFCR and as approved by IVASS, which results in a special purpose framework. As a result, as required by the article 13 of IVASS Regulation n. 42 dated 2 August 2018, the approvals, derogations or other decisions by IVASS, included the structure of the Partial Internal Model, are considered by us as part of the standard framework for our review and the reporting template and related disclosures may not be suitable for any other purposes. In particular, in accordance with articles 46-bis and 46-ter of Legislative Decree n. 209, dated 7 September 2005, the Partial Internal Model briefly described in the disclosures included in the SFCR has been approved by IVASS in the discharge of its supervisory functions and it could differ from internal models approved for other insurance groups.

Trieste, 31 May 2019

EY S.p.A.

Signed by: Matteo Brusatori, Partner

This report has been translated into the English language solely for the convenience of international readers.

Editing
Group Integrated Reporting

Coordination
**Group Communications
& Public Affairs**

The document is
available on
www.generali.com